Enforcement of Women’ Property Rights by Rwandan Courts: Battle of Equality before the Law

Nshimiyimana Didace
Law Studies, the Open University of Tanzania, Kigali, Rwanda

Abstract: Gender equality is essential for the achievement of human rights for all. Women are entitled to live with dignity and must enjoy the rights to equal protection by the law. The Judiciary remain the guardian of human rights and freedoms. The paper analyses the enforcement, by the judiciary, the women’ property rights on the proof of gender equality and written law in Rwanda where the customary system treated a woman like second class citizen; it evaluates the implication of these judgements in fight against women in Rwanda. The recently decisions of Supreme Court have declared the customary laws and practices which deny women inheritance rights as unconstitutional, have also developed some protection of women involved in customary marriage. This is particularly important, because these decisions have provided further interpretation and clarification for the actual enforcement and execution of women’ property rights. This contribution commends socio-policing, legislative enactment and court based advocacy in these cases for the protection of women’s rights. It therefore calls for judicial activism in the protection of women’s rights.

Keyword: Judiciary, Equality, Customary Law, property Rights, Women Rights, Rwanda

1. Introduction
The expression equality before the law at once means that all laws must apply to everyone, including those who enact and/or sanction them, and that the law so enacted or sanctioned cannot be used to apprehend or isolate a group of individuals for discrimination [1]. Equality before the law is not only a human rights issue but also an economic or property issue. Most countries still have gender-based legal differences, constraining women’s ability to access to the property of their family or make independent decisions in important areas of their lives.

Women are generally considered inferior to men and discriminated against in so many ways [2]. In some communities, women cannot own property nor do they have any formal property rights. The customary law in some places does not recognise the concept of matrimonial property as the woman is regarded as part the estate of the man. They cannot inherit property including their husband’s property [3].

Some decisions of Rwandan Tribunals and Courts reveal that the Rwandan custom did not allow the women and girls to succeed their parents. In the cases Dushimimana v. Usabumubeyi and Others, in the same line with other decisions taken by different courts [4], the court has held that before 1999 women could only rely on customary law that stipulates that only sons can inherit from their father and provides only weak and unpredictable inheritance rights for married women [5]. The women had no direct claims on land and were forced to rely on association with male members of their birth family, husband and in-laws. By contrast, in the case Kamagaju v. Mukagahima and Others [6], the court has ordered the equal inheritance between sons and daughters for their parents who have died before 1999.

This contrary views of Rwandan Tribunals and courts on the same issue relating to interpretation of Rwandan custom, can create in one way or another an injustice based on gender inequality and discrimination against women. It is within this context of reactions against gender discrimination against women that this contribution analyses the enforcement and protection of women rights in Rwanda, especially in the area of inheritance and in land property; it contributes to the existing scholarship by suggesting alternative measures that could be adopted to achieve the effective realization of these women’s rights.

Apart from the introduction, the paper starts by highlighting the legal and policy framework upon which the protection and enforcement of women’s rights in Rwanda is advocated. It analyses the judgements rendered by the Supreme Court which is the highest court in the Country [7]. It discusses
their implications for the protection of women’s rights in Rwanda. The paper therefore calls for the sustainability of the other tribunals and courts based advocacy in the protection of women’s rights in Rwanda.

2. Legal and Policy Framework

Women are human beings just as much as men are, and they are guaranteed the same rights as men by the 1948 Declaration on Human Rights and other international conventions.

Rwanda has made a strong commitment to gender equality and has ratified and domesticated most international and regional laws that promote the rights of women, including the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) [8]. To consolidate the commitments already undertaken towards the elimination of all forms of discrimination against women, Rwanda signed and ratified the Optional Protocols in 2008.


CEDAW supports a dispute on equal property rights [9]. Regional instruments, such as the Protocol to the African Charter on Human and People’s Rights on the Rights of Women in Africa (also known as the Maputo Protocol), offer thorough protection of women’s property rights. But most notably are the provisions on women’s property rights during and after marriage [10]. The Maputo protocol specifies that widows have the right to have an equal share of their husband’s inheritance. Moreover widows have the right to stay in the matrimonial house [11]. However, there is concern that the provisions of international laws are not well known by the legal profession [12] and that the full text of the ratified treaties is not published in the Official Gazette and therefore not easily accessible to law professionals and citizens more generally.

