

Gender Inclusive Legislative Drafting in Rwanda: Which Approach?

Richard KAYIBANDA

(School of Law, University of Rwanda, Rwanda)

Abstract: *In efforts to promote gender equality, the choice of the language to use in legislative drafting is of relevance. In this regard, legislative drafting principles require the use of a gender neutral terminology during law writing process. To ensure gender bias free legal texts a number of techniques are used, inter alia, the ‘masculine rule’, ‘two-way rule’, ‘all-gender rule’ and ‘separate gender rule. However, each of these rules has got advantages and disadvantages either from a gender promotion perspective or the legislative drafting perspective. This paper has investigated the approach Rwanda has taken as part of its efforts towards gender inclusive language legislation and sought to ascertain whether the same approach complies with legislative drafting principle of gender neutrality. After the review of various legal texts into force, it has been realised that Rwanda uses the ‘separate gender rule’ which, from a legislative drafting perspective, sins against the principle discouraging the use of stylistic variations.*

Keywords - gender inclusive, legislative drafting, gender neutral language

Research Area: Law

Paper Type: Research Paper

1. INTRODUCTION

Rwanda is known as an example of an inclusive society that promotes, among others, gender equality and women empowerment (Kwibuka, 2016). For instance, as of June 2016, Rwanda topped the world’s ranking as the country which has the highest percentage of female parliamentarians. This is as well witnessed by accolades the country has been awarded including the latest received during the 27th African Union Summit (Tashobya, 2016).

A number of achievements have been registered in the country regarding promotion of gender equality and eradication of gender based discrimination and violence in various areas; whereby a gender sensitive constitutional framework was put in place, gender sensitive laws were enacted and existing discriminatory ones have been repealed or modified (Republic of Rwanda, Ministry of Gender and Family Promotion, 2010). These positive gains are undoubtedly the results of efforts of not only politicians who express the political will to uphold gender equality principles; but also legislative drafters who craft the formers’ will into legal provisions since the gender sensitivity of a legal act is reflected, among others, in its language (Suteu & Draji, 2005).

It is uncontested that legislation should not discriminate against anyone and should not be gender biased. In this line, one of the principles of legislative drafting requires the use of gender neutral language (Segal, 2011). The draftspersons should thus make careful choice and use of words to ensure the legal text is free from any bias. To this end, they resort to a number of techniques including the use of gender-bias free language by avoiding to utilize gender-specific terminology. Approaches used to avoid gender based discrimination or gender bias in legal texts include the ‘masculine rule’, the ‘two-way rule’, the ‘all-gender rule’ and ‘separate-gender rule’. However, each of these techniques has got its advantages and disadvantages and some are discouraged in legislative drafting (Segal, 2011). It is in this

regard that this research is intended: (1) to investigate the approach Rwanda has adopted in its efforts towards gender inclusive language in legislation and (2) to gauge whether the very approach is in line with the legislative drafting principle of gender neutrality.

The study does not purport to look into every piece of legislation into force in Rwanda and it covers only some sampled legal texts. As it does not intend to make statistical generalization only five (5) legal texts were purposively and randomly selected and have helped to reach logical conclusion as to which approach is used in Rwandan legislative drafting practice.

Purposive sampling was used to ensure the inclusion of each of five major classifications of Rwandan laws as given by Legal Information Portal of the Republic of Rwanda which are: (1) Constitutional law, political institutions, treaties and international conventions, (2) Administrative law, (3) Judicial and criminal law, (4) Private law and social law and (5) Business law. Apart from the Constitution which was purposively selected as the supreme norm in Rwanda, one legal text was randomly selected from each of the four remaining classifications. The selection was done using “Random Thing Picker” which is an online sampling tool where only a single number is selected from a range of numbers entered into the computer. Therefore, as different legal texts available on the aforementioned Portal under each classification are numbered from one to a given number, the range from one (1) to the last number was entered into the online program. The latter generated one digit and the corresponding law were included in the sample of the research. The laws included in the sample are thus: The Constitution of the Republic of Rwanda of 2003 revised in 2015; Law N°14/2013 of 25/03/2013 determining the organization and functioning of the Province; Organic Law N° 01/2012/OL of 02/05/2012 instituting the penal code (Penal Code), Law N° 13/2009 of 27/05/2009 regulating labour in Rwanda and Law N°07/2009 of 27/04/2009 relating to companies.

