



Te Kāhui Tika Tangata
Human Rights Commission

Women in Prison: New Zealand

Analysis from the National Preventive Mechanism

| September 2024



association pour la prévention de la torture
asociación para la prevención de la tortura
association for the prevention of torture



In partnership with

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New Zealand¹



UNCAT Ratification

10 December 1989

OPCAT Ratification

14 March 2007

National Preventive Mechanism (NPM)

5 different institutions coordinated by
Te Kāhui Tika Tāngata | Human Rights Commission

NPM legal framework

Crimes of Torture Act 1989 (COTA)

NPM operationalisation

June 2007²

NPM structure

Multi-body NPM composed of 5 institutions:

- Te Kāhui Tika Tāngata | Human Rights Commission as the Central NPM (CNPM)
- Independent Police Conduct Authority
- Mana Mokopuna | Children and Young People’s Commission
- Inspector of Service Penal Establishments
- Ombudsman New Zealand

NPM composition (as of June 2024)

Human Rights Commission (CNPM):
2 Commissioners (2 women)
Staff members (78% women)

I. Facts and Figures

Prison population	Women in prison - Characteristics	Prisons for women	Prison staff
Total prison population	Māori women (Indigenous women)	Total number of women’s prisons	Total prison staff
9,638	360	3	4,359
Women in prison (total)	Pregnant women	Women-only prisons ⁴	Women prison staff ⁵
663 6.8%	9	3	30.7%
Women on remand ³			
382			
Sentenced women			
267			
<small>Source: Ara Poutama Aotearoa Department of Corrections ‘Prison facts and statistics – June 2024’</small>	<small>Source: Ara Poutama Aotearoa Department of Corrections, 30 November 2023</small>	<small>Source: Te Kāhui Tika Tāngata Human Rights Commission, March 2024</small>	<small>Source: Ara Poutama Aotearoa Department of Corrections, 1 December 2023</small>

¹ Report prepared based on submission made on behalf of Te Kahui Tika Tangata Human Rights Commission as New Zealand’s Central NPM.

² [Gazette Notice: Designation of Central National Preventive Mechanism \(21 June 2007\)](#); and [Gazette Notice: Designation of National Preventive Mechanisms \(21 June 2007\)](#)

³ It includes remand accused women (167) and remand convicted women (181).

⁴ Almost all women in New Zealand prisons are held in one of the country’s three women-only prisons: Auckland Region Women’s Corrections Facility; Arohata Prison, in Wellington; and Christchurch Women’s Prison. A very small number of women are held at offsite locations, such as mental health facilities or in police custody.

⁵ As of December 2023, all women-only prisons had female Prison Directors, Deputy Prison Directors, and Assistant Prison Directors.

II. Recommendations

Alternatives to detention

- + Consistent with recommendations from the Committee Against Torture (CAT Committee) in its 7th periodic review of New Zealand in 2023,⁶ reduce the number of women in prison, in particular those held on pre-trial detention.

Solitary confinement

- + Consistent with the recommendations of the CAT Committee in 2023, ensure that solitary confinement is used only in exceptional cases as a last resort, for as short a time as possible (and in no case for more than 15 consecutive days for adults), and is subject to proper authorisation, independent review, adequate record-keeping and is otherwise consistent with requirements of the UN Mandela Rules and Bangkok Rules.

Use of means of restraint and use of force

- + Prohibit: a) the use of “Cell Buster” pepper spray; b) the use of pepper spray (deployed through any means) in response to passive resistance, in confined spaces, and against individuals who have been identified as high risk (such as minors and those with underlying injuries, mental health issues, respiratory conditions, or pregnancy); and c) the use of restraints following the deployment of pepper spray through any means.

Access to mental healthcare

- + Provide gender-responsive, trauma-informed measures, including adequate mental health support, to women in prison in accordance with international human rights standards and obligations, including the UN Bangkok Rules.

Indigenous women

- + Given the huge over-representation of Māori women in prisons, recognise, respect and support Māori tino rangatiratanga (sovereign authority) and self-determination to design and implement their own initiatives to address criminal justice.

