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Honour-Based Suicides: Shaping Criminal Law

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1. The Challenge

The purpose of criminal law is to ensure victims receive the legal protection they need and to appropriately deter and punish criminals. However, for victims of domestic, forced, and honour-based suicides, this is not always the case. Loopholes within the current justice system sometimes allow perpetrators to escape criminal liability, even when their prolonged abuse leads to the victim's suicide.

In response to this issue, legal academics Dr. Maz Idriss and Mr. Jonathan McGahan, in collaboration with *The Halo Project*, initiated research into honour-based suicides. The aim of the study was to better understand what is working – and what is not – within criminal law, and to explore ways to bring perpetrators to justice. One area that has been largely overlooked in legal research is the gender-specific nature and experiences of women who have died by honour-based suicide, which this Policy Brief seeks to address. While the study focuses on the experiences of minority women, the authors emphasise that laws addressing suicides linked to domestic abuse are crucial for all victims, regardless of race or ethnicity. From an intersectional perspective, honour-based suicides are more prevalent among minority women, but it is vital to note that the issue of suicides resulting from domestic abuse is relevant to *all* women.

2. Honour-Based Suicides

Forced (honour-based) suicides occur when families (in particular, men) pressure women to take their own lives to avoid being held responsible for murder, driven by honour-based motivations. These suicides are termed 'forced' because the family directly coerces the victim.¹ Much like so-called 'honour' killings, forced suicides are the result of men's decisions and imposition on the victim. The family's active participation and encouragement for the victim to die by suicide are evident. The death may be presented as a suicide (voluntarily committed by the victim) or as an accidental death, with the perpetrators denying any encouragement or honour-based motivations, allowing them to evade liability.

On the other hand, honour-based suicides (which are not forced) occur when a woman takes her life due to the unbearable pressure and restrictions imposed by her family, who believe her actions or alleged misbehaviour have brought dishonour and shame to their reputation. While the family's disapproval and honour-based abuse play a direct role in her decision to die by suicide, no overt coercion is involved.

A key distinction between so-called honour killings and forced suicides is that the latter are portrayed as voluntary actions, allowing family members to avoid accountability. These suicides are presented as the victim's own free will, yet the family's contribution to the tragedy is often hidden, ignored, or unacknowledged. In Smith et al.'s study, hanging was the most common method used in honour-based suicides, though other cases involved burning to death, jumping in front of a train, or ingesting poison purchased from India.² Whether forced or honour-based, both forms of suicide represent a grave issue of violence against women and girls. Both stem from the persistent abuse, control, and oppression of women, upheld by male, family and community networks intent on preserving their notions of honour and reputation.

3. What we discovered

a. Suicide rates of South Asian women

Our research highlights a significant gap in the recording of forced and honour-based suicides by police and statutory bodies, as these deaths are rarely documented with reference to honour-related motivations. To investigate this issue, we examined historical statistics of suicides among South Asian women. The data reveals that suicide rates among South Asian women, particularly those aged 15-24, have historically been more than double the national average.³ A study by McKenzie et al. (1993-2003) further showed a notable increase in suicide rates among young South Asian women, with an 81% higher rate compared to their counterparts in England and Wales.⁴

In several studies, there is a clear pattern of heightened suicide and self-harm risk among South Asian women, particularly in the UK. Husain et al. (2006) found that South Asian women aged 16-24 were significantly more likely to self-harm or die by suicide compared to their white counterparts.⁵ A 2008 study showed that the suicide risk for South Asian women in England and Wales was nearly double that of white women.⁶ Aitken and Munro's 2018 research highlighted a correlation between honour-based abuse and suicidality, with a disproportionate number (56.5%) of cases coming from South Asian backgrounds.⁷ Smith et al.'s 2020 study also identified honour-based suicides among South Asian women.⁸ These findings suggest a persistent, elevated risk of suicide and self-harm among South Asian women, especially in the context of cultural pressures and honour-based abuse. The question remains: why is this the case?

