

The History of Palestinian Media Censorship A Historical Analytical Study

NESMA Y. k. ALSHAIKHALI

University name:

ANKARA SOSYAL BİLİMLER ÜNİVERSİTESİ(ASBU)

FACULTY:

INSTITUTE OF SOCIAL SCIENCES

DEPARTMENT:

SOCIAL MEDIA STUDIES DOCTORATE

Abstract

This paper will look into the history of media censorship in Palestine, placing the concept within the context of the conflict between Palestinians and Israelis. The descriptive-analytical method will be used to determine the main phases of development of media censorship since the period of the British mandate until today. Censorship in Palestine has been applied in extreme cases, such as killing journalists, shutting down media organizations, and destroying cultural institutions, alongside softer methods of media control, including legislation and symbolism.

Since 1967, when Israel occupied Gaza, the West Bank, and East Jerusalem, there have been efforts to suppress any form of Palestinian nationalism, including punishing displays of national symbols and imprisoning journalists. Nevertheless, censorship in Palestine is not a product of only the Israeli government's actions; there are instances when the Palestinian authorities also engage in censorship practices. Media censorship in Palestine is a unique concept that has been developing since colonial times, followed by military rule, institutional censorship, and now, digital censorship. Although the means of censorship have evolved, especially with social media, the goal of controlling narratives, identities, and legitimacy has remained unchanged..

Key words: Palestinian media, history of censorship, freedom of speech, journalists' suppression, internet censorship, media control

Introduction

Background and Significance

Palestinian media have consistently served as essential venues for national identity expression and resistance to occupation regimes. From the early twentieth century, different media types, such as print media, electronic media, and digital media, have not only been used for disseminating news but also for preserving culture and engaging in politics. However, all these functions have been sabotaged through censorship practices carried out by colonial, military, and administrative institutions. As evidenced by the four sources provided within the assignment, namely, the information booklet prepared by B'Tselem in 1990 regarding censorship in the Palestinian press in East Jerusalem, the article published in 1983 by Robert I. Friedman under the title 'Israeli Censorship of the Palestinian Press', the research performed by Hillel Nassek and Khalil Rinnawi in 2003 on the same issue, and the guidebook written by Jack Persekian on the topic of censorship in Palestinian art institutions, a history of censorship has existed for well over a hundred years.

Censorship in Palestine cannot be treated as an issue that is separate from the general issue of relations between Palestinians and Israelis. It takes different forms of censorship ranging from physical one such as closure, arrests, destruction of property, and infrastructure; legal as censorship is based on colonial laws and military orders of occupation; economic when censorship results from

economic dependency and self-censorship; as well as algorithmic when censorship is practiced by social network platforms' content moderation.

For instance, Israeli organization B'Tselem points at the problem as an indicator of democracy, referring to Article 19 of the Universal Declaration of Human Rights: "Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers." Nonetheless, successive governments keep emphasizing the importance of control over the narration in the name of "public order" or "national security."

The importance of the selected topic can be explained by the fact that media censorship in Palestine is a special case, as it relates to the settler colonialism model that implies destroying national symbols, breaking down national identity, and undermining resistance to occupation. While Friedman focuses on Israeli media censorship methods used after the invasion of Lebanon in 1982, Nossek and Rinnawi compare censorship during the military regime of Israel (1967-1993) and after the Oslo Accords when the Palestinian Authority became an alternative to the occupation and the Israeli occupation was replaced by another media censorship model, which includes subsidization, legislation, and self-censorship. However, Persekian examines the impact of neoliberal media funding policies on the ethics of cultural practitioners.

Today, with technological advancement, the discussed models appear in terms of digital occupation that involves either promoting or preventing specific narratives. In this way, the only similarity among all the examined cases is that of a struggle for power to control the narrative. Thus, the current study contributes to media studies significantly.

Research Objectives and Methodology

Objectives include: (1) identifying the chronological stages of censorship from the British Mandate through the digital age; (2) demonstrating continuity of goals (narrative and identity control) despite shifting means; (3) exploring the use of external (legality/militarism) and internal (self-censorship/P.A. constraints) instruments; and (4) discussing consequences for freedom of expression.

