People Against Prisons Aotearoa

Submission to the Justice Committee on the Corrections Amendment Bill 2018

People Against Prisons Aotearoa (PAPA) is a prisoner advocacy organisation established in early 2015. *PAPA* advocates for incarcerated people with respect to various issues, including housing, prison placement, access to medical and counselling services, complaints of sexual and physical assault, and cruel and inhumane treatment by the Department of Corrections. PAPA is currently campaigning to end the use of solitary confinement in New Zealand prisons.

We are united in the belief that prisons are inherently violent places and imprisonment must be entirely avoided. We see prisons as treating the symptoms of harm and injustice, rather than the root causes. It is our belief that the Corrections Amendment Bill 2018 leaves many of the Department of Corrections' concerning practices unchallenged, and grants it more power to continue its harmful and degrading treatment of prisoners, particularly prisoners who are mentally ill.

For these reasons, we oppose the majority of proposed amendments to the Corrections Act in this Bill.

This submission has been written on behalf of PAPA by Ti Lamusse, Kate McIntyre, Mackenzie Valgré, and Dani Pickering. We wish for our members to appear before the Justice Committee to present this submission.

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INTRODUCTION

People Against Prisons Aotearoa (PAPA) supports the following proposed amendments to the Corrections Act:

1. The explicit prohibition of chains and irons for the purpose of restraining prisoners, outlined in clause 20.

PAPA opposes the following proposed amendments to the Corrections Act:

1. The continued ability for Corrections to place prisoners at risk of self-harm in solitary confinement, outlined in clause 14.
2. The provision which requires at-risk prisoners to be strip searched, outlined in clause 25.
3. The extension of double-bunking, or "cell sharing", outlined in clause 19.
4. The softened responsibility for officers using dogs to keep the searched person safe, outlined in clause 24.
5. The extension of powers to the Chief Executive to detain prisoners in police jail cells, outlined in clauses 7, 8, 15, and 28.
6. The creation of new offences relating to supply and use of psychoactive substances, outlined in clause 4.
7. The creation of new offences for providing or receiving tattoos, outlined in clause 26.

PAPA expresses concerns about the following proposed amendment to the Corrections Act:

1. Changing the method of payment for phone communications between prisoners and people outside, outlined in clause 16.

This Bill is a missed opportunity for positive and meaningful reform that could substantially reduce the ongoing harm the Department of Corrections is causing to prisoners and their whānau.

The prohibition of chains and irons is certainly a welcomed and humane reform. Yet the practice of restraining prisoners remains under-questioned and legally permissible. The right for Corrections to use other harmful practices against prisoners is strengthened in

this Bill. These practices include solitary confinement, double-bunking, and violating searches.

We are particularly concerned that the very presence of mentally ill people in prisons remains unquestioned. Prisons are not equipped to provide mentally ill people with the tools and the environment they need to recover.[1] **Mentally ill people would be better served by mental health intervention outside of prison, which prioritises their care and rehabilitation.** Instead, prisoners at risk of self harm are physically restrained and forcibly confined in an at-risk unit, in conditions akin to solitary confinement.[2]

As this Bill currently stands, it will not have a meaningful positive effect on prisoners' capacity to rehabilitate.

PART 1: SOLITARY CONFINEMENT IN AT-RISK UNITS

The Department of Corrections refuses to admit that it places prisoners in solitary confinement.[3] It does not call its practices of isolation "solitary confinement", but in 2016, international human rights observer Sharon Shalev visited New Zealand to inspect our prisons. She found that conditions in punishment units, directed segregation, directed protective segregation, and at-risk units, meet the United Nations international definition for solitary confinement.[4] Prisoners are being isolated, deprived meaningful activities and social contact, for more than 22 hours per day. Shalev also found that prisoners were often not receiving their minimum entitlements of one hour per day outside their cells. This was also found in multiple reports by the Office of the Ombudsman.[5]

One of the most concerning uses of solitary confinement is on mentally ill people in at-risk units. Shalev observed that conditions in at-risk units were indistinguishable from

