



FINANCIAL RELIEF UNDER THE DOMESTIC VIOLENCE ACT 1994 IN MALAYSIA: WHAT MALAYSIA CAN LEARN FROM OTHER JURISDICTION IN AFRICA

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Abstract- Domestic Violence which is an abuse that occur in a home often confines women in their horrible lives because they have nowhere to go or have no means of sustaining themselves. Domestic violence may also produce financial hardship for the victims wherein it contributes to economic stress and hardship. In Malaysia, the Domestic Violence Act 1994 (Act No. 521) was passed in early 1994 by the Malaysian Parliament to curb violence within a home and to provide protection from the abuser. This article, adopting a doctrinal and content analysis methodology, will critically analyze the statutory provisions that governing financial or monetary relief to victims of domestic violence in Malaysia and benchmark the practice with other jurisdiction especially in progressive African countries where such remedy has been introduced to assist the victims of domestic violence. This study hopes to significantly contribute in improving the current legislative framework governing financial or monetary relief to the victims of domestic violence in Malaysia.

Keywords: compensation, domestic violence, economic security, financial security, monetary relief

I. INTRODUCTION

Domestic Violence is commonly used to refer to violence against women within a family. Besides wife battering, child abuse too occurs within the family. Domestic violence incurs not only private costs to individuals, but also wider social and economic costs, that impede human development, economic growth, and productivity. Day, McKenna, & Bowlus (2005) agreed that costs of violence against women are enormous as economic development is limited as long as violence against women exists. Duvvury, Callan, Carney & Raghavendra (2013) supported that violence against women has significant economic costs in terms of expenditures on service provision, lost income for women and their families, decreased productivity, and negative impacts on future human capital formation. Victims who suffer from domestic violence suffer serious economic impact as women do lose their jobs due the abuse and some are even discouraged from going out to work. By not allowing the victim to go out and work, this creates an economic dependency, making it difficult for the victim to leave.

Renzetti (2009) agreed that while economic stress and hardship may increase the risk of domestic violence, domestic violence may also cause financial problems for DV survivors and entrap them in poverty and an abusive relationship. Sharma & Borah (2020) posited that layoffs, loss of income, extended domestic stays, and exposure to habits due to stay-at-home orders as a result of Covid-19 are driving up the incidence of domestic violence which is inevitably an indirect driver of economic and social crisis. Megan, Margo, Maureen & Farrell (2020) further reiterates that people who suffer intimate partner violence are usually financially entangled with their abusive partner and becomes too convoluted to sever without an alternative source of economic support. Awang and Hariharan (2011) viewed that the value of economic studies on domestic violence lies in the potential to promote social policy and ultimately reduce violence against women. While there are no detailed studies on the economic and workplace impact of domestic abuse in Malaysia, the rising number of domestic violence cases clearly shows that there is a significant cost incurred as the victims have to take time off to recover or to attend court proceedings and some victims are also saddled with debts due to their partners (Jong, 2016).

The above findings indicate that financial relief for victims of domestic violence must be addressed appropriately by the legislation and the loopholes in the current legislation will expose the victims to further hardship. Therefore, this paper aims at examining the adequacy of the current legislation in addressing the issue in providing compensation or monetary relief for victims of domestic violence in Africa namely the Republic of Ghana, South Africa and Sierra Leone which provide comprehensive monetary assistance with the help of relevant organization to victims of domestic violence. However, the emphasis is made on special and unique features of the monetary assistance and benefits under the domestic violence law in these selected jurisdictions.

Initially, the introduction of domestic violence law dated back in 1994 was to provide Malaysian women with a protection for physical abuse by their husband or any other members in the family. Following the

case of *Muhammad Habibullah V Faridah Dato' Talib (1992) 2 MLJ 793*, a battered wife, who is usually the victim, can now initiate legal proceedings against her abusive husband where such remedy is not available in any statutes prior to the enactment of the domestic violence law except that women may initiate divorce proceedings against their husbands. The intention of the legislation is to provide protection during the existence of the marriage and possibly save the marriage should the parties do not agree with a divorce. The law lacks comprehensiveness in many aspects and reference to Penal Code is a must when the abuse fits into the definition of injuries under the criminal law. In addressing the loopholes in the law, the DVA 1994 has been briefly amended in 2012 to extend on the scope of injuries and another amendment in 2017 where emergency protection order was introduced and rehabilitation for the victims are now made available under the purview of the relevant Ministry and remove the provision on counselling. In the current law, following section 2 DVA 1994, it can be concluded that the DVA encompasses all types of violence occurring within a family institution. The scope of domestic violence covers physical injury such as threatening to injure, causing physical injury, engaging in sexual conduct forcefully, confining or detaining the victims, causing damage to property and includes psychological abuse (Randawar & Zin, 2019).