Among South Asian women, there is a significant link between honour-based abuse and suicide, largely due to cultural factors

¹ Honour Based Violence Awareness Network, available at <http://hmv-awareness.com/forms-of-hbv/>.

² JM Smith et al, *Building a Temporal Sequence of Developing Prevention Strategies, Risk Assessment, and Perpetrator Interventions in Domestic Abuse Related Suicide, Honour Killing, and Intimate Partner Homicide* (University of Gloucestershire, 2022), available at https://eprints.glos.ac.uk/10579/16/10579_Monckton-Smith_%282022%29_Home_Office_Report.pdf, at 29.

³ VS Raleigh and R Balarajan, 'Suicide and Self-Burning Among Indians and West Indians in England and Wales,' (1992) 161(3) *British Journal of Psychiatry* 365.

⁴ K McKenzie et al, 'Suicide Rates in People of South Asian Origin in England and Wales: 1993-2003' (2008) 193(5) *The British Journal of Psychology* 406.

⁵ MI Husain et al, 'Self-Harm in British South Asian Women: Psychosocial Correlates and Strategies for Prevention' (2006) 5 *Annals of General Psychiatry* 7.

⁶ McKenzie et al, above n 4, at 408. See also N Husain et al, 'Prevention of Suicide in Ethnic Minorities in the UK', (2009) 2(1) *Ethnicity and Inequalities in Health and Social Care* 10, at 11.

⁷ R Aitken and V Munro, *Domestic Abuse and Suicide: Exploring the Links with Refuge's Client Base and Work Force* (Refuge, 2018), at 27. See also V Munro and R Aitken, 'From Hoping to Help: Identifying and Responding to Suicidality Amongst Victims of Domestic Abuse' (2020) 26(1) *International Review of Victimology* 29; and C. Christie et al, *Domestic Abuse Links to Suicide: Rapid Review, Fieldwork, and Quantitative Analysis Report*, (Home Office Report, 2023), available at <https://osf.io/preprints/osf/4t9ab>.

⁸ Smith, above n 2, at 10.

that hinder appropriate intervention. These include societal expectations around honour, shame, and patriarchal control, which prioritise submission and deference to men. Additionally, there are cultural barriers that discourage divorce, relationship breakdowns, and seeking help for personal issues.⁹ These factors can prevent women from accessing the support they need, increasing their vulnerability to abuse and suicide.

South Asian women often face barriers in accessing mental health services, which have worsened during the recent pandemic.¹⁰ Factors such as family dynamics, cultural beliefs, and societal constraints contribute to their low uptake of care. Many are hesitant to seek help due to concerns over confidentiality, particularly if healthcare providers are familiar with their families. Additionally, a lack of cultural awareness among professionals, leading to oversimplified solutions, further complicates the situation.

Issues surrounding migration, language barriers, employment, economics, financial pressures, and dependency on family can also lead to feelings of isolation, diminished self-esteem, and a lack of belonging. For women facing honour-based abuse, these struggles are intensified, contributing to depression, a sense of entrapment, and vulnerability to suicide.¹¹ In some cases, suicide may be seen as a final act of protest, where women assert control over their bodies, symbolically reclaiming ownership of their lives and making a statement to their families. This act can be an expression of determination in a life where they lack power or autonomy.¹²

Recommendation 1:

Statutory agencies to improve their understanding of forced or honour-based suicides by enhancing statistical and data collection on these specific cases within the broader suicide data, including the ethnicity of victims. There is an urgent need for the College of Policing to issue guidance on honour-based suicides, and for the police and coroners courts to conduct thorough investigations into suicides (through enhanced assessments) to identify any potential foul play or involvement of perpetrators. Perpetrators may have contributed to the victim's death, either through direct participation or abuse, driven by honour-based motivations.

b. Prosecutions under the Suicide Act 1961

Investigating the motive behind a suicide is challenging, particularly when the victim does not survive to explain their reasons. In cases of honour-based suicides, where families pressure a woman into taking her own life but present it as voluntary, the perpetrators are unlikely to confess to the crime, as they seek to avoid imprisonment. In such cases, Section 2(1) of the 1961 Act is crucial, and authorities should prioritise its application. While the Act is often referenced in discussions about medically-assisted dying for the terminally ill, it is also important for cases where a woman's suicide might have been forced or encouraged due to domestic or honour-based abuse.