After this introduction, a review of the literature on different approaches towards gender neutral language in legislative drafting is presented (1). Afterward, the Rwandan approach is assessed (2) and the way forward is proffered (3) before a brief conclusion.

2. LITERATURE REVIEW ON GENDER NEUTRAL LANGUAGE IN LEGISLATIVE DRAFTING

This section explores details of different approaches adopted by various jurisdictions or advocated for by scholars towards legislative drafting that is not discriminatory or biased. Approaches covered are the ‘masculine rule’, the ‘two-way rule’, the ‘all-gender rule’ and ‘separate-gender rule’

2.1. THE ‘MASCULINE RULE’ APPROACH

2.1.1. Overview of the concept of masculine rule

The concept of masculine rule in legal writing implies that whenever a word referring to the masculine gender is used, it includes feminine unless the contrary intention appears. Under this rule, male pronouns are used with the intention to refer to both men and women (Kessler QC, 2012; Suteu & Draji, 2005; Williams, 2008; Diebo, 2015). For example the Interpretation Ordinance of Turks & Caicos Islands stipulates that:

In this Ordinance and in all Ordinances and other instruments of a public character relating to the Islands now in force or hereafter to be made, unless there is something in the subject or context inconsistent with such

construction, or unless it is therein otherwise expressly provided— (a) words importing the masculine gender include females; ...

The masculine rule was impliedly resorted to in the drafting of most international human rights instruments. For instance, Article 10 of the Universal Declaration of Human Rights which provides “*Everyone is entitled in full equality to a fair trial and public hearing by an independent and impartial tribunal, in the determination of his rights and obligations and of any criminal charge against him*”. Though, there is no express provision on interpretation of this Declaration, the words “his” and “him” in this article undoubtedly represent both female and male human beings. In my opinion, this is even substantiated by article 1 of the same document which recognises equality of all human beings and its article 2 that prohibits any kind of discrimination basing, among others, on sex. The same drafting approach is adopted in other international legal instruments such as the International Covenant on Civil and Political Rights (e.g. Art. 6 which provides “...*No one shall be arbitrarily deprived of his life*”.); African Charter on Human and Peoples’ Rights (e.g. Art. 4 that reads “...*Every human being shall be entitled to respect for his life*...”). This is also the case for the European Convention on Human Rights (For example Art. 5 reads “...*No one shall be deprived of his liberty*...”). In Rwanda, the example of a similar provision is article 258 of Civil Code Book III (*Décret du 30 Juillet 1888 sur Les contrats ou des obligations conventionnelles*) which in French provides that “*Tout fait quelconque de l’homme*...” which can be translated as “any act whatsoever of a man...” The word *l’homme* (man) stands for both men and women (*homme et femme*). There exist arguments for and against the use of the masculine rule in legislative drafting.

2.1.2. Arguments in favour of the use of ‘Masculine rule’

People advocating for the use of ‘Masculine rule’ in legislative drafting submit that the latter is not discriminatory against women because masculine words such as the pronoun “he” are accepted to encompass both genders. Also, interpretation acts in jurisdictions that adopt the masculine rule approach provides that reference to ‘man’ is considered to include ‘woman’ as well (Karen as cited in McKenzie, 2013). Thus, it was simply replied to complaints for women’s inclusion that the interpretation acts protect them since they define the male to include the female and that they suffered no practical injustice (Ritchie, 1975). In addition, drafting convenience reasons are invoked; whereby draftspersons draft by referring to only one gender and the established drafting practice and canons require to draft in terms of male (Ritchie, 1975). There is also the argument that the use of male terms is not only a trivial matter; but also its usage is merely a reflection of a defect in the English language which is not peculiar to legislation and is rather found in all English speeches and writings (Driedger, as cited in McKenzie, 2013). Opponents of gender-neutral language advances aesthetical grounds arguing that it must necessarily be awkward and they argue, as well, that it may annoy readers who do not support it (Fischer, 2009)

At this point, it is relevant to assess whether these reasons in favour of the masculine rule hold.