Generally, it is observed that domestic violence law is still restrictive in its scope and focusing only on the immediate problems faced by the victims rather than the sustainability of their lives after series of domestic abuses. Since domestic violence is a global issue, many countries in the world have rigorously expanded their laws and policies in providing maximum protection to the victims, especially the battered wives on economic and financial aspects of the remedy.

II. FINANCIAL RELIEF UNDER THE DOMESTIC VIOLENCE ACT 1994

Financial relief is not articulately addressed under the domestic violence law except that the victim may claim compensation for the injuries and the damage caused to the victims. The law states that a victim of domestic violence may claim for compensation for personal injuries or damage to property or financial loss as a result of the domestic violence. Section 10(1) of the Domestic violence Act 1994 (Act 521) provides:

Where a victim of domestic violence suffers personal injuries or damage to property or financial loss as a result of the domestic violence, the court hearing a claim for compensation may award such compensation in respect of the injury or damage or loss as it deems just and reasonable.

This provision allows a victim to file a civil claim against the abuser claiming for compensation for the injuries sustained by victim due to the abuse. Sections 10(3)(a) to (c) Domestic Violence Act 1994 states that although such compensation is allowed, courts when granting any necessary and reasonable expenses may take into account the financial position of both the victim and the abuser, the relationship that exists between the parties, reasonableness requiring the abuser to make the payment and also the possibility of any other proceedings being taken between the parties. If both parties have commenced divorce proceedings, then financial provisions pertaining to housing loans or rental payments in respect of the shared residence or alternative residence will be dealt with under the relevant laws relating to the financial provision of spouses or former spouses and other dependents [Section 10(2)(e)(iii) and Section 10(3)(c) Domestic Violence Act 1994].

In terms of compensation, the DVA does not provide any definition interpreting its meaning and scope. However, in relation to financial loss, the scope includes dishonestly misappropriating the victim's property which causes the victim to suffer distress due to financial loss [Section 2(ea) Domestic Violence Act 1994].

The DVA also provides a wide range of assessments used by the courts to assess the amount of compensation as normally practiced in tortious liability claim. The law states:

(a) in respect of criminal proceedings involving allegations of domestic violence, the court competent to try the actual offence with which the accused is charged;

(b) in respect of civil proceedings for compensation under Section 10, the court competent to hear such claims in tort;

Thus, all claims for compensation must be filed in the civil court which is the court of competent jurisdiction in a civil litigation, a person can only claim compensation when the offender is found guilty and damages are proven. The provision provides relief to the victims of domestic violence in which all litigations pertaining to divorce and the claim of compensation can be done in one jurisdiction. This may cause inconvenience to Muslims who will need to go to a civil court to claim for compensation and a Shariah court to petition for a divorce.

The issue pertaining to jurisdiction of the court has been raised in *Chin Yoke Yin v Tan TheamHuat [2015] 11 MLJ 577*, where a divorce petition was filed by the petitioner wife against the respondent husband. The

respondent husband cross-petitioned for divorce. The petitioner wife had ten witnesses whilst the respondent husband did not give any evidence. The respondent had moved out of the matrimonial home alleging domestic violence by the petitioner. The marriage was dissolved and the decree nisi for the divorce was made decree absolute immediately. The petitioner sought damages for domestic violence whilst the respondent submitted that damages could not be awarded under the Law Reform (Marriage and Divorce) Act 1976 and that the court did not have jurisdiction to hear this case as regards to domestic violence.

It was held that the High Court has jurisdiction to hear matrimonial matters as it comes within the civil jurisdiction of a High Court. Damages for domestic violence can be dealt with by this court since the intitlement of the suit mentioned '*Dalamperkara Seksyen-Seksyen 2 dan 10 Akta Keganasan Rumah Tangga 1994*'. The evidence showed that there was domestic violence that occurred between the parties during the marriage. In assessing the loss, the Court took guidance from cases of injury due to motor vehicle accident. The award of compensation made were based on the medical check-up and report. It was further supported by two medical doctors from Selayang Hospital.