Section 2(1) of the 1961 Act makes it an offence for a person (D) to encourage or assist another person's suicide or attempted suicide. This is true if D's actions are capable of encouraging or assisting the suicide and D intended for this to happen. Anyone convicted of this offence can face up to 14 years in prison. Section 2A(3) further clarifies that an act capable of encouraging suicide includes situations where someone pressures or threatens another person to die by or attempt suicide.

Inducing someone to die by suicide is a crime, including in cases of honour-based abuse. Even if the victim's final act of suicide is voluntary, the person who caused the pressure or coercion is still guilty of an offence. This law is particularly important for abused women who may be coerced into suicide. Under Section 2(1B), a person can be guilty of the offence whether the suicide is completed or not.

The main criticism of pursuing prosecutions under the 1961 Act is the rarity of such cases. Between 1 April 2009 and 31 March 2024, only 187 assisted suicide cases were referred to the Crown Prosecution Service (CPS). Of these, 127 cases were not pursued, 36 were withdrawn, and only six remain ongoing.¹³ This lack of prosecutions raises concerns in cases of forced suicide, as proving encouragement could be challenging, especially if families, particularly in honour-based cultures, remain silent about the circumstances. Additionally, the Act has rarely been applied in cases of violence against women and girls.

Recommendation 2:

Statutory agencies should focus on prosecuting and gathering evidence against perpetrators involved in domestic and forced suicides under the 1961 Act. This means that authorities should actively investigate and pursue legal actions against individuals responsible for pressuring or coercing others into taking their own lives. The aim is to hold perpetrators accountable under existing laws to prevent such tragic occurrences and provide justice to victims and their families.

⁹ J. Horder and L. McGowan, 'Manslaughter by Causing Another's Suicide' (2006) 12 Criminal Law Review 1035, at 1035-1036.

¹⁰ See Safety4Sisters, *Locked in Abuse, Locked Out of Safety: The Pandemic Experiences of Migrant Women*, Report, 19 October 2020, available at https://static1.squarespace.com/static/5af498dd3c3a53848b8530b6/t/5f8d43da5688f32ed1347aaa/1603093480213/Locked_in_abuse_locked_out_of_safety_S4Sreport.pdf, at 13.

¹¹ H Siddiqui and M Patel, *Safe and Sane: A Model of Intervention on Domestic Violence and Mental Health, Suicide and Self-Harm Amongst Black and Minority Ethnic Women* (Southall Black Sisters Trust, 2010).

¹² SS Sallan Gul, 'The Role of the State in Protecting Women Against Domestic Violence and Women's Shelter's in Turkey' (2013) 38 Women's Studies International Forum 107, at 111.

¹³ CPS, Assisted Suicide, 8 April 2024, available at <https://www.cps.gov.uk/publication/assisted-suicide>.

c. Loopholes within unlawful act manslaughter

Unlawful act manslaughter could be a potential route for prosecution in cases where the defendant's unlawful act (e.g., assault) directly leads to the victim's death, such as suicide. For example, if a person is pressured into a forced marriage and is then assaulted by the defendant in a fit of rage, resulting in the victim's death by suicide, unlawful act manslaughter could apply. However, securing a conviction can be challenging due to difficulties in proving the unlawful act, establishing causation, or both.

*R v Dhalialwal*¹⁴ is a landmark case in England and Wales, likely the first to address the prosecution of domestic abuse leading to suicide. The case revolved around the interpretation of 'bodily harm' under the Offences Against the Person Act 1861. It presented an opportunity to expand the criminal law to hold perpetrators of domestic abuse accountable for the suicides of their victims, potentially under unlawful act manslaughter. However, the Court of Appeal chose not to adopt this approach.

