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CONTENTS

SPECIAL ISSUE

JESSICA ARMAO	<i>EDITORIAL</i>	1
DR ADRIAN HOWE	<i>FATAL LOVE</i>	4
ANONYMOUS	<i>DOMESTIC VIOLENCE: TODAY I SPEAK OUT</i>	25
DR BIANCA FILEBORN	<i>ONLINE ACTIVISM AND STREET HARASSMENT: DIGITAL JUSTICE OR SHOUTING INTO THE ETHER?</i>	32
JANE CULLEN	<i>WA'S 'ONE PUNCH' LAW: SOLUTION TO A COMPLEX SOCIAL PROBLEM OR EASY WAY OUT FOR PERPETRATORS OF DOMESTIC VIOLENCE</i>	52
FELICITY GERRY QC	<i>LET'S TALK ABOUT VAGINAS ... FEMALE GENITAL MUTILATION: THE FAILURE OF INTERNATIONAL OBLIGATIONS AND HOW TO END AN ABUSIVE CULTURAL TRADITION</i>	78

GENERAL ISSUE

ANNA CAPPELLANO	<i>QUEENSLAND'S NEW LEGAL REALITY: FOUR WAYS IN WHICH WE ARE NO LONGER EQUAL UNDER THE LAW</i>	109
WILLIAM ISDALE & DR GRAEME ORR	<i>PATHOLOGIES IN QUEENSLAND LAW-MAKING: REPAIRING POLITICAL CONSTITUTIONALISM</i>	126
FIONA MCLEOD SC	<i>HUMAN TRAFFICKING AND MODERN DAY SLAVERY – AN AFFRONT TO HUMAN DIGNITY</i>	144
DR TERRY GOLDSWORTHY & MATTHEW RAJ	<i>STOPPING THE STALKER: VICTIM RESPONSES TO STALKING</i>	174
SUSAN ARBON & ZACH DUNCALFE	<i>FOOD, ANIMALS, AND THE LAW: DO WE HAVE A MORAL OBLIGATION TO PROTECT THEM FROM THE SUFFERING THAT THE LAW DOES NOT?</i>	199
ADELE DE MESNARD	<i>ENVIRONMENTAL MIGRATIONS: RETHINKING THE NEED TO TAKE INTO ACCOUNT LOCAL CONTEXTS IN LEGAL AND POLICY RESPONSES</i>	221

FATAL LOVE

DR ADRIAN HOWE*

The media and community reaction to Australia's most recent filicide case is the starting point for an analysis of the continuing misrecognition of "family" violence as isolated tragic events that could "happen to anyone". It does not. There is a clear pattern of women victims and male perpetrators, many of whom kill over lost love. A particularly innovative strategy currently being deployed in the UK is explored for its potential to subvert in order to convert intimate femicide into a first-order political problem.

CONTENTS

I	INTRODUCTION.....	5
II	RETHINKING HOT AND COLD-BLOODED MURDER: AN ENGLISH CASE STUDY.....	8
III	CHALLENGING FEMICIDE IN THE BLOGOSPHERE.....	11
IV	ENGLISH LESSONS: SAME OLD, SAME OLD.....	15
V	CONCLUSION.....	18

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I INTRODUCTION

No one loved him more than Greg, his father.¹

Another day, another domestic killing. This time, it is all over the news. Not the usual victim, not the usual behind-closed-doors location, this time private violence erupted publicly when a man killed his 11-year-old son at a Melbourne cricket oval, brutally bashing him to death with a cricket bat in full view of onlookers, most of them children. He killed his son in what police say was a premeditated crime followed by 'suicide by cop'.² Interviewed within hours of her son's horrific death at the hands of her former partner, Rosemary Batty told the media that no one loved Luke more than his father. Yes, he had been violent for over a decade, but he had a mental illness. Yes, there was an apprehended violence order that prevented him from seeing his son unconditionally, but Luke was at cricket practice. She thought he was safe. It was a public place. No one, she said, 'could see what was going to happen'.³ And she wanted to 'tell everyone that family violence happens to everyone' and 'if anything comes out of this, I want it to be a lesson to everyone about family violence'.⁴

There are many lessons. They might have been learnt long ago if only the media reported the findings of extensive research on intimate partner homicides conducted over the last three decades instead of the words of an utterly traumatised, grief-stricken woman. First, the vast majority of people living with mental illness are not violent. Mental illness is not to blame for this crime, the perpetrator is (though no doubt, had he lived, a mental impairment defence would most likely have been raised to save him from a murder conviction).⁵ Whatever his health issues, this man had a history of domestic violence and he killed his son in what police called a 'calculated act that would have occurred at some point'.⁶ Second, the killing of a child by a disgruntled father is neither

¹ Rosemary Batty quoted in Rania Spooner et al, 'Mother says Luke loved and trusted his father despite his problems' *The Age* (online), 13 February 2014 <<http://www.theage.com.au/victoria/mother-says-luke-loved-and-trusted-his-father-despite-his-problems-20140213-32juf.html>>.

² Ibid. One reviewer points out that a father killing his son on a cricket ground, a 'hallowed male space', transgressed the public/private divide that locates family violence in the private sphere.

³ Ibid.

⁴ Ibid.

⁵ As it was, for example, in the Darcey Freeman filicide case. The expert opinions about the mental capacity of her killer, yet another father disgruntled about custody and access issues, are outlined in Andrea Petrie, 'Freeman found guilty', *The Age* (online), 28 March 2011 <<http://www.theage.com.au/victoria/freeman-found-guilty-20110328-1cdcg.html>>.

⁶ Quoted in Spooner et al, above n 1.

unpredictable nor unprecedented; it is not the first case this year in Australia and it will not be the last. Third, police were well aware that Luke's father posed a serious danger to Luke and his mother; Rosemary Batty had taken out an intervention order against him after he threatened to kill her. Fourth, Victorian Police Commissioner Ken Lay says Luke's father 'should have been in jail' for what he initially called 'unrelated' matters at the time of the murder but there were 'cracks' in the system that prevented his arrest.⁷ Fifth, anyone with a passing familiarity with the realities of domestic violence could predict what was going to happen and to whom. Family violence does not "happen to everyone". Its victims are overwhelmingly women and the perpetrators overwhelmingly men, a reality born out over and over again by crime and homicide statistics across all Western jurisdictions. Sixth, when it comes to preventing domestic homicide, the cracks are not confined to the criminal justice system.