2.1.3. Arguments against the use of ‘masculine rule’

Despite its extensive use in international human rights instruments and arguments in its favour, the masculine rule approach has attracted a number of criticisms.

Sexist language based on the premise that the norm of humanity is male which was being used in English language legislative texts started being widely contested in 1970s whereby calls were made to redress the imbalance (Williams, 2008; Ritchie, 1975.) Feminists have advocated that the assumption that the masculine pronoun “he” subsumed the feminine

“she” has not accidentally come into existence; rather it has served to perpetuate the invisibility, inferiority and exclusion of women and should be abandoned (Petersson as cited in Suteu & Draji, 2005; Ateneo Human Rights Center, 2007). Also, many people hold the belief that this practices tends to reinforce historic gender stereotypes as well as sexist attitudes and behaviours (Kessler QC, 2012; Fischer, 2009). The use of masculine nouns and pronouns is as well viewed as implying that personality is a male attribute and that women are seen as human sub-species (Turatsinze, 2011-2012).

In the opinion of the Council for Europe, the sexist language which gives the masculine precedence over the feminine hinders the process of establishing equality between women and men (Callamard, 1999).

It is argued that even if terms “Man” and “Mankind” refer to people or humanity in general and it was traditionally correct, in modern English they are replaced by “people”, “individuals”, “humanity”. This is meant not only to avoid ambiguity; but also to express respect towards women (Kutateladze, 2015). In fact, it contributes to ambiguity as where singular masculine words such as “man” are used to refer to both men and women; it is likely to be interpreted to refer in some instances to men while in some other instances it would be used to mean women or used to refer to both men and women (Fischer, 2009; Leslie, 2010).

Also, it is pointed out that this method of legislative drafting is no longer in line with international best practices of drafting; i.e. gender neutral drafting (Diebo, 2015) which refers to both genders equally (OSCE/ODIHR, 2014). The expression of gender in male terms is no longer accepted (ESCWA, 2013). In addition to the fact that the use of gender-biased language is outdated, it can be seen as a discriminatory practice as well (Panel on Administration, 2009). It is further argued that the use of the masculine rule leads to inference that the male is more fundamental than the female. Moreover, it results in the exclusion of women from the reader’s mental landscape (McKenzie, 2013).

Finally but importantly, court decisions have exploited the masculine rule to exclude women through the assessment of the ‘context’ especially when it came to privileges. This happened in *Chorlton v. Lings* where the court was seized with a claim to determine whether a provision which read “everyman shall...be entitled to be registered and vote in Parliamentary elections” included women. The court ruled that the provision did not include women. Similarly, in *State of Wisconsin v. James Jagodinsky*, the Court held that where the statute about qualifications of petit jurors used the masculine pronoun “he”, only males were referred to (McKenzie, 2013). In UK, it is exemplified by *Bebb v. Law Society* whereby women were excluded from the profession of solicitor in England despite the clear statutory provisions that “*every word importing the masculine gender only shall extend and be applied to a female as well as a male unless there be something in the subject or context repugnant to such construction*” (Ritchie, 1975).

Thus, as pointed out by McKenzie (2013), even if these cases were decided some time ago and it can be argued that the modern society has more or less abandoned those biases; legislative draftspersons must endeavor to use terms that help to ensure that women are included within legislative texts without any discrimination or inequality and ensure that legal texts are clear as to who is exactly included therein. Abuses will indeed be avoided since legal texts adopting the masculine rule approach (such as “*...unless there is something in the subject or context inconsistent with such construction, or unless it is therein otherwise expressly provided— (a) words importing the masculine gender include females...*”) constitute the fertile ground for those who would want to interpret the law at the disadvantage of women and is considered, in the opinion of M. E. Ritchie (1975), as deceptive. Such

statutory provisions can be interpreted either as including or excluding women depending on the intention of the person (judge) called to rule on the matter where an interpretation is sought.

