

An Examination of the Legal Regime for Guaranteeing Rights of Persons with Disabilities in Nigeria

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ABSTRACT

Over the years, people across the world regardless of race, gender or perceived disability have been subjected to various forms of human rights violations. The case of people with disabilities is special, as violations of their fundamental rights are (to a greater extent) more rampant. In Nigeria, there are approximately 19 million persons living with one form of disability or another. A majority of them are stereotyped as being poor and unhealthy and as a result, they are often taunted by the society at large. Against this background, this article examines four major laws and their impact on persons with disabilities; the 1999 Constitution of the Federal Republic of Nigeria, the Convention on the Rights of Persons with Disabilities, the Lagos State Special Peoples Law, and the Nigerians with Disability Decree. This article also sets forth the need for guaranteeing the entirety of rights of persons with disabilities in Nigeria.

1.0 INTRODUCTION

About 15 percent of the world's population suffers from one form of disability or the other. In Nigeria alone, the World Health Organization (WHO) estimates that there are about 19 million persons with disabilities ("PWDs") and this number constitutes approximately 20 per cent of the nation's total population.¹ The most common forms of disabilities are physical, visual, aural and communication impairments.

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¹ Lang, R. and Upah, L. *Scoping Study; Disability issues in Nigeria* available at, https://www.ucl.ac.uk/lc-ccr/downloads/scopingstudies/dfid_nigeriareport. (accessed 11 September 2017)

The means through which disabilities may occur are endless. A person may become disabled from birth (or by circumstances of birth), through neurological or genetic conditions, accidents, infectious diseases, factory waste exposure, and so on. From time immemorial, PWDs have suffered discrimination from the society and even from loved ones. Consequently due to the stigma attached to the birth of disabled babies, some parents end up dumping these babies at an orphanage, motherless babies' homes or sometimes, under deplorable and inconceivable conditions.

However, it is pertinent to restate that PWDs should not be sidelined, and are to be treated with dignity, just as every other individual. Disability should not be a social problem and people's attitudes should reflect this. The crux of this paper is centered on the view that people with disabilities are exposed to greater risks of having their human rights violated. Many people with disabilities live in conflict settings or in developing countries, where they experience a range of barriers to education, health care and other basic services². Sometimes, they are subjected to violence, degrading conditions, discrimination, and even the right to live independently³. Overcoming the difficulties faced by people with disabilities requires interventions, to remove environmental and social barriers.⁴

2.0 CONCEPTUAL CLARIFICATIONS

Although, there are no generally accepted definition of terms, the need for clarifications of concepts such as rights and disability is vital to this paper. This would help readers understand the context of usage of the words.

2.1 Rights

² "Disability Rights" available at <https://www.hrw.org/topic/disability-rights> (accessed 1 October 2017)

³ *ibid*

⁴ "Disabilities" available at www.who.int/topics/disabilities/en/ (accessed 1 October 2017)

Rights in the context of this work shall be used interchangeably with “human rights”. A term which has been described by the United Nations (UN) as a right inherent to all human beings, regardless of nationality, place of residence, national or ethnic origin, (colour), religion, language, or *any other status*. Everyone is entitled to enjoy his or her human rights without discrimination⁵.

2.2 Disability

According to the WHO, disability is an umbrella term, covering impairments, activity limitations, and participation restrictions⁶. Disability is not just a health problem but a complex phenomenon as well, reflecting the interaction between features of a person’s body and features of the society in which he or she lives. Disability has further been defined as “any continuing condition that restricts everyday activities”⁷.

2.3 Person with disabilities

A person with a disability is one who has any physical or mental impairment which has substantial and long-term effects on his or her abilities to carry out day-to-day activities.⁸ The term may be used interchangeably with “disabled persons”⁹ which has been interpreted to mean

a person who has received preliminary or permanent certificate of disability to have a condition which is expected to continue permanently or for a considerable length of time which can reasonably be expected to limit the person's functional ability substantially, but not limited to seeing, hearing, thinking,

⁵ “What are Human Rights” available at www.ohchr.org/EN/Issues/Pages/WhatareHumanRights.aspx (accessed October 1, 2017)

⁶ Supra note 4.