III. Detention Issues

The Department of Corrections (Corrections) has made efforts to limit the number of women coming to prisons. While these efforts were initially successful, the number of women coming into prison is increasing again. Following a period of substantial growth, with a peak at over 800 women in prison in 2018, the number decreased to 426 in March 2022, but has since risen to over 500.⁷

In 2021, Corrections began implementing its *2021 – 2025 Strategy: Wāhine - E rere ana ki te pae hou | Women rising above a new horizon*.⁸ Corrections is also developing a gender and culturally-responsive,

⁶ See CAT Committee ‘Concluding observations on the 7th periodic report of New Zealand’, CAT/C/NZL/CO/7, 24 August 2023), paras [28(a)], [28(c)], [28(e)] – [28(g)], [30] and [32]:

https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CAT%2FC%2FNZL%2FCO%2F7&Lang=en.

⁷ See https://www.corrections.govt.nz/resources/statistics/quarterly_prison_statistics

⁸ Ara Poutama Aotearoa | Department of Corrections ‘Wāhine – E rere ana ki te pae hou: Women’s Strategy 2021– 2025’ available at: https://www.corrections.govt.nz/_data/assets/pdf_file/0004/44644/Corrections_Wahine_-_E_rere_ana_ki_te_pae_hou_2021_-_2025.pdf.

trauma-informed learning and development pathway to train custodial staff working in women's prison sites. Despite these initiatives, Te Kāhui Tika Tāngata Human Rights Commission, as Central NPM (CNPM), is concerned that Corrections is not acting with the necessary urgency to address the harms to women experienced under the current prison system, which is not adequately equipped to address the specific needs of women in prison.

The Office of the Inspectorate⁹ has produced a series of thematic reports¹⁰ about the experience of women within New Zealand prisons and recommended that Corrections reviews its “*strategic and operational leadership, resourcing, operating model and service delivery across the women's prison network (including health services) to enable, and deliver, better outcomes for women, which are critically gender specific, culturally responsive and trauma informed*”.¹¹

New Zealand's coalition government, formed in November 2023, has advised that it will abolish the previous government's target to reduce the prison population by 30 percent.¹² Corrections will receive increased funding to ensure there is sufficient prison capacity.¹³ The new government has also undertaken to extend eligibility for rehabilitative programmes to people held on remand.¹⁴

Body searches

a) Legal and regulatory framework

Under the Corrections Act 2004, Corrections officers are authorised to conduct strip searches¹⁵ on women in prison in the following circumstances:¹⁶

Strip-searches must be conducted on women:

- + On first being admitted to prison;
- + When being transferred between prisons;
- + Each time they are placed in an at-risk cell.

Strip searches may be conducted on women:

- + Immediately prior to being locked in a cell under penalty of cell confinement;
- + Immediately before leaving prison;
- + On return to prison, such as following temporary release, work placement or appearance before a judicial authority or parole board, or when they have been outside the supervision of a probation or Corrections officer;

⁹ The Office of the Inspectorate was established under the Corrections Act 2004 as a dedicated complaints resolution, investigation and assurance function. The Office is part of the Department of Corrections, but is independent of prison management, and its staff are independent of the activities they review.

¹⁰ Auckland Region Women's Corrections Facility inspection (January 2021); Arohata Prison inspection (July 2021); Special investigation into the management of three wāhine at Auckland Region Women's Corrections Facility (September 2021); Christchurch Women's Prison inspection (October 2021); The Lived Experience of Women in Prisons (October 2021); Mothers and Babies: Prison management of pregnant women and mothers of infants (September 2023).

¹¹ Shining a light on women in New Zealand prisons, February 2023.

¹² National Party New Zealand 'Restoring Law and Order', p.8 <https://www.national.org.nz/restoringlawandorder>.

¹³ Checkpoint “Corrections minister confident jails will be properly staffed” Radio New Zealand (4 December 2023); available at: <https://www.rnz.co.nz/national/programmes/checkpoint/audio/2018918109/corrections-minister-confident-jails-will-be-properly-staffed>.

¹⁴ Corrections Amendment Bill (264-2023), currently awaiting Third Reading in Parliament. The CNPM's submission on this aspect of the Bill is available [here](#).

¹⁵ Defined under the Corrections Act 2004, s 90.

¹⁶ See in particular s 98 of the Corrections Act 2004.

