



# Suicides and Claimed Suicides in the Context of Domestic and Family Violence and Coercive Control: Legal and Policy Responses

**Heather Douglas**

The University of Melbourne, Australia

## Abstract

Increasingly, suicide is being linked with histories of domestic and family violence. While some abusive partners kill their victim in a context of domestic and family violence and then claim it was suicide, in other cases the cause of death may be less directly connected to the abusive partner. For example, a victim of domestic and family violence may be overwhelmed by the abuse and determine to suicide – a form of slow femicide. In other cases, the perpetrator of abuse may encourage the deceased to suicide or to take part in a suicide pact, or pressure the abused person to agree to death as a form of mercy killing. Across these contexts, where a homicide offence is charged, suicide may be claimed by the accused, or assumed by investigators, to be the *cause* of death. Drawing on case examples, this article explores these various contexts, and considers the role of legal and policy responses to them. The article stresses the need for timely investigation of purported suicides as potential homicides where there is any suspicion of previous domestic and family violence and considers the possibilities for law and policy reform.

**Keywords:** Domestic violence, family violence, coercive control, criminal law, suicide pacts

## Introduction

Increasingly, research on domestic and family violence (DFV) has identified its strong links with suicide (Christie et al., 2023). Research reports that women who have experienced DFV are three times more likely to have attempted suicide than women who have not been abused, with one in eight suicides in the United Kingdom resulting from DFV (Agenda Alliance, 2023; Alimoradi et al., 2026). Data from Victoria, Australia have also shown a strong correlation between DFV and suicide. In a review of 1172 suicides reported between 2009 and 2016, 24.5% of the victims had experienced DFV (Coroners Court of Victoria, 2024, p. 7).<sup>1</sup> In New South Wales, Domestic Violence Death Review data suggest that DFV could be a significant contributor to suicide, with 49% of female suicides having a recorded or apparent prior history of DFV (NSW Domestic Violence Death Review Team, 2017). Research also points to several cohorts of women, including migrant women (Kheni et al., 2024) and First Nations women (Cripps, 2023), being at particular risk of suicide in the aftermath of DFV. However, there has been limited systematic collation of suicides attributed to DFV, which has implications for understanding its prevalence (Fitz-Gibbon & Walklate, 2023; Turnbull et al., 2025). Some research has demonstrated that many factors linked to suicide, such as unemployment, financial problems, alcohol and drug misuse and mental health issues, are also enmeshed in the experience of DFV, making the causes of suicide difficult to disentangle (Turnbull et al., 2025).



This article explores the different ways in which suicide is linked to DFV. It examines how the criminal law may be relevant in ensuring accountability of an abusive partner, and where legal regulation in other contexts, such as lawful euthanasia (Grant et al., 2024), could better protect victim-survivors from being pressured or coerced to take their own lives. A criminal charge may be appropriate where victims suicide as a response to overwhelming DFV, or where the abusive partner directly pressures the victim to commit suicide. Pressured euthanasia and purported failed suicide pacts are other contexts that may raise concerns about the role of DFV in the death. Abusers' accountability for their role in (claimed) suicides may be made more complex due to difficulties in identifying causation as well as other evidence issues, and because abusers may actively disguise homicides as suicides. These contexts and issues raise distinct policy questions about legal regulation and prosecution relating to DFV-related suicides, and are discussed in the following sections, drawing on illustrative cases.<sup>2</sup> The article concludes with a discussion of potential policy and legal reforms. It emphasises that in cases involving the death of a victim of DFV, the need for open-minded, appropriate and timely inquiry by investigators and prosecutors is pivotal to ensure that DFV perpetrators are not wrongly shielded by a claim of suicide.

## Overwhelming Domestic and Family Violence: Slow Femicide

In some cases where a victim suicides, the deceased has experienced extensive DFV, leading her to take action to end her life. Sometimes this is referred to as slow femicide (Walklate et al., 2020) or forced suicide (European Institute for Gender Equality, 2023, p. 60).

Several recent cases in England and Wales have highlighted the link between suicide and DFV; in some cases, criminal offences, including manslaughter, have been charged. In 2022, Roisin Hunter Bennett took her own life by hanging. While the coroner originally determined that the causes of suicide were the end of her relationship and the pressures of balancing work and exam study, after judicial review of the initial findings the coroner found Hunter Bennett took her life "due to an emotionally abusive relationship" (*Bennett v HM Senior Coroner for Surrey*, 2023, para. 4). Similarly, a coroner found that Jessica Laverack's primary cause of death was hanging. While she also experienced mental health issues and misused alcohol, the coroner found the cause of these contributing factors was DFV (Harris, 2022).

In 2017, Kellie Sutton died by hanging, and her death resulted in criminal charges against her former partner. Over the course of the night of her death, a series of messages between Sutton and her abusive partner, Steven Gane, showed she was becoming increasingly distressed. The messages culminated in Sutton threatening to hang herself, to which Gane responded with words along the lines of "do everyone a favour" (Broadfoot, 2024). After that message, Sutton stopped answering her messages and Gane returned home to find her hanging. Sutton sent a text to Gane shortly before she was found dead, saying, "Hope you feel bad, for this is your fault, you told me to do everyone a favour, so that's what I shall do ... Hope your life's better without me" (Levy, 2024). After the inquest, it was found that Gane caused Sutton's death through "months of controlling and coercive behaviour and domestic abuse" (Broadfoot, 2024, p. 1). Although not charged with a homicide offence, Gane was convicted of coercive control and assaults of Sutton after her death and sentenced to four years and three months in custody (Chaudhari, 2024). In sentencing Gane, the judge focused on the ongoing abuse Gane perpetrated, rather than the comments immediately before her death, but stated: "Your behaviour drove Kellie Sutton to hang herself that morning. You beat her and ground her down and broke her spirit" (Levy, 2024). Marc Masterton was convicted of similar offences to Gane in the wake of Chloe Holland's death by suicide in the United Kingdom in 2023 (Seth & Waple, 2023).

Two other cases in the United Kingdom are important in this context. Kiena Dawes experienced significant abuse from her partner, Ryan Wellings, including brutal assaults, death threats, isolation and psychological abuse (*R v Wellings*, 2025). Eleven days after a violent assault, Dawes determined to leave the relationship, but after placing her daughter at a friend's place, she went to a railway line, lay on the tracks and was fatally struck by a train (*R v Wellings*, 2025). Dawes left a suicide note that said: "Ryan Wellings killed me" (*R v Wellings*, 2025). Wellings was originally charged with manslaughter, but was acquitted. He then pled guilty to coercive control and serious assault and was sentenced to four years and two years respectively, to be served concurrently (*R v Wellings*, 2025).