⁷ “What is disability” available at www.disability.wa.gov.au/understanding-disability/what-is-disability/ (accessed 1 October 2017)

⁸ Section 1 (1) *Disability Discrimination Act 1995* of England

⁹ Although, it has been argued by human rights scholars that the use of the description “disabled persons” is discriminatory in itself. The present writers accord with this line of reasoning.

ambulating, climbing, descending, lifting, grasping, rising, any related function or any limitation due to weakness or significantly decreased endurance so that he cannot perform his everyday routine, living and working without significantly increased hardship and vulnerability to everyday obstacles and hazards.¹⁰

3.0 LEGAL REGIME FOR THE RIGHTS OF PWDs IN NIGERIA

This section of the paper will be incomplete if reference is not made to the earliest instruments guaranteeing the rights of PWDS at the international level. Such instruments include the United Nations Declaration on the Rights of Mentally Retarded Persons that was proclaimed by the General Assembly resolution 2856 (XXVI) of 20th, December 1971. This declaration guarantees *inter alia*, that a mentally retarded person has, to the maximum degree of feasibility, the same rights as other human beings. Similarly, the Declaration on the Rights of Disabled persons¹¹ provides *inter alia* that “disabled persons have the same civil and political rights as other human beings.”

3.1 The 1999 Constitution of the Federal Republic of Nigeria

Section 42(1) of the *1999 Constitution of the Federal Republic of Nigeria*¹² provides as follows-

A citizen of Nigeria of a particular community, ethnic group, place of origin, sex, religion or political opinion shall not, by reason only that he is such a person:-

(a) be subjected either expressly by, or in the practical application of, any law in force in Nigeria or any executive or administrative action of the government, to disabilities or restrictions to which citizens of Nigeria of other communities,

¹⁰ *Nigerians with Disability Decree* 1993 s. 3

¹¹ Proclaimed by General Assembly Resolution 3447 (XXX) of 9 December 1975

¹² *Constitution of Federal Republic of Nigeria* Cap. C23 Laws of the Federation of Nigeria 2004

ethnic groups, places of origin, sex, religious or political opinions are not made subject;

Non-reference to persons with disabilities is undisputedly a lacuna in the constitution, as this means that there is no express provision(s) regarding the right of persons with disabilities.¹³ However, there are other provisions which indirectly address the issue. For instance, section 42(2) provides that “no citizen of Nigeria shall be subjected to any disability or deprivation merely by reason of the circumstances of his birth.” Also, while section 14(2) (b) provides that “the security and welfare of the people shall be the primary purpose of the government”, Section 16 enjoins the government to ensure that adequate shelter, food, and unemployment and sick benefits are available for citizens¹⁴.

In addition to the societal discrimination PWDs are exposed to, access to public facilities by this category of persons still calls for concern. In Nigeria, most public buildings are not designed or built for ease of access of persons with disabilities.¹⁵ Upon realization of this aberration and the dire need to accord these individuals their full rights as human beings, as well as guarantee them some special rights by reason of their circumstance, a number of countries through the instrumentality of the United Nations have developed several instruments to affirm the rights of persons with disabilities.

The United Nations Convention on the Rights of Persons with Disabilities (CRPD) is a typical instrument that makes provisions for PWDs accessibility to buildings, transportation, schools, housing and medical facilities, workplaces as well as other indoor and outdoor facilities¹⁶. The Convention establishes a global benchmark for PWDs’ rights in all spheres of life.

¹³ *ibid* s. 42

¹⁴ *Ibid* s. 14 and 16 fall under Chapter II rights hence, they are rendered non-justiciable.

¹⁵ **Agu, O.B.** *Road and Building Approvals*. available at <http://www.nials-nigeria.org/Editedbookcovers/THE%20RIGHTS%20OF%20PERSONS%20WITH%20DISABILITIES.pdf>. (accessed 11 September 2017).

¹⁶ *CRPD Art. 9*

Nigeria has signed and ratified the CRPD along with its optional protocol, but has neither domesticated it nor put in place, national structure for the implementation of its provisions. Nigeria follows a dualistic approach under which international instruments or treaties become domestic law only when such treaties have been enacted into law by the National Assembly.¹⁷ As a result, there is no national statute protecting the rights of persons with disabilities.

