



Australian Government
Refugee Review Tribunal

Country Advice

Zimbabwe

Zimbabwe – ZWE37973 – Women –
Widow inheritance – HIV/AIDS –
Domestic violence – State protection –
ZANU-PF
14 January 2010

1. Can a woman be forced into marriage with her brother-in-law when her sister has died?

In some situations, women are coerced into accepting a marriage to a widowed brother-in-law, known as widow inheritance, arranged by family members. The 2010 United States Department of State (USDOS) *Human Rights Report* notes that women ‘remain vulnerable to entrenched customary practices’ in Zimbabwe, such as ‘forcing widows to marry the brothers of their late spouses’.¹ Women are particularly vulnerable because they traditionally hold a lower status in society. The 2010 UK Home Office report notes that women are unable to establish relationships with whom they please, and that ‘[w]omen who claim to be independent of men, even for sex, arouse intense anger in those men with deep-seated insecurities about sexual rejection and the need to control’.²

The practice of widow inheritance is a tradition in the Shona culture in Zimbabwe and may take one of two forms. *Kugara nhaka* is the practice where a widowed woman may marry the younger brother of her deceased husband and *chimutsamapfihwa* is the practice of a widowed man marrying the younger sister of his deceased wife (henceforth referred to as ‘widow inheritance’).³ The tradition is still observed in parts of Zimbabwe, but to a lesser extent than in the past.⁴ The practice also occurs in a modified form in some instances. While some widows marry their late spouse’s sibling, in some cases the spouse’s sibling just becomes the guardian of the surviving children.⁵

In the practice of *chimutsamapfihwa*, a widowed man may marry a younger sister or even a niece of his late wife. This is often the case where the widowed man is considered to

¹ US Department of State 2010, *Country Reports on Human Rights Practices 2009 – Zimbabwe*, 11 March – Attachment 1.

² UK Home Office 2010, *Country of Origin Information Report*, 30 September – Attachment 2.

³ ‘Frenzy about Zimbabwe Premier’s romance a year after the death of his first wife’, 2010, *ZimSentinel*, 29 March, http://zimsentinel.blogspot.com/2010_03_01_archive.html – Accessed 5 January 2011 – Attachment 3; ‘Romeo and Juliet: PM Tsvangirai has found new love’, 2010, *zimeye*, 31 May, <http://www.zimeye.org/?p=17919> – Accessed 5 January 2011 – Attachment 4; Immigration and Refugee Board of Canada, 2006, ZWE100923.E – *The custom of wife "inheritance"; the government's attitude towards this custom; protection available to women who refuse to observe this custom*, 13 February, <http://www.unhcr.org/refworld/docid/45f147cb23.html> – Accessed 4 January 2011 – Attachment 5.

⁴ Immigration and Refugee Board of Canada, 2006, ZWE100923.E – *The custom of wife "inheritance"; the government's attitude towards this custom; protection available to women who refuse to observe this custom*, 13 February, <http://www.unhcr.org/refworld/docid/45f147cb23.html> – Accessed 4 January 2011 – Attachment 5.

⁵ ‘Frenzy about Zimbabwe Premier’s romance a year after the death of his first wife’, 2010, *ZimSentinel*, 29 March, http://zimsentinel.blogspot.com/2010_03_01_archive.html – Accessed 5 January 2011 – Attachment 3

have good social or economic standing, so that the wife's biological family can still benefit from his wealth.⁶

Shona tradition also provides the widow with a 12 month mourning period, before a widow inheritance ceremony is held. The ceremony is performed to mark the end of the grieving period for the widow and allow them to remarry after this period if they wish. The ceremony also formalises the customary 'stand-in' spouse (or *sara pavana*) who becomes the guardian of any children produced by the widow and late spouse and performs all the domestic duties the late spouse would have been expected to perform. The *sara pavana* could be a younger sibling of the deceased, but is not necessarily expected to marry or have a sexual relationship with the widow/widower, though that arrangement is not uncommon.⁷ The siblings of the deceased spouse are seen as having a moral obligation to any surviving children.⁸ Sources suggest there is a considerable variation in the way inheritance situations are handled.

