

A LEGAL PERSPECTIVES OF THE MALAYSIAN AND INTERNATIONAL LAW IN COMBATING DOMESTIC VIOLENCE CASES DURING PANDEMIC COVID-19

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Abstract: *The Covid-19 pandemic has a significant likelihood of intensifying domestic violence. This paper examines the current legal framework for women's protection of their social rights against domestic violence based on Malaysian and international law. The analysis is based on a qualitative and descriptive cross-sectional analysis of the governing statutes, reported cases, and data gathered from the administrative authorities. The issue is also examined from the perspective of the Qur'an and the Sunnah. The research concludes that the Domestic Violence Act 1994 and Penal Code serve as the primary legal framework for dealing with domestic violence cases. However, although various international legal instruments are in place, when it comes to implementation, it remains unclear whether such facilities are being fully utilised in individual communities or not. Therefore, this issue needs to be addressed. It is proposed that the principle rights of women as outlined in the Islamic law must be strengthened in the government policies as the impact is in line with the Sustainable Development Goals (SDG) Plan (2030) in terms of gender equality, promoting peace from any violence and inclusive societies as well as communities for sustainable environment and development.*

Keywords: *Malaysian Law, International Law, Combating, Domestic Violence Cases, Pandemic Covid-19.*

Introduction

Domestic violence occurs when a member of the victim's household commits a violent act. This includes partners and ex-partners, immediate family members, other relatives, and close family friends. Domestic violence is, therefore, a crime committed by a person familiar with or close to the victim.

Cases of domestic violence have been reported throughout the ages for centuries. For instance, a woman used to be treated as the husband's property and under his control in early Roman society. The husband was urged to act as 'judge of his wife' in 'the Rules of marriage,' which the Catholic Church endorsed in the 15th century (Idoko, 2016). Invoking the norms, a husband can abuse their wife while claiming to be concerned for her soul.

The majority of legal systems in the early 1800s implicitly regarded wife-beating as a husband's right, part of his entitlement to control over the resources and services of his wife. These are a few examples of domestic violence over the ages. This is the major justification for why a strong legal system must address such a serious issue.

However, mandatory lockdowns to stop the spread of COVID-19 have locked victims of domestic violence in their homes with their abusers, isolating them from the people and resources that could help them, making the situation worse (Godin, 2020). Undeniably, containment policies play a major role in increasing domestic violence cases worldwide. Financial instability due to loss of employment, couples with depression and substance abuse may turn relationships into violence (Sediri, 2020).

Therefore, this research examines the current legal framework for women's protection of their social rights against domestic violence based on Malaysian and International law in determining to what extent the available legal framework protects women's social rights from domestic violence.

Methodology

The study employs qualitative methods of research. The content analysis entails reviewing relevant literature on all the primary and secondary materials on women's protection of their social rights toward domestic violence in Malaysia. Meanwhile, doctrinal analysis involves examining materials such as statutory provisions, treaties, and other legal and non-legal literature. From the Islamic legal perspective, the issue is examined from the perspective of the Qur'an and the Sunnah as primary sources of Islamic law.

Result and Discussion

The phrase "stay at home" has become a slogan for World Health Organisation (WHO) and every Government worldwide to encourage their citizen to be safe from Coronavirus Disease (Covid-19) (Anurudran et al., 2020). Nevertheless, for some people, home is anything but safe. Domestic violence endurers, for instance, are vulnerable to subsequent abuse, isolating them from assistance networks. Even before the Covid-19 pandemic, it was reported that in Latin American and Caribbean Region, 33% of women aged 15-49 years had suffered domestic violence from their intimate partner (Bott et al., 2019). UN Women (2020) also revealed the same number and added that the focus of Government in some countries had been diverted towards immediate Covid-19 relief.

Despite the absence of specific statistics on domestic violence cases around the globe during the COVID-19 pandemic, WHO (2020) believes that levels of domestic violence increase worldwide in line with the increase in Covid-19 cases, especially in the Eastern Mediterranean Region. The World Health Organization (WHO) estimates that 1 in 3 women worldwide experiences physical or sexual abuse, most often at the hands of an intimate partner. It is, therefore, the most pervasive and least reported human rights abuse.

As a result of large numbers of refugees, political and socioeconomic instability, the Region has become the second highest prevalence of violence against women (37%) globally. Plus, in Colombia alone, during the lockdown, there was a significant increase in a number of calls reporting domestic violence (150%) and 169 women were murdered for the same cause. A similar situation also occurs in advanced countries like the United States, Canada, United Kingdom, France, China and Australia (Taub, 2020; Almeron, 2020).

Legal Protection Against Domestic Violence in Malaysia

According to Malaysia's Deputy Minister of Women, Family and Community Development, Datuk Siti Zailah Mohd Yusof, a total of 2,287 calls were made to the Talian Kasih hotline to report cases of domestic violence after the Covid-19 pandemic spread throughout the nation and the country's first movement control order went into effect in 2020 (Carvalho, Rahim & Tan, 2020).

In Malaysia, domestic violence cases are governed by the Federal Constitution, the Penal Code, and the Domestic Violence Act of 1994. By Section 2 of the Domestic Violence Act of 1994, "domestic violence" is defined as the commission of any of the following acts:

- (a) wilfully or knowingly placing, or attempting to place, the victim in fear of physical injury;*
- (b) causing physical injury to the victim by such act. which is known or, ought to have been known would result in physical injury;*
- (c) compelling the victim by force or threat to engage in any conduct or act. (Domestic Violence Act 1994)*

According to the above definition, domestic violence includes verbal and physical acts of commission, as specified in Section 2(c) of the Domestic Violence Act of 1994. Even though no physical harm has yet been done to the victim, threatening them can also be seen as domestic violence.