After experiencing coercive controlling behaviour, in 2016 Justene Reece left her partner, Nicolas Allen, to stay at a women's shelter. Allen began stalking people close to Reece to try to find her, making over 3000 attempts to contact her – making thousands of calls, and leaving texts and messages via Facebook and WhatsApp directed to Reece and members of her family, with some messages including threats to kill (Connett, 2017). Reece hanged herself and left a suicide note stating that she "had run out of fight" (Connett, 2017). Initially, Allen was charged with coercive control and stalking; however, a manslaughter charge was later successfully brought in 2017, and Allen pleaded guilty to Reece's manslaughter, receiving a 15-year sentence. In sentencing Allen, the judge stated:

It is not suggested that you intended at any time that she should die but clearly you intended that she should suffer serious psychological harm . . . She committed suicide as a direct result of your sustained and determined criminal actions, actions which you clearly knew were having a profound effect upon her. (Connett, 2017)

In the United Kingdom, there have been some efforts to introduce a specific offence of “manslaughter by coercive control,” with a petition in favour of this garnering over 17,000 signatures in 2023 (Hunter, 2023; Seth & Waple, 2023). However, the government rejected the reform, observing that the current offence of manslaughter can “already cover circumstances where death results from coercive or controlling behaviour or any other unlawful act” (UK Government and Parliament, 2024). Across the United Kingdom, coercive control is an offence (e.g. *Serious Crime Act 2016 s 76*). This legislation allows prosecutors to identify a pattern of behaviour, rather than relying on a discrete incident or event, in order to identify and prove an unlawful act (such as an incident of assault) to underpin a manslaughter charge (Bronitt & McSherry, 2017).

While the prosecution must still prove that the accused “caused” the death, an important aspect of a manslaughter charge is that, unlike murder, the prosecution does not have to prove that the accused *intended* to cause death or serious harm through their unlawful acts (McGorrrery & McMahon, 2019). The accused’s intention is often difficult to prove, especially in cases involving DFV, where the aim of the accused is often to control the victim rather than kill them or cause specific physical harm or death (Stark, 2024). As I discuss later in this article, subject to establishing that the DFV perpetrated by the accused caused the suicide, those states in Australia that have introduced coercive control offences<sup>3</sup> have the option of charging an unlawful act with a manslaughter charge in suicides preceded by coercive control (McGorrrery & McMahon, 2019). However, other offences, such as assault and stalking, could potentially also ground a manslaughter charge if they were able to be proved (Bronitt & McSherry, 2017).

### **Counselling or Encouraging Suicide**

In some cases, abusive partners have directly pressured their partner to commit suicide – also sometimes referred to as forced suicides (European Institute for Gender Equality, 2023, p. 60). There may sometimes be a fine line between indirect pressure towards suicide through abuse and direct pressure through a comment or action. For example, Gane’s comment to “do everyone a favour” in response to Sutton’s threat that she would kill herself could also be understood as direct pressure.

In two cases in Massachusetts in the United States, Michelle Carter and Inyoung You were successfully prosecuted for manslaughter of their male partners on the basis of encouraging their suicides (Lujan, 2023). In Carter’s case, there was evidence in text messages that she had encouraged her partner, Conrad Roy, to commit suicide, instructed him on when and how and rebuked him when he changed his mind (Rogers & Vimalarajah, 2017). Eventually, Roy did suicide, with the medical examiner determining that the cause of death was inhalation of carbon monoxide (Chin, 2017). While Carter contested the conviction, arguing that it infringed her right to free speech, in 2020 the Supreme Court affirmed her conviction (Lujan, 2023). In the second case, You tracked her partner, Alexander Urtala, exchanging over 75,000 text messages with him – some of which urged him to kill himself – in the two months before his death. You pled guilty to the charge of manslaughter, receiving a sentence of 2.5 years, suspended for 10 years with supervision over the first five years of the suspension and a requirement that she complete community service and attend mental health treatment (Suffolk County District Attorney, 2021).

Unlike in Australia, a charge of incitement or coercion to suicide was not available in Massachusetts. While suicide is no longer a crime across Australia, assisting or counselling another person to commit suicide is still a crime.<sup>4</sup> Thus, an offence of counselling a suicide could be charged where there is a history of DFV and the abusive partner has directed or encouraged the victim to suicide. As with manslaughter, the prosecution must prove a causal connection between the “counselling” (or inciting) and the suicide (Bronitt & McSherry, 2017). However, in contrast to manslaughter, the prosecution must prove an intention on the part of the accused towards encouraging suicide specifically. As noted previously, proving intention can be difficult, given that abusive partners may have intended to control the other party, rather than encourage their death. Furthermore, while the penalty for manslaughter is often a maximum of life imprisonment, often resulting in sentences of around eight to 12 years (Sentencing Advisory Council, 2023), sentences are generally much lower for encouraging or assisting suicide offences – usually in the vicinity of a five-year maximum imprisonment (Del Villar et al., 2022). Overall, the offence of counselling suicide may fail to reflect the seriousness of the offending when carried out in the context of a history of DFV.

Even in cases where suicide fails, inciting suicide charges may be relevant. For example, in the New Zealand case of *R v Hawkins* (2023), Brendan Hawkins had been in a relationship with the victim and had been violent towards her. He was charged with assaulting her but not convicted. Throughout a period of 14 months while he was on bail for the assault charge, one of his conditions was that he must not associate with the victim. Despite the condition, Hawkins remained in contact with the victim via various messaging platforms. In several messages, he told the victim that she should kill herself because “no one cares

about you” and “no one likes you” (*R v Hawkins*, 2023, [5]–[6]). She eventually overdosed on paracetamol in an attempt to kill herself. While the suicide failed, Hawkins was charged and convicted of inciting suicide. In sentencing, the judge took into account the vulnerability of the victim, the repetitive nature of the accused’s behaviour and the breach of trust, sentencing the accused to 30.5 months of imprisonment.

McGorrery and McMahon (2019) argue that in some of these cases, manslaughter may be charged as an alternative. McGorrery and McMahon (2019) suggest that where the act was unlawful (e.g. a criminal offence such as stalking, assault or, in some jurisdictions, coercive control) and dangerous (in that the accused realised they were exposing the person to an appreciable risk of serious injury), the accused may be charged with unlawful and dangerous act manslaughter in the event of the victim’s suicide. However, there is a risk that where suicide is considered a response to encouragement or counselling, the relationship history will not be investigated properly to consider the role of DFV, and the abusive partner may avoid accountability for the DFV (European Institute for Gender Equality, 2023).