At the national level, Rwandan law generally, provides for gender equality in line with these international laws [13]. The Constitution incorporates the principle of equality by providing as follows in article 15 and article 16: “All persons are equal before the law. They are entitled to equal protection of the law. All Rwandans are born and remain equal in rights and freedoms. Discrimination of any kind or its propaganda based on, inter alia, ethnic origin, family or ancestry, clan, skin colour or race, sex, region, economic categories, religion or faith, opinion, fortune, cultural differences, language, economic status, physical or mental disability or any other form of discrimination are prohibited and punishable by law”.

To further demonstrate its determination to fulfil the obligations under the various treaties mentioned above, the Rwandan government, under the auspices of the Ministry of Gender and Family Promotion, adopted a Vision 2020 [14], and the Economic Development and Poverty Reduction Strategy (EDPRS) [15]. Rwanda has a National Gender Policy [16] and specific policies include ones for girls’ education [17], women in agriculture [18], Gender-based violence [19] and sexual and reproductive health [20], each with its own implementation strategy. The national gender machinery is comprised of the Ministry of Gender and Family Promotion, the Gender Monitoring Office and the National Women’s Council (NWC).

Progressive inheritance and land laws give women equal rights with men to own and inherit property, including land, and to the joint ownership of property in legal marriage [21]. The Land Law reaffirms the principle of equality set forth in the constitution and applies this principle to land rights: “All forms of discrimination, such as that based on sex or origin, in relation to access to land and the enjoyment of real rights shall be prohibited. The right to land for a man and a woman lawfully married shall depend on the matrimonial regime they opted for” [22].

The discriminatory provision which was in civil law that husbands are heads of the household and that wives have to live in the matrimonial home has been replaced by non-discriminatory provisions in 2016 in law nº 32/2016 of 28/08/2016 governing persons and family [23]. Therefore, there is no provision in domestic law that prohibits direct and indirect discrimination or specifically requires the state to ensure equal development for women in rural areas.

The results in the present paper are based on data from the decision of Supreme Court. Rather, they will provide insights on inequalities existing based on gender and the view of Rwandan courts and tribunals. As such, they could provide guidance relevant for the implementation of the gender equality on land property and other assets of
household, as well as a point of reference for future court decisions.

3. Judicial enforcement of women rights on land property

Enforcement can be understood as acts or process of compelling compliance with International agreements duly ratified, constitution and laws of a country. Without effective enforcement mechanisms, the later will generally have no impact. Enforcement transforms the de jure into the de facto and enables both women and men to enjoy rights and resources.

Land is one of the most important and fundamental natural resource in Rwanda, and is the most important asset for both production and survival. Customary law figures prominently in the day-to-day functioning of family law and land rights, with large impacts on women. Women who were widowed, divorced, or separated had no ownership rights to marital property.

In case Mukansanga v. Umutoni and Others [24], Cakadende who has 4 children include Umutoni, has legally married with Mukansanga, they bore two children. Cakadende has deceased in 1997. After 3 years Umutoni and her relatives file a claim in Intermediate Court of Gicumbi requesting inheritance of their father Cakadende. The Intermediate Court ordered the equal sharing of all properties of Cakadende between his children; it ordered also that Mukansanga has only the power of administration of her two minors’ property. Mukansanga who reclaim her rights to the property of the household, appealed to the High Court which decided that her appeal has no merit and sustained the judgment. Again, Mukansanga was not satisfied with the ruling and appealed to the Supreme Court. The council of Mukansanga states that Cakadende has legally married with Mukansanga and they jointly acquired the assets and material support to the household as well as its maintenance. He argues that is understandable how the court has ordered Mukansanga to quit the house and other property of her household. The Supreme Court ruled that pursuant to the Rwandan culture, a woman would not have right to a property, she would be given proportional alimony when the husband dies, then the remaining property would be administrated in the interests of the children.

In this case, even the Supreme Court, has ordered that Mukansanga could have a small share in the property of her household, she would be thrown out of her matrimonial home, where she had lived with her late husband and children, on the ground that she is a woman, is indeed very barbaric, worrying and flesh skinning.

The Supreme Court has made a small contribution to the fight against discrimination based on sex, but does not arrive to interpret and confront the Rwandan custom to the international instruments legally ratified by Rwanda. The customary ideal where the women were not unprotected remain the same, for this if a widow is not on good terms with her family in-laws, or when a woman divorces or is abandoned, she will be forced to return to her biological family.

