



Human Rights Council
Working Group on the Universal Periodic Review
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Compilation on Tonga

Report of the Office of the United Nations High Commissioner for Human Rights

I. Background

1. The present report was prepared pursuant to Human Rights Council resolutions 5/1 and 16/21, taking into consideration the periodicity of the universal periodic review. It is a compilation of information contained in reports of treaty bodies and special procedures and other relevant United Nations documents, presented in a summarized manner owing to word-limit constraints.

II. Scope of international obligations and cooperation with international human rights mechanisms and bodies^{1, 2}

2. The United Nations country team noted that, despite the recommendations accepted by Tonga during the second cycle of the universal periodic review to ratify core international human rights treaties, no concrete progress had been made thus far. It recommended that Tonga ratify the core international human rights treaties, including the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, the Convention on the Elimination of All Forms of Discrimination against Women, the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, and the Convention on the Rights of Persons with Disabilities.³

3. The United Nations country team stated that, in March 2015, the Cabinet had approved the process of ratification of the Convention on the Elimination of All Forms of Discrimination against Women, with a number of reservations pertaining to the accession to the throne, nobility, abortion and same-sex marriage. Progress had stalled due to public protest, particularly by women religious leaders associated with the church. In February 2017, the then Prime Minister called for public consultations on ratification with the participation of local women's groups, given that the country was divided over the subject.⁴

4. The United Nations Educational, Scientific and Cultural Organization (UNESCO) encouraged Tonga to ratify the UNESCO Convention against Discrimination in Education and the Convention on the Protection and Promotion of the Diversity of Cultural Expressions.⁵



5. The United Nations country team noted that Tonga had reports outstanding before the Committee on the Elimination of Racial Discrimination (since 2001) and the Committee on the Rights of the Child (since 1997). It encouraged Tonga to fulfil its reporting obligations under both conventions.⁶

6. The United Nations country team encouraged Tonga to consider transforming existing ad hoc structures into a national mechanism for reporting and follow-up in order to engage with United Nations human rights mechanisms in a constructive and systematic manner.⁷

7. The United Nations country team stated that, in January 2013, Tonga had extended a standing invitation to all special procedure mandate holders. It mentioned that, in 2016, the Working Group on the issue of discrimination against women in law and in practice had asked to visit the country, but that the visit had yet to take place.⁸

III. National human rights framework⁹

8. The United Nations country team noted that Tonga had held general elections in November 2014 that were deemed free and fair.¹⁰

9. The United Nations country team reported that, in May 2017, the Government had proposed an amendment to the Constitution with a view to empowering the Prime Minister to appoint the Attorney General, the Police Commissioner and the Anti-corruption Commissioner (in lieu of the Privy Council and the King). In August 2017, the King dissolved the Legislative Assembly and ordered new elections to be held in November 2017. That decision was reportedly taken after the Speaker of the Legislative Assembly had raised concerns about the proposed constitutional amendment, which had been deemed unconstitutional, the approval by the Government of the process of ratification of the Convention on the Elimination of All Forms of Discrimination against Women and a regional trade agreement, which were seen as an attempt to bypass the King and the Privy Council. The United Nations country team recommended that Tonga continue the reform and amendment of the Constitution to widen the country's democratic space and respect for human rights.¹¹

10. The United Nations country team stated that, in December 2016, Tonga had established an Ombudsman's Office, replacing the Office of the Commissioner for Public Relations that had been established in 2001. The Ombudsman, who was accountable to the Legislative Assembly, was responsible for investigating complaints received from all persons related to administrative actions and decisions made by any public department, enterprise or other public body, or by any officer, including any Minister or Governor. He was also empowered to act on his own volition. However, the United Nations country team stressed that Tonga still had no national human rights institution. It recommended that Tonga establish such an institution in compliance with the principles relating to the status of national institutions for the promotion and protection of human rights (Paris Principles) as a matter of priority.¹²

IV. Implementation of international human rights obligations, taking into account applicable international humanitarian law

A. Cross-cutting issues

1. Equality and non-discrimination¹³

11. The United Nations country team reported that section 4 of the Constitution guaranteed non-discrimination and equality for all citizens of Tonga. In 2014, the Government introduced the revised national policy on gender and development, which focused on promoting equal access, participation and distribution of the benefits of the

development process for all women, men and children. However, such measures had yet to be fully implemented.¹⁴