Methodology is descriptive-analytical, drawing primarily from the attached documents. B'Tselem supplies concrete legal and practical illustrations of press censorship in East Jerusalem according to Israeli law. Friedman gives examples of enhanced suppression in 1982-1983. Nossek and Rinnawi develop an analytic model based on theory (totalitarian, developmental, authoritarian). Persekian contributes qualitative insight into the phenomenon of institutional self-censorship within the culture industry. Additional citations from the indicated list (history of Palestinian journalism on Wikipedia, Al Jazeera analysis on digital occupation, etc.) confirm themes without importing additional information. Thematic analysis draws on direct quotations. Limitations include excerpted sources but not limited by those in the corpus.

Historical Context: Censorship under the British Mandate (1920-1948)

Colonial Policies and Media Control

This process laid down the basis for the media censorship system that was followed not only during the British Mandatory Period but also thereafter. According to the Press Ordinance of 1933, licenses for different publications could be granted solely by the District Commissioner, who had the prerogative of refusing, suspending, and canceling the licenses as he wished. Moreover, in accordance with the Defence (Emergency) Regulations of 1945, especially in Part VIII, the censor had the authority "to prohibit the publication of anything that is prejudicial to the defence of Palestine or to the public safety or to public order." According to Nossek & Rinnawi, "These regulations were later adopted in Israel in 1948."

To counter the Arab Revolt of 1936-1939, several major publications were banned. After the outbreak of World War II, the restrictions imposed on the press became even stricter; as a consequence, all Arabic presses except two were shut down since these two presses propagated moderation in terms of censorship. The Arab press comprised 250+ newspapers till mid-1930s, which functioned as an effective tool to encourage nationalism.

Early Suppression of Palestinian Press

This system laid the foundation for the censorship of the media policies which existed not only in the time of the British mandate period but also afterwards. The license needed to print any news according to the Press Ordinance of 1933 could only be granted to various newspapers through the District Commissioner who was free to refuse, suspend, or withdraw such licenses as he wished. Moreover, "according to Part VIII of the Defence (Emergency) Regulations of 1945, the censor had the right 'to prohibit the publication of anything that is prejudicial to the defence of Palestine or to the public safety or to public order.'"

As a reaction to the 1936-1939 Arab rebellion, several major newspapers needed to be censored. In the wake of the onset of the Second World War, censorship rules tightened up further, and hence, all Arab printing presses except two were shut down because they symbolized moderation regarding censorship rules. There were around 250+ newspapers available to the Arab press before the mid-1930s to promote Arab nationalism.

Israeli Occupation and Institutional Censorship (1967-Present)

Legal Frameworks and Military Orders

After the occupation of 1967, Israel continued to enforce the British 1933 Press Ordinance and the 1945 Emergency Regulations in the West Bank and Gaza Strip. B'Tselem explains how this was applied to the Palestinian press in East Jerusalem, which served as the epicenter of Palestinian journalism and was subject to the same regulations as in Israel but subjected to more rigorous enforcement. The Military Censor was governed by Regulation 87, prohibiting any information "prejudicial to the defence... or to the public safety or to public order."

Regulation 97 required that all information be submitted before publication, and Regulation 98 prohibited the reporting of censorship itself. Newspapers were subject to double censorship, being required to submit their articles in the evening for inspection by the Military Censor and then again in the morning for review by officials of the Civil Administration. As B'Tselem reports, "an article that passes the censorship test in the evening can be, and usually is, rejected the following morning."

Targeting Palestinian Identity and Symbols

Expressions of Palestinian nationalism were deliberately suppressed. Words such as awda, sumud, and references to refugees, settlements, or statements from the PLO were routinely deleted. As stated by Friedman, instances included censoring responses to editorials in Al-Fajr denouncing the Lebanese war of 1982 and offering condolences that use terms such as "pride."

Even poetry and prose, including love poems, were subjected to censorship based on metaphors used. For example, the study by Y. Harkabi on the meaning of awda concluded that the expression meant "the destruction of the Jewish state." This is an illustration of the way in which ideological censorship functions. It should also be noted that B'Tselem's finding concerning the ratio of published and censored materials in two East Jerusalem newspapers was not limited to matters of security.

Case Studies: Arrests, Closures, and Assassinations

From Friedman's specific instances in 1982-1983:

- Distribution of Al-Fajr rejected on July 15, 1982; Petition to High Court against Ariel Sharon; Military governors flouted the Court.