## Suicide Pacts

It is conceivable that in some cases an abusive partner may coerce their domestic partner into agreeing to a suicide pact with an intention on the abuser’s part to survive the pact. A suicide pact is an agreement between two or more people where the purpose is that all parties will die (Bronitt & McSherry, 2017). Where a person kills another pursuant to a suicide pact, and the person who killed the victim survives, they could be guilty of the lower-level offence of counselling or assisting suicide, as discussed earlier (Bronitt & McSherry, 2017). Although rare, researchers have observed that suicide pacts are generally carried out in pairs – most often intimate partners but also family, friends or close acquaintances (Gregory, 2013; Kim et al, 2023). Fredrickson’s (2023) review of suicide pacts in the years after World War I show that it was much more common for men to survive a suicide pact between intimate partners than women. In her study of eight “paired suicides,” Gregory found that the methods of killing were “overwhelmingly passive” (2013, p. 312).

As an example, in the initial stages of his trial for the murder of Ozlem Karakoc, Mural Davsanoglu maintained that he had made a suicide pact with the deceased (*R v Davsanoglu*, 2019). Karakoc and Davsanoglu had previously been in a relationship, but she had started to date another man. At the initial police interview, Davsanoglu claimed that the deceased had first proposed a suicide pact and, as part of this, the deceased had agreed to drowning her (*R v Davsanoglu*, 2019). The Crown case was that there was no suicide pact and Davsanoglu had drowned the victim in the bath and later had made superficial cuts on his wrist. During the trial, the accused changed his plea to guilty and was sentenced to 23 years’ imprisonment (*R v Davsanoglu*, 2019). In sentencing Davsanoglu for murder, the judge observed:

In my view, the injuries you inflicted on yourself did not represent a genuine attempt to kill yourself but, rather, a means for you to explain your involvement in the killing of the deceased by reference to a so-called suicide pact. (*R v Davsanoglu*, 2019, para. 14)

Given the rarity of paired suicides and suicide pacts, Gregory (2013) highlights that careful investigation in each case is necessary. This should clearly extend to any case where a person claims survival from a suicide pact, especially where there is a history of DFV or the purported suicide is actively violent.

## Mercy Killings and Euthanasia

So-called mercy killings and euthanasia cases have also been recognised as potential flashpoints where women may face pressure to be killed or engage in euthanasia under coercion (The Other Half, 2024). An important issue underpinning debates about euthanasia is that vulnerable people, such as older or disabled people, may be pressured to end their lives (Grey, 2016). People who have experienced DFV are often vulnerable and are also disproportionately represented in statistics about disability, which in some cases has resulted from DFV (AIJA, 2025). In the United Kingdom, it has been argued that extensions to eligibility of euthanasia may lead women to engage with the process in the context of DFV, resulting in some claiming that the widening of access is in essence a “softening of the prohibition on femicide” (The Other Half, 2024, p. 4). In Canada, researchers have expressed concern about the pressure placed on women to end their lives under expansions to the Medical Assistance in Dying legislation (Grant et al., 2024).

In an Australian example, Robert Cooper maintained that when he injected Donna Green with lethal doses of heroin, it was at her request and that he only wanted to “take the pain away” (*R v Cooper*, 2019, [45]). In effect he was claiming that this was a mercy killing – albeit not under the supervision of a medical team. Cooper and Green had been in a relationship for two years. The relationship included DFV and at the time she was killed, Green had a protection order against Cooper. Despite the order,

Cooper continued to seek out Green, leading to charges of stalking/intimidating with intent and breaching the protection order. While maintaining that the killing was a mercy killing, Cooper pleaded guilty to murder. Antecedent to the killing, Cooper did send various messages to friends and family stating that he intended to give Green a lethal dose to stop her pain. However, most of the evidence for mercy killing was from Cooper's messages and comments, which could be seen as self-serving. Despite the history of abuse, the judge found the killing was a "mercy killing," and the sentencing judge afforded leniency to the accused based on the plea of guilty and sentenced him to a non-parole period of 10 years (*R v Cooper*, 2019, [78]). This result may suggest that the DFV history was not sufficiently considered.

Voluntary Assisted Dying (VAD) laws in Australia remain fairly strict, and cases that fall outside the prescribed limits will likely result in criminal charges. Nevertheless, the vulnerability of DFV victims, coupled with the experiences of expanding euthanasia rules in other countries, provides a warning to Australian legislators, investigators and judicial officers to consider whether the vulnerable person is indeed making a voluntary request to die, or whether the victim is simply vulnerable (Del Villar et al., 2022) and may be experiencing coercive control from an abusive partner.

### The Importance of Thorough and Timely Investigation

Researchers have highlighted the risks of assuming that deaths are suicides and not homicides. In a review of 32 suicides investigated by Domestic Homicide Reviews in England and Wales, hanging was the most common method of suicide (Christie et al., 2023; Dangar et al., 2022, 2024). In the Australian context, female hangings have progressed from 1.9 deaths per 100,000 in 1997 to 3.2 per 100,000 in 2023, with half (53.5%) of female suicides now by hanging (Australian Institute of Health and Welfare, 2025). In the United Kingdom, Bates et al. (2021, p. 58) found that, of the deaths by hanging, over half had a history of non-fatal strangulation by a partner. While the authors did not specifically suggest that any of these hangings were homicides disguised as suicides or staged suicides, they did identify concerns from family members of the victim and associated professionals that police investigations were closed too quickly. When this has occurred, family members have talked about the difficulty of reopening them to explore the question of whether a suicide was staged (Dangar et al., 2022, p. 56). Other research suggests that a high proportion of homicides staged as suicides involve victims and offenders who were intimate partners – 56% in one study (Ferguson, 2015).

Like hangings, falling deaths have also been highlighted as potentially hidden homicides missed as suicides (Ferguson & Sutherland, 2018; Hoeger et al., 2025). In a UK study of falling deaths:

in 9 out of 10 falls from a building the suspect was present at the scene. In three cases the death was considered a SVSDA [suspected victim homicide following domestic abuse] and in four an unexpected death. The other two cases were recorded as IPH [intimate partner homicide]. (Hoeger et al., 2025, p. 53)

A report of the Forensic Pathology Unit (FPU) of the Home Office (2015) identified that cognitive biases held by police investigators may influence decisions about assessing the scene. This was particularly the case where the deceased had been using drugs or alcohol or was elderly, where "initial police decision making accounted for the potential to miss a homicide in 9 [out of 15]" cases (FPU, 2015, p. 12). In some of the cases explored in the FPU report, the bodies examined by investigators exhibited visible marks indicating violence, but deaths were not treated as suspicious, and in some cases there had been no inspection of the body (FPU, 2015).