One source was located, however, that indicates that widow inheritance in modern times does require the consent of both parties before a relationship is entered into. Academic Jannet Mudavanhu notes in her 2010 PhD thesis granted by Birmingham University that relationships occurring as a result of widow inheritance are socially accepted, but the agreement is required of both parties and a family cannot impose the relationship upon their relatives. Mudavanhu also states that widow inheritance is no longer as popular as it once was, mostly due to the economic responsibility involved.⁹ This author does not, however, give supporting evidence for her claims.

2. Are the following factors likely to make a difference: if the brother-in-law has AIDS; if the brother-in-law is known to be abusive; if the woman is educated and/or independently wealthy; if the woman has been living overseas?

No information was located on whether an abusive brother-in-law or a woman's country of residence would affect the likelihood of the widow inheritance occurring. Information was located on situations where one party of the widow inheritance arrangement has HIV/AIDS, and where the woman is educated and/or wealthy.

If the brother-in-law has AIDS

While no reports were found specifically detailing whether the HIV status of a relative would affect the likelihood of widow inheritance taking place, there are many reports that note how traditions like widow inheritance compound the spread of HIV/AIDS in Zimbabwe. This indicates that little attention is paid to HIV status where the practice is observed.¹⁰

⁶ Kanchense, J. H. M. 2007 'Urologic and Gynecologic Health Problems Among Zimbabwean Women: Harmful Cultural Practices', *Urologic Nursing*, vol. 27, no. 5, pp373-389 – Attachment 6.

⁷ 'Frenzy about Zimbabwe Premier's romance a year after the death of his first wife', 2010, *ZimSentinel*, 29 March, http://zimsentinel.blogspot.com/2010_03_01_archive.html – Accessed 5 January 2011 – Attachment 3.

⁸ Mudavanhu, J. 2010 *The Attitude of the Methodist Church in Zimbabwe to Homosexuality: Towards a Socio-Sexological Theological Investigation*, PhD thesis, University of Birmingham – Attachment 7.

⁹ Mudavanhu, J. 2010 *The Attitude of the Methodist Church in Zimbabwe to Homosexuality: Towards a Socio-Sexological Theological Investigation*, PhD thesis, University of Birmingham – Attachment 7.

¹⁰ A selection of these reports is as follows: Mvundura, C. 2010, 'Zimbabwe: US body helps communities fight HIV/AIDS', *ReliefWeb*, 29 July, <http://www2.reliefweb.int/rw/rwb.nsf/db900SID/EKIM-87T4YP?OpenDocument> – Accessed 11 January 2011 – Attachment 8; Zimbabwe Red Cross Society 2006, *Integrated HIV and AIDS Programme 2006 – 2010*,

Traditional practices such as widow inheritance and polygamy are highly prevalent in Zimbabwe and reported to greatly increase susceptibility to HIV infection.¹¹ The practice continues despite warnings of the dangers of HIV/AIDS. The *Panafrican News Agency* reports that although there are no official statistics regarding AIDS deaths as a result of widow inheritance, 'health authorities say most such cases [of AIDS deaths] in rural areas are related to the practice [of widow inheritance]'.¹² No reports were found of the situation in urban areas.

An evaluation run by Zimbabwe Open University in 2004 found that 73.7 per cent of the respondents rated widow inheritance as the 'top of the list of practices fuelling HIV' because of the possibility of the infection if the widow remarried a relative.¹³ Attempts to curb the practice by lobbying traditional leaders were unsuccessful, as it is often believed that widow inheritance will reduce the prevalence of HIV as it lessens sexual promiscuity.¹⁴ Furthermore, it is often considered rude to request that the widow undergo an HIV test before accepting the widow inheritance arrangement.¹⁵ This information indicates that the HIV status of the spouse's sibling is unlikely to reduce the likelihood of widow inheritance occurring.