As media reports and reactions to the *Batty* case show, persistently myopic received cultural understandings of family violence — it "happens to everyone" — prevent men being named as the overwhelming perpetrators, let alone being held fully accountable for their violent actions.⁸ There are so many other things to blame — in this case, mental illness; in others: the police who fail to issue warrants for the arrest of men who have made threats to kill their wives and women partners; the magistrate who granted them bail; and of course the women who upset the men in the first place. Rosemary Batty escaped this last fate, her courage in speaking out about her former partner's mental illness universally applauded. So too her determination to save him with approbation, going so far to call him a 'noble man' who had grown up 'with a family that loved him'.⁹ After that, no media outlet referred to Luke Batty's killer simply as his father. He became his 'mentally ill father', a father killing the son he loved just too much to bear. It had to be qualified. Had he killed Rosemary, not Luke, this would have been just another dime-a-dozen domestic, just another instance of ungendered family violence. Even Commissioner Lay, a staunch advocate of calling men's violence against women 'men's

⁷ Nick Toscano and Jessica Wright, 'Police chief says Luke Batty's father "should have been in jail"', *The Age* (online), 14 February 2014 <<http://www.theage.com.au/victoria/police-chief-says-luke-battys-father-should-have-been-in-jail-20140214-32pgl.html>>. Later it was clarified that the matters were not unrelated. One outstanding warrant was for the killer's breach of an intervention order.

⁸ David Penberthy, 'Where men are never to blame', *Herald Sun* (Melbourne), 23 February 2104.

⁹ Deborah Gough, 'Luke Batty's mother seeks to generate light from her tragedy', *The Age* (online), 17 February 2014 <<http://www.theage.com.au/victoria/luke-battys-mother-seeks-to-generate-light-from-her-tragedy-20140217-32vv9.html>>.

violence' and treating it as a serious crime, resorted to calling Luke Batty's death a 'watershed' moment in dealing with 'family violence', not men's violence, stating that 'if any good comes out of young Luke's death, I'm hoping that it sends an almighty strong message to the community, to police, to other agencies, to everyone involved, family violence is one of the most insidious crimes that we face'.¹⁰

At other times, Commissioner Lay has been more specific about perpetrators and victims of family violence and the underlying culture that feeds its continuing misrecognition. In his November 2013 National Press Club speech, he called violence against women 'first and foremost ... a cultural issue and underpinning it is misogyny', citing research revealing that on average, one Australian woman is killed by a male partner or former male partner each week.¹¹ He might have pressed home the magnitude of the problem by adding that this statistic makes Australia a more dangerous place for women trying to escape violent men than England and Wales. There, with a population more than double the size of Australia's, on average two women are killed each week by male partners or former partners.¹² *Former* partners — that is a vital clue to understanding intimate partner homicide — so many women are killed by men after (and indeed often because) they leave them. On the receiving end of a decade of violence, Rosemary Batty came close to becoming yet another exit case victim. Her former partner had threatened to kill her on more than one occasion. Save for wanting her son to know his father, she would have returned to her family in England to bring him up there. Statistically speaking, that was a safer option.

Not that the UK is by any means a safe haven for women, not when two women are killed on average each week. But in an important development, that killing statistic is now getting increasing mainstream media coverage over there, thanks largely to the innovative strategies being deployed in the blogosphere by a new wave of anti-violence campaigners. The most striking of these new social media sites is transforming each and every domestic femicide case in the UK into watershed moments. It deserves particular attention, offering as it does one of those classic Deleuzian "shocks to thought" so

¹⁰ Toscano and Wright, above n 7.

¹¹ Chief Commissioner Ken Lay, 'Elimination of violence against women' (Speech delivered at the National Press Club, Canberra, 26 November 2013).

¹² See Kevin Smith et al, 'Homicide, Firearm Offences and Intimate Violence' (Home Office Statistical Bulletin, Supplementary Volumes 2009/10 and 2010/2011, Home Office, January 2012).

essential for rocking people out of conventional ways of thinking about violent crime.¹³ Recent English homicide cases also prove illuminating. It is nevertheless an Australian filicide case that provides the occasion for this commentary on the persistent misnaming of family violence and consequent failure to recognise it as a “first-order political problem” that is equal to, if not more serious than, violent crimes committed by strangers, the sort that usually garner media and public attention.¹⁴ The recent political noise in Australia over king-hits inflicted by young men on other young men in public places is a case in point.¹⁵ What about men’s king-hits on women in the private sphere? What about domestic murders, of which women bear the brunt, usually as partners, as victims of the crime now known as “intimate homicide”?¹⁶ Will they ever count as first-order political problems? The shock value of the much publicised private-violence-in-the-public-sphere Batty case provides the stimulus to continue the fight against persistent disavowals of domestic homicide’s sexed asymmetry in the face of overwhelming evidence of a clear pattern of male perpetrators and women (and sometimes child) victims.

II RETHINKING HOT AND COLD-BLOODED MURDER: AN ENGLISH CASE STUDY

As research across many western jurisdictions has shown, exiting a marriage can be a hazardous operation for women, a high-risk group for violent victimisation; her desire to depart frequently triggers his murderous fury.¹⁷ That was Christine Chamber’s fate.

¹³ The importance of “shocks to thought” is discussed in Adrian Howe, ‘Provocation in Crisis — Law’s Passion at the Crossroads? New Directions for Feminist Strategists’ (2004) 21 *Australian Feminist Law Journal* 55, 61–4.

¹⁴ Lisa Miller, ‘Violent Victimisation, Inequality and Democratic Politics’ (2013) 17(3) *Theoretical Criminology* 283, 284–285. See the discussion contrasting the outpouring of grief for Jill Meagher, murdered by a man she did not know, with the relative silence about the murder of Sargun Ragi by her husband a few days later in Adrian Howe, ‘Enduring Fictions of Possession — Sexual Infidelity and Homicidal Rage in Shakespeare and Late Modernity (glossing *Othello*)’ (2012) 21 *Griffith Law Review* 772, 772–4; Adrian Howe, ‘Mastering Emotion or Still Losing Control? — Seeking Public Engagement with Sexual Infidelity Homicide’ (2013) 21(2) *Feminist Legal Studies* 141, 158–9.

¹⁵ ‘Push to refer to king hit attacks as coward punches after teen left in coma’, *ABC News* (online), 3 January 2014 <<http://www.abc.net.au/news/2014-01-03/push-to-refer-to-king-hit-attacks-as-coward-punches/5183260>>.