Notably, drug and alcohol use is strongly associated with DFV, with victims using alcohol and other drugs to medicate the pain and mental health issues associated with DFV (AIJA, 2025). Substance use coercion, where the perpetrator of violence coerces their victim into using alcohol or other drugs as part of a tactic of control, is also well-recognised (AIJA, 2025). Thus, alcohol- and drug-affected DFV victims' homicides may be at high risk of being assumed to be suicide and insufficiently investigated. One example of many of these issues is the assumed suicide by falling and the associated poor investigation of the death of Caroline Byrne. Byrne died in 1995 at The Gap in Sydney – a well-known place where suicides had occurred. Originally the coroner left an open finding (*Wood v R*, 2012). There had been no witnesses. At the time of her death, Byrne was in a relationship with Gordon Wood. He was the one to raise the alarm about her well-being. There was evidence that Byrne had suffered bouts of depression and she had failed to attend an appointment with her psychiatrist the day she died. A witness claimed he had seen Byrne before her death and from her behaviour he had assumed she was affected by drugs and alcohol (only Rohypnol as metabolite was found in her blood at autopsy). In the immediate aftermath of her death, her family had accepted that she may have suicided. However, there was evidence of Wood controlling Byrne, calling her often, that he was jealous and possessive and wanted her to stop working. The court observed that "it would seem unusual, the police apparently took no photographs of the scene" (*Wood v R*, 2012, [10]). The lack of appropriate investigation was guided by an assumption. The Court stated that, "at the time the assumption was made that, like many others had done before her, she committed suicide by jumping from the

cliff top” (*Wood v R*, 2012, [1]). It was not until 2006 that Wood was charged with Byrne’s murder, after Byrne’s father agitated for 10 years for police to reopen the investigation. Wood was originally convicted by a jury, but the conviction was set aside on appeal with a verdict of acquittal ordered by the judge, given issues with evidence. The evidence issues might have been ameliorated had there been an open-minded and appropriate investigation at the time of Byrne’s death.

Autopsy findings can also be incorrect and result in deaths being misinterpreted as suicides, resulting in misdirected police investigations (Geisenberger et al., 2019) and potentially a cold case of murder. In some cases, part of the offender’s planning maybe to frustrate the autopsy and forensic examination. For example, in one case, while the autopsy did not ascertain a cause of death and the coroner handed down an open finding, Brian Crickitt, a Sydney GP, was ultimately convicted of the murder of his wife, Christine Crickitt (*R v Crickitt*, 2016). The Crown case was that on New Year’s Eve, Brian Crickitt injected his wife with a lethal dose of insulin, knowing an autopsy would not be carried out quickly enough to detect insulin in the body. According to the evidence, the blood of the deceased needs to be tested soon after death to detect insulin; however, in this case the autopsy was not carried out for another two days. The Crown submitted that “the accused was aware of this and deliberately chose New Year’s Eve to murder his wife knowing that it was highly unlikely that an autopsy would be conducted on the deceased on New Years Day” (*R v Crickitt*, 2016, [42]). Crickitt was ultimately convicted of murder based on a number of circumstances (there was bruising consistent with forceful injecting, he was having an affair, there was a life insurance policy, he treated Christine Crickitt for medical issues during their relationship, and she was not a diabetic – yet he had obtained a prescription for insulin, and Crickitt had her body cremated against her family’s wishes). In this case, even though no cause of death was established through the autopsy, the investigation was rigorous and the circumstantial evidence was sufficient to convict Crickitt of murder.

### **Prosecution Challenges Regarding Homicide Where Suicide is Claimed**

Even where the investigation results in a homicide charge being laid, there are challenges for the prosecution when suicide is claimed by the accused. Several cases are discussed in this section to illustrate some of the difficulties in securing a conviction.

#### ***Causation and Coercive Control***

While causation is a key issue in proving manslaughter and other offences explored in this article, causation as a concept is not well defined. Entire textbooks are dedicated to considering it (e.g. Reed et al., 2026), so no more than a brief comment is offered here. In cases where there might be multiple causes of death, the test of causation is likely to be satisfied if “the act” of the accused person is “an operating and substantial cause of the death” (Bargaric, 2026, p. 174). In cases of suicide preceded by victimisation by coercive control, there will be questions about whether the accused’s “act” – that is, the tactics used by the accused as part of a pattern of coercive control – was the operating and substantial cause of the death/suicide or whether other causes such as underlying mental health issues were the “operating and substantial” cause. This, of course, can be complex given that mental health issues are often associated with DFV, and the mental health of the victim may be raised as a defence to a charge of homicide. This is further discussed at the end of this section.

In this context, the concept of coercive control, which focusses on patterns of harm (Stark, 2024), is potentially a challenging one for Australian criminal law, which has historically focused on discrete incidents (Tolmie, 2018). Understanding the “act” that underpins causation as a pattern of harm is potentially significant. However, McGorry and McMahon (2018) argue that it is a crime – for example, in Victoria – to cause psychological harm to another person and the catalyst for that harm does not need to be a physical act. They contend that the infliction of harm through non-physical means such as emotional abuse, social isolation and stalking could underpin the unlawful act for a charge of unlawful and dangerous act manslaughter in Australia. This suggests that, even without a specific coercive control crime, coercive control – the tactics of which include emotional abuse, social isolation and stalking and result in psychological harm (Stark, 2024) – could be an assault of psychological harm and thus an unlawful act for the purposes of the offence. In those Australian jurisdictions where an offence of coercive control is on the books (Wangmann, 2024) and it is provable against an individual abuser, it seems possible that this could underpin the unlawful act requirement for the unlawful and dangerous act of manslaughter.

#### ***Burden of Proof***

A further challenge is the prosecution’s burden of proof where suicide is claimed. The prosecution is required to prove each element of murder beyond reasonable doubt. Where suicide is raised by the defence as an explanation for the death and the alternative hypothesis to murder, the jury only needs to be satisfied that suicide is a plausible or reasonable alternative explanation to acquit. This is well illustrated in a case involving Ljube Veleviski (*Veleviski v R*, 2002). Veleviski unsuccessfully appealed against his murder convictions for the stabbing murder of his wife, Snezana Veleviska, and their three children. The

throats of all four had been cut. Velevski claimed he had been in another part of the house at the time and that his wife had killed the children and then herself. High Court judges Gleeson CJ and Hayne J commented:

[I]t became apparent that the central question in this Court is whether it was open to the jury to conclude, as it did, that the prosecution had proved beyond reasonable doubt that the appellant had murdered his wife and children or was there a reasonable possibility that Mrs Velevska had killed her children and then herself? (*Velevski v R*, 2002, [5])

While the majority of the High Court dismissed the appeal against conviction, Gaudron J would have allowed it and entered a not guilty verdict. She observed the case was circumstantial but involved “true alternatives: either Snezana killed her children and then committed suicide, or the appellant killed his wife and children. In the case of true alternatives, the exclusion of one necessarily proves the other.” That is, if the jury finds that suicide is a plausible alternative, it would not be possible at the same time to find that the accused was guilty of a homicide offence beyond a reasonable doubt. While I do not argue for any change in the burden of proof, it is important for the jury to be well informed by the prosecution about any available history of DFV in a given case, as this may influence the jury’s fact-finding.