- + Immediately before and/or after any person visits them;
- + If an officer has reasonable grounds to believe they are in possession of unauthorised items;
- + If a prison manager has reasonable grounds to believe they have supplied a diluted, tainted or otherwise contaminated drug and/or alcohol test.

b) In practice

Corrections has recently installed and operationalised body-scanning technology at three prison sites (two women's and one men's facility). This technology is offered to people in prison at these three sites as an alternative to strip-searching. Corrections has indicated that it intends to install body-scanning technology across all sites, subject to necessary infrastructure changes. Body imaging technology that is less intrusive than strip-searching helps to promote personal dignity and wellbeing for both people in prison and Corrections staff, who have reported more positive outcomes since this technology was introduced. This is particularly important for imprisoned women, many of whom have experienced domestic and sexual violence, exploitation and victimisation before they have entered prison.¹⁷

Both strip searches and body-scanning searches must only be conducted by a Corrections officer who is the same sex as the person being searched, in the presence of another officer or Police constable of the same sex, and cannot be conducted in view of any person who is of a different sex to the person being searched.¹⁸ Whilst these same-sex staff requirements are a welcomed safety measure, the CNPM notes they are based on an assumption that no staff member of the same sex will exploit a person in prison.

Solitary confinement, isolation

The Corrections Act 2004 allows for 'segregation' – that is, the denial or restriction of a person's opportunity to associate with others, including other people in prison, friends and family/whānau, as well as staff. While review processes exist, they allow for segregation to be continued indefinitely.¹⁹

In his [submission to the UN Committee against Torture for New Zealand's 7th periodic review \(2023\)](#) the Chief Ombudsman observed:

"If segregation processes do not adequately ensure meaningful human contact, time out of cell and opportunities to exercise in the open air, then the 'segregation' allowed for under the Corrections Act may effectively constitute solitary confinement, and for periods longer than 15 days, prolonged solitary confinement.

Furthermore, the minimum entitlements afforded to people in custody under the Corrections Act do not necessarily provide safeguards against solitary confinement. In particular, while there is a Minimum Entitlement to at least one hour of physical exercise (in the open air if weather permits), in line with Rule 22 of the Mandela Rules, there is no Minimum Entitlement to unlock hours/time outside of cell to ensure that no person is confined for 22 hours or more or that where this occurs it is recorded and monitored to allow for potential solitary confinement to be identified, ensure compliance with

¹⁷ See Office of the Inspectorate [The Lived Experience of Women in Prisons](#) (October 2021), at *Introduction* (p.11) and *Profile of women in prison* (p.15). See also Marianne Bevan "New Zealand prisoners' exposure to trauma" *Practice: The New Zealand Corrections Journal* (2017) available at: https://www.corrections.govt.nz/resources/research/journal/volume_5_issue_1_july_2017/new_zealand_prisoners_prior_exposure_to_trauma#:~:text=General%20violence,-Other%20violence%20included&text=Over%20half%20of%20prisoners%20had,women%20experienced%20compared%20to%20men.

¹⁸ See Corrections Act 2004, s 94.

¹⁹ See Corrections Act 2004, ss 58 – 60.

international human rights standards, and prevent prolonged or indefinite solitary confinement.”

In 2016, the CNPM invited Dr Sharon Shalev to undertake a review of seclusion and restraint practices in New Zealand’s places of detention. Dr Shalev’s 2017 report, [Thinking Outside the Box?: A review of seclusion and restraint practices in Aotearoa New Zealand](#), revealed the high use of seclusion and restraint, and an overrepresentation of Māori in seclusion and in prison segregation units.

Dr Shalev’s report found that at Auckland Region Women’s Corrections Facility, 78% and 75% of segregations in the Separates and Management Units respectively were of Māori women. As many as 93% of segregations lasting 15 days or longer in the Management Unit were of Māori or Pacific women. The report also concluded that there were stark physical environments and impoverished regimes in seclusion, secure care and segregation units, and in a number of cases no access to basic fixtures such as a call-bell to alert staff, a toilet or fresh running drinking water.

In 2020, Dr Shalev published [Time for a Paradigm Shift: A follow-up review of seclusion and restraint practices in Aotearoa New Zealand](#). The report indicated that while there had been strong commitments from the detaining agencies to reduce the use of seclusion, it continued to be embedded in their practices. The overall picture was found to be disappointing with ongoing issues that had not been addressed, such as: a) seclusion (or solitary confinement) continues to be used too often, for too long, and not always with clear justification; and b) seclusion continues to be disproportionality used with Māori and Pacific Peoples in prisons (where the practice is known as ‘segregation’).