¹⁶ See, eg, Alexia Cooper and Erica Smith, ‘Homicide Trends in the United States, 1980–2008’ (Report No 236018, Bureau of Justice Statistics, 16 November 2012).

¹⁷ The feminist literature on the dangers faced by exiting women is vast but see, eg, Martha R Mahoney, ‘Legal Images of Battered Women: Redefining the Issue of Separation’ (1991) 90 *Michigan Law Review* 1; Caroline Dick, ‘A tale of Two Cultures: Intimate Femicide, Cultural Defences and the Law of Provocation’ (2011) 23 *Canadian Journal of Women and the Law* 519; Victoria Nourse, ‘Passion’s Progress: Modern Law Reform and the Provocation Defence’ (1997) 106 *Yale Law Journal* 1331. Seventy-two per cent of 144 domestic violence death cases reviewed in Toronto between 2003–2011 involved a couple with ‘an actual

She had left her partner, described by an English court as a ‘violent, domineering man’, and applied for a non-molestation order against him.¹⁸ The order was made on 21 April 2011 on the basis of several allegations of ‘significant violence’.¹⁹ He breached the order on numerous occasions and was warned by police against these breaches. On the night of 5 June, he entered the house where she was living with her two daughters, carrying with him a bag containing an axe, petrol, a knife, pliers, and a double-barrelled shotgun. While the older daughter managed to escape, her mother was subjected to what the court described as ‘a series of degrading and humiliating assaults’.²⁰ She was ordered to cut off her hair, remove her clothes and, tellingly, to ‘hug and kiss him and say that she loved him’ before being subjected to ‘an attack of horrifying violence’.²¹ After shooting their two-year-old daughter in the head, her former partner shot himself but survived. In May 2012 he was convicted at the Crown Court at Chelmsford in Essex of two counts of murder and sentenced to life imprisonment with a whole term as the specified minimum sentence, the trial judge concluding that he had killed Christine Chambers and his daughter ‘simply because he was unable to accept that’ his former partner could ‘no longer bear to be with him and wanted to start a new life’.²² In the court’s view:

His reaction had been purely selfish, self-pitying and extremely violent. On more than one occasion he had said that no other man would be her partner, or would act as the father to his daughter. If the family life was coming to an end, they would pay for leaving him with their lives.²³

Rejecting his appeal against this whole life term, the Court of Appeal agreed with the trial judge that there was not a shred of mitigation. For the appellant, it was argued that his objective of killing his family and then himself in a situation that was ‘not unique’ showed that he had ‘temporarily lost any sense of rational and decent behaviour or hope’ and so it was not a case that ‘fell within the exceptionally serious category’.²⁴ The

or pending separation’, making that the 2nd highest risk factor after a history of domestic violence (74 per cent). While no gender breakdown is provided for the frequency of common risk factors, 80 per cent of the homicide victims were adult females: Office of the Chief Coroner, ‘2011 Annual Report Domestic Violence Death Review Committee’ (2011 Annual Report, Domestic Violence Death Review Committee, September 2012), 5, 8.

¹⁸ *R v Oakes* [2012] EWCA Crim 2435 [33] (*‘Oakes’*).

¹⁹ *Ibid.*

²⁰ *Ibid* [36].

²¹ *Ibid* [34]–[37].

²² *Ibid* [41].

²³ *Ibid.*

²⁴ *Ibid* [44].

court disagreed. He did not (as so many other men appearing before English courts had) simply ‘explode into violence as a result of the stresses and strains of the breakdown of his relationship’.²⁵ His was a planned, revenge killing carried out with the intention of making his former partner’s death ‘the most terrifying and agonising ordeal that he could envisage’.²⁶ According to the court:

He was utterly merciless, and took pleasure at her prolonged suffering. Thereafter, quite deliberately, and in cold blood, he executed their daughter, as she was screaming with fear at witnessing what he had been doing to her mother.²⁷

The appeal was dismissed — life means life, a whole life term for this domestic executioner.

Was it the extreme violence inflicted on his former partner or the shooting of the child that set the Court of Appeal so resolutely against him? Either way, it is significant that in a unanimous judgment, the court labelled the murders ‘cold-blooded’.²⁸ This was no angst-ridden explosion of emotion on the part of a man pushed beyond endurance by a wayward wife, the usual wife-killing scenario entertained by criminal courts for centuries. Upholding his life sentence (while substituting minimum sentences for the other appellants who had raped or killed women unknown to them and whose cases were considered at the same time) was certainly a novel move, the exception proving the usual rule that murderous attacks on women by strangers trump domestic ones in the seriousness stakes.²⁹ The English Court of Appeal appears to have come one step closer to realising that given the lengths some men go to in pursuit of former women partners — the stalking, Facebook hacking, and home invasions — domestic murder *is* cold-blooded murder. One step closer perhaps, but still so far to go.

²⁵ Ibid [45].

²⁶ Ibid [45].

²⁷ Ibid.

²⁸ Ibid [57]; The Court of Appeal’s handling of so-called hot-blooded provocation by infidelity cases is discussed in Adrian Howe “‘Red Mist’ Homicide—Sexual Infidelity and the English Law of Murder (Glossing *Titus Andronicus*)” (2013) 3 *Legal Studies* 407.

²⁹ In *Oakes* the court considered five unrelated cases in which defendants had been sentenced to life imprisonment. It substituted minimum terms for whole life terms in the four non-domestic cases.

III CHALLENGING FEMICIDE IN THE BLOGOSPHERE

There is still such a yawning gap between feminist campaigns to get intimate femicides recognised as a first-order political problem and the police and judicial responses. This is why the innovative strategies of the new wave of feminist campaigners working in the blogosphere are so crucially important, particularly those of English domestic and sexual violence charity worker, Karen Ingala Smith. Anti-violence campaigners in Britain, Australia, and elsewhere are forever citing killing statistics, and some have held rallies to commemorate individual women in the towns and cities where they have been killed by men.³⁰ But no one, to my knowledge, has had the kind of impact Ingala Smith achieves on her social media site where she counts and names all of the women killed in the UK each year through what she calls 'suspected gender-related murder'.³¹ Her naming and memorialising of all of the dead women, giving a face, identity, and sometimes even a voice to the anonymous victims formerly represented only in endlessly repeated homicide statistics, has a powerful effect even on researchers like myself who study femicide cases.