If the woman is educated and/or independently wealthy

It is possible that if a woman is educated and/or wealthy there may be less pressure to marry a deceased sister's husband. The practice is traditionally undertaken to ensure that the wealth of a widowed man can still benefit the deceased wife's family.¹⁶ If the sister of the deceased woman has the capacity to provide for her family, it is possible that a widow inheritance marriage would be seen as unnecessary.

IRIN News reported in 2004 that the more economically disadvantaged the woman, the more vulnerable she is to widow inheritance. The report also refers to a program initiated by the Women and AIDS Support Network (WASN) that works within the traditional structures of Zimbabwean communities, targeting customs that enable the spread of HIV, such as widow inheritance. The WASN program found that once women were equipped

<http://www.ifrc.org/docs/appeals/annual06/logframes/africa/MAA63003ZW.pdf> – Accessed 11 January 2011 – Attachment 9; Shoko, B. 2005, 'Vapostori tackle HIV and Aids', *The Standard*, 8 May,

<http://www.thestandard.co.zw/local/10003.html> – Accessed 11 January 2011 – Attachment 10; Shoko, R. 2001, 'Zimbabwe: Spouse Inheritance Continues in Zimbabwe Despite AIDS', *Panafrican News Agency*, 24 January, <http://allafrica.com/stories/200101240258.html> – Accessed 23 December 2010 – Attachment 11; Nyakudya, M. 1998, 'HEALTH-ZIMBABWE: 'Wife Inheritance' Tradition Spreads AIDS', *InterPress News Service (IPS)*, 3 August, <http://www3.aegis.org/news/ips/1998/IP980801.html> – Accessed 11 January 2011 – Attachment 12.

¹¹ Zimbabwe Red Cross Society 2006, *Integrated HIV and AIDS Programme 2006 – 2010*,

<http://www.ifrc.org/docs/appeals/annual06/logframes/africa/MAA63003ZW.pdf> – Accessed 11 January 2011 – Attachment 9.

¹² Shoko, R. 2001, 'Zimbabwe: Spouse Inheritance Continues in Zimbabwe Despite AIDS', *Panafrican News Agency*, 24 January, <http://allafrica.com/stories/200101240258.html> – Accessed 23 December 2010 – Attachment 11.

¹³ 'ZIMBABWE: Tackling the impact of customs on AIDS', 2004, *IRIN News*, 17 August, <http://www.irinnews.org/report.aspx?reportid=51062> – Accessed 23 December 2010 – Attachment 13.

¹⁴ Shoko, R. 2001, 'Zimbabwe: Spouse Inheritance Continues in Zimbabwe Despite AIDS', *Panafrican News Agency*, 24 January, <http://allafrica.com/stories/200101240258.html> – Accessed 23 December 2010 – Attachment 11.

¹⁵ Makumbe, J. & Makumbe, V. 2010, 'Should a Christian Inherit a wife or husband?', *The Zimbabwean*, 14 October, http://www.thezimbabwean.co.uk/index.php?option=com_content&view=article&id=34854:should-a-christian-inherit-a-wife-or-husband&catid=35:opinion-a-analysis&Itemid=31 – Accessed 10 January 2011 – Attachment 14.

¹⁶ Kanchense, J. H. M. 2007 'Urologic and Gynecologic Health Problems Among Zimbabwean Women: Harmful Cultural Practices', *Urologic Nursing*, vol. 27, no. 5, pp373-389 – Attachment 6.

with ‘information and negotiating skills, they were able to make informed decisions on matters concerning high-risk behaviour’.¹⁷ The report did not assert whether these skills help women to refuse widow inheritance marriages.

3. Could a woman receive assistance from the authorities if she does not wish to remarry in these circumstances?

No reports were found on instances of women refusing widow inheritance arrangements and any assistance from the authorities received for refusing.