[1] National Health Committee, "Health in Justice: Kia Piki Te Ora, Kia Tika! – Improving the Health of Prisoners and Their Families and Whānau: He Whakapiki I Te Ora O Ngā Mauhere Me Ō Rātou Whānau" (Wellington: Ministry of Health, 2010).
[2] Ti Lamusse, "Solitary Confinement in New Zealand Prisons" (Wellington: Economic and Social Research Aotearoa, 2018).
[3] Cleo Fraser, "Anti-Prison Group Campaigns to Ban Solitary Confinement", *Newshub*, 16 October 2017, http://www.newshub.co.nz/home/new-zealand/2017/10/anti-prison-group-campaigns-to-ban-solitary-confinement.html.
[4] Sharon Shalev, "Thinking Outside the Box? A Review of Seclusion and Restraint Practices in New Zealand" (Auckland: Human Rights Commission, 2017).
[5] Peter Boshier, "OPCAT Findings Report: A Question of Restraint" (Wellington: Office of the Ombudsman, 2017); Office of the Ombudsman, "Monitoring Places of Detention: Annual Report of Activities under the Optional Protocol to the Convention Against Torture (OPCAT) 1 July 2012 to 30 June 2013" (Auckland: Human Rights Commission, 2013); Peter Boshier, "OPCAT Report: Report on an Unannounced Inspection of Hawke's Bay Regional Prison Under the Crimes of Torture Act 1989" (Wellington: Office of the Ombudsman, 2017).

punishment units.[6] This means that the most vulnerable people in prison are being locked in a cell by themselves with no meaningful activities, where their dark thoughts are allowed to overwhelm them. Shalev's observations corroborate the experiences of prisoners PAPA has advocated for. The Department of Corrections' assertions that it does not use solitary confinement are untrue.

According to Rule 43(1)(b) of the *UN Standard Minimum Rules on the Treatment of Prisoners*, otherwise known as the 'Mandela Rules', prolonged use of solitary confinement (15 or more days) is prohibited. According to Rule 45(2), any imposition of solitary confinement on mentally ill prisoners should be prohibited as "their conditions would be exacerbated by such measures."[7] However, prolonged solitary confinement is legally permissible under the Corrections Act,[8] and conditions in at-risk units meet the international definition for solitary confinement. This means that the standard practice for dealing with mentally ill people in New Zealand prisons is to place them in solitary confinement. Even more concerning is that multiple reports have found that prisoners are being kept in at-risk units for prolonged periods, sometimes for months at a time.[9] Shalev has noted that these practices are in clear breach of the Mandela Rules.[10]

Solitary confinement has detrimental effects on prisoners' physiological and mental health. Physiological effects can include insomnia, migraines, and heart and intestinal problems. Psychological effects of solitary confinement can include anxiety, depression, anger and psychotic rage, paranoia, psychosis, hallucinations, and increased suicidality.[11] Effectively, placing mentally ill prisoners in at-risk units can worsen their mental health and increase

[6] Shalev, "Thinking Outside the Box?".
[7] United Nations General Assembly, "Resolution 70/175: The United Nations Standard Minimum Rules for the Treatment of Prisoners," December 17, 2015, Rule 45(2).
[8] As outlined in Lamusse, "Solitary Confinement in New Zealand Prisons."
[9] Boshier. "A Question of Restraint"; National Health Committee. "Health in Justice"; Shalev. "Thinking Outside the Box?".
[10] Shalev, "Thinking Outside the Box?"
[11] Sharon Shalev, "A Sourcebook on Solitary Confinement" (London: Mannheim Centre for Criminology, 2008); Shalev, "Thinking Outside the Box?"; Lamusse, "Solitary Confinement in New Zealand Prisons."

their inclination towards self-harm and suicide.[12] Conditions in at-risk units are counter-productive to the recovery and rehabilitation of mentally ill prisoners.[13]

It is entirely possible to support mentally ill people to recover and rehabilitate without locking them in a room alone for 22 hours a day.[14] Significant legislative change is needed to eliminate the practice of solitary confinement in New Zealand prisons.

The Corrections Amendment Bill does not do this. Instead, clause 14 continues to uphold Corrections' right to use solitary confinement on mentally ill prisoners. The Corrections Act currently allows for the segregation of at-risk prisoners under section 60 (for reason of medical oversight). Clause 14 inserts eight new sections outlining the framework for a person to be segregated, specifically for the reason that they are at risk of self-harm. Many of the inserted sections reflect already-existing practice and are already incorporated in the Corrections Regulations sections 60-63.