3.2 Overview of the United Nations Convention on Rights of Persons with Disabilities (CRPD)

Sometime in the 1980s, a movement was formed towards the re-conceptualization of human rights at the national level. Socio-economic rights were being accorded the same status as civil and political rights. Against this background, there was an increasing clamor to project and propagate the rights of the vulnerable persons in the society. In December 2001, the UN set up an *ad hoc* committee to consider proposals for a comprehensive and integral international convention to protect the rights and dignity of PWDs. This process culminated in the adoption of the CRPD¹⁸ in 2006. The Convention is the first international, legally binding human rights treaty targeted at protecting the human rights of people with disabilities.

Upon the realization that disabilities are more characterized as products of interactions between impairments and other barriers, the UN Convention adopts, alongside a rights-based framework, the development-based approach. It empowers people to demand justice as a right, not as charity, and gives communities a moral basis from which to claim both national and international action as needed.¹⁹ The Convention makes a 'paradigm shift' in attitudes and approaches to

¹⁷ This is by virtue of s.12 of the CFRN (1999) which provides that "no treaty between the Federation and any other country shall have the force of law to the extent to which any such treaty has been enacted into law by the National Assembly."

¹⁸ UN General Assembly *Convention on the Rights of Persons with Disabilities: resolution/* adopted by the General Assembly, 24 January 2007, A/RES/61/106.

¹⁹ Report of the Secretary-General on the Work of the Organization, 1998, United Nations, A/53/51, paras 173-174.

the Persons with Disabilities. Article I of the Convention defines the purpose of the Convention to include “to promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and to promote respect for their inherent dignity”.

3.2.1 General Principles

The General Principles of the Convention include²⁰ respect for inherent dignity, individual autonomy including the freedom to make one’s choices, independence of persons; non-discrimination of PWDs; full and effective participation and inclusion in society; respect for difference and acceptance of PWDs as part of human diversity, equality of opportunity, accessibility and respect for the evolving capacities of children with disabilities and respect for the right of children with disabilities in order to preserve their identities.

3.2.2 General Obligations

The general obligations of state parties under the Convention include: ensuring and promoting the full realization of all human rights and fundamental freedoms for all persons with disabilities without discrimination of any kind on the basis of disability. To this end, state parties undertake to carry out several obligations²¹.

²⁰ CRPD Art. 3

- ²¹ (a) To adopt all appropriate legislative, administrative and other measures for the implementation of the rights recognized in the present Convention.
- (b) To take all appropriate measures, including legislation, to modify or abolish existing laws, regulations, customs and practices that constitute discrimination against persons with disabilities.
- (c) To take into account the protection and promotion of the human rights of persons with disabilities in all policies and programmes.
- (d) To refrain from engaging in any act or practice that is inconsistent with the present Convention and to ensure that public authorities and institutions act in conformity with the present Convention.
- (e) To take all appropriate measures to eliminate discrimination on the basis of disability by any person, organization or private enterprise.
- (f) To undertake or promote research and development of universally designed goods, services, equipment and facilities, as defined in the article 2 of the

The obligations engage the responsibilities of state and non-state actors, and will require collaboration between public and private sectors. For instance, there is a need for synergy between the government and its regulatory agencies, such as the Nigerian Communications Commission (“NCC”) on the one hand, and telecommunications service providers such as MTN, Glo, Airtel, 9Mobile, as well as manufacturers of telecommunications hardware and software on the other hand, in the provision of telecommunications facilities that reckon with the plight of PWDs. Similarly, stakeholders in the construction industry such as architects and engineers need to consider the rights of persons with disabilities into the design and construction of infrastructural facilities.²²

Furthermore, the Convention provides that state parties shall recognize that all persons are equal before and under the law, and are entitled, without any discrimination, to the equal protection benefits of the law.²³ It also makes it mandatory for State Parties to prohibit all discrimination on the basis of disability and guarantee persons with

present Convention, which should require the minimum possible adaptation and the least cost to meet the specific needs of a person with disabilities, to promote their availability and use, and to promote universal design in the development of standards and guidelines.

- (g) To undertake or promote research and development of, and to promote the availability and use of new technologies, including information and communications technologies, mobility aids, devices and assistive technologies, suitable for persons with disabilities, giving priority to technologies, suitable for persons with disabilities, giving priority to technologies at an affordable cost.
- (h) To provide accessible information to persons with disabilities about mobility, aids, devices and assistive technologies, including new technologies, as well as other forms of assistance, support devices and facilities.
- (i) To promote the training of professionals and staff working with persons with disabilities in the rights recognized in this Convention as to better provide the assistance and services guaranteed by those rights

²² E. Azinge and C. Ani, *Rights of Persons with Disabilities* (Lagos: Nigerian Institute of Advanced Legal Studies, 2011).