### ***Circumstantial Evidence***

In many cases where the accused claims the victim suicided, rather than that he killed her, only circumstantial evidence rather than direct evidence is available. This was the case in *R v Crickett* (2012), discussed earlier (see also *Lang v R*, 2023; *R v Allen*; *R v Basham*, 2023; *Velevski v R*, 2002; *Wood v R*, 2012). Direct evidence is evidence of what witnesses saw, heard or did, or a video-recording showing the accused carrying out the act they are accused of doing. In contrast, a case based on circumstantial evidence will involve a collection of circumstances that together point to guilt. For example, a person seeing the accused shoot the victim is direct evidence, whereas seeing the accused flee the scene shortly after the witness has heard a gunshot is circumstantial evidence. The court explained in *Shepherd v R* (1990) that:

Ordinarily, in a circumstantial evidence case, guilt is inferred from a number of circumstances – often numerous – which taken as a whole eliminate the hypothesis of innocence. The cogency of the inference of guilt is derived from the cumulative weight of circumstances, not the quality of proof of each circumstance. (*Shepherd v R*, 1990, [11])

There is some evidence from psychology studies that there is a human tendency to undervalue circumstantial evidence compared with direct evidence, and that jurors tend to be more sceptical of circumstantial evidence (Blum, 2019). In the context of criminal trials, a fear of wrongful convictions is also important, with non-conviction being seen as a way to avoid them. While such concerns may influence jurors, they may also influence investigators. The fact that circumstantial evidence may be very important in cases where suicide is claimed underlines the importance of timely and thorough investigation.

### ***Evidence of Mental Health of the Victim***

It is recognized that DFV often results in the victim experiencing mental health issues (AIJA, 2025), but mental ill-health is also associated with suicide. When suicide is raised as a “defence,” the accused person will often advance the mental ill health of the victim to support his claim that she suicided (*R v Allen*, 2011; *R v Basham*, 2023; *Lang v R*, 2023; *Wood v R*, 2012).

For example, a jury found Allen guilty of the murder of his wife (*R v Allen*, 2011). Allen and his wife separated in April 2008, and Allen had moved out of the home where they had previously lived together. In June 2008, the deceased had consulted a lawyer about property matters and in July she died from neck compression. There was evidence of a history of DFV. Allen claimed his wife had suicided, and he testified at trial that he had found her hanging, taken her down, attempted to resuscitate her and called 000. There was substantial evidence presented at the trial that the deceased’s mental state “was in a downward trend” leading to her death; she was described by witnesses as “very sad and losing lots of weight” and “some days every day she would be crying” (*R v Allen*, 2011, [181]). Allen’s defence counsel submitted that the depression might have led her to commit suicide. Justice Peek relevantly observed that: “Defence counsel was ... understandably hampered in making the submission that the appellant himself may have contributed to her suicide death through inducing her depression by his prior violent conduct” (*R v Allen*, 2011, [186]). While the victim’s mental ill-health leading up to the purported suicide is relevant, care needs to be taken that this factor does not compromise any initial investigation, or the jury’s considerations in the event of a prosecution.

## Policy and Law Reform

The proposed offence of manslaughter by coercive and controlling behaviour was determined to be unnecessary in England and Wales, as the offence of coercive control could underpin unlawful and dangerous act manslaughter (UK Government and Parliament, 2024). In Australia, one of the unexpected outcomes of introducing the offence of coercive control (Wangmann, 2024) may be to add support to the prosecution of the unlawful and dangerous act manslaughter in situations where victims of DFV have been so overwhelmed by the abuse that they commit suicide, or where the accused has used coercive control to pressure the victim to suicide. Successful prosecutions of this nature rely (in part) on the prosecution proving, beyond a reasonable doubt, that the act(s) of the accused caused the death.

What is key in many of the contexts discussed in this article is that an open-minded and thorough investigation of suicides is pivotal. Common themes associated with staged homicides have been identified. McLachlan and Ferguson (2024) have observed that intimate partner fatalities regularly involve elements of detection avoidance and concealment. In their study of all intimate partner fatalities in Queensland from 2006 to 2019, they found that 43% involved some form of detection avoidance by offenders (McLachlan & Ferguson, 2024). In another study investigating staged homicides, Ferguson points to the common features of staged suicides, including weapon arrangement and simulating self-injury to the victim; rearranging the body; and removing valuables (Ferguson, 2015) as well as the frequent involvement of hanging or asphyxia and deep knowledge of their victims (Ferguson & Petherick, 2014). The Training Institute on Strangulation Prevention (2023) has identified 10 factors of a suspicious death in intimate partner violence relationships: (1) the victim died prematurely; (2) it appeared to be a suicide or accident scene; (3) one partner wanted to end the relationship; (4) there was a prior history of domestic violence (or coercive control); (5) the victim was found dead in their home/place of residence; (6) the victim was found by their current or previous partner; (7) there was a prior history of strangulation/suffocation; (8) the partner was the last person to see the victim alive; (9) the partner had control of the crime scene before the police arrive; and (10) the crime scene was altered in some way. While these themes and factors provide guidance regarding the need to consider homicide in cases of claimed suicide, the general guiding principle in this context should be that the death is suspicious unless evidence shows otherwise (FPU, 2015).

There are examples of laws developed in other countries that mandate such an approach. For example, in the United States, California has introduced Senate Bill 989 (2024), known as Joanna's law, to respond to the concerns about hidden homicides, where perpetrators may have staged a suicide to conceal their crimes. The legislation mandates law enforcement officers to thoroughly investigate deaths suspected to be suicides, especially when there is a history of DFV. It also extends powers for coroners investigating such deaths and extends rights to family members to access records about the death. The legislation recognises that:

Domestic violence-related homicides are highly susceptible to staging or alteration of the death scene before investigators can conduct a scene investigation, which hampers the responsibilities of the coroner or medical examiner and compromises the ability of investigators to evaluate death cases adequately. (Senate Bill 989, section 1(b))

To tackle the high rates of deaths of women connected with dowry, in 1986 India introduced an offence of dowry death (Goel, 2015). An aspect of this law is the police are required to order a postmortem whenever a case involves suicide of a woman within seven years of marriage (*The Code of Criminal Procedure*, India s 174).

## Conclusion

The intersection of DFV and suicide presents significant challenges for policy and legal responses. DFV victims may suicide as a response to DFV, or they may be pressured to suicide; in some cases, homicides are deliberately staged as suicides. These dynamics complicate investigations and prosecutions. Existing offences such as manslaughter, and counselling or assisting suicide, provide some avenues for accountability where suicide results from DFV. The introduction of coercive control offences in Australia may support prosecutions for manslaughter in contexts where victims are driven to suicide because of DFV. While I do not argue for specific reforms to offences and evidence laws, awareness of the issues raised in the cases discussed here may assist investigators and prosecutors to assess deaths where this is a history of DFV with an open mind and ensure that relevant evidence about DFV is put before juries and judicial officers, including for consideration in sentencing. This is especially so given that causation and intent may be difficult to prove, evidence may be circumstantial and the victim may often have a history of mental health issues, further complicating the picture. In suspected suicide cases where there is evidence of DFV, strengthening investigation protocols and potentially legislative reforms such as Joanna's law (that mandates investigations of homicide where there is a history of DFV and coercive control), may help to ensure appropriate and timely investigation and sentencing, and prevent perpetrators from exploiting claims of suicide as a shield for their lethal violence.