The dispute relating to the assessment of loss based on general damages for injury claim has been challenged in *Chin Yoke Yin v Tan Theam Huat* [2015] 11 MLJ 577, at p. 584, where the counsel petitioner wife assessed the loss based on motor vehicle accident's claim. The Respondent husband disagreed with the submission that compensation could be based on accident cases. Though there were no reported cases to serve as precedent, the judge agreed with the petitioner's counsel and regardless of how the injuries were inflicted, as long as there were injuries, reference to general damages based on motor vehicle accident for domestic violence victim is acceptable. On that premise, the court awarded compensation of RM4,000 to the petitioner wife to be paid by the respondent.

The above discussion shows that the claims of compensation in domestic violence cases is claimable in civil court and it can provide financial relief for the victims especially after the divorce. However, there are not many victims that come forward to initiate such proceedings due to the nature of relationship between the parties and the litigation process can be costly for many. The absence of comprehensive provisions on the claim for financial relief will deter the female victims from making claims and they have to rely heavily on the lawyers to assist if they could afford them.

III. THE LAW AND PRACTICE IN SELECTED JURISDICTION IN AFRICA

Victims who suffer violence from any part of the world will always require proper support services to assist them to lessen the hardship they have endured. One important aspect that has been incorporated in the domestic violence legislations of many countries is intensive provision pertaining to compensation and monetary relief. The pain suffering endured by a victim during difficult times, can be made worse by financial problems. It is interesting to observe that in Africa, support system in terms of financial assistance for the victim's worth consideration.

The court in the case of *Fose v Minister of Safety and Security* [1997] ZACC 6; 1997 (3) SA 786 (CC) explains that "An examination of the earlier cases awarding damages of the nature in issue in this case reveals that our courts have consistently placed a high premium on personal liberty, the infringement of rights to dignity and the right to freedom and security of the person. And where these rights have been gratuitously undermined, as has happened in this case, an award of aggravated damages (as opposed to punitive damages that are not allowed) may be justifiable."

In the Republic of Ghana, section 29 and section 30 of the Domestic Violence Act 2007 (Act 732), has established the Victims of Domestic Violence Support Fund to support victims of domestic violence. This fund provides necessary assistance to victims of domestic violence for varied of purposes. The provisions in the act state that the moneys of the Fund shall be applied:

- (a) towards the basic material support of victims of domestic violence,
- (b) for training the families of victims of domestic violence,
- (c) for any matter connected with the rescue, rehabilitation and reintegration of victims of domestic violence,
- (d) towards the construction of reception shelters for victims of domestic violence in regions and districts, and
- (e) for training and capacity building of persons connected with the provision of shelter, rehabilitation and reintegration.

The Fund will assist the state in providing for the physical needs of the victims and their families. Sources of money for the Fund comes from relevant bodies and organisations. The provisions in section 31 of the Republic of Ghana Domestic Violence Act 2007 (Act 732) states the moneys for the Fund include:

- (a) voluntary contributions to the Fund from individuals, organizations and the private sector;

- (b) moneys approved by Parliament for payment into the Fund, and
- (c) moneys from any other source approved by the Minister responsible for finance.

The moneys for the fund shall be paid into a bank account opened for the purpose by the Board [section 32(2) of the Republic of Ghana Domestic Violence Act 2007 (Act 732)]. The Board shall keep proper records of the account and shall submit the accounts to the Auditor-General for audit within three months after the end of the financial year [section 33(1)(2)(3)(4) of the Republic of Ghana Domestic Violence Act 2007 (Act 732)]. The management board consists of the chairperson or representative who is the Minister responsible for Women and Children's Affairs, one representative of the Attorney-General, one representative of the Ministry for Local Government, one representative of the Ministry for Health, one representative of the Ministry for Education, one representative from the Police Service, one representative from the Department of Social Welfare, two representatives from the civil society organizations and four persons nominated by the President [section 36(1) (a-h) of the Republic of Ghana Domestic Violence Act 2007 (Act 732)].

In addition, under section 27 of the Republic of Ghana Domestic Violence Act 2007 (Act 732) a civil claim for damages shall be in addition and shall not derogate from the right of a person to institute a civil action for damages. Hence this saves time and makes it easier for the victim to put up a cogent claim with reasonable explanation for the losses suffered.

Hence, the fund, and related programs create and support comprehensive responses to the needs of victims of domestic violence in Ghana. Such benefit enables the country to support the victims in their efforts to end the abuse and maintain safety for themselves and their children.

Similarly, in Republic of South Africa, in section 7(4) of the Domestic Violence Act 1998 (No: 116 of 1998), the court can order the husband to pay emergency monetary relief to cater to the financial needs of the battered wife. Such an order can be requested by the battered wife during the applications of the interim protection order and the protection order. The provision for this relief explains that the court may order the respondent to pay emergency monetary relief having regard to the financial needs and resources of the complainant and the respondent, and such order has the effect of a civil judgment of a magistrate's court.