The case highlights the complex nature of prosecuting such offences, particularly in cases of domestic abuse leading to suicide. It also raised awareness about the need to reconsider legal responses, given that such suicides are a serious violence against women and girls issue. Campaigns, like those by *The Halo Project*, have emphasised the importance of addressing suspicious suicides linked to domestic and honour-based abuse. The recent cases of Demi Hannaway in 2021 and Kiena Dawes in 2022, both of whom died by suicide after prolonged domestic abuse, further underline the ongoing relevance of this issue.

On 22 February 2005, Gurjit Dhalialwal died by suicide after hanging herself in an outhouse at the back of her home in Southall. After her death, several pieces of evidence in the form of a diary, witness statements, court injunctions, police reports and medical reports emerged, which showed a history of domestic abuse. She also suffered psychological abuse and physical assaults. She was previously admitted to hospital having tried to slash her wrists and was recorded as having 'family' problems. On the day of her death, she had an argument with her husband, and he struck her on the forehead. The *Kara* (a religious bangle worn by Sikh men) he was wearing at the time cut her skin. D was then prosecuted for unlawful act manslaughter.

The prosecution relied on the unlawful act of grievous bodily harm under section 20 of the 1861 Act. Typically, when a crime involves physical violence leading to death, establishing a direct causal connection is clear. However, in this case, the CPS determined that while Gurjit had experienced several assaults, they could not prove a direct link between these assaults and

her suicide. Instead of focusing on the last physical assault, the CPS argued that the defendant (D) committed an offence under section 20 by causing serious psychological harm to the victim (V) over the course of years of abuse.

The court faced two key issues in this case: (1) Interpretation of 'Bodily Harm': The question was whether psychological harm could be considered as 'bodily harm' under section 20, even in the absence of a clinical diagnosis; and (2) Causation and V's Own Act: D argued that V's death was not his responsibility because she had broken the chain of causation by her own actions. Regarding the psychiatric aspect, two out of three experts believed V had suffered psychological harm due to prolonged domestic abuse, though they could not confirm any identifiable psychiatric condition. Since V had died, no further mental health examination could be conducted, and the experts relied on second-hand information to understand her experiences.

At trial, the judge stated that while the husband's actions were inexcusable, they did not amount to unlawful conduct. The court struggled to determine whether psychological harm could be considered bodily harm and concluded that there was no legal basis for a conviction. The case did not proceed to trial, and the defendant was acquitted. The judge suggested that focusing on the physical assault (the injury caused by the metal *Kara*) might have led to a conviction, as it would fit within the framework of unlawful act manslaughter. However, the prosecution's focus on psychological harm, which falls outside the scope of the 1861 Act,¹⁵ was the wrong approach. As a result, when the triggering act is not physical violence, it is not deemed unlawful, as psychological harm does not meet the criteria for unlawful act manslaughter.¹⁶

However, the current legal approach to psychological harm is inconsistent with other areas of law that recognise the serious impact of such harm.¹⁷ In the case of forced marriages,¹⁸ if the victim (V) is coerced into marriage without physical assault and later dies by suicide due to the psychological trauma, the perpetrator (D, typically the father) would not be held liable. Yet the essence of forced marriage is that it involves psychological harm,¹⁹ as it infringes on V's autonomy and rights, and coercion can include psychological manipulation.²⁰ The current legal stance is unjust,²¹ as it fails to recognise the severe consequences of psychological harm and unjustly limits liability based on whether the harm meets specific psychiatric criteria,²² such as a diagnosis from a psychiatrist.²³

We argue that the 1861 Act, which was enacted during a time when domestic abuse was not recognised as a serious social issue,²⁴ fails to account for psychological harm,²⁵ which can

¹⁴ [2006] 2 Cr App R 24.

¹⁵ [2006] 2 Cr App R 24, at [7].

¹⁶ H Siddiqui and M Patel, above n 11, at 102.