**Acknowledgement**

This research was supported by the Australian Government through the Australian Research Council's Centre of Excellence for the Elimination of Violence Against Women (Project number CE230100004).

*Correspondence:* Professor Heather Douglas, Melbourne Law School, The University of Melbourne, Australia.  
[douglash@unimelb.edu.au](mailto:douglash@unimelb.edu.au)

---

<sup>1</sup> Notably, research has also shown that perpetrators of domestic abuse are also at high risk of suicide, pointing to the need to focus on mental health support for perpetrators as well (Knipe et al., 2024), with younger males particularly at-risk post separation (Wyder et al., 2009).

<sup>2</sup> Wherever possible, published case law and transcripts of decisions are cited; however, where these were not available, media items were sometimes cited.

<sup>3</sup> *Crimes Act 1990* (NSW) Part 3, Division 6A; *Criminal Code 1899* (Qld) Chapter 29A.

<sup>4</sup> *Crimes Act 1900* (ACT) s 17; *Criminal Code Act 1983* (NT), s 162; *Criminal Code 1899* (Qld) s 311; *Criminal Law Consolidation Act 1935* (SA), s13A; *Criminal Code Act 1924* (Tas) s 163 (refers to instigating or aiding suicide); *Crimes Act 1958* (Vic) s 6B; *Criminal Code Act Compilation Act 1986* (WA).

## References

- Agenda Alliance (2023). *Underexamined and underreported: Suicidality and intimate partner violence – connecting two major public health domains*.  
[https://www.agendaalliance.org/documents/138/Underexamined\\_and\\_Underreported\\_Briefing.pdf](https://www.agendaalliance.org/documents/138/Underexamined_and_Underreported_Briefing.pdf)
- Alimoradi, Z., Arabloo, J., Jandaghian-Bidgoli, M., Alizadeh, S., Griffiths, M. D., Gorji, H. A., Abdi, F., & Shalbafan, M. (2026). The association between intimate partner violence and suicide ideation and attempts among women: A systematic review and meta-analysis. *Journal of Affective Disorders*, 394, 120511. <https://doi.org/10.1016/j.jad.2025.120511>
- Australian Institute of Health and Welfare. (2025). *Deaths by suicide over time*. <https://www.aihw.gov.au/suicide-self-harm-monitoring/overview/suicide-deaths>
- Australasian Institute of Judicial Administration (AIJA). (2025). *National domestic and family violence bench book*.  
<https://dfvbenchbook.aija.org.au>
- Bates, L., Hoeger, K., Stoneman, M.-J., & Whitaker, A. (2021). *Domestic homicides and suspected victim suicides during the COVID-19 pandemic 2020–2021*. Home Office (UK).  
[https://assets.publishing.service.gov.uk/media/6124ef66d3bf7f63a90687ac/Domestic\\_homicides\\_and\\_suspected\\_victim\\_suicides\\_during\\_the\\_Covid-19\\_Pandemic\\_2020-2021.pdf](https://assets.publishing.service.gov.uk/media/6124ef66d3bf7f63a90687ac/Domestic_homicides_and_suspected_victim_suicides_during_the_Covid-19_Pandemic_2020-2021.pdf)
- Blum, B. (2019). Evidence law: Convictions based on circumstantial evidence, *The Judges' Book*, Vol. 3, Art. 11.  
<https://repository.uclawsf.edu/judgesbook/vol3/iss1/11>
- Broadfoot, S. (2024). *Regulation 28: Report to prevent future deaths*. Assistant Coroner. [https://www.judiciary.uk/wp-content/uploads/2024/05/Kellie-Sutton-Prevention-of-future-deaths-report-2024-0239\\_Published.pdf](https://www.judiciary.uk/wp-content/uploads/2024/05/Kellie-Sutton-Prevention-of-future-deaths-report-2024-0239_Published.pdf)
- Bronitt, S. & McSherry, B. (2017). *Principles of criminal law*. Thomson Reuters.
- Chaudhari, S. (2024, 14 May) Steven Gane jailed after “driving his partner to suicide.” *BBC News*.  
<https://www.bbc.com/news/articles/cljd96y2yxgo>
- Chin, A. (2017). Suicide by text: The case of Michelle Carter. *Journal of Technology Law & Policy*, 21(2), 261–269.  
<https://scholarship.law.ufl.edu/jtlp/vol21/iss2/5>
- Christie, C., Rockey, J. C., Bradbury-Jones, C., Bandyopadhyay, S., & Flowe, H. D. (2023). *Domestic abuse links to suicide: Rapid review, fieldwork, and quantitative analysis report*. UK Home Office. <https://www.suicideinfo.ca/wp-content/uploads/2023/06/Domestic-Abuse-links-to-Suicide.pdf>
- Connett, D. (2017, 29 July). Stalker jailed for manslaughter of former partner who killed herself. *The Guardian*.  
<https://www.theguardian.com/uk-news/2017/jul/28/stalker-jailed-manslaughter-former-partner-killed-herself-nicholas-allen-justene-reece>
- Coroners Court of Victoria (2024). *Experience of family violence among people who suicided, Victoria 2009–2016*.  
<https://www.coronerscourt.vic.gov.au/sites/default/files/2024-09/Coroners%20Court%20of%20Victoria%20Experience%20of%20family%20violence%20among%20people%20who%20suicided%202009-20016.pdf>
- Cripps, K. (2023). *Indigenous domestic and family violence, mental health and suicide*. Australian Institute of Health and Welfare. <https://www.indigenoumhspsc.gov.au/publications/dfv>
- Dangar, S., Munro, V., & Young Andrade, L. (2022). *Learning legacies: An analysis of domestic homicide reviews in cases of domestic abuse suicide*. Warwick University. <https://aafda.org.uk/learning-legacies>
- Dangar, S., Munro, V. E., & Young Andrade, L. (2024). Learning legacies: Better understanding the dynamics of domestic abuse suicidality through domestic homicide reviews. *Journal of Gender-Based Violence*, 10(1), 77–93.  
<https://doi.org/10.1332/23986808Y2024D000000037>
- Del Villar, K., Willmott, L., & White, B. (2022). Voluntary requests, or vulnerable adults? A critique of criminal sentencing in assisted suicide and “mercy killing” cases. *University of New South Wales Law Journal*, 45(2), 449–498.  
<https://classic.austlii.edu.au/au/journals/UNSWLawJl/2022/16.html>
- European Institute for Gender Equality. (2023). *Improving legal responses to counter femicide in the European Union: Perspectives from Victims and professionals*. [https://eige.europa.eu/publications-resources/publications/improving-legal-responses-counter-femicide-european-union-perspectives-victims-and-professionals?language\\_content\\_entity=en](https://eige.europa.eu/publications-resources/publications/improving-legal-responses-counter-femicide-european-union-perspectives-victims-and-professionals?language_content_entity=en)
- Ferguson, C. (2015). Staged homicides: An examination of common features of faked burglaries, suicides, accidents and car accidents. *Journal of Police and Criminal Psychology*, 30, 139–157. <https://doi.org/10.1007/s11896-014-9154-1>
- Ferguson, C., & Petherick, W. (2014). Getting away with murder: An examination of detected homicides staged as suicides. *Homicide Studies*, 20(1), 3–24. <https://doi.org/10.1177/1088767914553099>
- Ferguson, C., & Sutherland, T. (2018). Murder by pushing: An exploratory analysis of homicidal falls from a height. *The American Journal of Forensic Medicine and Pathology*, 39(3), 192–200.  
[https://journals.lww.com/amjforensicmedicine/fulltext/2018/09000/murder\\_by\\_pushing\\_an\\_exploratory\\_analysis\\_of.2.aspx](https://journals.lww.com/amjforensicmedicine/fulltext/2018/09000/murder_by_pushing_an_exploratory_analysis_of.2.aspx)
- Fitz-Gibbon, K., & Walklate, S. (2023). Cause of death: Femicide. *Mortality*, 28(2), 236–249.  
<https://doi.org/10.1080/13576275.2022.2155509>