2.2. THE ‘TWO-WAY RULE’

According to O. A. McKenzi (2013), the two-way rule emerged in efforts to rectify problems caused by the ‘masculine rule’. It provides that the masculine gender used in legislative enactments includes the feminine gender and, conversely, where the feminine gender is used, it includes the masculine. One of the jurisdictions that have adhered to this approach is the United Kingdom where the Interpretation Act 1978, in its Section 6, reads:

In any Act, unless the contrary intention appears, -

(a) words importing the masculine gender include the feminine;

(b) words importing the feminine gender include the masculine;...

Opponents of the two-way rule argue that, since it uses the ‘masculine’ to include the ‘feminine’ it may produce the same exclusionary result against women as the masculine rule of which imperfections it is supposed to correct. Thus, it does not improve the situation of women in legislation. It is as well argued that it may be used to exclude men when the feminine is used to include men. Even if this rule can lead to the express inclusion of women as it allows either gender to include the other, it is not required to explicitly mention women. In the absence of express inclusion of the latter, the possibility of their exclusion remains (McKenzie, 2013).

2.3. THE ‘ALL-GENDER RULE’

As put forward by Susan PETERSSON (cited in Dreyfus, 2008), the ‘all-gender rule’ is the one pursuant to which words importing a gender include every other gender. Jurisdiction that have adopted this approach include Western Australia of which Interpretation Act 1984 provides in its Section 10 that: “*In any written law- (a) words denoting a gender or genders include each other gender;...*”¹ This approach is believed to be an important move to reduce the potential for any ambiguity in the interpretation of the law².

However, it is submitted that the ‘all-gender rule’ cannot certainly eliminate any discrimination against women because from legal enactments since it always entails a possibility for the masculine to be used to include the feminine (McKenzie, 2013).

2.4. THE ‘SEPARATE GENDER RULE’

The separate gender rule explicitly prohibits the use of either gender (masculine or feminine) to include the other (Peterson cited in McKenzie, 2013). Consequently, words importing the masculine gender are used only with their ordinary masculine meaning while words importing feminine gender are used to give their ordinary feminine meaning (McKenzie, 2013). This rule requires always to use both the masculine and feminine terms such as pronouns and possessive adjectives together (‘he’ or ‘she’; ‘he/she’, ‘his or her’, etc) except in cases where the legislation is intended to apply to people of one sex and not the other. This is the case, for instance, for maternity leave legislation (Parliamentary Counsel, 2016).

¹ Available at

[https://www.slp.wa.gov.au/pco/prod/FileStore.nsf/Documents/MRDocument:26673P/\\$FILE/Interpretation%20Act%201984%20-%20\[07-c0-02\].pdf?OpenElement](https://www.slp.wa.gov.au/pco/prod/FileStore.nsf/Documents/MRDocument:26673P/$FILE/Interpretation%20Act%201984%20-%20[07-c0-02].pdf?OpenElement), accessed on 29/07/2016.

² *Ibidem*.

2.4.1. Arguments in favor of ‘Separate gender rule’

The ‘separate gender rule’ is praised for its capability to uproot discriminatory effect from legal provisions since no gender subsumes the other whether feminine or masculine. It promotes clarity of legal provisions since the masculine only imports masculine and the feminine only encompasses the feminine (McKenzie, 2013).

2.4.2. Arguments against the ‘Separate gender rule’

The ‘separate gender rule’ has also the other side of the medal. This rule is attracts criticism for its inconsistency with the legislative drafting convention that stylistic variations using alternates ‘he or she’ should be avoided since it is considered cumbersome (Fischer, 2009; Solembier, n.d.). Furthermore, the use of separate gender rule leads to lengthy legislations and it is argued that is not fully gender neutral as one of the two words, i.e. the masculine and feminine, will have to come first (McKenzie, 2013). The possible solution to the last problem would be alternation between ‘he or she’ and ‘she or he’; but it would be unappealing addition to the drafter’s burden (Ian McLeod, n.d.).