Under section 1(x) of the Republic of South Africa Domestic Violence Act 1998, "emergency monetary relief" means compensation for monetary losses suffered by a complainant at the time of the issue of a protection order as a result of the domestic violence, which includes (a) loss of earnings; (b) medical and dental expenses; (c) relocation and accommodation expenses; (d) household necessities.

A similar provision on the definition of "emergency monetary relief" is available under section 1 of the Domestic Violence Act, 2007 in Sierra Leone which explains "emergency monetary relief" means compensation for monetary losses suffered by a complainant at the time of the issue of a protection order as a result of the domestic violence, including, as appropriate (a) loss of earnings; (b) medical and dental expenses; (c) relocation and accommodation expenses; and (d) household necessities.

A protection order under section 15(2)(a)(iii) of the Domestic Violence Act 2007 (No.20), at the request of the applicant includes and directs the respondent to relocate and continue to pay any rent, mortgage payment and maintenance to the applicant. Moreover, under, section 15(2)(d) of the Domestic Violence Act 2007 (No.20), includes a provision temporarily directing the husband to make periodic payments in respect to the maintenance of his wife and children. The provision reads-

(d) a provision temporarily directing the respondent to make periodic payments in respect of the maintenance of the applicant, and of any child of the applicant, if the respondent is legally liable to support the applicant or the child, as an emergency measure where no such maintenance order is already in force, together with such other emergency monetary relief as is appropriate;

Thus, the protection order in Sierra Leone does not only restrain the abuser from subjecting the victim to domestic violence but it provides financial support for immediate needs during domestic violence. Such financial support is needed by a victim to recover from the physical and psychological effects of an act of violence.

The issue of damages for domestic violence was discussed in the case of *Young v McDonald* (A213/2010) [2010] ZAWCHC 537 (In the High Court of South Africa). Prior to the appeal, the Respondent instituted two actions against the appellant in the Knysna Magistrates' Court. The actions were tried together, and a single judgment was delivered by the Magistrate court where it was held that the proceedings in terms of the Domestic Violence Act had been maliciously instituted by the appellant and that the averments made in support thereof by the appellant were defamatory. The Magistrate court granted the respondent R50 000 in damages for the malicious institution of proceedings, R30 000 for defamation and R80 000 in respect of the injury to his person and dignity in the assault on him when he was dispossessed of the vehicle. The magistrate ordered the appellant to pay the respondent's costs of suit on the scale as between attorney and client and also made an order that the appellant should pay the respondents costs for

domestic violence proceedings.

Thus, the appellant, appealed the High court against the judgment. The appeal was upheld and award of damages by the Magistrates' Court in the sums of R50 000 and R30 000, respectively was set aside and an award in the globular amount of R25 000 was made in substitution therefor. The award of damages by the Magistrates' Court in the sum of R80 000 was set aside too and an award in the amount of R5 000 is made in substitution therefor. The court considered that the damages for the claims founded on the injurious institution of proceedings and defamation to be so strikingly disparate from comparatively modest awards made in far more grave examples of injuria as to warrant interference on appeal.

The High court was of the view that the magistrate failed to have adequate regard to the fact that the publication of the defamatory matter was restricted; and to the fact that there was little or no evidence that the injurious actions of the appellant had in fact reduced or affected the esteem in which the respondent had previously been held by right thinking members of the community. The magistrate over-emphasized the punitive aspect in assessing damages and in this regard put emphasis on the consideration that a modest award would have little effect on the appellant, who, the evidence suggested, was a woman of relatively considerable means.

Notably, a battered wife can make the application for periodic payments during the applications of the interim protection order and the protection order. The welfare of the wife and children are of primary concern in which the court should consider the order for maintenance as an emergency measure. In *Minister of Safety and Security v Tyulu [2009]* (5) SA 85 (SCA) at par 26, Bosielo AJA (as he was then) emphasized that the primary purpose is “not to enrich the claimant but to offer him or her some much-needed solatium for his or her injured feelings”. The above provisions, therefore, allows the court to make several monetary awards. These include compensation for the victims for the infliction of injury and maintenance for the wife and children.