Following the concerns identified in *Time for a Paradigm Shift*, in 2021 Dr Shalev produced [First, Do No Harm: segregation, restraint, and pepper spray use in women’s prisons in Aotearoa New Zealand](#). Among Dr Shalev’s key findings was the high use of solitary confinement and other punitive practices towards women. In 2019, women were segregated significantly (73%) more than men in New Zealand’s prisons. While the majority of segregations were relatively short, there were 101 occasions in 2019 where women spent 15 days or longer in segregation, a period defined as ‘prolonged’ and prohibited as a form of torture or cruel, inhuman or degrading treatment or punishment in the UN Nelson Mandela Rules. Māori and Pacific women were disproportionately segregated in Management and Separates Units used for control and punishment.

The Office of the Inspectorate released a report in July 2023, focused on [Separation and Isolation \(although not exclusive to women in prison\)](#). This report found that between 1 October 2020 and 30 September 2021, 29% of people in New Zealand’s prisons experienced a time when they had to be separated from the rest of the prison population. These people had been separated from the mainstream population for a range of reasons, including: perceived risks from other people in prison; perceived risks to staff and other people in prison; as a penalty for a disciplinary offence; because of their mental and physical health, including being at risk of self-harm; and as part of Corrections’ response to the Covid-19 pandemic.

The Inspectorate called on Corrections to mitigate the isolation experienced by these people in prison; to collect accurate data and report annually on all people who are unable to associate with others; and to implement an assurance framework for these people. Corrections accepted the recommendation, among others, that it “must recognise the profound isolation experienced by segregated and at-risk prisoners, including that many are likely to be subject to solitary confinement as that term is defined by the Mandela Rules.”

Use of means of restraint and use of force

Dr Shalev’s 2020 report [Time for a Paradigm Shift: A follow-up review of seclusion and restraint practices in Aotearoa New Zealand](#) found some positive developments including an end to the use of ‘tie down’ beds in prisons. However, the data on the use of force and restraint was concerning.

In 2023, Corrections provided the CNPM with data sets related to the use of force (including the use of

less-lethal weapons) across all prison sites from 2016 to 2022 disaggregated by gender, ethnicity, and prison location, as well as type of force.²⁰ This data shows that the use of force has increased within prisons since 2016, that incidents involving the use of force have been occurring more frequently in women's prisons, and that Māori and Pacific people are disproportionately affected in these incidents. The CNPM has questioned the necessity and reasonableness of the high use of force against women in prison, against Māori, and against people of Pacific origin.

In October 2021, the Office of the Inspectorate released its [Special investigation into the management of three wāhine at Auckland Region Women's Corrections Facility](#). This report found systemic failures in how these women were managed, which developed into a regime that was highly restrictive, failed to follow procedural safeguards and natural justice requirements, and was contrary to minimum entitlements including through prolonged disciplinary confinement and segregation, withholding of food and excessive use of handcuffs. Two of these women were also the subject of legal proceedings regarding their subjection to a process of "cell extraction", whereby Corrections officers pumped pepper spray into their closed cells by means of a fog delivery device known as a "Cell Buster". The Court held that the relevant provisions under the Corrections Amendment Regulations (2009, 2012, 2017) were not consistent with the humane treatment of people in prison.²¹ In response to the Court's decision, the Government amended the [Corrections Regulations](#) to strengthen provisions relating to the use of less-lethal weapons.²² The CNPM has raised concerns with Corrections that the Amendment Regulations do not comply with international human rights law obligations, in particular because they continue to permit the use of pepper spray in response to passive resistance, in confined spaces, and against individuals identified as high risk (such as those with underlying injuries, mental health conditions, respiratory conditions, or pregnancy), as well as the use of restraints following the deployment of pepper spray. The CNPM continues to call for the elimination of the use of pepper spray and other less-lethal weapons in New Zealand's prisons.