12. The United Nations country team noted that the Criminal Offences Act (1988) still criminalized same-sex sexual relations between consenting adults and carried a maximum penalty of 10 years' imprisonment and, at the court's discretion, the use of corporal punishment. The 1988 Constitution of Tonga, while containing a declaration of rights that provided for equality before the law (clause 4), did not refer to freedom from discrimination, nor did other laws exist ensuring protection from discrimination on grounds of sexual orientation and gender identity.¹⁵

13. The United Nations country team added that Tongan culture was supportive of transgender and gender-diverse people and had a strong traditional *leiti* (or *fakaleiti*) community. The Tonga Leitis Association was well respected and had the support of the Tongan royal family. Nonetheless, *leitis* enjoyed no legal recognition and cross-dressing remained a crime under section 81 (5) of the Criminal Offences Act. Under section 136 of the Act, a person convicted of sodomy could be sent to prison for up to 10 years.¹⁶ In December 2016, the Tonga Leitis Association had held a national consultation with the Government to revise criminal laws to protect lesbian, gay, bisexual, transgender and intersex persons. However, legal reform in this area was yet to occur.¹⁷

14. Stressing that during the second cycle of the universal periodic review, Tonga had accepted the recommendation to strengthen measures to eliminate all discriminatory treatment related to sexual orientation and gender identity,¹⁸ the United Nations country team recommended that Tonga commit to equality and non-discrimination by repealing the provisions of the Criminal Offences Act that criminalized same-sex sexual relations between consenting adults, combat discrimination against them and prevent violence by raising public awareness of the situation of lesbian, gay, bisexual, transgender and intersex persons.¹⁹

2. Development, the environment, and business and human rights²⁰

15. The United Nations country team stressed that Tonga was highly prone to natural disasters and that the effects of climate change were liable to increase that susceptibility, which could threaten all aspects of sustainable development in the country.²¹

16. It noted that in June 2017, the Government, with the support of the Environment National Adaptation Plan Global Support Programme of the United Nations Development Programme, had held discussions on the second joint national action plan for climate change adaptation and disaster risk management. Furthermore, Tonga had endorsed the Sendai Framework for Disaster Risk Reduction (2015-2030) as the global strategy for building the resilience of communities, with the aim of reducing risk from natural hazards and disasters so as to help ensure sustainable development.²² The United Nations country team referred to a study completed by the World Bank in 2016, which found that in many cases existing technical knowledge and financial capacity were insufficient to adequately address climate and disaster vulnerabilities and reduce risks. Implementation and absorptive capacities remained a key issue and the effectiveness of early warning systems was also affected by the geographical expansiveness of the country, as well as the limitations and high costs of communications systems.²³

17. The United Nations country team recommended that Tonga periodically assess the impact of climate change and natural disasters, particularly with reference to the enjoyment of human rights by the poor and lower-income segments of the population and various other social groups, and assist them in becoming more resilient in the face of such disasters; that it develop sector-based plans and programmes that fully integrated climate resilience with a priority focus on biodiversity, education, energy, fisheries, forestry, health, infrastructure, land, water and youth; and ensure that stakeholders, including target groups, were consulted while planning such interventions.²⁴

B. Civil and political rights

1. Right to life, liberty and security of person²⁵

18. The United Nations country team noted that sexual and gender-based violence, including intimate-partner violence, sexual assault and rape, and violence against transgender persons, was widespread.²⁶

19. The United Nations country team noted that Tonga had passed the Family Protection Act (2013), which included provisions that enhanced protection against domestic violence in several ways: by preventing violence through increased awareness; by granting greater power to police officers to provide protection to victims through the issuance of protection orders; by providing health and mental health support and counselling to victims; by imposing heavy penalties on offenders; and by strengthening the institutional response through the creation of the Family Protection Advisory Council under the Ministry of Internal Affairs.²⁷