Legal provisions for protection

There is no specific legislation that prohibits widow inheritance. The recourse available to a woman who opposes a widow inheritance arrangement would depend on the actions of her family or brother-in-law if she refused to comply, or after a ceremony had taken place.¹⁸ The following Acts include provisions that may protect a woman in these circumstances:

- Section 7 Paragraph 1(b) of the *Customary Marriages Act* considers that a marriage under the Act is not valid unless both parties ‘freely and voluntarily consent to the marriage’.¹⁹ Thus, without consent the marriage is not valid.
- Under the *Domestic Violence Act 2007*, certain acts are prohibited and carry the punishment of a fine and maximum ten years imprisonment. Section 3 Paragraph 1(l)(vi) stipulates that any ‘abuse derived from [...] forced wife inheritance’ is considered an offence. While ‘wife inheritance’ is not defined within the Act, it is possible that it refers to both *kugara nhaka* and *chimutsamapfihwa*.²⁰ Section 3 Paragraph 1(f) specifies that harassment is considered an offence. The abuse or harassment must have been perpetrated by a current or former spouse, a parent or a person who is or has been living with the victim.²¹
- Under Section 15 of the *Sexual Offences Act 2001*, any person who knowingly infects another person with HIV is committing an offence. The sentence for those convicted with the offence is a maximum of twenty years imprisonment.²²

¹⁷ ‘ZIMBABWE: Tackling the impact of customs on AIDS’, 2004, *IRIN News*, 17 August,

<http://www.irinnews.org/report.aspx?reportid=51062> – Accessed 23 December 2010 – Attachment 13.

¹⁸ Immigration and Refugee Board of Canada, 2006, *ZWE100923.E – The custom of wife "inheritance"; the government's attitude towards this custom; protection available to women who refuse to observe this custom*, 13 February, <http://www.unhcr.org/refworld/docid/45f147cb23.html> – Accessed 4 January 2011 – Attachment 5.

¹⁹ *Customary Marriages Act [Chapter 5:07]*, (Zimbabwe), http://www.law.co.zw/index.php/persons-and-the-family/doc_download/95-customarymarriages-act.html – Accessed 7 January 2011 – Attachment 15.

²⁰ **Note:** both terms are defined in the response to Question 1. *Domestic Violence Act 2006*, (Zimbabwe), http://www.kubatana.net/docs/legisl/dom_viol_act_ch5_16_act%2014_2006_070226.pdf – Accessed 7 January 2011 – Attachment 16.

²¹ *Domestic Violence Act 2006*, (Zimbabwe), http://www.kubatana.net/docs/legisl/dom_viol_act_ch5_16_act%2014_2006_070226.pdf – Accessed 7 January 2011 – Attachment 16.

²² *Sexual Offences Act 2001*, (Zimbabwe), <http://www.kubatana.net/docs/legisl/sexoff010817.rtf> – Accessed 7 January 2011 – Attachment 17.

Difficulty accessing protection

Regardless of the legal provisions set out above, a woman may experience increased difficulty receiving protection from police if her brother-in-law is a member of, or associated with ZANU-PF. The Zimbabwean police are reported to be ‘generally partisan towards ZANU-PF’ and ‘[r]ather than being protectors, many police are persecutors and are effectively a paramilitary wing of ZANU-PF’.²³ Reports that describe the police in this way generally refer to politically motivated crimes perpetrated by ZANU-PF members against those who hold opposing political beliefs.²⁴ These crimes usually take place before elections; it may be of note that one is reportedly scheduled for 2011.²⁵ It is thus possible that police may be sympathetic towards ZANU-PF members in non-political matters, though reports do not specifically mention this.

Reports indicate that violence against women is pervasive in Zimbabwe and that perpetrators are largely able to act with impunity.²⁶ This suggests that a woman who refuses to accept a widow inheritance marriage and experiences violence as a result, may not expect to access effective protection. In regards to the enforcement of laws such as those contained within the *Domestic Violence Act 2007*, non-government organisation Africa 4 Women’s Rights reports that ‘[t]he lack of training of law enforcement personnel, the lack of awareness of women’s human rights, the fear of social stigma and reprisal contribute to the ineffectiveness of such laws’. The organisation notes, for example, that since the criminalisation of marital rape in 2001 only one case has been tried in court, as at August 2010.²⁷