Access to mental healthcare

During In his [self-initiated investigation – Kia Whaitake | Making a Difference \(2023\)](#), the Chief Ombudsman outlined several complexities and risk factors that are more prevalent among women in New Zealand's prisons population compared with men:

- + 62% of women in prison have had both (comorbid) mental health conditions and substance addictions across their lifetime (compared with 41% of men in prison).
- + 75% of women in prison have been diagnosed as having mental health needs within the last 12 months (compared with 61% of men in prison).
- + 46% of women in prison have lifetime alcohol dependence (compared with 35% of men).
- + 52% of women in prison have a lifetime diagnosis of post-traumatic stress disorder (compared with 40% of men in prison).
- + 68% of women in prison have been the victim of family violence.
- + 53% of women in prison have experienced sexual assault (compared with 15% of men).

A key contributor to poor mental wellbeing for women in detention is disruption of contact with their community and family, particularly their children. The majority of women in New Zealand prisons are mothers, and are more likely than their male counterparts to have lived with their children prior to imprisonment and played a central role in the care of their children.²³ They have a strong emotional need for regular contact with their children, and maintained social contact is essential to their

²⁰ Corrections has noted some limits in the way this data is presented, whereby one incident involving the use of force may count across multiple factors (i.e. use of force, non-lethal weapons, mechanical restraint).

²¹ [Cripps and Bassett v Attorney-General \[2022\] NZHC 1532](#), p. 202.

²² See Corrections Regulations 2005 (NZ), regs 123A – 123F.

²³ See <https://www.mothersproject.org/>.

prospects of re-integration upon release. In all but exceptional cases it will also be in a child's best interests that they maintain direct connections with their mother.

In his recent submission to the CAT Committee for New Zealand's 7th periodic review, the Chief Ombudsman relevantly observed "[...] that opportunities for maintaining family contact are inadequate, with many women unable to receive visits due to distance and associated travel costs. Early lock up times often prevent many women from telephoning their children after they finish school. Limited visits combined with restricted access to telephones and an unsatisfactory mail system affect women's mental wellbeing."

This issue has been exacerbated for over 60 women who have been transferred from Arohata prison (in the lower North Island) to women's prisons in Christchurch (in the South Island) and Auckland (in the upper North Island) from September 2022. This has serious repercussions for many women who are now located further from their homes, significantly limiting the practicality of visits from their children and families.

Corrections transferred these women because of staffing shortages. However, the New Zealand High Court found that resource constraints cannot legitimise the unlawful treatment of these women.²⁴ The Court earlier held that Corrections had discriminated against these women when transferring them, because it failed to take their individual circumstances into account, disrupted their local connections, and prevented their access to rehabilitation treatment programmes.²⁵ The Crown has filed a limited appeal in relation to this proceeding, regarding the need to consider individual circumstances when deciding whether to transfer people in prison to manage national numbers.²⁶

To mitigate the harmful effects of detention, women require adequate protection and support and should not be subjected to measures which are likely to exacerbate their distress.

IV. Women in a special situations of vulnerability

Indigenous women - wāhine Māori

Circumstances leading to detention are often exacerbated for Indigenous women, including wāhine Māori in New Zealand. The legacy of colonisation has caused intergenerational trauma and systemic marginalisation, resulting in higher levels of poverty, financial and social stress, significant gaps in opportunities, increased exposure to alcohol and drug use, historic and continued over-policing and institutional discrimination in law enforcement practices.²⁷ Wāhine Māori are the fastest-growing prison population in New Zealand, rising from less than 10% of women in prison in the 1980s to more than 65% today.²⁸

In his submission to the CAT Committee on New Zealand's 7th periodic review, the Chief Ombudsman

²⁴ *Wallace v Chief Executive of the Department of Corrections [2023] NZHC 592* at [27].

²⁵ *Wallace v Chief Executive of the Department of Corrections [2023] NZHC 2248*, at [75], [90] and [98].

²⁶ See Corrections Act 2004, s 54.

²⁷ Tracey McIntosh "Behind the wire: Māori women and prison" *Women's Studies Journal*, Vol. 31: 1 (July 2017), p.115. See also Report of the Working Group on the issue of discrimination against women in law and in practice, Women deprived of liberty (May 2019) UN Doc. A/HRC/41/33, <http://documents-dds-ny.un.org/doc/UNDOC/GEN/G19/139/27/PDF/G1913927.pdf?OpenElement>, at [16]; APT 'Violence against indigenous women deprived of liberty and in contact with law enforcement officials' (February 2022) <https://www.apr.ch/en/resources/publications/violence-against-indigenous-women-deprived-liberty-and-contact-law>, at [9] – [10].