20. The United Nations country team also noted that, although corporal punishment was prohibited by law as a disciplinary measure in prisons, provisions in the Prison Rules (1947) (particularly articles 45, 163, 164 and 165) had not been formally repealed as of May 2017. It also noted that corporal punishment was considered a lawful sentence for crimes under section 24 of the Criminal Offences Act (1926). The law empowered the authorities to give boys under the age of 16 as many as 20 lashes “with a light rod or cane composed of tamarind or other twigs”, whereas adults may be given up to 26 lashes “with a cat (cat of nine tails) pattern approved by the Cabinet” (art. 31). It recommended that Tonga strictly enforce the legal and constitutional provisions concerning the prohibition of torture and cruel and inhuman and degrading treatment and punishment.²⁸

21. The United Nations country team noted that the Education Act (2013) prohibited (corporal) punishment in the form of verbal abuse and the use of force against any student in school or on school premises. However, various reports had revealed that corporal punishment remained widespread in the country, including in primary and secondary school settings. It recommended that Tonga take specific measures at the legislative and administrative levels to prohibit the corporal punishment of children in both public and in private settings.²⁹

2. Administration of justice, including impunity, and the rule of law

22. The United Nations country team recommended that Tonga establish separate juvenile courts.³⁰

3. Fundamental freedoms and the right to participate in public and political life³¹

23. UNESCO reported that, under section 96 of the Communications Act (2015), the Ministry of Information and Communications had the power to censor, subject to the approval of the Minister, a licensee if the media supplied content that was indecent, displayed excessive violence, was blasphemous, treasonous, seditious, defamatory or went against Tongan laws. The Ministry might also require a licensee to supply content of religious interest, related to matters of national interest or educational matters. The Ministry might also determine the “extent and manner in which a licensee may provide political or controversial content”.³² UNESCO added that the Communications Commission was responsible for licensing and controlling radio frequencies and for enforcing the Communications Act (2015). That body was composed of four members appointed by an Appointments Committee consisting of the Minister of Information and Communications, an information and communication technology expert and a consumer representative. UNESCO recommended that Tonga consider strengthening the independence of broadcast licensing in line with international standards.³³

24. The United Nations country team also stated that the then Prime Minister had recently threatened the public broadcaster owing to his dissatisfaction with their reporting. The Government had also fired the Chair of the board and the general manager of the Tonga Broadcasting Commission; the latter was now before the courts. The United Nations

country team added that, in June 2017, the Government had announced that the national broadcaster, the Tonga Broadcasting Commission, would be privatized.³⁴ It recommended that Tonga respect the right to freedom of expression in law and practice.³⁵

25. UNESCO noted that defamation was regarded as a criminal offence under the Defamation Act and was punishable by a fine or imprisonment, if the fine was not paid. It recommended that Tonga decriminalize defamation and place it within a civil code that is in accordance with international standards.³⁶

26. The United Nations country team stated that, although the current legal and institutional framework provided opportunities for citizens, including civil society organizations to participate in the law-making and oversight process through standing committees and public hearings, those mechanisms needed to be strengthened to ensure that the engagement process and its outcomes were inclusive, open, transparent and participatory. Currently, civil society organizations, churches, registered interest groups and other constituents were not taking a full part in the law-making, oversight, national planning and budgeting process. The United Nations country team therefore recommended that Tonga strengthen such mechanisms.³⁷

27. The United Nations country team noted that civil society organizations faced a range of capacity constraints, including an uncertain funding environment, a lack of coordination and limited capacity for financial management and reporting. It recommended that Tonga create a conducive environment for civil society to grow and thrive so that it might provide critical input for the development of public policies.³⁸

28. UNESCO encouraged Tonga to fully implement the relevant provisions under the Convention concerning the Protection of the World Cultural and Natural Heritage and the Convention for the Safeguarding of the Intangible Cultural Heritage that promoted access to, and participation in, cultural heritage and, as such, were conducive to implementing the right to take part in cultural life. In doing so, Tonga was encouraged to give due consideration to the participation of communities, practitioners, cultural actors and non-governmental organizations from civil society, as well as vulnerable groups (minorities, indigenous peoples, migrants, refugees, youth and people with disabilities), and to ensure that equal opportunities were given to women and girls to address gender disparities.³⁹

29. UNESCO noted that Tonga had not submitted its national report on the implementation of the Recommendation on the Status of Scientific Researchers (1974) for the second consultation, covering the period from 2013 to 2016. It encouraged Tonga to report on any legislative or other steps taken by the Government to ensure the application of this international standard-setting instrument.⁴⁰