4. What is ZANU-PF?

The Zimbabwe African National Union – Patriotic Front (ZANU-PF) is one of Zimbabwe’s ruling political parties, headed by President Robert Mugabe. Robert Mugabe has been Zimbabwe’s leader since 1980, though the name of the party he led has changed a number of times through alliances and mergers with other parties.²⁸ The party failed to win a majority of seats in the most recent presidential and parliamentary elections in 2008, and now governs Zimbabwe in a power-sharing agreement with the Movement for Democratic Change (MDC) headed by Prime Minister Morgan Tsvangirai.²⁹

²³ UK Home Office 2010, *Zimbabwe. Report of fact finding mission to Zimbabwe. Harare 9 – 17 August 2010*, 21 September 2010 – Attachment 18.

²⁴ UK Home Office 2010, *Zimbabwe. Report of fact finding mission to Zimbabwe. Harare 9 – 17 August 2010*, 21 September 2010 – Attachment 18.

²⁵ ‘Zimbabwe: ZANU-PF Calls For Expulsion of Envoys Promoting ‘Regime Change Agenda’’, 2011, *The Zimbabwe Guardian*, 7 January, <http://www.talkzimbabwe.com/regime-change-envoys-should-be-expelled-zanu-pf-cms-1030> – Accessed 10 January 2011 – Attachment 19; UK Home Office 2010, *Country of Origin Information Report*, 30 September – Attachment 2.

²⁶ AIDS-Free World 2009, *Electing to Rape: Sexual Terror in Mugabe’s Zimbabwe*, p. 26 <http://www.aids-free-world.org/images/stories/Zimbabwe/zim%20grid%20screenversionfinal.pdf> - Accessed 18 October 2010 – Attachment 20.

²⁷ Africa 4 Women’s Rights, 2010, *Women’s rights protection instruments ratified by Zimbabwe*, 5 May, <http://www.africa4womensrights.org/post/2010/03/05/Dossier-of-Claims%3A-Zimbabwe> – Accessed 10 January 2011 – Attachment 21; ‘New Sex Law to Curb HIV/AIDS, Marital Rape in Zimbabwe’, 2001, *The Body*, 27 August, <http://www.thebody.com/content/art22372.html> – Accessed 10 January 2011 – Attachment 22.

²⁸ ‘Zimbabwe Country Profile’, 2010, *BBC News*, 11 November, http://news.bbc.co.uk/2/hi/africa/country_profiles/1064589.stm – Accessed 10 January 2011 – Attachment 23.

²⁹ ‘Zimbabwe Country Profile’, 2010, *BBC News*, 11 November, http://news.bbc.co.uk/2/hi/africa/country_profiles/1064589.stm – Accessed 10 January 2011 – Attachment 23.

ZANU-PF has a history of political domination and violence against opposition. From 1983 to 1987 government forces killed between 10,000 and 20,000 civilians.³⁰ Extra-judicial killings continued during the 1990s amidst widespread political unrest.³¹ Presidential and parliamentary elections held in 2002 and 2005 were both marred by ‘political violence aimed at MDC supporters, fraudulent electoral processes, and the abuse of state resources, including state-run media’.³² Despite this, Robert Mugabe and his party ZANU-PF claimed victory in both contests and continued to rule Zimbabwe.³³

During the most recent elections held in 2008, ZANU-PF was widely criticised for its conduct, which is described by the USDOS as constituting ‘pervasive and systematic abuse of human rights’.³⁴ The party used ‘trumped-up charges and arbitrary arrest, intimidation, and corruption’ to ensure they won the election.³⁵ The presidential elections required a run-off vote between Robert Mugabe and Morgan Tsvangirai, from which Morgan Tsvangirai withdrew because of attacks on MDC supporters by members of ZANU-PF. After negotiations, ZANU-PF and MDC agreed on a power-sharing deal, with Robert Mugabe becoming president and Morgan Tsvangirai prime minister.³⁶