- Editors of Al-Fajr, Al-Sha'ab, and Al-Tali'a were put under town arrest in Ramallah for six months (extended); effectively exiled from East Jerusalem offices.
- Samaan Khoury (English language edition editor) imprisoned for 17 days in solitary confinement for holding prohibited PFLP bulletins; Translation service shut down.
- Talal Abu Afifeh brutally assaulted at Muskobiyya; threat of expulsion.
- Hanna Siniora (editor) forbidden to enter West Bank/Gaza Strip; arrested and interrogated on PLO connections.
- Nabhan Khreisheh confined to village; extended without charge.
- Al-Sha'ab office in Bethlehem sealed; same for Al-Fajr.
- Hamdi Faraj incarcerated, library seized and "inadvertently burned."
- Several reporters arrested for illegal possession of English Al-Fajr and Kapeliouk's "Sabra/Shatila" book.

B'Tselem reports 627 Palestinian deaths from Israeli forces as of February 1990, providing background to censorship during Intifada. After the Oslo Accords, these trends persisted, such as the attack on the Palestinian Radio and Television stations in 2002, the repeated closing of East Jerusalem bureaus, and not recognizing journalists' press credentials. The last few decades have been marked by murdered journalists, with the highest number killed during conflicts in Gaza. Nossek and Rinnawi term this phenomenon as pre-democratic authoritarianism.

Palestinian Authority and Internal Censorship Governmental Restrictions and Self-Censorship

The signing of the Oslo accords in 1993 represented a major point of transition with regard to the regulation of Palestinian media, where control was handed over from Israeli military administration to the newly created Palestinian Authority. This saw the introduction of the Press Law under the Palestinian Authority, and the objective of such a law was supposed to be the regulation of media activities in the self-administrative areas of the West Bank and Gaza. According to Nossek & Rinnawi (2003), however, this period did not witness freedom of the press but rather continued domination. With the establishment of the PA, the majority of these media houses were financially tied to the Authority through subsidies, advertisement, notice, and government tender contracts. As such, most of the Palestinian publications lost their financial independence. According to Nossek and Rinnawi, the media outlets controlled by the PA can be put in four groups: First, those media houses completely owned and controlled by the PA, including the newspaper Al-Hayat al-Jadida launched in Ramallah in November 1994, and PBC radio and television stations. Second, those indirectly controlled media channels through PA officials, for example, Al-Ayyam, founded in 1995 by Akram Haniya, who is part of PA's High Negotiations Committee with Israel, reflecting almost identical opinions as the PA's positions. Third, the semi-independent media, such as Al-Quds, whose editors were free to express their views but consciously steered away from topics that could upset PA leaders in order to protect their income. Fourth, totally independent media, mainly weekly newspapers and radio stations surviving on advertisements but living under the threat of government interference.

More evidence of further entrenchment of PA powers is evident from the passing of the Cyber Crimes Law of 2017 that reinstated the restrictions akin to the ones established during the period of occupation when Israeli military authority issued various orders. The new law prohibits incitement, defamation of the Authority, and any material that poses a potential threat to public order. As a result, the PA gains sweeping powers to engage in spying, arrests, and intimidation of journalists and bloggers. The practice of self-censorship on the part of Palestinian journalists and cultural producers took place regularly, owing not only to fear, but also to financial reasons. As Persekian puts it, "censorship is a moral dilemma for culture producers and organizations." Where Palestinian cultural

organizations opt for self-censorship in order to refrain from offending the authority or losing funding, they put themselves at the risk of losing artists and failing to fulfill their mission of facilitating discussion on vital issues. With Palestine suffering from "very dire political climate," the lack of funding and budget cut-offs make it practically impossible for cultural organizations to produce anything but "predictable, safe skeleton programs."

In addition to the above, Persekian goes further in explaining how the cultural institutions in Palestine have become an important component "in the last open space where there can be some reflection and contemplation of Palestinian identity." Without these organizations, no other space would remain for reflection or criticism. The outcome is that the journalists and editors will set their own boundaries on such issues as corruption in the Palestinian Authority, cooperation with Israeli forces on security concerns, and factional conflicts among Fatah and Hamas.