Working alone in her East London flat, Ingala Smith has counted and named 112 women killed by men in 2012, identifying them from local newspaper reports that rarely made national headlines. Starting with the 'two women killed each week' statistic,³² she soon found herself grappling with how best to name the problem, deciding to broaden her 2013 list from those killed 'through domestic violence' to include 'women killed through male violence against women',³³ excluding those where it is unclear whether they had what she referred to as a 'gender related element'.³⁴ By 30 December 2013 she had counted and named 140 women killed that year.³⁵ Shocked and angry about 'the lack of attention given to these murders', she sought ways 'to make the horror and

³⁰ See, eg, the Red Rose Rallies held in Australia: <<https://www.facebook.com/DVDRAG/events>>.

³¹ Karen Ingala Smith, 'Counting dead women' on Karen Ingala Smith, *As I See It* (25 March 2013) <<http://kareningalasmith.com/2013/03/>>.

³² Karen Ingala Smith, 'More British women killed though men's violence last year than British troops killed in Afghanistan in the last 3 years' on Karen Ingala Smith *As I See It* (16 January 2014) <<http://kareningalasmith.com/2014/01/16/more-british-women-were-killed-though-mens-violence-last-year-than-british-troops-killed-in-afghanistan-in-the-last-3-years/>>.

³³ *Ibid.*

³⁴ *Ibid.*

³⁵ Karen Ingala Smith, '139 women were killed through suspected male violence in the UK in 2013. 139 women in 365 days is one woman every 2.6 days' on Karen Ingala Smith, *As I See It* (2013) <<http://kareningalasmith.com/counting-dead-women/femicide-118-uk-women-killed-though-suspected-male-violence-january-november-2013/>>.

unacceptability of what is happening to women feel more real'.³⁶ To that end, she has launched a petition campaign 'Counting Dead Women' aimed at pressuring the government to set up a Domestic Homicide Review 'for every sexist murder' and to fund an independent 'Femicide Observatory' charged with analysing the victim-perpetrator relationship and 'social, cultural, and psychological issues'.³⁷

In Australia and elsewhere, significant progress has been made towards establishing formal processes for domestic homicide reviews.³⁸ But I have yet to come across a media-savvy intervention to match the sheer breadth and impact of Ingala Smith's project. Besides memorialising all the women killed each year on a national scale, she also ponders how best to name the killing of women by men. Challenging academic feminist definitions of femicide that fail to name men as the perpetrators, she calls for the recognition of the practice-based evidence and expertise of specialist women's organisations to be considered 'as worthy as that of academics'.³⁹ As part of this process, she queried the status of killings of older women in the course of robberies — killings that, as she notes, are often extraordinarily brutal. They too should be included on a list of 'women killed through male violence'.⁴⁰ As counting women killed 'through domestic violence' did not tell 'the whole story' of femicide in the UK, she chose 25 November,⁴¹ International Day for the Elimination of Violence Against Women, to name on her Twitter account all 114 women she had counted to that date. Starting at 6am with Janelle Bailey, a 25-year-old mother of two children strangled by an ex-boyfriend on 2 January, she moved through her list every 10 minutes, ending with 81-year-old Annie

³⁶ Ingala Smith, above n 32.

³⁷ Karen Ingala Smith, *Stop Ignoring Dead Women*, Change <<http://www.change.org/en-GB/petitions/stop-ignoring-dead-women>>.

³⁸ See, eg, Lyndal Bugela et al, 'The Implementation of Domestic Violence Death Reviews In Australia' (2013) 17(4) *Homicide Studies* 353; Myrna Dawson, 'Intimacy, Homicide and Punishment: Examining Court Outcomes Over Three Decades' (2012) 54(3) *Australian and New Zealand Journal of Criminology* 400.

³⁹ Karen Ingala Smith, 'Who gets to define femicide?' on Karen Ingala Smith, *As I See It* (11 October 2013) <<http://kareningalasmith.com/2013/10/11/femicide-naming-the-problem/>>; some academics have also insisted that men be named as perpetrators of violence against women; Adrian Howe, *Sex, Violence and Crime — Foucault and the 'Man' Question* (Routledge-Cavendish, Abingdon, Oxon, 2008).

⁴⁰ Ingala Smith, above n 35.

⁴¹ Karen Ingala Smith, 'Clare's Law: the domestic violence disclosure scheme' on Karen Ingala Smith, *As I See It* (25 November 2013) <<http://kareningalasmith.com/2013/11/25/clares-law-the-domestic-violence-disclosure-scheme/>>.

Beaver, whose 80-year-old husband has been charged with murder.⁴² It was a stunning commemoration thanks to the “Twitter effect”.

By expanding her list beyond those killed by male partners, Ingala Smith has uncovered another less heralded form of femicide, namely matricide, and has taken a particular interest in the 32 women killed by their sons in the two-year period from 2012–2014, one of whom also killed his sister.⁴³ Crucially, she also challenges police reports describing femicides as ‘isolated incidents’ when there is a clear pattern to these killings — many have been stabbed to death (she counted 45 in 2013 and 44 in 2012);⁴⁴ most were killed by partners or former partners (on her count three quarters of the UK women killed by men between January 2012 – January 2014). So much then for the police response to the stabbing death of 17-year-old Elizabeth Thomas following the arrest of a 16-year-old male known to her as being ‘an isolated incident’ with ‘no risk to the further community’.⁴⁵ Trying to fathom why this was an ‘isolated incident’, Ingala Smith eliminates the fact that she was killed by a man known to her, that she was stabbed, or that she was a teenager (she’s the 16th teenage girl killed since January 2012). She comments:

Maybe it’s that she lived in affluent Surrey, the county ranked fifth least deprived according to the multiple deprivation index? Maybe it’s that, after all it’s a long 14 months since 25-year-old Georgina Hackett was bludgeoned to death with a mallet by her boyfriend Daniel Baker. Yet Elizabeth’s murder was followed only 5 weeks later by the fatal shooting of two women ... Maybe now, Elizabeth’s murder seems a little less of an isolated incident.⁴⁶

Maybe now it looks more like yet another watershed moment.

⁴² Karen Ingala Smith, ‘On Monday 25th November it is the International Day for the Elimination of Violence Against Women. I’ll be highlighting the UK’s appalling record of women killed through men’s violence in 2013’ on Karen Ingala Smith, *As I See It* (23 November 2013) <<http://kareningalasmith.com/2013/11/23/highlighting-the-uks-appalling-record-of-women-killed-through-mens-violence-monday-25th-november-the-international-day-for-the-elimination-of-violence-against-women/>>.