The use of ‘separate gender rule’ can as well create ambiguity where the two-word combination of the masculine and feminine terms (e.g. pronouns ‘he or she’, possessives ‘his or her’, etc.) are used in some provisions while either of them is inadvertently omitted in other provisions of the same legislative act (HAVUGIYAREMYE, 2016). It may be likely to be interpreted that only one sex is meant on the ground that where both sexes are targeted, it is explicitly indicated by the use of both the masculine and feminine words. For instance, the reading of East African Community Treaty reveals that in its Article 1, it uses only ‘his’ while defining ‘freight forwarders’³ while in other articles such as Article 25 and 53 it uses ‘his or her’ and ‘he or she’ respectively.

Despite its drawbacks from the legislative drafting angle, the ‘separate-gender rule’ approach provides a solution to the shortcomings of the previously examined rules (i.e. the masculine rule, the two-way rule and all-gender rule) in gender equality perspective.

After the review of the literature on different approaches towards inclusive legislative drafting, it is relevant to consider the one that Rwanda legislative drafters utilize and assess its compliance with legislative drafting principles.

3. RWANDA’S APPROACH TOWARDS GENDER BIAS FREE LEGISLATION

This section thoroughly examines sampled Rwandan legal text in order to find out the approach used by the legislative drafters among approaches examined above. Five legal texts scrutinized are: The Constitution of the Republic of Rwanda of 2003 revised in 2015 (hereinafter ‘the Revised Constitution of Rwanda’); Law N°14/2013 of 25/03/2013 determining the organization and functioning of the Province (hereinafter ‘Province Law’); Organic Law N° 01/2012/OL of 02/05/2012 instituting the penal code (hereinafter ‘Penal Code’), Law N° 13/2009 of 27/05/2009 regulating labour in Rwanda (hereinafter ‘Labour Law’) and Law N°07/2009 of 27/04/2009 relating to companies (hereinafter ‘Company Law’).

First of all, apart from the fact that Rwanda does not have a ‘Statutory Interpretation Law’ which might contain the ‘masculine rule’, the ‘two-way rule’ or the ‘all-gender rule’ as described above, there is no clause in any of the above laws under scrutiny that contain any of such rules.

³ A freight forwarder is defined as “any person engaged at a fee, either as an agent for other transport operators or on *his* own account, in the management of transport services and related documentation.”

Secondly, the reading of the Revised Constitution of Rwanda shows that it uses several times the combination of the masculine and feminine terms. For instance, this is the case for its article 25 which provides: “*Every Rwandan has the right to his or her country....*” (Constitution of the Republic of Rwanda of 2003 revised in 2015, 2015) Likewise, there are other articles where a similar formulation is used such as articles 14, 17, 19, 23, 65, 77, etc.

In the same vein, the Province Law (2013) uses the combination of masculine and feminine pronouns and possessive adjectives in its articles such as article 5 which provides:

The Governor of Province shall be the representative of the State in the Province and responsible for the coordination of the fulfillment of the responsibilities of the Province.

He/she may delegate in writing some of his/her powers to a member of staff of the Province and stand as a guarantor for the exercise of delegated powers.

He/she shall be assisted by the Executive Secretariat while performing his/her daily duties.

The Governor of Province shall be under the authority of the Minister in charge of Local Government

The Penal Code (2012) is no exception. For example its article 17 paragraph 2 reads “*Prosecution may not be instituted if the accused proves that he/she has been subject of a final judgment delivered abroad....*” Similar structures are utilized in many others articles such as 48, 77, 98, 101, etc.

The use of the combination of masculine and feminine terms is also identified in the Labour Law (2009). Its article 46, for example, provides that “*The principal employer shall keep up to date the list of the sub-contractors with whom he/she signed a contract*”. The reading of some of its other articles contain the same combined terms. This is the case for articles 1, 6, 10, etc.

Finally, the Company Law also was drafted using the combination of both masculine and feminine terms. For example its article 2, 23^o reads “*A person is a nominee of another person where he/she is entitled to exercise such a right only in accordance with instructions given by that person*”.

From the reading of all the above laws, it is clear that the ‘separate-gender rule’ approach is the one that is used in Rwandan legislative drafting especially post-genocide legal texts. Indeed, from the selected articles the use both the masculine and feminine terms such as pronouns and possessive adjectives together (‘he’ or ‘she’; ‘he/she’, ‘his or her’, etc) was observed and this leads to the conclusion about this approach.

