

IN THE WAITANGI TRIBUNAL

Wai 2700

Wai 3011

IN THE MATTER OF the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF the Mana Wāhine Kaupapa
Inquiry

BY Paula Ormsby, on behalf of
herself, the Wāhine Toa Chapter
of the Mongrel Mob Kingdom,
and Priority Whānau, including,
Māori women and their children
associated with other gangs

BRIEF OF EVIDENCE OF PAULA ORMSBY

12 FEBRUARY 2026

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RECEIVED

Waitangi Tribunal

12 Feb 26

Ministry of Justice
WELLINGTON

I, **Paula Ormsby**, Consultant, of Kirikiriroa, state as follows:

1. I provide this Brief of Evidence (“BoE”) in support of my claim, Wai 3011. My BoE sets out evidence that supports the claim that the Crown’s actions and legislation breach te Tiriti o Waitangi (“te Tiriti”) in ways that have prejudiced wāhine Māori.
2. I am of Ngāti Apakura, Ngāti Maniapoto descent and am the named claimant for the Wai 3011 Wāhine Toa claim. Furthermore, I am also the leader of the Wāhine Toa movement for wāhine Māori and their children within the Mongrel Mob Kingdom.
3. Outside of this mahi that I do within the Wāhine Toa movement, I am also an educationalist with vast experience in early childhood, primary, and tertiary education, with a particular focus on Māori education.
4. My evidence speaks to issue 1 of the Inquiry’s Statement of Issues, which is as follows:

What are the Crown’s duties and obligations under te Tiriti/the Treaty concerning the exercise of rangatiratanga and tikanga by wāhine Māori in relation to their status, roles, responsibilities, practices, values, and beliefs?

5. This BoE should be read alongside the speaking notes filed on my behalf during the Tūāpapa Phase Hearings dated 24 February 2021.¹

B: Mana Wāhine in Educational spaces

6. As part of the mahi that I have done and been involved with, I have experienced repeated exclusion and silencing of wāhine Māori within educational spaces. This has occurred across a range of professional and educational settings and has significantly been directed both at myself and at other wāhine Māori. In particular, wāhine Māori who are associated with the Wāhine Toa Movement of the Mongrel Mob have been disproportionately excluded from meaningful participation and engagement with the Crown.

¹ Wai 2700, #A055.

7. In my experience, when issues around equity, tikanga, culturally unsafe practices, or the marginalisation of wāhine are raised, these concerns are frequently minimised in ways that undermine their legitimacy. Rather than being engaged in good faith, I have not been able to engage with the Crown or Crown entities. If I did, I would be classed as overly emotional, confrontational, or disruptive. This framing has the effect of silencing wāhine Māori and discouraging us from speaking openly or advocating for change, especially for wāhine.
8. These dynamics have resulted in wāhine Māori being excluded from leadership opportunities and funding rounds within the educational system. While employed as the Pou Tautoko ā Rohe for Mahi Tahī Akoranga Trust (“Mahi Tahī”), I applied to access prisons across Aotearoa to support the delivery of long-standing Mahi Tahī programmes that had been operating in prisons for many years. These were established Mahi Tahī programmes and not personal initiatives of my own. My applications were declined on multiple occasions. In addition to refusing access, the Department of Corrections (“Corrections”) ceased engagement with me altogether, which prevented me from carrying out my role, including coordinating other Kaiako to deliver programmes supporting prisoners. This effectively excluded me from fulfilling my role, despite Mahi Tahī advocating strongly on my behalf.
9. I was informed by Corrections that my affiliation with the Mongrel Mob was a determining factor in the decision to deny access. This decision was not based on any assessment of the programmes content, or alignment with rehabilitation outcomes, but rather on my personal affiliations. As a wāhine Māori, my educational programme was subjected to heightened scrutiny. My affiliations are grounded in whanaungatanga and community relationships. However, this was reframed as being a risk factor, rather than recognised as a tool that can be used to work with some of the most marginalised people in the education and justice system.
10. Being denied access to the prisons as a wāhine Māori has prevented my mana being exercised through teaching prisoners and supporting their access to culturally grounded support. Furthermore, my rangatiratanga was diminished

as I was excluded from accessing opportunities that are readily available to non-affiliated people, or institutionally aligned providers. This reinforces that inequitable Crown imposed policies restrict wāhine Māori like me to lead kaupapa that have been designed to serve their own communities.