⁴³ Karen Ingala Smith, ‘Mother Killers: 32 UK men killed – or allegedly killed – their mothers between 2012–2014’ on Karen Ingala Smith, *As I See It* (2 February 2014) <<http://kareningalasmith.com/2014/02/02/mother-killers/>>; Little information is available about the matricides, most of the men charged are being held under the Mental Health Act and declared unfit to plead.

⁴⁴ Karen Ingala Smith, ‘There are a lot of isolated incidents around’ on Karen Ingala Smith, *As I See It* (24 February 2014) <<http://kareningalasmith.com/2014/02/24/there-are-a-lot-of-isolated-incidents-around/>>.

⁴⁵ *Ibid.*

⁴⁶ *Ibid.*

Ingala Smith's strategy of unearthing media reports and listing all of the dead women makes the horror of femicide all the more real even for a researcher acquainted with hundreds of such cases.⁴⁷ It also provides an invaluable resource for researchers wanting to keep track of all the cases making up the "two-per-week" killing statistic. While a detailed analysis of her 2013 list must wait until all of the cases are disposed of in the courts, some preliminary remarks about the intimate partner homicides that form the majority of the cases are in order. I have identified 99 of the 140 cases (71 per cent) as "intimate partner" homicides committed by male partners or former partners, including 16 men who committed suicide after killing their wives.⁴⁸ This understates the number of intimate partner cases, as the relationship between killers and victims has yet to be clarified in many of the cases and in any event, Ingala Smith's list is incomplete, omitting the names of women who died in suspicious circumstances where there is little information.⁴⁹ But we do know that Jennifer Rennie, aged 26, was murdered by her former boyfriend who then committed suicide. They had rowed over his use of steroids. Police described the case as a 'tragedy' that was 'entirely self-contained'.⁵⁰ This was to perhaps reassure the community, which police so often forget includes women, that leaving her relationship could result in his lethal violence. Nor is age a barrier for women to be killed by suiciding partners and former partners. Rennie was the youngest, 80-year-old Chloe Siokos the eldest, murdered after separating from her husband. But for the tireless work of feminist activists like Ingala Smith retrieving the crime reports, separating perpetrators from victims, and memorialising the lives of the murdered women, the violent deaths of these women at the hands of their husbands, would disappear in brief media stories reporting 'tragic deaths of a couple' or 'couple found dead at home in suspected murder-suicide after screaming row over the ending of their

⁴⁷ See, eg, Howe, above n 28.

⁴⁸ Several men failed in suicide bids after killing their wives.

⁴⁹ *For Our Daughters: Working to End Homicide and Violence Against Women* (2014) For Our Daughters <<http://forourdaughters.co.uk/>>; lists two women not on her list who were killed in October – Melissa McColm and Ellie Butler. Two men have been arrested. I have discovered four other cases of women killed in October not on her list. The circumstances of their deaths are still unclear but men have been arrested in three of the cases.

⁵⁰ Claire Warrender, 'Mum Jennifer Rennie was murdered as children slept in Rosyth home', *TheCourier.co.uk* (online), 13 March 2013 <<http://www.thecourier.co.uk/news/local/fife/mum-jennifer-rennie-was-murdered-as-children-slept-in-roseyth-home-1.76203>>; *For Our Daughters: Working to End Homicide and Violence Against Women* is not only keeping track of the statistics, it is also commemorating some of the women killed by men each year with brief accounts that query police and media descriptions of their deaths as 'self-contained' tragedies having no implications for the wider community.

long-term relationship' as isolated, unrelated incidents.⁵¹ The victim in this exit case was Gabrielle Stanley, 28, killed by her boyfriend, one of many who 'couldn't get his head around the split'.⁵² Ingala Smith has ensured that her death is not misremembered as some isolated tragedy, that it is one of many essential links in making the case for registering intimate femicides as a first-order political problem.

IV ENGLISH LESSONS: SAME OLD, SAME OLD

As the first cases on Ingala Smith's list came to court, we caught further glimpses of the circumstances in which men killed women, the familiar circumstances revealed over and over again by feminists researching intimate femicide cases. Janelle Duncan-Bailey, aged 25, the first on the list, was strangled by her former partner in a row over child support. He received eight years for manslaughter, a sentence her family regard as unduly lenient.⁵³ Samantha Medland, aged 24, was killed by her estranged husband. Distressed that she had left him, he stabbed her repeatedly in a frenzied attack in a public square watched by onlookers. According to media reports, this 'jilted husband' had stabbed his estranged wife to death using knives they got as a wedding present after hacking her Facebook account 'to monitor her growing bond with another man'.⁵⁴ According to the prosecution, he was 'incapable of dealing with rejection'.⁵⁵ He received a life sentence with a 25-year minimum sentence for murder.⁵⁶ Dimitrina Borisova, 46, was also knifed to death in a street by her former partner. Angry that she had obtained non-molestation orders against him, he had feared losing a custody battle over their children.⁵⁷ Daneshia

⁵¹ Chris Brooke, 'Couple found dead at home in suspected murder-suicide after screaming row over the ending of their long-term relationship', *MailOnline* (online), 28 October 2013 <<http://www.dailymail.co.uk/news/article-2477439/Doncaster-couple-dead-suspected-murder-suicide-pictured.html>>.

⁵² 'Bodybuilder stabs girlfriend to death after being dumped before killing himself', *Metro* (online), 27 October 2013 <<http://metro.co.uk/2013/10/27/bodybuilder-stabs-girlfriend-to-death-after-being-dumped-before-killing-himself-4163357/>>.

⁵³ 'Jail for ex-partner who killed Janelle Duncan-Bailey' *BBC News: London* (online), 6 September 2013 <<http://www.bbc.com/news/uk-england-london-23985781>>.

⁵⁴ 'Jilted husband who stabbed his estranged wife to death in a frenzied attack using knives they got as a wedding present is found guilty of murder', *MailOnline* (online), 26 July 2013 <<http://www.dailymail.co.uk/news/article-2379005/Ty-Medland-stabbed-estranged-wife-death-frenzied-attack-guilty-murder.html>>.