²³ CRPD. Art. 5

disabilities, equal and effective legal protection against discrimination on all grounds.²⁴

3.2.3 Accessibility

The Convention requires state parties to take appropriate measures to ensure persons with disabilities have access, on an equal basis with others, to the physical environment, transportation, information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and rural areas.²⁵ Accessibility would, as a matter of necessity, include access to information, communication, and services.²⁶ Accessibility of services is fundamental if the goal of encouraging functional independence is to be achieved in PWDs.²⁷

3.2.4 Education

According to Article 24 of the Convention, States are under obligation to recognize the right to education of Persons with Disabilities. Towards the realization of this right without discrimination and on the basis of equal opportunity, state parties shall ensure an inclusive education system at all levels and lifelong learning directed to:

- (a) The full development of human potential and sense of dignity and self-worth, and the strengthening of respect for human rights, fundamental freedoms and human diversity;
- (b) The development by persons with disabilities of their personality, talents and creativity, as well as their mental and physical abilities, to their fullest potential;
- (c) Enabling persons with disabilities to participate effectively in a free society.

²⁴ CRPD Art. 5 (2)

²⁵ Article 9 of the CRPD.

²⁶ "Ensuring Access for People with Disabilities", available at <http://ctb.ku.edu/en/tablecontents/chapter26section4-tools.aspx> (accessed 11 September 2017).

²⁷ N Amusat: "Disability Care for Nigeria: The need for Professional Advocacy" *AJPARS* Vol. 1 (2009) 30-36 at 32, available at <http://www.ajol.info/index.php/ajprs/article/viewFile/51313/39976>. (accessed 11 September 2017).

However, the Convention requires special treatment in the case of education of PWDs; they are entitled to receive the support required within the general education system to facilitate their effective education.²⁸

3.2.5 Work and Employment

Employment is one area disability-based discrimination is prominent and persistent. However, under the Convention, state parties are under obligation to recognize the rights of persons with disabilities to work, on an equal basis with others. State parties are mandated to safeguard and promote the realization of the right to work, including those who acquire a disability during the course of employment, by taking appropriate steps, including through legislation to prohibit discrimination on the basis of disability with regards to matters concerning employment.²⁹

State parties are also required to protect the rights of PWDs, on an equal basis with others, to just and favorable conditions of work, including equal opportunities and equal remuneration for work of equal value, in addition to safe and healthy working conditions.³⁰ They are also mandated to promote employment opportunities and career advancement for persons with disabilities in the labor market, as well as provide assistance in finding, obtaining and returning to employment.³¹

3.2.6 Participation in Political and Public life

State parties shall guarantee to persons with disabilities, political rights and the opportunity to enjoy them on an equal basis with others. They shall ensure that PWDs can effectively and fully participate in political and public life on an equal basis with others, directly or through freely chosen representatives, including the right and opportunity for

²⁸ CRPD Art. 24 (2) (d)

²⁹ *ibid.* Art. 27 (1) (a)

³⁰ *ibid.* Art 27 (1) (b)

³¹ *ibid.* Art. 27 (1) (e)

persons with disabilities to vote and be elected by ensuring that voting procedures, facilities and materials are appropriate, accessible and easy to understand and use; Protecting the rights of person with disabilities to vote by secret ballot in elections and public referendums without intimidation, and to stand for elections, to effectively hold office and perform all functions at all levels of government, facilitating the use of assistive and new technologies where appropriate and guaranteeing the free expression of the will of persons with disabilities as electors and to this end, where necessary, at their request, allowing assistance in voting by a person of their own choice.³²

Article 29(b) of the Convention mandates the state parties to actively promote an environment in which persons with disabilities can effectively and fully participate in the conduct of public affairs, without discrimination and encourage their participation in public and political affairs of the country as well as the forming and joining of organizations to represent persons with disabilities at all levels.