This custom reduced a widow as a chattel and part of the husband’s estate, constitutes, the height of man’s inhumanity to woman, his own mother, the mother of nations, and the hand that rocks the cradle, it would be avoided. In any case a woman is a human being, she must be equally treated and enjoy the same rights as those of man. This gender equality would contribute, as noted by Israel NE Worugi and Rose O Ugbe [25], to the development strategy for reducing poverty level among women and men, improving health and living standards and enhancing efficiency in public investment. The attainment of gender equality is not only seen as an end in itself and human right issue, but as a prerequisite for the achievement for sustainable development.

The earliest cases concerning gender equality and custom was the case of Ntahonkiriye and Other v. Icyitegetse [26]. The Supreme Court took a judgment which analyse, explain and interpret Rwandan customary law. Mporubucye has legally married with Mukampujiye, they died childless respectively 1997 and 2004. Their assets have been taken by the heirs of the husband. Ntahonkiriye with others heirs of Mukampujiye filed a claim in Primary Court of Muzo requesting to inherit the assets of their daughter. The primary court ruled that when Husband Mporubucye has died in 1997, the Rwandan customary law did not allow Mukampujiye who were widowed to have ownership rights to marital property, if a woman became widowed without having borne her husband any children, she was denied any rights to her husband’s land only the husband’s family could give it to the widow as usufruct, however when widow died all assets return to the husband family.

Through the applications for review of a final decision due to injustice, the Supreme Court has reviewed the case Ntahonkiriye and Other v. Icyitegetse. The council of Ntahonkiriye states that the legitimate heirs of Mukambuguje have the right to succeed their child who died in 2004. He argued that the Primary Court could not be bound by the custom which has the discrimination based on sex.
In applying the constitutionality test of the custom which provides that if a woman became widowed without child, she could be granted only the right of usufruct on the conjugal house and the land of her husband, the Supreme Court has declared it unconstitutional. The Supreme Court found that the article 5 (a) of Convention on the Elimination of all Forms of Discrimination against Women of 1 May 1980 ratified by Rwanda at 02 March 1981 [27] ensures governments to strive to eliminate cultural and traditional practices that perpetuate discrimination and gender stereotyping of women. In the respect of this engagement Rwandan has incorporate in the constitution of 1991, in force when MPOREBUCYE died, in article 16 [28] that all citizen shall be equal before the law, without any discrimination, especially in respect to sex.

The Supreme Court held that: “denying Mukambuguje the right to have a share to the assets of her household shall be to contribute to the discrimination based on sex and to enforce the unwritten customary system, based on the principle of masculinity and patrilineal heritage, where daughters and women were considered to own land only through their fathers or husbands, who were the holders of primary land rights”.

The decision of the Supreme Court in this case was innovative and would play a great role in avoiding the discrimination based on gender in whole country. The Court upheld the plaintiff’s claim and declared the Rwandan customary law which excluded female children from inheritance and to have the right to own land in 1997 was in breach of article 16 of 1991 Constitution, a fundamental right provision guaranteed to every Rwandan. The said discriminatory customary law is void in the time of the execution of succession of MPOREBUCYE, as well as it conflicts with paragraph 2 of article 98 of the 1991 Constitution which provided that the Custom shall remain applicable in as much as it was not replaced by laws or is not contrary to the Constitution, laws, regulations, public order or morals. The Supreme Court of Rwanda decided that the culture that contradicts the State’s principle of equality of people before the law is vacuum, thus the court further ruled that a woman has right on the property even if the culture states otherwise.

Gender equality is essential for the achievement of human rights for all. This judgment has a great significance in gender equality, it can be safely said that it is a landmark decision in this area of human rights, has a pivotal role to play in the interpretation, implementation and protection of gender equality in particular, and human rights in general, in the country. The Supreme Court showed a great appreciation whatsoever for the fundamental human rights and the equal protection of the law.

4. Protection of the rights to property of women unlawfully married.

A consensual or informal union is a simple consensus between partners without the recognition of society. In Rwanda, consensual unions are still frequent. In 2015, combined with customary unions, they still represented 24% [29]. In Rwandan legal system there is no legal recognition of consensual cohabiting and customary unions. It is not surprising that the legal system excludes almost a quarter of women. Women who are informally married have no legal protection of their rights to property and inheritance. When it comes to rights on their spouse’s property, they are not entitled to retain a share of the property upon divorce or their husband’s death. They are also at risk of being forced to leave the land of the husband without being able to claim rights to it.