11. The exclusion and silencing of wāhine Māori reflects broader systemic and institutional practices that privilege Western norms, communication styles, and frameworks of knowledge. Māori ways of knowing, being, and doing are frequently treated as secondary or conditional, rather than as foundational. This creates environments in which wāhine Māori must continually justify their presence, expertise, and right to speak, placing an additional burden on us that is not experienced by non-Māori colleagues.
12. For wāhine Māori associated with the Wāhine Toa movement, these issues are often compounded. Advocacy for Māori rights, mana wāhine, and rangatiratanga is regularly reframed as inappropriate or unprofessional, rather than acknowledged as a legitimate response to inequity and harm. This has resulted in wāhine Māori being subjected to increased scrutiny, surveillance, and disciplinary action, further entrenching power imbalances within educational institutions.
13. The cumulative impact of these experiences has been significant. The exclusion and silencing of Wāhine Toa has affected our professional wellbeing, sense of safety, and ability to participate fully and confidently within educational spaces. It has also limited the capacity of educational institutions to genuinely meet their stated commitments to equity, inclusion, and the principles of te Tiriti.

C: Wāhine grassroots initiative

14. Despite the exclusion from leadership opportunities, I continued to undertake grassroots community-led initiatives that were grounded in kaupapa Māori. Where formal systems failed to provide support or access, I worked directly with whānau, hapū, and community networks to deliver programmes and support based on the needs identified.

15. These grassroots initiatives were developed and delivered without institutional resourcing, relying instead on community relationships, voluntary labour, and collective responsibility. The work focused on supporting some of the most marginalised individuals and communities in Aotearoa, including those who are often excluded from formal educational and rehabilitative programmes.
16. Through this mahi, I have delivered programmes and support that prioritise cultural identity, reconnection, accountability, and wellbeing. This has included working alongside individuals impacted by the justice system, supporting pathways back into education and learning, and providing culturally grounded guidance that reflects lived experience and whakapapa connections.
17. The effectiveness of these initiatives is directly linked to the trust and credibility established within the communities I work alongside. My ability to engage meaningfully with participants is grounded in shared lived realities and an understanding of the structural barriers they face. These relationships enabled outcomes that would not have been achievable through externally imposed or institutionally designed programmes.
18. The continuation of this work demonstrates our ongoing commitment to education, rehabilitation, and community wellbeing, despite systemic barriers to funding and recognition. It also highlights the capacity of grassroots, wāhine Māori-led initiatives to operate effectively where formal systems have been unable or unwilling to engage.
19. These experiences further illustrate how wāhine Māori leadership is often exercised outside formal structures, not by choice but out of necessity. While this work is frequently undervalued or rendered invisible within institutional frameworks, it remains critical to addressing inequity and supporting meaningful outcomes for Māori communities.

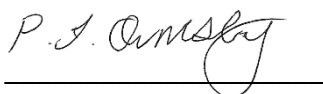
D: Prejudice

20. I have faced persistent and intersecting prejudices as a wāhine Māori within educational and Crown engaged spaces. These prejudices include the racialised and gendered framing of wāhine Māori advocacy as confrontational or

unprofessional, the minimisation of concerns raised about equity and cultural safety, and the exclusion of wāhine Māori voices from meaningful engagement. In particular, my affiliation with the Wāhine Toa movement of the Mongrel Mob has been treated as a disqualifying risk factor, rather than understood within its proper context of whanaungatanga, whakapapa, and community-based leadership. As a result, kaupapa Māori initiatives I sought to lead were subjected to heightened scrutiny not applied to non-Māori or institutionally aligned providers.

21. These prejudices have directly interfered with my ability to exercise rangatiratanga as a wāhine Māori. The denial of access to prisons and funding for my educational programme was not based on the merits, content, or outcomes of the programme, but on Crown-imposed judgments about my affiliations and identity. This prevented me from exercising my mana through teaching, leadership, and service to some of the most marginalised people within the education and justice systems. By excluding me from opportunities readily available to others, the Crown constrained my authority to lead kaupapa designed by and for my community, thereby diminishing both my mana wāhine and rangatiratanga.
22. Despite these barriers, I have continued to exercise rangatiratanga through grassroots, community-led initiatives grounded in kaupapa Māori. This leadership has been carried out outside formal structures not by choice, but out of necessity, in response to exclusion from Crown systems. While this work has often been undervalued or rendered invisible, it demonstrates that wāhine Māori leadership persists even when constrained by prejudice and institutional barriers. These experiences highlight that the issue is not an absence of capability or legitimacy, but the ongoing failure of Crown systems to recognise and support the rangatiratanga of wāhine Māori.

12 February 2026



Paula Ormsby