⁵⁵ 'Wife-killer Ty Medland to serve at least 25 years in prison' *BBC News: Sussex* (online), 29 July 2013 <<http://www.bbc.com/news/uk-england-sussex-23486509>>.

⁵⁶ *Ibid.*

⁵⁷ 'Mother stabbed to death on street in custody battle', *Sheffield Telegraph* (online), 13 June 2013 <<http://www.sheffieldtelegraph.co.uk/news/local/mother-stabbed-to-death-on-street-in-custody-battle-1-5763650>>.

Arthur, aged 30, was killed by a former partner who was angry that she had 'gone a bit distant'.⁵⁸ He received a life sentence with a 17-year minimum for murder, the court accepting in mitigation that he had not taken his knives to her home to use them as a weapon — as a chef he had a reason to carry them. Amongst the cases referred to the Independent Police Complaints Commission ('IPCC') for investigation, Yvonne Walsh, 25, and her baby son were killed after a 3-month relationship with her 'dream man', despite there being previous contact with police and complaints of domestic incidents.⁵⁹ At his December trial, he admitted strangling her and her seven-month-old son a few days after their relationship ended.⁶⁰ By August 2013, Manchester police were facing three investigations into failures to follow up on women's domestic violence complaints.⁶¹ All three cases had ended in what the press called 'tragedy', code for the deaths of Rania Alayad, aged 25, Linzi Ashton, 25, and Farkhanda Younis, 30, all killed by husbands and boyfriends.⁶²

While some men killed former wives and partners over child custody and access disputes, and divorce settlements, it is clear that a woman's departure from a relationship is the main trigger of men's homicidal fury. Indeed, it was the risibly short sentences given to men who killed exiting wives that precipitated the reform movement culminating in the abolition of the provocation defence and its replacement by a "loss of control" defence that expressly excludes 'sexual infidelity' as a trigger for loss of control.⁶³ As a result, adultery cannot feature as prominently as it used to in defences mounted in intimate femicide cases. Not that infidelity has lost its entire excusatory prowess for jealous, possessive men. In the 2012 case of *R v Clinton, Parker and Evans*, conjoined appeals by three men who had killed exiting wives, the Court of Appeal defied the reform legislation by determining that infidelity, in the form of a wife's departure from a marriage, may properly be taken into consideration for the purposes of the partial defence of loss of control when such behaviour was 'integral to the facts as a

⁵⁸ *A senseless Act: The murder of Daneshia Arthur*, Murder Map <<http://www.murdermap.co.uk/pages/cases/case.asp?CID=111156970>>.

⁵⁹ Nick McCarthy, Catherine Lillington and Matt Lloyd, 'Billesley murder: young mum told friends she had found her dream man', *Birmingham Mail* (online), 4 June 2013, <<http://www.birminghammail.co.uk/news/local-news/billesley-murder-mum-told-friends-4045850>>.

⁶⁰ *Ibid.*

⁶¹ Jennifer Williams 'Greater Manchester police facing third 'domestic abuse' probe' *Manchester Evening News* (online), 2 August 2013 <<http://www.manchestereveningnews.co.uk/news/greater-manchester-news/greater-manchester-police-facing-third-5430271>>.

⁶² *Ibid.*

⁶³ *Coroners and Justice Act 2009* (UK) c 25, s 55(6)(3); See the discussion of the movement that culminated in this controversial reform in Howe, above n 28.

whole'.⁶⁴ No matter how strained and implausible his account of how her infidelity (code for her desire to leave the relationship) provoked him beyond endurance, the *Clinton* decision has ensured that his manslaughter plea will still be countenanced in English criminal courts in the 21st century. And her infidelity will still count as mitigation in sentencing.⁶⁵ Heather Arthur and Christine Baker, two of the women on Ingala Smith's list, were killed by their husbands in Newcastle on the same day in May 2013.⁶⁶ Baker's husband pleaded to murdering his wife. He strangled her after discovering she had had an affair. He received a life sentence with a minimum of 13 years, the judge taking into account 'the effect your wife's revelations about the affair and about the details of the relationship will have had on you'.⁶⁷ Mark Arthur, who pleaded guilty to manslaughter on the basis of loss of control, was also convicted of murder and given a life sentence with a minimum of 18 years.⁶⁸

While the new loss of control defence might be more difficult to plead than the provocation defence, it can still succeed. In March 2013, a man was given a seven-year four-month manslaughter sentence for killing his fiancée, Gaby Miron-Buchacre, a PhD student and mother of his newborn child, in 2012. The jury had accepted his loss of control defence. His lawyer alleged there had been 'psychological bullying' and an 'intellectual imbalance' in the relationship, her 'low-level emotional abuse' of him culminating in a threat to take away their child that had caused him to lose control.⁶⁹ Ingala Smith protested to the Attorney-General against his 'unduly light sentence'.⁷⁰ He replied that the Solicitor General did not regard the sentence in this 'very sad case' as

⁶⁴ [2012] 1 Cr App R 26 [37] ('*Clinton*').

⁶⁵ See the critique of *Clinton* in Howe, above n 28, 774–778. For an insightful analysis of 'lingering paternalism' judicial discourse in Canadian wife-killing cases see Diane Crocker, 'Regulating Intimacy: Judicial Discourse in Cases of Wife Assault (1970–2000)' (2005) 11(2) *Violence Against Women* 197, 198.

⁶⁶ Rob Kennedy, 'Heather Arthur and Christine Baker murders: Charged husbands appear in court', *ChronicleLive* (online), 3 May 2013 <<http://www.chroniclive.co.uk/news/north-east-news/heather-arthur-christine-baker-murders-3406498>>.

⁶⁷ Rob Kennedy, 'Alan Baker jailed for life after strangling wife', *ChronicleLive* (online), 6 September 2013 <<http://www.chroniclive.co.uk/news/north-east-news/husband-strangled-wife-after-son-5847127>>.

⁶⁸ Rob Kennedy, 'Heather Arthur murder trial: Killer husband jailed for 18 years for stabbing partner to death', *ChronicleLive* (online), 13 February 2014 <<http://www.chroniclive.co.uk/news/north-east-news/heather-arthur-murder-trial-killer-6705630>>.

⁶⁹ 'Paul Keene jailed for fiancée manslaughter', *BBC News: Somerset* (online), 22 March 2013 <<http://www.bbc.com/news/uk-england-somerset-21894015>>.