Whereas social recognition of the female partner’s entitlements in an informal marriage may vary according to whether the marriage is monogamous or polygamous or whether it is a traditional, community-recognized marriage or simply co-habitation [30], in cases of separation or death of the husband, women in these de facto unions are frequently evicted by the husband or his relatives, losing land, house, furniture, even bank accounts and business stock [31].

Government of Rwanda has passed a different Gender-sensitive laws [32], only Law n°59/2008 of 10/09/2008 on prevention and punishment of gender - based violence (hereinafter GBV), offers a little protection to some of property rights in one situation namely when a person in a polygamous relationship wants to officially marry one of his/her partners or another [33]. Even if this situation is arguably a form of discrimination due to its negative impact on the property rights of men who are living in consensual unions, some persons have criticized this article to be unconstitutional. In Gatera, Kabalisa v. State of Rwanda [34], Gatera who lived together with Kiza, has taken a decision to legally marry another woman called Kabalisa. Kiza has instituted a legal proceedings against her partner Gatera at the Intermediate Court asking the equal share of their house where they lived. The court has based its decision on article 39 of GBV Law and ruled in favor of Kiza. Gatera and Kabalisa have brought a petition in Supreme Court asking to repeal the article 39 of the law mentioned above, on account of non-conformity with the Constitution.
The Supreme Court has interpreted the questionable article, and argues that the consequences on the property of people entertaining unlawful marriage when they separate are different from the consequences that come as a result of divorce, because if the spouses are married under the regime of community of property or the property acquired after the marriage and later divorce, the right on the property derives from the contract without any other evidence; whereas for those entertaining unlawful marriage a right to share the property depends on whether it was acquired after marriage or co-owned and each party must prove it.

This court decision interpreting this law has however set a precedent ruling in favour of a woman who claimed a share of the common property when her former consensual partner abandoned her and married another woman in a legal marriage or when her relationship failed. In Ngangare v. Mukankuranga [35], Mukankuranga has filed a claim in Intermediate court requesting the sharing of the assets jointly acquired with her partner Ngangare. The court decided that they share the assets and apportioned a half of those assets to each one. It also decided that everyone shall retain the movable assets in his or her possession. Ngangare appealed to the High Court which decided his appeal to be without merit. He appealed again to the Supreme Court stating that the court relied on the GBV Law, while the assets have been acquired after the year 2000 should not be shared. He further argues that even if that law was to be applied, its article 39 would not be relied on since it relates to the sharing of assets of concubines of whom one of them intends to get married.

A cohabiting woman was especially vulnerable under customary rules, under which a cohabitating woman is not allocated any rights to her partner’s land. If her relationship fails, a cohabitating woman will be forced to return to her natal home with her children, where she may find that her rights to natal land are denied by her brothers or other family members. The right on the property for each one of those partners in de facto unions must be protected because of the contribution he or she made in aim of promoting their common household. Supreme Court has contributed a lot in this matter.

Even if the GBV Law of 2008 offers implicitly limited protection for informally married persons in one rare situation, when a person in a polygamous relationship intends to formally marry one of his/her partners, in Ngangare v. Mukankuranga, the Supreme Court has set an interesting precedent that can have a positive impact on land rights for women who are involved in de facto unions. The Supreme Court ordered an equal share of their house and other assets. It has clarified the consensual union [36] as the people entertain unlawful marriage for a certain period of time working together in various activities to promote the welfare of their family, uniting all efforts to stimulate the increase of their property as those married in accordance with the monogamous principle. It stated that no one shall enjoy the property exclusively since each of the spouses played a role in acquisition of the property [37]. In addition that, having the right to a property does not rely only on the cohabitation of partners but it must be evident that there exists a property they jointly own or acquired.