3.2.7 Committee on the Rights of Persons with Disabilities

A Committee on the Rights of Persons with Disabilities is established under the CRPD, and it is to carry out certain functions³³. The Committee shall consist of 18 members who although appointed by state parties,³⁴ shall serve in their personal capacity, and shall be of high moral standing, recognized competence and experience in the field covered by the present Convention.³⁵

3.3 The Nigerians with Disability Decree 1993

Interestingly, during General Ibrahim Babangida's defunct military rule, a decree titled *Nigerians with Disabilities Decree 1993* ("the Decree") was promulgated. The purpose of the Decree is to provide clear and comprehensive legal protection and security for Nigerians with

³² CRPD. Art 29 (a)

³³ *ibid.* 34 (1)

³⁴ *ibid.* 34 (2)

³⁵ *ibid.* 34 (3)

disabilities as well as establish standards for enforcement of the rights and privileges guaranteed under the Decree and other laws applicable to the disabled in the Federal Republic of Nigeria.³⁶

The decree provides that PWDs shall be guaranteed equal treatment with able bodied Nigerians. Section 2(1) of the decree states in clear terms as follows:-

Disabled persons shall be guaranteed treatment as equals to other Nigerians for all purposes in the Federal Republic of Nigeria. Accordingly, it shall be the duty and responsibility of organs of government and of all authorities and persons to adopt and promote policies that will ensure full integration of the disabled into the mainstream of the society.

The decree further provides that the Government shall ensure, within the context of economic, political and social idea and objectives to Nigerians, which PWDs are fully integrated into the national economy, have equal rights, privileges, obligations and opportunities with able-bodied Nigerians before the law, and are provided equal and adequate education.³⁷

It also makes provision for the disabled to have access to health care³⁸, education³⁹, housing⁴⁰, transportation⁴¹, sports and recreational activities⁴² and the like and reserving in most cases ten percent of the services to the disabled.

In addition, the establishment of a body to be known as National Commission for people with Disability was made under the decree.

³⁶ The Decree Section 1

³⁷ *ibid.* 2(2)

³⁸ *ibid.* 4

³⁹ *ibid.* 5

⁴⁰ *ibid.* 7

⁴¹ *ibid.* 9

⁴² *ibid.* 11

The Commission shall be a corporate body with perpetual succession and a common seal and may sue in its corporate name.⁴³

As laudable as this piece of legislation is, nothing concrete has been done to match its provisions with action. To date, the National Commission for Persons with Disabilities has not taken off. And contrary to section 9 of the Decree, transport is not free for the disabled, national news and official broadcasts do not provide sign language for interpretation in accordance with section 19 of the decree, and it has been difficult under the circumstances of our electoral process for the disabled to exercise their rights to vote and be voted for. In spite of the social rights guaranteed under this decree, most PWDs live off begging on streets.⁴⁴ More importantly, it should be noted that the current status of the decree is vague, as it has not been replicated in the Laws of the Federation of Nigeria.

Currently, there is a proposed Disability Bill sponsored by Honourable Abike Dabiri before the National Assembly. Some state governments have recognized the fact that the need for the protection of Persons with Disability cannot be overemphasized and have as a result taken strategic steps to ensure that their rights are guaranteed. For instance, Lagos State has a *Special People's Law*, while Edo State is proposing to establish a commission for PWDs.

3.4 The Lagos State Special People's Law, 2011

Mr. Babatunde Raji Fashola, the former Governor of Lagos State signed the *Special People's Bill* into law on June 24, 2011. The Lagos State Special People's Law ("LSSPL") is a bold attempt by the State because the law is the first of its kind in Nigeria. The law was passed to reduce the stigma faced by PWDs on a daily basis. These individuals experience widespread exclusion from the social, economic, and political life of their communities. This is inevitably a function of

⁴³ *ibid.* Section 14 of the Nigerian with Disability Decree.

⁴⁴ A Olanrewaju, "Comparative Analysis of Disability Rights" *The Rights of Persons with Disabilities* (Nigerian Institute of Advanced Legal Studies, Lagos: 2011) P.189.

ongoing stigmatization rooted in cultural and religious beliefs, and the neglect of their needs in the design of policies, programmes and facilities.