C. Economic, social and cultural rights

1. Right to work and to just and favourable conditions of work

30. The United Nations country team noted that gender discrimination in terms of wages and work conditions remained an issue. Men outnumbered women in paid employment outside the agricultural sector and they were paid 20 to 50 per cent more than women. Higher education for young women had failed to lead to better employment outcomes owing to gender barriers in labour markets, gender stereotypes about suitable occupations for women and traditional expectations regarding women's unpaid domestic activity and taking care of the family. In the private sector, women were almost invisible on company boards. In the public sector, women usually occupied lower-level positions. The participation of women in the workforce was highest in the informal sector. Unemployment among women was typically higher in rural and remote outer islands.⁴¹ The United Nations country team recommended that Tonga ensure in law and in practice that women were paid a salary equal to that of their male counterparts for the same type of work.⁴²

2. Right to an adequate standard of living⁴³

31. The United Nations country team mentioned that Tonga had witnessed a decline in the contribution of the primary sector to gross domestic product and a general weakening of

the rural sector, where many of the vulnerable and poor lived. The declining importance of the primary sector had been exacerbating inequality, as rural households struggled to generate cash income to purchase the basic essentials. In urban areas, poverty was mostly the result of rural-urban migration caused by the movement of people from rural and remote areas of the country to towns and cities in search of the better employment opportunities needed to improve their livelihoods.⁴⁴

32. The United Nations country team emphasized that, in Tonga, the share of the poorest quintile in total household consumption had increased over the last decade, marking a reduction in income inequality of around 10 per cent. It added that Tonga was a net food-importing country and its dependency on availability made it vulnerable to the price volatility of food imports. Furthermore, access to clean water and basic sanitation was of growing concern in the country. Changing weather patterns, as a result of climate change, had negatively impacted the availability of water resources and the effectiveness of sanitation. The United Nations country team emphasized that if unaddressed, that might result in more severe crises, including social unrest, which would particularly affect urban areas.⁴⁵

3. Right to health⁴⁶

33. The United Nations country team stated that, despite overall improvements in health services, maternal health continued to be a cause for concern. Maternal morbidity left many women chronically ill or disabled.⁴⁷

34. It recommended that Tonga continue strengthening universal access to health-care services, including sexual and reproductive health services, particularly for newborns and children. It also recommended providing life skills-based education and incorporating sexual education into school curricula.⁴⁸

35. The United Nations country team also stated that forced sex constituted a key risk for sexually transmitted infections and HIV transmission, as well as other sexual and reproductive health problems, including unwanted pregnancies and psychological trauma. Various studies had revealed that 30 per cent of women under 25 in Tonga suffered from a sexually transmitted infection, largely due to a strong religious disapproval of the use of condoms.⁴⁹

4. Right to education⁵⁰

36. The United Nations country team stressed that Tonga had a 99.4 per cent literacy rate and that progress had been made toward achieving universal primary education. While the gender parity index in 2012 of enrolment at the pre-primary and primary level stood at 0.99, challenges remained, particularly for remote communities and persons with disabilities. These included gendered learning pathways that limited opportunities for women and girls to engage in education suiting their interests and capabilities.⁵¹

37. UNESCO noted that, at the pre-primary level, Tonga had made significant strides in achieving Education for All goal 1 on expanding early childhood care and education by increasing the gross enrolment ratio from 29 per cent in 2000 to 71 per cent in 2012. While higher than the world average of 54 per cent, that ratio indicated that almost 30 per cent of children in Tonga were not in pre-primary education.⁵²

38. The United Nations country team stated that while the expansion of free basic education had been key to improving access to primary schooling for children from low-income households, the quality of education remained of concern.⁵³

39. UNESCO noted the lack of recent data regarding the implementation of the education policy framework for the period 2004 to 2019 and the absence of a monitoring system.⁵⁴

40. UNESCO strongly encouraged Tonga to enshrine the right to education within its Constitution and submit State reports for the periodic consultations on its education-related standard-setting instruments. It also encouraged Tonga to monitor and report on the implementation of its education policy framework; to further its actions on improving

quality and human rights education; and to share with UNESCO any relevant information to update its country profile on the UNESCO global database on the right to education.⁵⁵