The contribution made by the Supreme Court is relevant but not sufficient. Women in consensual unions remain unprotected in some cases when this union fails, in the case of death of her partner or when the couple separates. Accessing on assets other than houses and land, as livelihood, movable property, bank accounts and the fruits of all activities together acquired is almost impossible. In Rwanda Development Board (RDB) v. Successions of Mubumbyi [38], case relating to succession of Mubumbyi, Kantenga, who lived with Mubumbyi as a wife and husband for a long time, intervened requesting that RDB gives her 30% of the proceeds of the debt accruing from the cement that they would gain in this cases, he requested so basing on the minutes of the meeting of Mubumbyi’s family which indicates that the family accepted to pay her that amount of money due to the fact that they took from the vehicle that she was bequeathed by her husband and twenty thousand United States dollars (USD 20,000) she was bequeathed in the will made by Mubumbyi Manasseh in 1996 which she was not given by the heirs of Mubumbyi. The court has stated that Kantenga does not have status to intervene in the case RDB v. succession of Mubumbyi because she was not legally married with Mubumbyi Manasseh and they did not give birth to any child.

In this case, a woman who has valuable contributed to household production and maintenance of farmsteads, has producing marketable products for the profit of his household has, as stated in this case, no legal claim to any of their possession on one reason of being a woman without child with deceased Mubumbyi. The assets gained through vehicle of Kantenga (woman) and 20.000 USD contributed in the project has been succeed by the heirs of Mubumbyi. All this work went uncounted in the eyes of Rwandan law. In all the same, women in consensual union would have the same legal and judicial protection as a man which
Regardless the recent progressive precedent, as shown in RDB v. successions of Mubumbyi, and noted by Justice Sam Rugege, women face difficulties to prove their contribution to the household assets, which is de facto co-owned by the ex-partners [39]. In addition, even the question of proving cohabitation remains problematic for women, cohabitation can be proven by testimonies, however, one must keep in mind that community relations are influenced by patriarchy. When it comes to sharing or dividing assets, there seems to be a male boycott to include women [40].

5. The Implications of court decisions in Protection of Women’s Rights

A judiciary that understands the varied and complex manifestations of women’s inequality is a key to rapid advancements of women’s human rights. The adverse impact of a judiciary that is not able to appreciate the sources of women’s inequality is often to confirm and further entrench discriminatory laws that exacerbate women’s inequality [41]. The problem of this discriminatory based to sex could be affiliated to concept of legal pluralism that exist in Rwanda. The Rwandan society operates with two different systems of law that operate simultaneously. The consequence of this legal pluralism is the interplay between written law and customary law, which in most instances had resulted in serious conflict of law issues domestically with regards to women’s right to land property and rights to household assets in Rwanda.

Rwandan customary law frequently treated a woman as a second-class citizen, less than fully human. Female child and Women could not have rights to inherit and rights to land property. The fight against this discrimination against woman was begun with King Mutara III Rudahigwa [42] in 1956. In Case of Kagwenyonga v. The sons of Rwubusisi [43], relating to succession of Rwubusisi. The Royal Court, analysed the case and put into consideration the common human values, the improvement and adjustment of the national culture and custom towards justice and equity, decided to put on the same level the sons and daughters of Rwubusisi in succession procedures, thus the daughters Kagwenyonga and Mukasona were given shares equal to the ones given to their brothers. This relevant decision did not have a great influence in the different regions of country due to the character of custom which, as noted by William, calls the evolutionary construct. This allows it to reform itself over time, depending largely on extensive education to facilitate the process [44].

The Supreme Court judgment in Mukansanga v. Umutoni and Others has put to rest these lingering conflicts of customary law and written issues on the subject of succession from the first constitution of Rwanda dates back on 24 November 1962. The Court declared that the Rwandan customary law which excluded female children from inheritance and to have the right to own land was in breach with the Constitution. This landmark decision is in particular Rwandan customary law but could be a cornerstone of different African countries in general where such practices are held.

The Supreme Court in Gatera, Kabalisa v. State of Rwanda has not only declared constitutional the equal share of land property when a person in a polygamous relationship wants to officially marry one of his/her partners or another as provided for article 39 of GBV Law. It cleared the uncertainty in the application of this provision and defined largely a consensual union by an earlier Supreme Court opinion in Ngangare v. Mukankuranga, as the people entertain unlawful marriage for a certain period of time working together in various activities to promote the welfare of their family, uniting all efforts to stimulate the increase of their property.

The national jurisdictions would be bound by those decisions in protecting the women rights to property or common assets, given that the judgements and decisions of the Supreme Court shall be binding on all other courts of the country [45]. This situation can also be applicable to a husband when a woman involved in polygamy or in consensual union wants to be legally married with other husband. This is where the court becomes relevant. It is through the active participation of the courts that the issue of protection of women’s rights can be taken beyond law making and policy formulation. The judiciary in some other African countries have also relied on their national Constitutions and influenced by the international human rights standards to protect women’s rights in their national jurisdictions [46].