⁷⁰ Karen Ingala Smith, 'Letter to the Attorney General regarding the unduly lenient sentencing of Paul Keene for the killing of Carmen Gabriela Miron-Buchacra' on Karen Ingala Smith, *As I See It* (24 March 2013) <<http://kareningalasmith.com/2013/03/24/letter-to-the-attorney-general-regarding-the-unduly-lenient-sentencing-of-paul-keene-for-the-killing-of-carmen-gabriela-miron-buchacra/>>.

unduly lenient. After all, the jury had acquitted him of murder.⁷¹ By contrast, Rachael Slack's former partner did not face trial, having committed suicide after stabbing her and their baby son to death in 2010. A 2013 inquest into their deaths heard that his harassment had increased in the week before the murders, that she had reported his abuse and threats to the police, and that he had been arrested for making threats to kill but was released despite him being assessed as at high risk of homicide. He had given her this warning: 'You are a fucking bitch for abandoning me and getting together with someone else and getting pregnant. I gave up everything to be with you. You have no idea what I am capable of. I will kill you and take him'.⁷² And so he did. The coroner conducting the inquest warned that this was far from being an isolated case, that there was an 'epidemic' of domestic violence in the UK.⁷³ The press report concluded with yet another reminder that two women are killed each week in England and Wales by male partners and former partners.

V CONCLUSION

Once the inquests, the IPCC investigations, and criminal proceedings in the 2013 cases are concluded, we will have a much fuller picture of intimate femicide in the UK today. The task then will be to compare contemporary patterns with what has been revealed about historical cases. In my study of 300 years of reported English provocation by sexual infidelity cases from 1706 to 2011, men convicted of murdering their wives over that period rarely found them *in delicto flagrante*.⁷⁴ More usually, they merely suspected them of adultery or said they did, or, in more recent cases, punished them for wanting to leave the marriage. Paying with your life for leaving a man is something that late modern femicide victims have in common with their predecessors over the centuries. And sympathy is still extended to men who kill their wives — recall the judge weighing up the mitigating prowess of an admission of an affair in the Baker case. Such is the enduring purchase of his possessory right over her.⁷⁵ Read together with my research and that of other feminist legal scholars on hundreds of obscure intimate femicide cases, Ingala Smith's list of slaughtered

⁷¹ Ibid.

⁷² Sandra Laville, 'Rachel Slack murder: Killer released after 'no risk' psychiatric assessment', *The Guardian* (online), 23 October 2013 <<http://www.theguardian.com/uk-news/2013/oct/22/rachael-slack-murder-high-risk-andrew-cairns>>.

⁷³ Ibid.

⁷⁴ Howe, above n 28.

⁷⁵ I discuss the continuing legal and cultural salience of male possessory right in Howe, 'Enduring Fictions', above n 14.

women who would otherwise have been lost from view, makes a formidable cumulative case for registering these cases as a deeply serious social problem in the UK today.

The same approach, I suggest, could be taken in Australia. Forging links between feminist academic research and activists' social media sites as well as between historic and contemporary intimate homicides will assist in elevating intimate femicide into a first-order political problem. Luke Batty's death at the hands of his violent father at a Melbourne Cricket Ground shocked a community unused to thinking critically about men's pervasive violence against women and children they know and think they own. Typifying this myopia, the Prime Minister described his death as an 'unspeakable tragedy'.⁷⁶ It must surely be the goal of any anti-violence movement to get communities to see and speak about filicides (like that of Luke Batty) and femicides (like his mother's near miss) in intelligible ways. Naming the perpetrators of domestic homicides — overwhelmingly men — as men and the victims — overwhelmingly women — as women, is a first step. Focusing not just on the occasional sensationalised child-killing case but on obscure wife-killing cases retrieved from the archives and local newspapers, we need to reclaim from oblivion the names and lives of *all* the silenced and forgotten victims, bringing their collective suffering to critical attention, transferring to them residual empathy for their killers.⁷⁷ But it won't be easy when disavowal remains the default position of choice for so many in the face of overwhelming evidence that the killing of women and children by men who "love" them, fatally, is a far more serious problem than the occasional king-hits inflicted by men on men in public places. Cognitively and emotionally, it might still be all too much to bear.

⁷⁶ Toscano and Wright, above n 7.

⁷⁷ I outline my idea for just a public engagement project in Howe, 'Mastering Emotions', above n 14.

REFERENCE LIST

A Articles/Books/Reports

- Bugela, Lyndal et al, 'The Implementation of Domestic Violence Death Reviews In Australia' (2013) 17(4) *Homicide Studies* 353
- Cooper, Alexia and Smith, Erica, 'Homicide Trends in the United States, 1980–2008' (Report No 236018, Bureau of Justice Statistics, 16 November 2012)
- Crocker, Diane, 'Regulating Intimacy: Judicial Discourse in Cases of Wife Assault (1970–2000) (2005) 11(2) *Violence Against Women* 197
- Dawson, Myrna, 'Intimacy, Homicide and Punishment: Examining Court Outcomes Over Three Decades' (2012) 54(3) *Australian and New Zealand Journal of Criminology* 400
- Dick, Caroline, 'A Tale of Two Cultures: Intimate Femicide, Cultural Defences and the Law of Provocation' (2011) 23 *Canadian Journal of Women and the Law* 519
- Howe, Adrian, 'Provocation in Crisis—Law's Passion at the Crossroads? New Directions for Feminist Strategists' (2004) 21 *Australian Feminist Law Journal* 55
- Howe, Adrian, *Sex, Violence and Crime — Foucault and the 'Man' Question* (Routledge-Cavendish, Abingdon, Oxon, 2008)
- Howe, Adrian, 'Enduring Fictions of Possession — Sexual Infidelity and Homicidal Rage in Shakespeare and Late Modernity (glossing *Othello*)' (2012) 21 *Griffith Law Review* 772
- Howe, Adrian, 'Mastering Emotions or Still Losing Control? — Seeking Public Engagement with Sexual Infidelity Homicide' (2013) 21(2) *Feminist Legal Studies* 141
- Howe, Adrian, "'Red Mist" Homicide — Sexual Infidelity and the English Law of Murder (Glossing *Titus Andronicus*)' (2013) 33(3) *Legal Studies* 407
- Mahoney, Martha R, 'Legal Images of Battered Women: Redefining the Issue of Separation' (1991) 90 *Michigan Law Review* 1
- Miller, Lisa, 'Violent Victimization, Inequality and Democratic Politics' (2013) *Theoretical Criminology* 17(3) 283