- Forensic Pathology Unit (FPU) of the Home Office (2015). *A study into decision making at the initial scene of unexpected death: A report for the Forensic Science Regulator concerning the 2012 audit of forensic pathologists reports*. [https://assets.publishing.service.gov.uk/media/5a80043de5274a2e8ab4daf9/Report\\_into\\_the\\_2012\\_FSR\\_FP\\_Audit\\_Publication\\_copy\\_pdf.pdf](https://assets.publishing.service.gov.uk/media/5a80043de5274a2e8ab4daf9/Report_into_the_2012_FSR_FP_Audit_Publication_copy_pdf.pdf)
- Fredrickson, J. (2023). No future to look forward to: Suicide pacts, intimacy and society in 1920s and 1930s Britain. *Twentieth Century British History*, 34(4), 657–680. <https://doi.org/10.1093/tcbh/hwad043>
- Geisenberger, D., Pollak, S., & Thierauf-Emberger, A. (2019). Homicidal strangulation and subsequent hanging of the victim to simulate suicide: Delayed elucidation based on reassessment of the autopsy findings. *Forensic Science International*, 298, 419–423. <https://doi.org/10.1016/j.forsciint.2019.02.037>
- Goel, R. (2016). Women who kill women. *William & Mary Journal of Women and the Law*, 22(3), 549–584. <https://scholarship.law.wm.edu/wmjowl/vol22/iss3/4>
- Grant, I., Benedet, J., Sheehy, E., & Frazee, C. (2024). A conversation on feminism, ableism, and medical assistance in dying. *Canadian Journal of Women and the Law*, 35(1), 21–72. [https://doi.org/10.3138/CJWL\\_2023\\_Grant3](https://doi.org/10.3138/CJWL_2023_Grant3)
- Gregory, M. J. (2013). Dying together: Suicide pacts and other episodes of paired suicides in Yorkshire and the Humber. *British Journal of Social Work*, 43(2), 298–316. <https://doi.org/10.1093/bjsw/bct015>
- Grey, L. (2016). The person who really loves me will be the one who helps me die: A critique of *Seales v Attorney-General*. *Public Interest Law Journal of New Zealand*, 3, 44–67. <https://www.nzlii.org/nz/journals/NZPubIntLawJl/2016/3.html>
- Harris, L. (2022). *Regulation 28: Report to prevent future deaths*. [https://www.judiciary.uk/wp-content/uploads/2022/11/Jessica-Laverack-Prevention-of-future-deaths-report-2022-0344\\_Published.pdf](https://www.judiciary.uk/wp-content/uploads/2022/11/Jessica-Laverack-Prevention-of-future-deaths-report-2022-0344_Published.pdf)
- Hoeger, K., Gutierrez-Munoz, C., Sadullah, A., & Whitaker, A. (2025). *Vulnerability knowledge and practice programme (VKPP): Domestic homicides and suspected victim suicides 2020–2024 Year 4 Report*. Home Office. [https://www.vkpp.org.uk/assets/Year-4-Report\\_publication.pdf](https://www.vkpp.org.uk/assets/Year-4-Report_publication.pdf)
- Hunter, M. (2023). *Criminal Justice Bill: Written evidence submitted by Margaret Hunter to the Criminal Justice Bill Public Bill Committee* (CJB06). Parliament UK, <https://publications.parliament.uk/pa/cm5804/cmpublic/CriminalJustice/memo/CJB06.htm>
- Kheni, N., Lee, J. J., Maselka, C., Murray, S., & Sabri, B. (2024). Addressing suicide risk Among Immigrant Women Survivors of Intimate Partner Violence. *Issues in Mental Health Nursing*, 45(3), 311–321. <https://doi.org/10.1080/01612840.2023.2291685>
- Kim, K., Russell, C., Kaplan, M., Rehm, J., & Lange, S. (2023). Types of suicide pacts: A comparative analysis using national violent death reporting system. *Frontiers in Psychiatry*, 14. <https://doi.org/10.3389/fpsy.2023.1139305>
- Knipe, D., Vallis, E., Kendall, L., Snow, M., Kirkpatrick, K., Jarvis, R., Metcalfe, C., Eisenstadt, N., & Bickham, V. (2024). Suicide rates in high-risk high-harm perpetrators of domestic abuse in England and Wales. *Crisis*, 45(3), 242–245. <http://econtent.hogrefe.com/doi/10.1027/0227-5910/a000925>
- Levy, A. (2024, 15 May). Mother-of-three, 30, took her own life to escape abusive partner who said she would be doing everyone “a favour” after police failings. *Daily Mail*. <https://www.dailymail.co.uk/news/article-13418005/Mother-took-life-escape-abusive-partner-police-failings.html>
- Lujan, V. (2023). Blurred lines: How the court in *Commonwealth v Carter* blurred the line between freedom of speech and criminal liability. *Houston Law Review*, 61(1), 209–230. <https://houstonlawreview.org/article/90805-blurred-lines-how-the-court-in-commonwealth-v-carter-blurred-the-line-between-freedom-of-speech-and-criminal-liability.pdf>
- McGorry, P., & McMahon, M. (2019). Causing someone else to commit suicide: Incitement or manslaughter? *Alternative Law Journal*, 44(1), 23–28. <https://doi.org/10.1177/1037969X18802455>
- McLachlan, F., & Ferguson, C. (2024). Rates and features of detection avoidance in intimate partner femicide in Australia. *Homicide Studies*, 30(2), 179–199. <https://doi.org/10.1177/10887679241233980>
- NSW Domestic Violence Death Review Team (2017). *Report 2015–2017*. NSW Government. [https://coroners.nsw.gov.au/documents/reports/2015-2017\\_DVDRT\\_Report\\_October2017\(online\).pdf](https://coroners.nsw.gov.au/documents/reports/2015-2017_DVDRT_Report_October2017(online).pdf)
- The Other Half. (2024). *Safeguarding women in assisted dying: A rapid review to inform the debate on assisted dying in the UK*. <https://theotherhalf.uk/safeguarding-women-in-assisted-dying>
- Reed, A., Bohlander, M., Simpson, B., & Adams, V. (2026). *Causation in criminal law: A research companion*. Routledge.
- Rogers, H., & Vimalarajah, S. (2017). Manslaughter by suicide: Carter in NSW. *Dissent: Social Justice Journal*, 26–29. <https://classic.austlii.edu.au/au/journals/DissentSocJustJl/2017/14.pdf>
- Sentencing Advisory Council. (2023). *Snapshot 274: Manslaughter*. <https://www.sentencingcouncil.vic.gov.au/snapshots/274-manslaughter>
- Seth, S., & Waple, K. (2023, 21 November). Chloe Holland death: Mum describes daughter’s coercive control battle. *BBC Online*. <https://www.bbc.com/news/uk-england-hampshire-67458247>
- Stark, E. (2024). *Coercive control: How men entrap women in personal life*, 2nd ed. Oxford University Press.
- Suffolk County District Attorney. (2021). Young woman pleads guilty to manslaughter for her role in boyfriend’s suicide. Suffolk County District Attorney, Massachusetts. <https://www.suffolkdistrictattorney.com/press-releases/items/in-young-you-guilty>