¹⁷ See s.63A(6) of the Family Law Act 1996 and forced marriage protection orders (FMPOs; civil orders): 'force' includes coerce by threats or other psychological means. Note breaches of FMPOs may be subject to criminal punishment under s.120 of the of the Anti-Social Behaviour, Crime and Policing Act 2014.

¹⁸ A crime and unlawful act under s.121 of the 2014 Act.

¹⁹ See AK Gill and S Anitha, *Forced Marriage: Introducing a Social Justice and Human Rights Perspective* (Zed Books, 2011).

²⁰ See the wording of s.121 of the 2014 Act.

²¹ Siddiqui and Patel, above n 11, 103.

²² Paraphrased comments of the trial judge in *R v Dhalialwal*, 7 March 2006, Central Criminal Court.

²³ Aitken and Munro, above n 7, at 7.

²⁴ R Hunter et al, *Feminist Judgments: From Theory to Practice* (Hart Publishing, 2010), at 257.

²⁵ Ibid.

be just as damaging as physical abuse. It demonstrates the limitations of the current law, showing that old laws should adapt to modern understandings of harm, especially in the context of domestic abuse. Psychological abuse, often experienced in relationships of trust, can lead to severe mental distress, including suicide and self-harm.²⁶ The law should hold perpetrators criminally liable for causing such harm, as psychological injury is just as valid as physical injury under the 1861 Act.²⁷

In the case of *Dhaliwal*, the question of whether D's conduct in causing psychological injury was a sufficient cause in law (i.e., the causation issue) was raised. The defence argued that V's suicide was an intervening act, which would break the chain of causation. V's head wound, inflicted by the *Kara*, while reprehensible, did not pose a direct threat to life, making it difficult for the court to apply legal precedents where the victim's actions merely contributed to the outcome, rather than being the main, continuing, and operating cause attributed to D.²⁸

However, the principles of causation should be expanded in cases of domestic abuse to account for the increased risk of suicide and suicidal thoughts, which are well-documented in social science research.²⁹ Domestic abuse creates an environment of hopelessness where suicide becomes a way to escape the abuser. This environment, fostered by D within a relationship of trust and systematic abuse, should place legal and moral responsibility on D for the resulting harm.³⁰ Instead of focusing on the victim's final act of suicide, the emphasis should be on the abuser's actions that contributed to the psychological injury and ultimate death.³¹

The suicides of abused individuals, particularly women, are not voluntary or freely chosen acts,³² but rather outcomes of coercion, psychological manipulation, and control exerted by the abusive partner. The abusive behaviour can leave the victim feeling trapped, isolated, and without hope of escape, thus contributing to the tragic decision to take their own life.³³ The criminal justice system fails to properly address the psychological impact of abuse on victims. While women may take their lives as a result of the trauma and abuse they have suffered, the criminal law does not hold perpetrators accountable in a way that recognises

the long-term psychological damage caused by such abusive relationships.³⁴ Suicides are viewed as an escape from intolerable pain, a cry of pain rather than as a cry for help, and suicide is more likely when victims feel a sense of defeat and entrapment, and when they feel that escape or rescue is not possible.³⁵ These combination of feelings and emotions can lead any victim, regardless of any expert psychiatric diagnosis, to consider and die by suicide.³⁶

The issues highlighted also reveal that South Asian women experiencing abuse often avoid mainstream services due to a lack of trust. Barriers such as language difficulties, cultural and religious insensitivities, and experiences of racism and discrimination lead to infrequent access to support services.³⁷ These women tend to seek help only in extreme crises, and when they do, they are less likely to receive appropriate care, especially mental health support. For example, South Asian women are more often assessed by general A&E staff rather than mental health specialists, reducing their chances of early psychiatric diagnosis.³⁸ This lack of early diagnosis means that the psychological impact of abuse, which may lead to undiagnosed psychiatric injury, is often overlooked.³⁹ This underscores the argument for including psychological injury under unlawful act manslaughter, as some groups face additional barriers in obtaining proper psychiatric care, leaving their suffering unrecognised.