Amongst other things, the LSSPL contains provisions to ensure that people living with disabilities in Lagos State are given equal rights in all social services, employment, political, and educational facilities. In addition, the law safeguards PWDs against discrimination, guarantees them right of access to information, access to special education, and access to public transport facilities, and so on.. Under the law, a dedicated Office for Disability Affairs to address complaints of harassment, discrimination and torture will be set up. The office will also ensure that the tenets of the law are fully and effectively implemented. People with disabilities will have an office to hold responsible for any discrimination made to them.

The LSSPL⁴⁵ therefore aims to reduce the pain, agony, high cost and stigma associated with people living with disabilities in Lagos State. The law empowers information dissemination and access to information. It creates openings for PWDs to participate in various activities within the State. Successful implementation of this law will have a profound and positive impact on the status of people with disabilities.⁴⁶

4.0 RECOMMENDATIONS AND CONCLUSION

4.1 Recommendations

Against the backdrop of the above, we recommended that laws be enacted to protect PWDs in Nigeria and in particular, to give legal support to the provision of the required services for people with disabilities. These laws should expressly stipulate their rights, and should accord them equal treatment with other citizens irrespective of the nature of disability. For example, it will provide individuals with disabilities the basis to seek redress in law courts in cases where it is considered that the provisions of the law are not followed. Recently,

⁴⁵ The Bill was passed by the Lagos State House of Assembly in December 2010.

⁴⁶ A. Olanrewaju, "Comparative Analysis of Disability Rights" *The Rights of Persons with Disabilities* (Nigerian Institute of Advanced Legal Studies, Lagos: 2011) P.189.

a university in Nigeria expelled a deaf student because of ‘speech and hearing challenges’.⁴⁷ Federal disability legislation would have given this person a good platform to fight for justice. Another important recommendation is the call for the ratification and domestication of the United Nations Convention on Rights of persons with Disabilities in Nigeria.

Furthermore, although there has been a significant level of articulation of the rights of PWDs, the agitations for their rights need to be intensified. This of course, should be done without compromising the status of these individuals as persons with dignity.

We also advocate that the Nigerian government should take positive steps to empower people with disabilities and enhance their contribution to national development. It is evident from the discussion above that people with disabilities in Nigeria may not have access to the services essential to the development of their talents. Clearly, for this situation to change for the better, actions are required in several areas.

Our final recommendation is that the government should endeavor to intimate members of the public on the rights of PWDs, as well as sensitize members of the public to understand that persons with disabilities are not in those situations by choice. Nigerians especially, need to understand also that disability is not necessarily a disease, people in such unfortunate situations are also global citizens entitled to their right of human dignity.

4.2 Conclusion

As earlier noted, the population of Nigerians living with disabilities stands at 19 million. This disabled population is a group that overtime has been characterized by marginalization, silence, and invisibility. Ensuring that people with disabilities in Nigeria have adequate human right protections and access to necessary services will empower them

⁴⁷ Ezeamalu B. Shocking: Rivers University expels student for having “speech and hearing challenges” *Premium Times*. 2015 Dec 16. Cover page. available at <http://www.premiumtimesng.com/news/headlines/194029-shocking-rivers-university-expelsstudent-for-having-speech-and-hearing-challenges.html> (accessed, 13th September, 2017).

and contribute to national development. This requires the Nigerian government to enact and implement the necessary laws. Sadly, it remains the case that there is no federal legislation in Nigeria that guarantees the rights of people with disabilities to receive these essential protections and services.⁴⁸

It is noteworthy that there have been several proposals to address the plights of PWDs, such as Bill for an Act to Ensure Full Integration of Persons with Disabilities into the Society⁴⁹, Discrimination against Persons with Disabilities (Prohibition) Bill (2008), National Disabled Trust Fund (Establishment Bill) (2004), and so on. Unfortunately, these bills are yet to be passed into law. The Nigerian government is encouraged to pass these bills into law and additionally, have the political will to enforce them.⁵⁰

⁴⁸ Eleweke .C.A review of the Challenges of achieving the goals of the African Plan of Action for people with disabilities in Nigeria. *Disability Society* 2013: 28 (3): 313-323.

⁴⁹ Bill for an Act to Ensure Full Integration of Persons with Disabilities into the society, and to Establish a National Commission for Persons with Disabilities and vest it with the responsibilities for their education, Healthcare and protection of their Social, Economic, Civil and Political Rights (2009)

⁵⁰ *ibid.*