More recently, ZANU-PF is reported to continue to perpetrate violence against MDC supporters. A 2010 Human Rights Watch report states that ZANU-PF is using its ‘control of the security forces and the judiciary to harass, abduct, torture, and kill those it considers opponents, including senior MDC figures’.³⁷ Regarding ZANU-PF’s current conduct, the 2010 USDOS report notes:

Politically motivated, arbitrary, and unlawful killings by government agents continued. State-sanctioned use of excessive force continued, and security forces tortured members of the opposition, student leaders, and civil society activists with impunity.³⁸

Attachments

1. US Department of State 2010, *Country Reports on Human Rights Practices 2009 – Zimbabwe*, 11 March.

³⁰ Freedom House, *Freedom in the World 2010 - Zimbabwe*, 3 May 2010, <http://www.unhcr.org/refworld/docid/4c0ceaca1a.html> – Accessed 10 January 2011 – Attachment 24.

³¹ Freedom House, *Freedom in the World 2010 - Zimbabwe*, 3 May 2010, <http://www.unhcr.org/refworld/docid/4c0ceaca1a.html> – Accessed 10 January 2011 – Attachment 24.

³² Freedom House, *Freedom in the World 2010 - Zimbabwe*, 3 May 2010, <http://www.unhcr.org/refworld/docid/4c0ceaca1a.html> – Accessed 10 January 2011 – Attachment 24; US Department of State 2010, *Country Reports on Human Rights Practices 2009 – Zimbabwe*, 11 March – Attachment 1.

³³ Freedom House, *Freedom in the World 2010 - Zimbabwe*, 3 May 2010, <http://www.unhcr.org/refworld/docid/4c0ceaca1a.html> – Accessed 10 January 2011 – Attachment 24.

³⁴ US Department of State 2010, *Country Reports on Human Rights Practices 2009 – Zimbabwe*, 11 March – Attachment 1.

³⁵ US Department of State 2010, *Country Reports on Human Rights Practices 2009 – Zimbabwe*, 11 March – Attachment 1.

³⁶ ‘Zimbabwe Country Profile’, 2010, *BBC News*, 11 November, http://news.bbc.co.uk/2/hi/africa/country_profiles/1064589.stm – Accessed 10 January 2011 – Attachment 23.

³⁷ Human Rights Watch 2010, *World Report – Zimbabwe*, January – Attachment 25.

³⁸ US Department of State 2010, *Country Reports on Human Rights Practices 2009 – Zimbabwe*, 11 March – Attachment 1.