Nourse, Victoria, 'Passion's Progress: Modern Law Reform and the Provocation Defence' (1997) 106 *Yale Law Journal* 1331

Office of the Chief Coroner, '2011 Annual Report Domestic Violence Death Review Committee' (2012)

B Cases

R v Clinton, Parker and Evans [2012] 1 Cr App R 26

R v Oakes [2012] EWCA Crim 2435

C Legislation

Coroners and Justice Act 2009 (UK) c 25

D Other

A senseless Act: The murder of Daneshia Arthur, Murder Map

<<http://www.murdermap.co.uk/pages/cases/case.asp?CID=111156970>>

'Bodybuilder stabs girlfriend to death after being dumped before killing himself', *Metro* (online), 27 October 2013 <<http://metro.co.uk/2013/10/27/bodybuilder-stabs-girlfriend-to-death-after-being-dumped-before-killing-himself-4163357/>>

Brooke, Chris, 'Couple found dead at home in suspected murder-suicide after screaming row over the ending of their long-term relationship', *MailOnline* (online), 28 October 2013 <<http://www.dailymail.co.uk/news/article-2477439/Doncaster-couple-dead-suspected-murder-suicide-pictured.html>>

Chief Commissioner Ken Lay, 'Elimination of violence against women' (Speech delivered at the National Press Club, Canberra, 26 November 2013)

For Our Daughters: Working to End Homicide and Violence Against Women (2014) For Our Daughters <<http://forourdaughters.co.uk/>>

Gough, Deborah, 'Luke Batty's mother seeks to generate light from her tragedy', *The Age* (online), 17 February 2014 <<http://www.theage.com.au/victoria/luke-battys-mother-seeks-to-generate-light-from-her-tragedy-20140217-32vv9.html>>

'Jail for ex-partner who killed Janelle Duncan-Bailey' *BBC News: London* (online), 6 September 2013 <<http://www.bbc.com/news/uk-england-london-23985781>>

'Jilted husband who stabbed his estranged wife to death in a frenzied attack using knives they got as a wedding present is found guilty of murder', *MailOnline* (online), 26 July 2013 <<http://www.dailymail.co.uk/news/article-2379005/Ty-Medland-stabbed-estranged-wife-death-frenzied-attack-guilty-murder.html>>

Kennedy, Rob, 'Alan Baker jailed for life for strangling wife', *ChronicleLive* (online), 6 September 2013 <<http://www.chroniclive.co.uk/news/north-east-news/husband-strangled-wife-after-son-5847127>>

Kennedy, Rob, 'Heather Arthur and Christine Baker murders: Charged husbands appear in court', *ChronicleLive* (online) 3 May 2013 <<http://www.chroniclive.co.uk/news/north-east-news/heather-arthur-christine-baker-murders-3406498>>

Kennedy, Rob, 'Heather Arthur murder trial: Killer husband jailed for 18 years for stabbing partner to death', *ChronicleLive* (online), 13 February 2014 <<http://www.chroniclive.co.uk/news/north-east-news/heather-arthur-murder-trial-killer-6705630>>

Laville, Sandra, 'Rachel Slack murder: Killer released after "no risk" psychiatric assessment', *The Guardian* (online), 23 October 2013 <<http://www.theguardian.com/uk-news/2013/oct/22/rachael-slack-murder-high-risk-andrew-cairns>>

McCarthy, Nick, Catherine Lillington and Lloyd, Matt, 'Billesley murder: young mum told friends she had found her dream man', *Birmingham Mail* (online), 4 June 2013 <<http://www.birminghammail.co.uk/news/local-news/billesley-murder-mum-told-friends-4045850>>

'Mother stabbed to death on street in custody battle', *Sheffield Telegraph* (online), 13 June 2013 <<http://www.sheffieldtelegraph.co.uk/news/local/mother-stabbed-to-death-on-street-in-custody-battle-1-5763650>>

'Paul Keene jailed for fiancée manslaughter', *BBC News: Somerset* (online), 22 March 2013 <<http://www.bbc.com/news/uk-england-somerset-21894015>>

Penberthy, David, 'Where men are never to blame', *Herald Sun* (Melbourne), 23 February 2104

Petrie, Andrea, 'Freeman found guilty', *The Age* (online), 28 March 2011 <<http://www.theage.com.au/victoria/freeman-found-guilty-20110328-1cdcg.html>>

'Push to refer to king hit attacks as coward punches after teen left in coma', *ABC News* (online), 3 January 2014 <<http://www.abc.net.au/news/2014-01-03/push-to-refer-to-king-hit-attacks-as-coward-punches/5183260>>

Smith, Karen Ingala, *As I See It* <<http://kareningalasmith.com>>

Smith, Karen Ingala, *Stop Ignoring Dead Women*, Change <<http://www.change.org/en-GB/petitions/stop-ignoring-dead-women>>

Smith, Kevin et al, 'Homicide, Firearm Offences and Intimate Violence' (Home Office Statistical Bulletin, Supplementary Volumes 2009/10 and 2010/2011, Home Office, January 2012)

Spooner, Rania et al, 'Mother says Luke loved and trusted his father despite his problems' *The Age* (online), 13 February 2014 <<http://www.theage.com.au/victoria/mother-says-luke-loved-and-trusted-his-father-despite-his-problems-20140213-32juf.html>>

Toscano, Nick, and Wright, Jessica, 'Police chief says Luke Batty's father "should have been in jail"', *The Age* (online), 14 February 2014 <<http://www.theage.com.au/victoria/police-chief-says-luke-battys-father-should-have-been-in-jail-20140214-32pgl.html>>

Warrender, Claire, 'Mum Jennifer Rennie was murdered as children slept in Rosyth home', *The Courier.co.uk* (online), 13 March 2013 <<http://www.thecourier.co.uk/news/local/fife/mum-jennifer-rennie-was-murdered-as-children-slept-in-roseyth-home-1.76203>>

'Wife-killer Ty Medland to serve at least 25 years in prison', *BBC News: Sussex* (online), 29 July 2013 <<http://www.bbc.com/news/uk-england-sussex-23486509>>

Willams, Jennifer, 'Greater Manchester police facing third 'domestic abuse' probe', *Manchester Evening News* (online), 2 August 2013 <<http://www.manchestereveningnews.co.uk/news/greater-manchester-news/greater-manchester-police-facing-third-5430271>>