6. Conclusion

It has been shown that the principle of gender equality has a fundamental position in the Rwandan Constitution and Rwandan laws. Only monogamous marriages are recognized within the confines of law in Rwanda. Almost a quarter of women are involved in consensual unions and customary marriage, their rights to property are not equal to the ones of their husband. When their unions fail they are at risk of being forced to leave the land, house and other assets of the household without being able to claim rights to it.
Despite the legal framework is largely silent on the property rights of women which are involved in customary marriage and in consensual unions, the decisions of Supreme Court recently developed, have a valuable contribution in protecting the women in those situations. In case a husband in consensual union wants to celebrate a legal marriage with another woman, he must first share the assets with his partner. If a husband in consensual union dies, a woman is forced to leave the land and other assets of the household, the heirs of Decuyus inherit all assets. When she has children of the Decuyus she lives in assets of household as an administrator of her minors’ property, and can have claim through those minors. This is worse in case she is childless; woman has not a claim to her share, as it was in Dushimimana v. Usabumubeyi and Others, Case n° RCA 0322/011/TGI/MHG, Intermediate court of Muhanga, Judgment of 30 September 2011, paragraph 7; Kasine v. Twagirimana, Case n° RC 0299/07/TGI/NYGE, Intermediate Court of Nyarugenje, Judgment of 5 July 2011.

The Supreme Court decisions in these cases remain a fundamental step in the protection of women’s rights in Rwanda. Using constitutional parameters, it has contributed to protection and safeguard of women’s rights in Rwanda, especially those involved in polygamous and in consensual unions. The issue of protection of inheritance rights of women or female child from promulgation of the 1962 Constitution of Rwanda, the rights to equal share in case of polygamous and consensual unions when a husband wants to be legally remarried or in the case of failure of those unions, does not need a specific law as the Supreme Court has cleared the customary law inhibitions and enforced the enjoyment of property rights to women in consensual unions. What is needed now in those situations, is to institute a national policy framework in the field includes the creation of awareness in respect of the existence of such rights. The animators of justice could always take in account this contribution of Supreme Court and enforce and execute such rights in case of any violation or threat thereof.

Even if the official Rwandan policy to solve the problem of women living in de facto unions is to encourage them to enter into an official marriage, these appear to be short-sighted solutions and women remain victims. Law, policies and programmatic interventions to protect women in consensual unions in case of failure of this union, about her rights on movable property, bank accounts, the fruits of their works jointly acquired, and how could she enjoy her rights on share of the property of household in the case of death of co-partner is also necessary.

7. References


[23] Article 209 of law n° 32/2016 of 28/08/2016 governing persons and family provides that spouses jointly provide management of the household including moral and material support to the household as well as its maintenance. One of the spouses performs those duties alone if the other is unable to do so. In case of disagreement, competent authorities take the decision.


[25] NE Worugji I., O Ugbe R., The Supreme Court has cleared the customary law inhibitions on the inheritance origin, ethnic background, clan, sex, opinion, religion, or any discrimination, especially in respect to race, color, and jurisdiction of the Supreme Court.


[28] Article 16 of 1991 constitution of Rwanda provides that all citizens shall be equal in the eyes of the law, without any discrimination, especially in respect to race, color, origin, ethnic background, clan, sex, opinion, religion, or social status.


[33] Article 39 of law n°59/2008 of 10/09/2008 on prevention and punishment of Gender-Based Violence provides that if a person entertaining unlawful marriage was living with many husbands/wives, he shall first of all share the commonly owned belongings with those husbands/wives equally before getting married in accordance with the monogamous principle.

[34] Gatera, Kabalisa v. State of Rwanda, Case n° RS/INCONST/Pén.0003/10/CS, Supreme Court, Judgement of 07 January 2011.


[42] Mutara III Rudahigwa (March 1911 – 25 July 1959) was King of Rwanda between 1931 and 1959.


[45] Article 47, 6 of Organic Law n° 03/2012/OL of 13/06/2012 determining the organization, functioning and jurisdiction of the Supreme Court.

[46] UN Commemoration of International Women’s Day: Speech by the UN Women Executive Director Phumzila Mlambo-Ngceku, UN Headquarter, New York, 2014.