2. UK Home Office 2010, *Country of Origin Information Report*, 30 September.
3. 'Frenzy about Zimbabwe Premier's romance a year after the death of his first wife', 2010, *ZimSentinel*, 29 March, http://zimsentinel.blogspot.com/2010_03_01_archive.html – Accessed 5 January 2011.
4. 'Romeo and Juliet: PM Tsvangirai has found new love', 2010, *zimeye*, 31 May, <http://www.zimeye.org/?p=17919> – Accessed 5 January 2011.
5. Immigration and Refugee Board of Canada, 2006, *ZWE100923.E – The custom of wife "inheritance"; the government's attitude towards this custom; protection available to women who refuse to observe this custom*, 13 February, <http://www.unhcr.org/refworld/docid/45f147cb23.html> – Accessed 4 January 2011.
6. Kanchense, J. H. M. 2007 'Urologic and Gynecologic Health Problems Among Zimbabwean Women: Harmful Cultural Practices', *Urologic Nursing*, vol. 27, no. 5, pp. 373-389.
7. Mudavanhu, J. 2010 *The Attitude of the Methodist Church in Zimbabwe to Homosexuality: Towards a Socio-Sexological Theological Investigation*, PhD thesis, University of Birmingham.
8. Mvundura, C. 2010, 'Zimbabwe: US body helps communities fight HIV/AIDS', *ReliefWeb*, 29 July, <http://www2.reliefweb.int/rw/rwb.nsf/db900SID/EKIM-87T4YP?OpenDocument> – Accessed 11 January 2011.
9. Zimbabwe Red Cross Society 2006, *Integrated HIV and AIDS Programme 2006 – 2010*, <http://www.ifrc.org/docs/appeals/annual06/logframes/africa/MAA63003ZW.pdf> – Accessed 11 January 2011.
10. Shoko, B. 2005, 'Vapostori tackle HIV and Aids', *The Standard*, 8 May, <http://www.thestandard.co.zw/local/10003.html> – Accessed 11 January 2011.
11. Shoko, R. 2001, 'Zimbabwe: Spouse Inheritance Continues in Zimbabwe Despite AIDS', *Panafrican News Agency*, 24 January, <http://allafrica.com/stories/200101240258.html> – Accessed 23 December 2010.
12. Nyakudya, M. 1998, 'HEALTH-ZIMBABWE: 'Wife Inheritance' Tradition Spreads AIDS', *InterPress News Service (IPS)*, 3 August, <http://ww3.aegis.org/news/ips/1998/IP980801.html> – Accessed 11 January 2011.
13. 'ZIMBABWE: Tackling the impact of customs on AIDS', 2004, *IRIN News*, 17 August, <http://www.irinnews.org/report.aspx?reportid=51062> – Accessed 23 December 2010.
14. Makumbe, J. & Makumbe, V. 2010, 'Should a Christian Inherit a wife or husband?', *The Zimbabwean*, 14 October, http://www.thezimbabwean.co.uk/index.php?option=com_content&view=article&id=34854:should-a-christian-inherit-a-wife-or-husband&catid=35:opinion-a-analysis&Itemid=31 – Accessed 10 January 2011.
15. *Customary Marriages Act [Chapter 5:07]*, (Zimbabwe), http://www.law.co.zw/index.php/persons-and-the-family/doc_download/95-customarymarriages-act.html – Accessed 7 January 2011.

16. *Domestic Violence Act 2006*, (Zimbabwe),
http://www.kubatana.net/docs/legisl/dom_viol_act_ch5_16_act%2014_2006_070226.pdf – Accessed 7 January 2011.
17. *Sexual Offences Act 2001*, (Zimbabwe),
<http://www.kubatana.net/docs/legisl/sexoff010817.rtf> – Accessed 7 January 2011.
18. UK Home Office 2010, *Zimbabwe. Report of fact finding mission to Zimbabwe. Harare 9 – 17 August 2010*, 21 September 2010.
19. ‘Zimbabwe: ZANU-PF Calls For Expulsion of Envoys Promoting ‘Regime Change Agenda’’, 2011, *The Zimbabwe Guardian*, 7 January,
<http://www.talkzimbabwe.com/regime-change-envoys-should-be-expelled-zanu-pf-cms-1030> – Accessed 10 January 2011.
20. AIDS-Free World 2009, *Electing to Rape: Sexual Terror in Mugabe’s Zimbabwe*, p. 26
<http://www.aids-free-world.org/images/stories/Zimbabwe/zim%20grid%20screenversionfinal.pdf> -
Accessed 18 October 2010.
21. Africa 4 Women’s Rights, 2010, *Women’s rights protection instruments ratified by Zimbabwe*, 5 May, <http://www.africa4womensrights.org/post/2010/03/05/Dossier-of-Claims%3A-Zimbabwe> – Accessed 10 January 2011.
22. ‘New Sex Law to Curb HIV/AIDS, Marital Rape in Zimbabwe’, 2001, *The Body*, 27 August, <http://www.thebody.com/content/art22372.html> – Accessed 10 January 2011.
23. ‘Zimbabwe Country Profile’, 2010, *BBC News*, 11 November,
http://news.bbc.co.uk/2/hi/africa/country_profiles/1064589.stm – Accessed 10 January 2011.
24. Freedom House, *Freedom in the World 2010 - Zimbabwe*, 3 May 2010,
<http://www.unhcr.org/refworld/docid/4c0ceaca1a.html> – Accessed 10 January 2011.
25. Human Rights Watch 2010, *World Report – Zimbabwe*, January.