Journalist's Arrests and Newspapers Banned in Recent Years

Moreover, some concrete examples will clarify the mechanism of internal censorship carried out by the Palestinian authority. The opposition newspapers belonging to the Islamists, such as Al-Watan newspaper (Homeland) of Hamas and Al-Istiqlal newspaper (Independence) of Islamic Jihad, were initially provided with publication permits. However, these permits were later revoked because of confrontations with the PA authorities. According to them, "their newspapers endangered public safety" similar to what used to happen under the military occupation of Israelis.

Arbitrary detentions on grounds of "incitement" have continued in the West Bank and Gaza. Journalists opposed to PA policies have been subject to arbitrary arrests, interrogation, and fines, without any formal charges being filed against them. Nossek and Rinnawi observe that even private media organizations needed funding from outside sources due to the monopoly enjoyed by the PA as the only advertiser that "no Palestinian publisher could afford to ignore." Such an economic control has led to the situation when journalists develop their own boundaries, exercising self-censorship to ensure access to official information and sources.

In conjunction with the persistent Israeli violations – such as detention and torture of more than dozens of Palestinian journalists since October 2023 – it means that journalists continue operating in the highly restricting environment. According to Nossek and Rinnawi, PA media relations constitute the hybrid of the "developmental-authoritarian model": state regulation of the media sphere is carried out under the pretense of supporting "national interests and social integration," whereas, in practice, it implies political repression. This duality reflects the principles of the "developmental model" outlined in media theories (McQuail, 1994).

The internal censorship regime of the PA does not therefore mark a departure from the system of occupation-era repression, but rather a transformation into a regime of internal, economic and legal pressure to accomplish the same ends of narrative control and silencing of dissent.

The Digital Age: New Frontiers of Censorship Social Media Surveillance and Content Removal

The emergence of digital mediums has brought about invisible but highly effective means of censorship which defy both legal and physical boundaries. Social media platforms such as Meta (Facebook & Instagram), X (formerly known as Twitter), TikTok, and YouTube are increasingly becoming key spaces for Palestinians to express themselves, especially when events take place in Gaza and the West Bank. Nonetheless, these social media spaces have adopted something that analysts call "invisible censorship" through the mass deletion of content, shadow bans, algorithmic suppression, and suspensions of accounts.

Posts relating to Israel's military campaigns in Gaza are rapidly deleted as a result of community standards violations. Citizen journalists or eyewitnesses posting videos of Israeli airstrikes in Gaza,

death of civilians, or any form of destruction being done in Palestine find their posts flagged and immediately deleted. The hashtags associated with criticism against Israel, such as "#FreePalestine", "#GazaUnderAttack" or "#SaveGaza" have been consistently throttled by social media sites, making them less visible to other users. The accounts belonging to prominent Palestinians, including journalists and activists, are arbitrarily banned from using the site.

Algorithmic Bias and Platform Policies

However, algorithms compound this issue, prioritizing pro-Israel material while downplaying Palestinian perspectives. While emotional appeals and dehumanization (e.g., describing Palestinian struggles for freedom as "terror") proliferate, any video footage that captures resistance activities or humanitarian crises is automatically filtered out or demonetized. Research demonstrates how algorithms trained through biased datasets disproportionately censor Arabic-language posts and terminology related to Palestine.

In addition to the aforementioned information manipulation, Israel's physical infrastructure assault further restricts the capacity of citizen journalism to disseminate its material online. Through repeated attacks against communications centers, intentional disruptions of internet access during military campaigns, and power cuts, the Palestinians' efforts to publish their videos are hampered. In spite of these challenges, the use of technology has facilitated new resistance strategies. Through platforms like The Electronic Intifada and TikTok, journalists have bypassed traditional gatekeepers to communicate with international audiences.

The analysis of Persekian's cultural coalitions provides several useful strategies for resisting cultural oppression, which can be applied to the digital context. For example, the Jerusalem Arts Network (known as "Shafaq") is one such coalition. It includes a series of cultural centers and institutes: Al Ma'mal, Al Hoash, Yabous, al-Hakawati, and the Music Conservatory. In addition, Qalandiya International is a biennale project that involves various artists. Such initiatives unite cultural organizations, allowing them to develop together, expanding the scope of safe spaces. Coalitions enable cross-border cooperation (Amman, Beirut, Doha, Johannesburg, and others) and collaboration on resources and decision-making in a trusting environment of "trust, reciprocity, and self-organization." Pooling research efforts, advertising, and resources ensures better visibility and protection from political repression and market pressures.