PAPA opposes Clause 14 as it entrenches the power of Corrections to deny the ability of prisoners to associate with others. This continues to empower Corrections to impose solitary confinement conditions on at-risk prisoners, potentially depriving them of meaningful human contact for up to 24 hours per day.[15] **Instead, at-risk prisoners must be guaranteed at least 4 hours out of cell, which includes association with others, as well as meaningful therapeutic intervention.** These are the recommendations of a 2018 report into solitary confinement in New Zealand prisons produced by Economic and Social Research Aotearoa.[16]

[12] Bruce A. Arrigo and Jennifer Leslie Bullock, "The Psychological Effects of Solitary Confinement on Prisoners in Supermax Units: Reviewing What We Know and Recommending What Should Change," *International Journal of Offender Therapy and Comparative Criminology* 52, no. 6 (December 2008): 622–40; Sarah Glowa-Kollisch et al., "From Punishment to Treatment: The 'Clinical Alternative to Punitive Segregation' (CAPS) Program in New York City Jails," *International Journal of Environmental Research and Public Health* 13, no. 2 (2016): 182; Fatos Kaba et al., "Solitary Confinement and Risk of Self-Harm Among Jail Inmates," *American Journal of Public Health* 104, no. 3 (2014): 442–47; Ti Lamusse, "Grieving Prison Death" (University of Auckland, 2017); Bruce Way et al., "Inmate Suicide and Time Spent in Special Disciplinary Housing in New York State Prison," *Psychiatric Services* 58, no. 4 (2007): 558–60; World Health Organisation, "Preventing Suicide in Jails and Prisons" (Geneva: World Health Organisation, 2007).

[13] National Health Committee. "Health in Justice"; Lamusse, "Solitary Confinement in New Zealand Prisons."

[14] Kaba et al., "Solitary Confinement and Risk of Self-Harm Among Jail Inmates."

[15] PAPA does not consider interactions with Corrections officers and medical professionals to be meaningful contact.

[16] Lamusse, "Solitary Confinement in New Zealand Prisons."

PART 2: STRIP SEARCHES

According to the Corrections Act, during strip searches Corrections Officers may open the mouth of the prisoner, lift and "rub" their hair, and force them to spread their legs and squat naked. Corrections Officers are also authorised to lift or raise fat, breasts, and genitalia.[17] Strip searches are degrading and inherently non-consensual. They constitute legal sexual violence. For people who have been victims of sexual assault, this kind of unconsenting touching by an authority figure can be extremely distressing.[18]

Strip searches are a widespread practice that almost never actually achieve their purpose of finding contraband. In response to Official Information Act requests from Ti Lamusse and Mark Hanna in 2016, Corrections admitted that from July 2014 to June 2015, there were 115,166 strip searches conducted.[19] This means that every 4 minutes and 24 seconds, on average, a Corrections Officer strips a person naked and sexually violates them. In those 115,166 searches, contraband was only found in 0.41 percent of cases.[20] In other words, in 99.59 percent of cases, strip searches achieve nothing, except to humiliate the person being searched.

Clause 25 of the Bill rewords section 25(7A) of the Corrections Act, reiterating the compulsory strip searching of at-risk prisoners, when the enter the unit for the first time and when they return to the unit from another area. This is entirely unnecessary. People at risk of suicide and self-harm need to be treated with dignity and respect, not humiliation. Recent research[21] suggests that people in at-risk units are often treated as security threats first and patients second. People experiencing mental distress should, first and foremost, receive the care they require. Clause 25 undermines this principle. **PAPA recommends that Clause 25 be amended to remove the compulsory strip searches of all prisoners entering an at-risk unit.**

PART 3: DOUBLE-BUNKING or "CELL SHARING"

PAPA is concerned about the increased use of double-bunking (or "cell sharing", as it is referred to in the Bill). Double-bunking occurs where two or more people are housed in a

[17] Corrections Act, s 90(2).
[18] Cathy Pereira, "Strip Searching as Sexual Assault," *Women in Prison* 27, no. 2 (2001): 187–96.
[19] Mark Hanna, "Guest Post: Strip Searches in Prisons - What Is Reasonable?," *NZ Council for Civil Liberties*, July 4, 2016, https://nzccl.org.nz/blog/guest-post-strip-searches-prisons-what-reasonable.
[20] Ibid.
[21] Alexis Harris, "Care-Oriented Practice in At-Risk Units: Risks, Realities and Therole of Multi-Disciplinary Teams" (Master of Arts Thesis, Victoria University of Wellington, 2015); Lamusse, "Grieving Prison Death."

cell. Its practice has increased dramatically as the prison population has grown, with around 30 percent of the total prison population now in double-bunked cells.[22]