41. UNESCO reported that Tonga had not submitted its national reports in the framework of the eighth (2011-2013) and ninth (2016-2017) consultations of member States on the measures taken to implement the Recommendation against Discrimination in Education, and the fifth (2012-2013) and sixth (2016-2017) consultations on the measures taken for the implementation of the 1974 Recommendation concerning Education for International Understanding, Co-operation and Peace and Education relating to Human Rights and Fundamental Freedoms.⁵⁶

D. Rights of specific persons or groups

1. Women⁵⁷

42. The United Nations country team stressed that owning land was very difficult for women in Tonga. The Land Act prevented them from inheriting land, which greatly limited their capacity to access financial services. It stressed that, although some matriarchal land-tenure systems existed, real control and management of the land lay with brothers and other men of the clan. Tongan women seldom participated in decision-making related to the development of land and were seldom able to benefit from such developments. The United Nations country team recommended that Tonga amend the Land Act currently in effect, particularly its provision preventing women from inheriting land.⁵⁸

43. The United Nations country team emphasized that the representation of women in the Legislative Assembly remained extremely low, with currently only one woman representative. It recommended that Tonga take specific measures to increase the representation of women at the decision-making level, including within the Legislative Assembly. In particular, Tonga should expedite the adoption of the necessary laws on increasing women's representation in the legislature and other decision-making bodies through temporary special measures. The United Nations country team mentioned the initiative of a women's coalition group pushing for a bill to be drafted in this area.⁵⁹

44. The United Nations country team recommended that Tonga introduce more targeted programmes to take into account the specific needs of women belonging to marginalized and vulnerable groups, such as rural women and women with disabilities.⁶⁰

45. Against that background, the United Nations country team recalled the recommendation from the second cycle of the universal periodic review for Tonga to prioritize gender equality initiatives within its strategic development framework and intensify efforts to increase women's participation at all formal decision-making levels.⁶¹

2. Children⁶²

46. The United Nations country team stressed that child marriage remained a critical issue in Tonga. Despite Tonga being party to the Convention on the Rights of the Child, the marriage law in Tonga permitted children to marry as early as 15 years of age with parental permission. Girls were often forced by their parents to marry and in certain cases teenage pregnancy was involved. In other cases, girls were forced into marriage simply because they had been seen with boys. In some instances, girls were even forced to marry their rapists. That situation had left many children, particularly girls, exposed to early pregnancy, thereby putting their and their babies' health at risk, even resulting in death at times.⁶³

47. The United Nations country team added that this situation had also resulted in an increased risk of domestic violence, including marital rape and emotional abuse, as well as children leaving school early, which deprived them of their right to education.⁶⁴

48. The United Nations country team noted that, in March 2017, the Ministry of Justice had partnered with a local women and child rights group to launch a campaign entitled "Let Girls be Girls", with the aim of putting an end to child marriage and calling for the repeal of the section of the Constitution dealing with the marriage law.⁶⁵

49. The United Nations country team recommended that Tonga amend, as a matter of priority, the marriage law, including raising the marriage age to 18 and declaring marriage below the minimum legal age as void ab initio, meaning that it should have no legal basis under any pretext, be it custom, religion, or traditional practice; increase the existing range of punishments and fines for all parties involved in performing or abetting the performance of child marriages so they are commensurate with the seriousness of the offence; recognize child marriage as a form of child labour, explicitly criminalizing child labour within the domestic sphere under laws related to children; and continue public campaigns such as “Let Girls be Girls”, in collaboration with civil society, relevant government ministries and religious leaders.⁶⁶

3. Persons with disabilities

50. The United Nations country team reported that, in 2015, the Government had established a Social Protection and Disability Division under the Ministry of Internal Affairs, with a view to developing social protection policies and schemes to support vulnerable populations, including persons with disabilities, and improve their quality of life by 2025. However, such institutional arrangements had yet to be supported with the help of robust legal and policy frameworks that recognized the rights of persons with disabilities. The United Nations country team recommended that Tonga strengthen the legal and policy framework related to improving the access of persons with disabilities to health, education, employment, public places, transport and information.⁶⁷