²⁶ Aitken and Munro, above n 7, at 4.

²⁷ Hunter et al, above n 24, at 272.

²⁸ See *R v Blaue* (1975) 61 Cr App R 271 and *R v Dear* [1996] Crim LR 595.

²⁹ J McLaughlin et al, 'Intimate Partner Abuse and Suicidality: A Systematic Review' (2012) 32 *Clinical Psychology Review* 677; S Kiza et al, 'The Level of Hopelessness and Psychological Distress Among Abused Women in a Women's Shelter in Turkey' (2019) 33(1) *Archives of Psychiatric Nursing* 30; T Qui et al, 'Hopelessness Predicts Suicide Ideation but Not Attempts: A 10-Year Longitudinal Study' (2017) 47(6) *Suicide and Life Threatening Behavior* 718.

³⁰ V Tadros, 'The Distinctiveness of Domestic Abuse: A Freedom-Based Account', in RA Duff and SP Green (eds), *Defining Crimes: Essays on the Special Part of the Criminal Law* (OUP, 2005), 119-142, at 126-127.

³¹ Hunter et al, above n 24, at 259.

³² Anne Lodge, 'Domestic Abuse, Suicide and Liability for Manslaughter: In Pursuit of Justice for Victims' (2020) 84(4) *Journal of Criminal Law* 273, at 285; see also Tadros, above n 30, at 125-131.

³³ See *R v Wallace* [2018] 2 Cr App R 22.

³⁴ Aitken and Munro, above n 7, at 7; S Walby (ed), National Statistics, Women and Equality Unit, *The Cost of Domestic Violence* (September 2004), available at <https://openaccess.city.ac.uk/id/eprint/21681/1/The%20Cost%20of%20Domestic%20Violence.pdf>, at 56.

³⁵ Ibid, at 12. See also M Williams, *Suicide and Attempted Suicide: Understanding the Cry of Pain* (Penguin, 2002), Ch 9; RC O'Conno, 'Suicidal Behavior as a Cry of Pain: Test of a Psychological Model' (2003) 7(4) *Archives of Suicidal Research* 297; J Johnson et al, 'An Investigation of Aspects of the Cry of Pain Model of Suicide Risk: The Role of Defeat in Impairing Memory' (2008) 46(8) *Behavior Research and Therapy* 968; and M Williams, *Cry of Pain: Understanding Suicide and the Suicidal Mind* (Plaktus, 2014).

³⁶ Ibid.

³⁷ See Chew-Graham et al, 'South Asian Women, Psychological Distress and Self-Harm: Lessons for Primary Care Trusts' (2002) 19(5) *Health and Social Care in the Community* 339; and E Burman et al, 'Culture as a Barrier to Service Provision and Delivery: Domestic Violence Services for Minoritized Women' (2004) 24 *Critical Social Policy* 332.

³⁸ Husain et al, above n 6.

³⁹ Ibid.

Recommendation 3:

The proposal for a new statutory offence of 'suicide aggravated by harassment, violence, or abuse'⁴⁰ is an important reform to address the complex and tragic issue of domestic and honour-based suicides. The current legal framework, specifically under unlawful act manslaughter, has limitations in effectively prosecuting perpetrators of such crimes. A new offence that focuses on the actions of the perpetrator (D) rather than on the psychological state or psychiatric diagnoses of the victim (V) would shift the emphasis to the abusive or harmful conduct that directly contributes to the victim's death. This approach could provide clearer and more just legal outcomes in cases where suicide results from a pattern of abuse or harassment. A new statutory offence could be drafted as follows:

Where a course of harassment, violence or abuse causes a person serious physical, psychiatric or psychological harm that directly results in a suicide or is a significant contributory factor in that suicide, D is guilty of an offence of causing suicide aggravated by harassment, violence, or abuse.⁴¹

d. Key points of the proposal:

1. *Addressing Domestic and Honour-Based Suicides:* The proposal specifically addresses suicides related to domestic abuse and honour-based abuse. These types of suicides are often underreported or misclassified by authorities. By framing these cases within a distinct statutory offence, the proposal seeks to enhance the recognition and appropriate legal response to these deaths.
2. *Focusing on the Actions of the Perpetrator (D):* Unlike existing legal frameworks, such as unlawful act manslaughter, that might focus more on the victim's mental health or personal circumstances, this proposal centres on the defendant's conduct. This includes patterns of harassment, violence, and abuse. The key here is to show that the perpetrator's behaviour directly contributed to the victim's decision to end their life. This avoids the complexities and subjective nature of psychiatric evaluations in cases where mental health assessments may be contested.
3. *Wider and Complete Picture of Abuse:* The law would not isolate individual acts of violence or harassment but would consider them as part of a broader, ongoing pattern of abusive behaviour. This approach would allow for a more comprehensive understanding of how the cumulative impact of abuse might have led to a suicide, reflecting the continuous nature of the harm that the victim experiences. It also brings greater focus to long-term psychological trauma that is overlooked in existing legal definitions.
4. *Fair Labelling and Justice for Victims:* The aim of the new offence is not only to address the perpetrator's actions but also to ensure justice for the victim after their death. By prosecuting perpetrators for suicide aggravated by abuse, the law would allow the criminal justice system to hold offenders

accountable for the full extent of their actions, ensuring they are appropriately labelled for the harm they have caused. This could also help families and communities seek justice for victims who might otherwise be neglected by current laws.

5. *Encouraging Better Law Enforcement Response:* The introduction of a new offence could enhance law enforcement's recognition of domestic and honour-based suicides. By providing a specific legal framework for these cases, it could incentivise more proactive and sensitive investigations. Authorities might be more likely to identify and address patterns of harassment or abuse that contribute to a victim's death, potentially leading to earlier interventions and preventing further tragedies.
6. *Addressing the Deficiencies in Dhaliwal:* The case highlighted the limitations of unlawful act manslaughter in capturing the complexities of such cases. By proposing a new statutory offence, the intention is to fill this gap, ensuring that perpetrators of abuse or harassment that leads to suicide can be criminally liable, even if the exact mental state of the victim at the time of death is difficult to establish.
7. *Parliamentary Sovereignty:* The new statutory offence would supersede judicial precedents established by the courts under the doctrine of Parliamentary Sovereignty, ensuring that the law is created and interpreted by elected lawmakers rather than relying on judicial discretion. This could provide greater clarity and consistency in prosecuting cases involving suicide resulting from domestic and honour-based abuse.

In conclusion, the creation of a new statutory offence of 'suicide aggravated by harassment, violence, or abuse' has the potential to significantly improve the legal framework for addressing domestic and honour-based suicides. It could provide a more appropriate mechanism for holding perpetrators accountable, securing justice for victims, and encouraging law enforcement agencies to take these cases more seriously. However, careful thought would need to be given to how causality is established, and the complexities of the victims' mental states are handled in the legal process.

Case Study:

In 1999, a woman I had seen regularly at a local gym for years tragically died by suicide in a house fire in Middlesbrough. Seven years later, her former partner experienced the loss of another wife/partner in a house fire, both incidents being considered suspicious. As the police officer stated, "We are treating the death as suspicious, but no arrests have been made in relation to the inquiry." At the time, I was serving as Chair of the Independent Advisory Group for Policing and was asked if I had any information or intelligence. It became clear to me that more should and could be done to investigate the partner's involvement in these cases (Yasmin Khan, CEO of The Halo Project).

Acknowledgements

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⁴⁰ This is a reform originally recommended by Southall Black Sisters: Siddiqui and Patel, above n 11, at 8 and 101. See also Amelia Hill, 'Campaigners Call for New Homicide Law for Inciting Suicide', *The Guardian*, 19 March 2012, available at <https://www.theguardian.com/uk/2012/mar/19/campaign-new-homicide-law-inciting-suicide>.

⁴¹ Adapted from Siddiqui and Patel, above n 11, at 116.

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