- Tolmie, J. R. (2018). Coercive control: To criminalize or not to criminalize? *Criminology & Criminal Justice*, 18(2). <https://doi.org/10.1177/1748895817746712>
- Training Institute on Strangulation Prevention. (2023). Ten factors of a suspicious death in intimate relationships. <https://www.allianceforhope.org/training-institute-on-strangulation-prevention/resources/ten-factors-of-a-suspicious-death-in-intimate-partner-violence-relationships>
- Turnbull, P., Hunt, I. M., Woodhouse, T., Monk, H., Kapur, N., & Appleby, L. (2025). Domestic violence and suicide in women under the care of mental health services in the UK, 2015–2021: A national observational study. *The Lancet Regional Health – Europe*, 55, 101350. <https://doi.org/10.1016/j.lanep.2025.101350>
- UK Government and Parliament. (2024). *Petitions: Create a statutory offence of manslaughter by coercive and controlling behaviour*. <https://petition.parliament.uk/archived/petitions/648948>
- Walklate, S., Fitz-Gibbon, K., McCulloch, J., & Maher, J. (2020). *Towards a global femicide index: Counting the costs*. Routledge.
- Wangmann, J. (2024). Criminalising coercive control in New South Wales: Misunderstandings and misunderstandings. *University of New South Wales Law Journal*, 47(3), 812–841. <https://classic.austlii.edu.au/au/journals/UNSWLawJl/2024/28.html>
- Wyder, M., Ward, P., & De Leo, D. (2009). Separation as a suicide risk factor. *Journal of Affective Disorders*, 116(3), 208–213.

### Cases

- Bennett v HM Senior Coroner for Surrey* (Case No: AC-2023-LDS-000117), [2024] EWHC 1275 (Admin). <http://juristeca.com/uk/administrative-court/sentencias/2024/1/ac-2023-lds-000117-2024-ewhc-1275-admin>
- Cooper v R* [2021] NSWCCA 65 (14 April 2021). <http://www.austlii.edu.au/cgi-bin/viewdoc/au/cases/nsw/NSWCCA/2021/65.html>
- Lang v R* [2023] HCA 29. <https://www.austlii.edu.au/cgi-bin/viewdoc/au/cases/cth/HCA/2023/29.html>
- R v Allen* [2011] SASCFC 40. <https://www.austlii.edu.au/cgi-bin/viewdoc/au/cases/sa/SASCFC/2011/40.html>
- R v Basham* [2023] VSC 79. <https://www.austlii.edu.au/cgi-bin/viewdoc/au/cases/vic/VSC/2023/79.html>
- R v Cooper* [2019] NSWSC 1042 (16 August 2019). <http://www.austlii.edu.au/cgi-bin/viewdoc/au/cases/nsw/NSWSC/2019/1042.html>
- R v Crickett* [2016] NSWSC 1738. <http://www.austlii.edu.au/cgi-bin/viewdoc/au/cases/nsw/NSWSC/2016/1738.html>
- R v Davsanoglu* [2019] VSC 332. <https://www.austlii.edu.au/cgi-bin/viewdoc/au/cases/vic/VSC/2019/332.html>
- R v Hawkins* [2023] NZDC 13801. [https://www.austlii.edu.au/cgi-bin/viewdoc/nz/cases/NZDC/2023/13801.html?context=1;query=suicide%20pact;mask\\_path=](https://www.austlii.edu.au/cgi-bin/viewdoc/nz/cases/NZDC/2023/13801.html?context=1;query=suicide%20pact;mask_path=)
- R v Wellings* (Sentencing Remarks), Altham J, Crown Court at Preston (UK), 16 January 2025. <https://www.judiciary.uk/judgments/rex-v-ryan-wellings>
- Shepherd v The Queen* [1990] HCA 56. <https://www.austlii.edu.au/cgi-bin/viewdoc/au/cases/cth/HCA/1990/56.html>
- Velevski v R* [2002] HCA 4. <https://www.austlii.edu.au/cgi-bin/viewdoc/au/cases/cth/HCA/2002/4.html>
- Wood v R* [2012] NSWCCA 21. <https://www.austlii.edu.au/cgi-bin/viewdoc/au/cases/nsw/NSWCCA/2012/21.html>

### Legislation

- The Code of Criminal Procedure*, India
- Crimes Act 1900* (ACT)
- Crimes Act 1900* (NSW)
- Crimes Act 1958* (Vic)
- Criminal Code 1899* (Qld)
- Criminal Code Act 1924* (Tas)
- Criminal Code Act 1983* (NT)
- Criminal Code Act Compilation Act 1986* (WA)
- Criminal Law Consolidation Act 1935* (SA)
- Senate Bill No. 989 (2024) Domestic Violence Deaths [California]. [https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill\\_id=202320240SB989](https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202320240SB989)
- Serious Crime Act 2016* (England and Wales)