As the only approach seen as capable of warding off discriminatory effect of other examined approaches (sub-section 1.4.2), the ‘separate gender rule’, which is so far applied in Rwanda is not spared from shortcoming as well. It is against the drafting principle discouraging stylistic variations which is seen as unwieldy, it results into lengthy legislation and can create ambiguity in case of unintended omissions. So what should be the way forward?

4. WHAT SHOULD BE THE WAY FORWARD?

Some scholars have advocated for some other legislative drafting rules that are considered gender-neutral. These include the use of the plural, the use of passive voice and avoidance of pronouns.

4.1. USE OF THE PLURAL?

One of the techniques resorted to in order to achieve gender neutrality in legislative drafting is the use of plural form as the third person plural is gender neutral (Segal, 2011). Nevertheless, the drafting technique using the plural is considered to violate another general rule that legal documents should be drafted using the singular form. It is pointed out that the use of singular form of nouns promotes clarity since the legislation had to apply to each and every member of the target group. On the contrary the plural can cause confusion (Segal, 2011). Moreover, even if the plural is gender neutral for possessives and pronouns, it is not the case for nouns like ‘man’ and ‘woman’. So, the use of the plural cannot be recommended in Rwandan legislative drafting.

On the contrary, some scholars recommend the repetition of the noun instead of the use of pronouns in the plural form (Turatsinze, 2011-2012). For instance if we consider article 5 of the Province Law mentioned above, the terms “*He/she*” in its paragraphs 2 and 3 would have been replaced by “*The Governor*” as it is the case in paragraph 4 of the same article.

4.2. USE OF PASSIVE VOICE?

The use of passive voice is also suggested by some as a way to avoid gender-based language especially the one using pronouns. For instance the sentence ‘A lawyer should file his briefs on time’ can be changed to ‘Briefs should be filed on time’. Nevertheless, the passive voice is perceived to give rise to difficulties since it is often wordy and the absence of an identified actor is likely to result in vague sentence (Fischer, 2009; Department of Justice & Border Control, Republic of Nauru, 2015). In the same line, Mark Segal submits that the law should not use passive voice when it addresses its norms to people. If this is not the case, the legislation is defective as it lacks one of its essential elements; i.e. sufficient information on the target group. Moreover, in the opinion of the same author, “legislation is less precise when it is drafted to apply to inanimate objects or actions that are actually part of the ‘what’ that animate target groups must or must not do” (Segal, 2011). So, passive voice cannot as well be encouraged where it is not appropriate.

Therefore, instead of the plural, the passive voice or the extensive resort to the ‘separate-gender rule’, efforts should be on the use of recommended techniques to ensure gender neutrality which do not sin against legislative drafting.

5. CONCLUSION

From this research it was found the Rwandan legislative drafter avoids gender biased language. This is done by the use of the ‘separate gender rule’ approach as confirmed by all studied legal texts. While this approach is preferable to unnecessary use of gender biased or gender specific language in legislative drafting, it is recommended that its use should be kept to the minimum where possible. Indeed, the ‘separate-gender rule’ is criticized for its likeliness to lead to ambiguity, in case for instance of unintended omissions, or unwieldy lengthy legislation. These are not in line with legislative drafting principles that legislation should be gender neutral and unambiguous, among others. However, some of the suggested solutions such as the use of the plural and passive voice are also against principles of legislative drafting. So, the Rwandan legislative drafting should put an emphasis on the reduction of the use of the ‘combination of masculine and feminine terms’ where appropriate gender neutral wording that is in line with other legislative drafting principles is available.