²⁸ Te Kāhui Tika Tangata | Human Rights Commission "Maranga Mai! The impact of colonisation, racism and white supremacy on tangata whenua in Aotearoa New Zealand" (February 2023) available at: <https://tikatangata.org.nz/our-work/maranga-mai>, pp.85 – 93; and Ara Poutama | Department of Corrections "Prison facts and statistics – March 2024" https://www.corrections.govt.nz/resources/statistics/quarterly_prison_statistics/prison_facts_and_statistics_-_march_2024.

observed:

“It is well-established that Māori women are over-represented in prison and I have observed this during my own inspections. The Office of the Inspectorate’s report found that Māori women aged 20-60 years comprised 15% of the general New Zealand population at June 2020, but for Māori women in prison the figure is 61%. By comparison, Māori men comprised 50% of the prison population. ...I have observed the difficulties that people in custody experience in accessing cultural support. During my 2017 visit to [Arohata Upper Prison](#) Māori made up 57% of the prison population and 77% of respondents to my survey said they were unable to access cultural services.

United Nations bodies have consistently raised concerns about the over-incarceration of wāhine Māori and have recommended that the government address discrimination within the criminal justice system and provide alternatives to detention to reduce the high number of Māori detainees.²⁹

Through Te Tiriti o Waitangi, the founding constitutional agreement between Māori and the British Crown in 1840, the government has obligations to support better outcomes for wāhine Māori and to provide conditions that are culturally appropriate to the needs of those in prison. The New Zealand NPM agencies have made a collective commitment to explore the relationship between their OPCAT monitoring functions and the role of Te Tiriti when monitoring places of detention in New Zealand.³⁰ There is an urgent need to address conditions that expose wāhine Māori to heightened risk of systemic discrimination, torture and ill-treatment in prison, including the need to improve:

- + support for ongoing contact with whānau,³¹ hapū³² and iwi;
- + access to rehabilitative, educational and vocational programmes which must adapt to meet cultural needs;
- + policies, practices and staff training programmes which must respect customs, beliefs and practices and not be applied in the same manner to everyone;
- + elimination of discriminatory practices against wāhine Māori, e.g. disproportionately subjected to solitary confinement and disciplinary measures;
- + reintegration and post-release support which should address systemic economic and social marginalisation of Indigenous women.

Prominent Māori advocates have called for the government to support self-determination through Māori models of justice.³³ Such models could embed tikanga Māori (customs and practice) and shift focus from punishment to restoring mana (dignity), achieving balance through reciprocal engagement, and restoring women back to their whānau (families) and communities.³⁴

This report is part of the Global NPM report on Women in Prison.
Access the full report here: www.apt.ch/global-report

²⁹ CAT Committee, above n 6, at [32] and Committee on the Elimination of All Forms of Discrimination Against Women “[Concluding Observations on the 8th periodic report of New Zealand](#)” (CEDAW/C/NZL/CO/8, 25 July 2018), at [44].

³⁰ Aotearoa New Zealand NPMs “[Joint submission for Aotearoa New Zealand’s 7th periodic review under the Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment](#) (12 June 2023), pp. 6-8.

³¹ <https://maoridictionary.co.nz/search?idiom=&phrase=&proverb=&loan=&histLoanWords=&keywords=whanau> (second meaning – extended family).

³² <https://maoridictionary.co.nz/search?idiom=&phrase=&proverb=&loan=&histLoanWords=&keywords=hapu> (third meaning - kinship group, clan, tribe, subtribe - section of a large kinship group and the primary political unit in traditional Māori society).

³³ Sir Kim Workman “Whānau ora and imprisonment” *Te Arotahi Series Paper* (September 2019-03), available at <https://www.maramatanga.ac.nz/node/1194> at p.5 – 6. See also C Burrows, TK McIntosh, C Jones, J Whaipooti et. al, “Turuki! Turuki! Move Together!: Transforming our Criminal Justice System” *Hapaitia te Oranga Tangata - Safe and Effective Justice* (2019: 2), available at <https://researchspace.auckland.ac.nz/handle/2292/60739>, Recommendation 2.

³⁴ Workman, *Ibid*.