Double-bunking is an inhumane practice that needs to be entirely eliminated.[23] There are two key reasons for this: first, double-bunking has been demonstrated by international research to increase the rates of prisoner-on-prisoner violence, particularly of sexual assault.[24] The problem of widespread sexual assault in New Zealand prisons[25] is seriously exacerbated by placing two people in a cell. **Clause 24 of this Bill will lead to more people being sexually assaulted.**

The second reason double-bunking should be eliminated is that it makes the general prison environment less safe. In a 2017 report into Spring Hill Corrections Facility, Chief Ombudsman Peter Boshier found that the "increase of double-bunking at the Prison has led to an increase in assaults and incidents".[26] This repeats the findings from a Corrections report investigating the causes of the 2013 Spring Hill riot. That report states that double-bunking was in use in the prison, and that there was extended lockdown of up to 26 hours at a time.[27] These factors undeniably contributed to a pressurised environment that increased the risk of violence responses. In other words, **double-bunking undermines the security of prisons and the safety of all people in them.**

The Mandela Rules state "it is not desirable to have two prisoners in a cell or room" overnight.[28] Rule 12 further states that, double-bunking should only be used as a short-term measure in "special circumstances" of "temporary overcrowding". Double-bunking is not a temporary solution to New Zealand's overcrowded prisons, but a fundamental feature of it. Its use has increased rapidly over the last 10 years and new cells have been built specifically for double-bunking.[29] This is in clear breach of the Mandela Rules. Clause 19 of this Bill entrenches this breach of international human rights law.

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[22] Laura Walters, "The Threat of Make-Shift Cells in the Gym, Stretchers in the Hallway - a Broken Prison System," *Stuff*, May 15, 2018, https://www.stuff.co.nz/national/politics/103881926/makeshift-cells-in-the-gym-stretchers-in-the-hallway--a-broken-prison-system.

[23] PAPA calls for the abolition of double-bunking in our *Abolitionist Demands*: Ti Lamusse, Sophie Morgan, and Emilie Rākete, eds., *Abolitionist Demands: Toward the End of Prisons in Aotearoa* (Auckland: No Pride in Prisons Press, 2016).

[24] Terence P. Thornberry and Jack E. Call, "Constitutional Challenges to Prison Overcrowding: The Scientific Evidence of Harmful Effects," *Hastings Law Journal* 35, no. 2 (1983): 313–51.

[25] Ti Lamusse, ed., *Torture in New Zealand Prisons: A Briefing* (Auckland: No Pride in Prisons Press, 2017).

[26] Boshier, "Spring Hill COTA Report 2017," 29.

[27] Neil Beales et al., "Report of the Inquiry into the Prisoner Riot at Spring Hill Corrections Facility on Saturday 1 June 2013" (Wellington: Department of Corrections, 2014).

[28] United Nations General Assembly, "Mandela Rules", Rule 12.

[29] Walters, "A Broken Prison System."

As it currently stands, the Corrections Act does not explicitly permit double-bunking. Instead, section 82 of the Act provides broad executive power to the Chief Executive to determine the standards of accommodation. The power to place people in double-bunked cells is outlined in section 66 of the Corrections Regulations. Although we are unaware of any challenges to double-bunking before the courts, it is arguable that the section 66 of the Regulations is unlawful, as it breaches New Zealand human rights standards.

Clause 19, however, clears up any legal uncertainty and entrenches Corrections' ability to impose double-bunking. It inserts section 82A, which is as follows:

> *82A Types of permitted accommodation*
>
> *Subject to any restrictions set out in this Act or regulations made under this Act, a prisoner may be accommodated in an individual cell, **a shared cell**, or a self-care unit.*

Therefore, under section 82A, the amendment contains explicit language which empowers Corrections to place people in a shared cell. This is a shift in the wrong direction. **The practice of double-bunking should be abolished immediately. Allowing double-bunking to continue would lead to more sexual victimisation of vulnerable people and greater violence in prisons**. Addressing the overcrowding crisis in New Zealand prisons requires an immediate reduction in the number of people in prison and the end of breaches of prisoners' human rights.