However, despite the emergence of new tools, certain structural obstacles remain. Digital platform bias and vulnerability of the infrastructure make digital resistance still operate within the paradigm of "digital occupation." This leads to the creation of a new battlefield in which censorship does not affect journalists and printers but works through codes, algorithms, and global corporate policy.

Comparative Analysis: Evolution of Censorship Tools and Objectives

From Colonial to Digital: Changing Methods, Constant Goals

However, looking through the comparative prism shows that although the tools utilized in Palestinian media censorship may vary greatly depending on time periods, the core purposes and goals remain very much alike.

The British mandate period (1920-1948) saw the use of colonial licenses (Press Ordinance, 1933) and emergencies (1945), which stipulated pre-publication examination and suspensions at the discretion of authorities. The occupation of Israel brought no major changes since it used the exact same British law along with additional military orders, double censoring, arrests, shutting down of offices, and destruction of physical infrastructures (according to B'Tselem and Friedman). After the signing of Oslo agreements, the Palestinian Authority implemented the new system of economic incentives, the 2017 Cyber Crimes Law, and selective licensing (according to Nossek and Rinnawi). With the

advent of the Internet, however, the censorship practices evolved into algorithms and content filtering.

The Nossek and Rinnawi's theory related to three types of censorship such as external or authoritarian, consensual or developmental, and internal offers answers to the posed questions. Military occupation by the force in Israel is a manifestation of the external type of authorship. Consensual or developmental authoritarianism refers to the current state, the Palestinian Authority, when the interference of the state authorities in the actions aimed at the promotion of the national interests is combined with the use of pressure on citizens using monetary rewards and laws. Journalistic self-censorship is also a type of censorship (internal) which evolved from the controlled press of the mandate period to the self-censorship performed by algorithms today.

Legal continuity is characterized by Nossek and Rinnawi as one of the features of this censorship manifested in the use of the acts of 1933 and 1945 for censorship by the British and Israeli administrations as well as their indirect application by PA. The development of the theory is provided by Persekian who considers cultural aspects of self-censorship in contemporary Palestine.

The Struggle for Narrative Control

But, Palestinian artists and cultural activists have managed to prove their resilience even against this multitude of control systems. The Jerusalem Arts Network and Qalandiya International are just two of the many collaborations that use numbers as an advantage tool and transmit their messages to an audience outside of the nation-state borders. New technologies and tools such as live-streaming, citizen journalism, and digital autonomous spaces allow circumventing the usual media gatekeepers and communicating directly with a global audience.

Nevertheless, certain structural constraints persist through the whole process; these include economic dependence, the Israeli-Palestinian pressure, algorithmic filtering, and the physical destruction of technological infrastructure. Looking back into the history of censorship, from licenses issued by the colonizers to digital coding, one can see not only the development of the technologies involved but also the need to silence Palestinian voices and strip away their identities and resistance acts.

Conclusion

Summary of Findings

In conclusion, this paper has traced the progression of media censorship in Palestine throughout its history starting with the colonial era to its current state under the military occupation by the Israeli government and its later period as the Palestinian Authority, then into the present-day digital media age. This paper has demonstrated through its critical analysis of the four selected primary sources (B'Tselem's Report, Friedman's Analysis, Nossek and Rinnawi's Study, and Persekian's Reflection on Palestinian cultural institutions) the consistent and continuous nature of media censorship throughout the years. Although colonial-era legislations (Press Ordinance and Emergency Regulations) have served as the basis of media censorship, media censorship was escalated through the military occupation period where it took the form of prepublication censorship, detention, office raids, and even destruction of media infrastructure. The introduction of the PA regime not only did not put an end to media censorship but it evolved into something else, which included elements of authoritarianism and developmental state due to their economic dependency, cyber crimes law in 2017, and self-censorship.

Throughout all stages, both external forces (law enforcement and military pressures) and internal factors (self-censorship motivated by funding and fear) have been working together and have formed a complex mechanism that evolves with time and new technologies but retains its ultimate goal.