51. The United Nations country team echoed the findings of a 2013 study conducted by the United Nations Population Fund in three countries, including Tonga, which found that women with disabilities faced a number of challenges.⁶⁸ For instance, they were particularly vulnerable to hardship and poverty and were often culturally, socially and economically excluded. Despite some helpful laws, policies and practices, women with disabilities were less educated, experienced higher rates of unemployment, were more likely to be abused, were poorer and more isolated, experienced worse health outcomes and generally had a lower social status than men living with disabilities or female peers elsewhere. Moreover, women with disabilities were two to three times more likely to become victims of physical and sexual abuse than women with no disabilities. Their access to reproductive health care was minimal and they suffered greater vulnerability as a result.⁶⁹

Notes

- 1 Tables containing information on the scope of international obligations and cooperation with international human rights mechanisms and bodies for Tonga are available at www.ohchr.org/EN/Countries/AsiaRegion/Pages/TOIndex.aspx.
- 2 For the relevant recommendations, see A/HRC/23/4, paras. 79.1-79.21, 79.27-79.30, 81.16-18 and 82.1-82.3.
- 3 United Nations country team submission for the universal periodic review of Tonga, pp. 3, 10 and 13.
- 4 *Ibid.*, p. 3.
- 5 UNESCO submission for the universal periodic review of Tonga, p. 5-6.
- 6 United Nations country team submission, p. 3.
- 7 *Ibid.*, p. 4.
- 8 *Ibid.*, p. 5.
- 9 For the relevant recommendations, see A/HRC/23/4, paras. 79.23-79.24, 79.26, 79.49, 80.1 and 81.1-81.3.
- 10 United Nations country team submission, p. 4.
- 11 *Ibid.*
- 12 *Ibid.*, p. 5.
- 13 For the relevant recommendations, see A/HRC/23/4, paras. 81.5-81.10.
- 14 United Nations country team submission, p. 5.
- 15 *Ibid.*, p. 13-14.
- 16 *Ibid.*, p. 15.
- 17 *Ibid.*
- 18 *Ibid.*, p. 16.
- 19 *Ibid.*
- 20 For the relevant recommendation, see A/HRC/23/4, para. 79.31.

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- 21 United Nations country team submission, p. 17.
22 Ibid., p. 17.
23 Ibid.
24 Ibid., p. 18.
25 For the relevant recommendations, see A/HRC/23/4, paras. 79.37-79.38, 79.40, 79.42, 79.44-79.45, 80.3, 81.15 and 81.19-81.27.
26 United Nations country team submission, p. 12.
27 Ibid., p. 5-6.
28 Ibid., p. 9-10.
29 Ibid., p. 10.
30 Ibid.
31 For the relevant recommendations, see A/HRC/23/4, paras. 79.22 and 79.46.
32 UNESCO submission, p. 3.
33 Ibid., p. 6.
34 Ibid., p. 9.
35 Ibid.
36 UNESCO submission, p. 6.
37 United Nations country team submission, p. 11.
38 Ibid.
39 UNESCO submission, p. 7.
40 Ibid.
41 United Nations country team submission, pp. 6 and 11-12.
42 Ibid. p. 8.
43 For the relevant recommendations, see A/HRC/23/4, paras. 79.25 and 79.47.
44 United Nations country team submission, p. 11.
45 Ibid., p. 12.
46 For the relevant recommendation, see A/HRC/23/4, para. 79.48.
47 United Nations country team submission, p. 12.
48 Ibid., p. 13.
49 Ibid.
50 For the relevant recommendations, see A/HRC/23/4, paras. 79.50-79.52.
51 United Nations country team submission, p. 13.
52 UNESCO submission, p. 5.
53 United Nations country team submission, p. 13.
54 UNESCO submission, pp. 4-5.
55 Ibid., p. 6.
56 Ibid., p. 2.
57 For the relevant recommendations, see A/HRC/23/4, paras. 79.32-79.36, 79.39, 79.41, 79.43, 80.2, 81.4, 81.11-81.14 and 82.4.
58 United Nations country team submission, pp. 7-8.
59 Ibid., p. 7.
60 Ibid., p. 8.
61 Ibid.
62 For the relevant recommendation, see A/HRC/23/4, para. 81.28.
63 United Nations country team submission, p. 6.
64 Ibid.
65 Ibid.
66 Ibid., p. 8.
67 Ibid., p. 14.
68 United Nations Population Fund, *A Deeper Silence: the Unheard Experiences of Women with Disabilities — Sexual and Reproductive Health and Violence against Women in Kiribati, Solomon Islands and Tonga* (2013).
69 Ibid., p. 10.
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