PART 4: SEARCHES BY DOGS

Clause 24 amends section 97(3) of the Corrections Act, which relates to the use of dogs for searching. The current wording of the section is that "While any officer is using a dog for the purposes of searching any person, the person who has control of the dog *must not allow* that dog to come into physical contact with the person being searched."[30] The amendment would change this to state "While any officer is using a dog for the purposes of searching any person, the officer who has control of the dog *must take reasonable steps to prevent* the dog from coming into physical contact with the person being searched."[31]

By changing the wording of the section from "must not allow" to "must take reasonable steps to prevent", the amendment softens the responsibility of the officer who is handling the dog. The wide scope of "reasonable steps" makes this amendment open to abuse by Corrections officers. A "reasonable steps" standard is far too open to interpretation and

[30] Corrections ACt 2004, s 97(3)
[31] Corrections Amendment Bill 2018, Clause 24.

could lead to higher rates of injury to searched people. Put simply, if an officer cannot sufficiently control the dog to stop it from touching the searched person, that officer should not be handling that dog. **PAPA opposes clause 24.**

PART 5: POLICE CELLS

Clauses 7, 8, 15, and 28 provide a framework for the use of police cells by Corrections as "temporary" accommodation during times of overpopulation. Clause 7, under a proposed section 32A(1), allows the Minister to "declare any land or building, or part of any land or building, that is a Police jail to be part of a particular established corrections [sic] prison". This is not a reasonable response to the overcrowding crisis in New Zealand prisons. The only reasonable response is to immediately reduce the number of people in prison.

People in police jails have severely limited rights compared to those in prison cells. For example, they can be denied the right to exercise (and time out of cell), as well as the rights to private visitors, receiving mail, making outgoing phone calls, and access to information and education.[32] In other words, under this amendment, prisoners held in police jails could be held in their cells for 24 hours per day, with no contact with the outside world, and no way to meaningfully use their time. This is in breach of the fundamental rights to humane detention of these people, and undermines the supposed rehabilitative goals of Corrections.

PAPA opposes clauses 7, 8, 15, and 28, as they expand the potential use of police jails to detain prisoners. Instead, this practice should be abolished.

PART 6: DRUG PROHIBITION

Clause 4 amends the interpretation section of the Corrections Act to include psychoactive substances under the definition of "drug". This amendment would subject more people to mandatory drug testing[33] and internal offence charges, which can result in up to 15 days of solitary confinement,[34] loss of privileges for up to 3 months,[35] and loss of wages for up to 3 months.[36]

[32] Corrections Act 2004 s 69(3).
[33] Under Corrections Act 2004 s 124.
[34] Corrections Act 2004 s 137(3)(c).
[35] Corrections Act 2004 s 137(3)(a).
[36] Corrections Act 2004 s 137(3)(b).

Evidence-based research, consistently demonstrates that prohibition is an ineffective method to deal with problematic drug use and leads to worse health outcomes.[37] **PAPA opposes the prohibitionist response to problematic drug use and, therefore, opposes clause 4.** We recommend that the Select Committee propose reforms to roll back prohibition, not to increase it.

PART 7: TATTOO PROHIBITION

Clause 26 of the Bill inserts new offences in section 128 of the Corrections Act:

> *(o) tattoos another prisoner:*
>
> *(p) receives a tattoo with his or her consent:*
>
> *(q) tattoos himself or herself:*

In other words, the Bill bans the practice of tattooing in prison. As tattooing would become an offence, a person who has been proved to have committed an offence under one of the subsections, can be sentenced to up to 15 days of solitary confinement,[38] loss of privileges for up to 3 months,[39] and loss of wages for up to 3 months.[40] This is a regressive reform that undermines the already-limited ability for Māori and Pasifika people to engage in traditional cultural practices in prisons. **PAPA considers this reform to be racist, as it criminalises Māori and Pasifika cultural practices.**

Tattoos can also have a therapeutic effect on people suffering from mental illness. Tattoos are often used to cover self-harm scars[41] and to reclaim histories and traumas in a creative way.[42] This reform would punish people for providing and accessing a potentially rehabilitative outlet, and could cause the mental health crisis in prisons to become even worse than it already is.

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[37] New Zealand Drug Foundation, "Whakawātea Te Huarahi: A Model Drug Law to 2020 and beyond" (Wellington: New Zealand Drug Foundation, 2017).
[38] Corrections Act 2004 s 137(3)(c).
[39] Corrections Act 2004 s 137(3)(a).
[40] Corrections Act 2004 s 137(3)(b).
[41] Serena Solomon, "How Tattoos Can Ease the Emotional Pain of Self-Harm Scars," *Vice*, April 22, 2015, https://www.vice.com/en_us/article/gqm534/summer-is-the-hardest-time-to-hide-self-harm-scars-511.
[42] Olivia Callaghan, "How My Tattoos Helped Me Erase a History of Self-Harm," *Healthline*, January 8, 2018, https://www.healthline.com/health/depression/tattoos-mental-illness.