REFERENCES

1. Random thing picker. Retrieved from <http://andrew.hedges.name/experiments/random/pickone.html>
2. ATENEO HUMAN RIGHTS CENTER. (2007). Training Manual on Gender Sensitivity and CEDAW.
3. CALLAMARD, A (1999). Methodology for Gender-Sensitive Research. Quebec: Amnesty International Publications.
4. Department of Justice & Border Control, Republic of Nauru (2015). Legislative Drafting Manual.
5. DIEBO LONGJOHN, C. (2015). Gender Neutral Legislative Drafting in Nigeria. *International Journal of Humanities and Social Sciences*, 4(3), 67-84.
6. DREYFUS, M. (2008). Statute Law Revision Bill 2008. Retrieved from http://markdreyfus.nationbuilder.com/statute_law_revision_bill_2008.
7. ESCWA. (2013). Gender-Sensitive language. December 2013.
8. FISCHER, Judith D., (2009). Framing Gender: Federal Appellate Judges Choices About Gender-Neutral Language. *University of San Francisco Law Review*, 43(3), 473-506.
9. HAVUGIYAREMYE, A. (2016). *Principles of Legislative Drafting*. Unpublished lecture notes.
10. Inter-Parliamentary Union (n.d.). *Women in national parliaments*. Retrieved from <http://www.ipu.org/wmn-e/classif.htm>
11. KESSLER J., QC (2012). *Public and Private Drafting-Objectives, problems, styles and approaches*. London: Institute of Advanced Legal Studies.
12. KUTATELADZE, M. (2015). Importance of Gender-Sensitive Language and Some Guidelines for Business Writing. *Journal in Humanities*, 1(1), pp. 21-24.
13. KWIBUKA, E. (2016, July 09). Women leaders push for gender equality in Africa. *The New Times*.
14. Law n^o 13/2009 of 27/05/2009 regulating labour in Rwanda (Official Gazette special N^o of 27/05/2009).
15. Evan Segal, M. (2011). *Legislative drafting: Principles and Materials*.
16. MCKENZIE, O.A. (2013). *The masculine rule and its alternatives: a comprehensive analysis*. Unpublished LLM research paper. University of London.
17. OSCE/ODIHR. (2014). Opinion on the Draft Law of Ukraine on Police and Police Activities.
18. Panel on Administration of Justice and Legal Services. (2009). *Drafting Legislation, (Information Paper for the Meeting)*. Retrieved from <http://www.legco.gov.hk/yr09-10/english/panels/ajls/papers/aj1215cb2-512-4-e.pdf>.
19. Parliamentary Counsel, (2016). Drafting Direction N^o 21, English usage, gender-specific and gender-neutral language, grammar, punctuation and spelling. Retrieved from http://www.opc.gov.au/about/docs/drafting_series/DD2.1.pdf
20. PETERSSON, S. (1999). Gender-Neutral Drafting: Recent Commonwealth Developments. *Statute Law Review*, 20(1), 35-65.

21. PETERSSON, S., (1998). Locating Inequality—The Evolving Discourse on Sexist Language. *UBC Law Review*, 32(1), 55-90.
22. TURATSINZE, E. (2011-2012). *In pursuit of clarity, precision and unambiguity in drafting retrospective legislation*. Unpublished LLM Thesis. University of London.
23. Republic of Rwanda, Ministry of Gender and Family Promotion (2010). National Gender Policy.
24. RITCHIE, M. E. (1975). Alice Through the Statutes. *McGill Law Journal*, (21), 685-707. Retrieved from <http://www.lawjournal.mcgill.ca/userfiles/other/6093764-ritchie.pdf>
25. LESLIE, M. R. (2010). The Supreme Court and Gender-Neutral Language: Setting the Standard or Lagging Behind. *Duke Journal of Gender Law & Policy*, 17(81), 81-129.
26. Legal Information Portal, “Codes and Laws of Rwanda. (n.d.). Retrieved from <http://lip.alfa-xp.com/lip/AmategekoDB.aspx?Mode=d&pid=3>
27. SUTEU, S.& DRAJI, I.(2005). ABC for a Gender Sensitive Constitution, EFI (Euromed Feminist Initiative).
28. TASHOBYA (2016). *Africa: Officials-AU Gender Scorecard Award Boosts Fight for Equality*. *Allafrica*. Retrieved from <http://allafrica.com/stories/201607250907.html>
29. The Constitution of the Republic of Rwanda of 2003 revised in 2015, (Official Gazette Special N° of 24/12/2015).
30. WILLIAMS, C. (2008). The End of the ‘Masculine Rule’? Gender-Neutral Legislative Drafting in the United Kingdom and Ireland. *Statute Law Review*, 29(3), 139-153.