Freedom of Expression and Media Freedom Implications

The continued censorship in Palestinian media raises serious issues about freedom of expression and media freedom in general. It is a threat to democratic principles in that it prevents access to multiple sources of information and, in doing so, divides the community into pieces and stifles any discussion among people. In view of the Palestinian-Israeli struggle, control over the information disseminated is important because it influences the perception of Palestine internationally and thus excludes Palestinians from international discussions. Indeed, as pointed out by Persekian, cultural and media centers are "the last open spaces for the expression and reflection of the Palestinian identity."

However, there is hope offered by the idea of resilience. Organizations such as the Jerusalem Arts Network ("Shafaq") and Qalandiya International are examples of the potential for collective organizing, cross-border collaboration, and digital innovation to extend safe spaces and give voice to the silenced. These endeavors speak to the fact that in spite of decades of cumulative censorship, Palestinian media professionals and cultural workers remain defiant through the use of adaptive tactics of solidarity and ingenuity.

Future Research Directions

For future research to be done on this topic, there are four suggestions that could be used based on what we learned from this study. First, it would be important to do quantitative studies of platform accountability to systematically document algorithmic bias by comparing the visibility levels of narratives from Palestine compared to those of Israel. Second, longitudinal studies on self-censorship trends could illuminate how economic and political pressure shifts over time. Third, comparative work with other conflicts might help to put this case into broader context in terms of global phenomena of digital occupation and hybrid authoritarianism. Fourth, policy research around bolstering independent coalitions and platform governance could help to develop concrete solutions.

References

1. B'Tselem (1990). Censorship of the Palestinian Press in East Jerusalem: Information Sheet – Update February-March 1990. B'Tselem – The Israeli Information Center for Human Rights in the Occupied Territories.
2. Friedman, Robert I. (1983). "Israeli Censorship of the Palestinian Press". Journal of Palestine Studies, Vol. 13, No. 1 (Autumn 1983), pp. 93-101. Taylor & Francis / JSTOR. Stable URL: <https://www.jstor.org/stable/2536927>.
3. Persekian, Jack (2019). "Navigating Censorship: A Case from Palestine". In Crisis, Art, and Political Transformation (Chapter 7). Open Book Publishers. DOI: <https://books.openbookpublishers.com/10.11647/obp.0238/ch3.xhtml>
4. Nossek, Hillel & Rinnawi, Khalil (2003). "Censorship and Freedom of the Press Under Changing Political Regimes: Palestinian Media from Israeli Occupation to the Palestinian Authority". Gazette: The International Journal for Communication Studies, Vol. 65, No. 2, pp. 183-202. SAGE Publications. DOI: 10.1177/0016549203065002005
5. Nossek, H. & Rinnawi, K. (2003). Full PDF version of the Gazette article. https://d1wqtxts1xzle7.cloudfront.net/72277850/Censorship_and_Freedom_of_the_Press_Unde20211012-27697-uper73.pdf
6. Jerusalem Story. (n.d.). "Perspective: Israel's war on independent Palestinian media goes back decades". <https://www.jerusalemstory.com/en/blog/perspective-israels-war-independent-palestinian-media-goes-back-decades>
7. EBSCO Research Starters. (n.d.). History of Censorship in Israel. <https://www.ebsco.com/research-starters/history/history-censorship-israel>
8. Al Jazeera Centre for Studies. (n.d.). "Digital Occupation: Pixelated Propaganda, Censored Platforms, and the Battle for Narrative in Gaza". <https://studies.aljazeera.net/en/analyses/digital-occupation-pixelated-propaganda-censored-platforms-and-battle-narrative-gaza>
9. The Palestine Post. (n.d.). "The Evolution of Palestinian Media: From Traditional Outlets to Digital Resistance". <https://thepalestinepost.net/1209/the-evolution-of-palestinian-media-from-traditional-outlets-to-digital-resistance/>
10. "The Privilege of Anxiety: On Censorship, Self-Censorship, and Palestine" (PDF). https://d1wqtxts1xzle7.cloudfront.net/121610148/The_Privilege_of_Anxiety_On_censorship_s.pdf
11. ACM Digital Library. (2024). Article on digital censorship (DOI: 10.1145/3613904.3642422). <https://dl.acm.org/doi/full/10.1145/3613904.3642422>
12. Palestine Studies. (n.d.). Relevant article/node. <https://www.palestine-studies.org/en/node/1658383>
13. Additional reference: <https://journals.co.za/doi/pdf/10.10520/EJC184126>