If the concern is about the health impacts of using unsafe or unclean equipment, the Department of Corrections should instead provide clean, safe tattooing equipment for incarcerated people. Prohibition of tattoos is an unfair and regressive reform.

PART 8: PHONE COMMUNICATIONS

Regular communication with loved ones has beneficial effects on prisoners' mental health, wellbeing, and capacity for rehabilitation.[43] Placing a charge on phone calls results in de facto penalties against prisoners from low-income backgrounds, and prisoners who are unable to work. It also adds to the financial burdens of family of prisoners, who may already be struggling on just one-parent's income, while the other is incarcerated.

Clause 16 of the Bill amends section 77(6) of the Act, which currently states "Every prisoner who makes an outgoing telephone call must meet the cost of that call, except where this Act, or any regulations made under this Act, provide otherwise." The Bill would replace subsection 6 and insert a new subsection 7:

> *(6) Every prisoner who makes an outgoing telephone call may be required to—*
>
> *(a) meet the cost of the call; or*
>
> *(b) pay a fee.*
>
> *(7) Despite subsection (6), a prisoner is not required to meet the cost of an outgoing telephone call or to pay a fee if this Act, or any regulations under this Act, provides otherwise.*

Although the meaning here is ambiguous, the change appears minimal. Instead of the Act assuming the incarcerated person *will pay* for the call unless the Act or Regulations provide otherwise, the incarcerated person *will not pay* for the call if the Act or Regulations provide otherwise. The reform may, but will not necessarily, lead to a more widespread capacityfor prisoners to make outgoing calls free-of-charge.

PAPA instead proposes that the right to make outgoing calls free-of-charge be enshrined in the Act. Ensuring regular contact with whānau is crucial for the rehabilitation and reintegration of incarcerated people. Making outgoing calls free-of-charge will help to address stagnant recidivism rates and should be implemented.

[43] Minnesota Department of Corrections, "Effects of Prison Visitation on Offender Recidivism" (St Paul: Minnesota Department of Corrections, 2011).

PART 9: RESTRAINTS BY CHAIN AND IRONS

Clause 20 bans the use of chains or irons to restrain a prisoner. Although the Corrections Regulations do not currently empower the Department to use these kinds of restraints, their explicit prohibition is welcomed. **PAPA supports the insertion of sections 87(6) and 87(7) under clause 20.**

RECOMMENDATIONS AND CONCLUSION

PAPA makes the following conclusions:

1. We oppose Clause 14 as it entrenches the power of Corrections to deny the ability of at-risk prisoners to associate with others. It, in effect, restates Corrections' ability to impose solitary confinement on mentally ill prisoners.
2. Clause 24 of this Bill would lead to more people being sexually assaulted and would undermine the security of prisons and the safety of all people in them. We oppose Clause 24.
3. We oppose clauses 7, 8, 15, and 28, as they would expand the potential use of police jails to detain prisoners.
4. We oppose the prohibitionist response to problematic drug use and, therefore, oppose Clause 4.
5. We consider clause 26 to be racist, as it criminalises Māori and Pasifika cultural practices, and we believe it could cause further harm to mentally ill prisoners by removing a potentially rehabilitative outlet. We oppose the prohibiting of giving or receiving tattoos.
6. We support the insertion of sections 87(6) and 87(7) under clause 20.

PAPA makes the following recommendations:

7. We recommend that at-risk prisoners be guaranteed at least 4 hours out of cell, which includes association with others, as well as meaningful therapeutic intervention.
8. We recommend that Clause 25 be amended to remove the compulsory strip searches of all prisoners entering an at-risk unit.
9. The practice of double-bunking should be abolished immediately. Allowing double-bunking will lead to more sexual victimisation of vulnerable people and greater violence in prisons.
10. We recommend the abolition of the practice of using police cells to house prisoners.

11. We recommend that the Select Committee propose reforms to roll back drug prohibition, including in prison.
12. We recommend that the right to make outgoing calls free-of-charge be enshrined in the Act.

Overall, we see this Bill as a missed opportunity to undo many of the worst excesses of the New Zealand prison system.