IV. DISCUSSION

A comprehensive integrated protection for victims of domestic violence is important as it empowers to take control of their lives. The legislation in Ghana, South Africa and Sierra Leone focuses on economic survival and psychosocial survival of the victims suffering from domestic violence. No doubt Ghana relies heavily on donor funding for implementation purposes which may to an extent create a dilemma because donor funding focus very much on advocacy work which may be very questionable. However, such virtuous implementation of funding will be viable and feasible for the socio-economy benefit of the society. A proper budgeting is important to ensure that the state funds were allocated to ensure the proper implementation and enforcement of the laws.

Economic dependence will always preclude and hinder a victim from accessing proper relief of protection. Hence, with proper enforced laws that provide financial relief as assistance to victims hopefully would empower such victims of domestic violence for protection. This monetary and financial relief optimistically would try to reconstruct back the shattered lives of the victims. Early intervention and some amount and type of financial assistance will enable a victim who is financially abused to safely leave an abusive relationship. Lundwall, Fons and Boado (2009) explained that it is also important to recognize that domestic violence not only poses a serious threat for women's health and lives, but also imposes significant social and economic costs. Economic insecurity remains on the agenda when developing responses to domestic and family violence (Corrie, 2016). Violence against women and girls (VAWG) which is often dismissed as a private matter, inflicts a permanent, yet invisible, drain on the economy and if it continues to be ignored, it has far reaching implications for long-run economic growth and development (Raghavendra, 2019).

Inter-agency collaboration is another strategy employed to improve the quality and enhance the coordination between agencies and services dealing with domestic violence issues (Randawar, 2012). Issues pertaining to domestic violence are usually complex as they involve matters in the “private sphere” within a family and henceforth, such collaboration is important as it can develop and promote effective prevention strategies and also improve access to available assistance/aid involving domestic violence (Randawar, 2012). Such collaboration will allow all agencies and services that respond to domestic violence to adopt policies, procedures, programs, trainings, actions, schemes in accordance with a specific goal and with proper coordination by all agencies, smoother and faster outcomes for victims of domestic violence will hopefully be achieved (Randawar, 2012).

The Ghanaian government has begun to recognize the systemic nature of domestic violence in Ghana and has taken some important first steps to address the problem—most importantly, creating the specialized Women and Juvenile Unit within the criminal justice system (Cantalupo, Martin, Pak & Shin, 2006). Nonetheless, more progress is needed within the agencies charged with providing services to domestic

violence victims, including the criminal justice system, and the Commission on Human Rights and Administrative Justice (Cantalupo, Martin, Pak & Shin, 2006). The effectiveness of legislation in achieving its protective function depends crucially on the compliance of those regulated. Prevention is always better than cure and thus, wherever practicable such commendable and noble approach that exist in the region of Africa is worth in attempting as a mode of effective financial and monetary assistance for victims in domestic violence. Bendall (2010) emphasized that the law alone cannot cure the epidemic of domestic violence; the people themselves must be involved in helping to alleviate the problem which, directly or indirectly, impacts each and every one of their lives. Strengthening the justice system and providing a periodic monitoring system of the laws is a fundamental goal in order to tackle issues pertaining to domestic violence.

V. CONCLUSION AND RECOMMENDATIONS

The above discussion depicts legislative responses in selected jurisdiction when dealing with domestic violence. It is obvious that the scope of violence is extensive and covers all aspects of violence/abuse that normally occurs in family relationships. The provisions cited to protect the interest of victims in terms of benefits and monetary relief are interesting observations to be emulated in any legislation. One example is imposing liability not only on the respondent but on a third party as well such as the employer of the respondent, so that continued financial support for a victim during such difficult times is guaranteed. Hence, all domestic violence cases should be handled accordingly regardless of the severity of the offence and should be treated equally like other crimes. It is important to adopt some of the best practices employed in some regions and to use them as a model in lobbying and advocating for legislations that will directly benefit and protect the rights of victims exclusively. Enacting and implementing such provisions of laws also demonstrate the government commitment in combatting domestic violence. Thus, it is important to build the economic and financial stability among the victims in domestic violence. It is indubitable that implementing and enforcing such laws will ensure on the financial stability of a country but with the collaborative efforts from all relevant stakeholders it may probably concord to reduce the hidden cost in domestic violence and promote lucrative financial stability of an individual. The creation of Fund for Domestic Violence is an interesting concept in which the community at large will be able to contribute to the betterment of the society by helping vulnerable members such as the victims of domestic violence. The Fund can generate money from taxpayers, donation from generous members of the society as well as compounds imposed on civil offence. With a little assistance, the victims which are mostly women and children could sustain their livelihood while regaining their strength.

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