The Federal Constitution, Malaysia's supreme law, establishes the framework and fundamental mechanisms for national governance (Heng Seng, 2021). Any law that conflicts with the Federal Constitution is therefore null and void. All forms of discrimination are strictly prohibited by Article 8(2) of the Federal Constitution.

Regardless of whether a person is male or female, everyone must be treated fairly and equally without discrimination. This follows the Domestic Violence Act (DVA), which Malaysia's Government passed to regulate domestic violence cases specifically, regardless of the victim's gender or age. According to Section 3 of DVA, "the contents of this Act shall be read together with the requirements of the Penal Code." The Penal Code is thus another legal framework applicable and will be implemented against the offender in addition to the DVA.

International Legal Framework in Combating Domestic Violence

Owing to substantive works by activists worldwide, the United Nations and several associations, such as the Council of Europe, have introduced and developed policy and international law on domestic violence. In fact, the principles of international human rights have made it abundantly clear that the Government must protect every individual from private acts of violence, to make an investigation of any claimed violations and publicly report the results as well as give an adequate and effective remedy when these duties are breached (Bettinger-Lopez, 2008). The international legal instruments and policy statements developed by United Nations are Treaties and Conventions and the Declaration on the Elimination of Violence Against Women.

Admittedly, most critical international human rights instruments conventions do not directly tackle the issue of domestic violence. Nevertheless, since the concerning issue can be associated with the violation of human rights, namely the right to life, physical and mental well-being, equal protection of the laws as well as free from discrimination, thus, numerous instruments such as the Universal Declaration of Human Rights (UNDHR) and its implementing covenants such as International Covenant on Civil and Political Rights (ICCPR) and International Covenant on Economic, Social and Cultural Rights (ICESCR) are applicable (Vesa, 2004).

These covenants hold ratifying states answerable and provide a framework to change cultural traditions that persecute women (Freeman, 1993). Furthermore, as stipulated under Optional Protocol to the ICCPR, it is an affirmative obligation for the Government to safeguard these fundamental human rights frequently breached in domestic violence cases (Edwards, 2010).

The same applies to The Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW). Nearly thirty years ago, the CEDAW Committee endorsed General Recommendation Number 19, which appeals to the Women's Convention's silence on violence and further asserts that gender-based violence is a discriminatory practice which severely hampers women's capability to enjoy rights and freedoms based on equality with men (King, 2019). Further, CEDAW affirms the importance of substantive equality of women's rights in public and private life (Islam, 2017). Since its adoption, CEDAW has been ratified by 189 states, making it one of the most widely accepted human rights treaties in the world. However, domestic violence may pose a major challenge to the efficiency of international human rights law (McQuigg, 2011).

The United Nations General Assembly adopted the Declaration on the Elimination of Violence Against Women (DEVAW) in 1993, which, though persuasive, serves as a benchmark for the world to work toward improving nation commitments to global involvement and policy creation regarding violence against women (Morgaine, 2007). According to DEVAW, the main cause of domestic violence is discriminatory behaviour that places women in a weaker position than men.

Significantly, DEVAW requires nations to investigate and properly punish domestic violence offences and improve extensive law, political, management and cultural programs to hinder violence against women. Additionally, it provides training to law enforcement officials and encourages research and compile statistical data concerning domestic violence (Edwards, 2010).

The Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence, also known as the Istanbul Convention, is the most comprehensive legal instrument on domestic violence to date. Adopted in 2011, the Convention defines and criminalizes domestic violence, and requires states to provide support and protection to victims, prosecute perpetrators, and promote gender equality. As of 2021, the Istanbul Convention has been ratified by 34 countries, including 27 European Union member states.

Domestic Violence in the Islamic Law

Islam views marriage as a sacred relationship prioritising love, respect, and understanding between two people. To balance family harmony and fulfil particular tasks, the husband and wife have a specific duty. The Qur'an stated that:

Men are the protectors and maintainers of women because Allah has given the one more (strength) than the other and because they support them from their means. Therefore, the righteous women are devoutly obedient and guard in (the husband's) absence what Allah would have them guard. As to those women on whose part ye fear disloyalty and ill-conduct, admonish them (first), (Next), refuse to share their beds, (And last) beat them (lightly); but if they return to obedience, seek not against them Means (of annoyance): For Allah is Most High, great (above you all)
(Qur'an, 4:34).

Islam forbids the husband from treating his wife brutally in a conflict between the parties. He is urged to use kindness to overcome the issues and consider his wife's strengths. Qur'an stated that:

O ye who believe! Ye are forbidden to inherit women against their will. Nor should ye treat them with harshness, that ye may Take away part of the dower ye have given them,-except where they have been guilty of open lewdness; on the contrary live with them on a footing of kindness and equity. If ye take a dislike to them it may be that ye dislike a thing, and Allah brings about through it a great deal of good
(Quran, 4:19).

Domestic violence was condemned by the Prophet (PBUH) in both deed and word. The Prophet (PBUH) said, "Never beat God's handmaidens (female believers)." (Asad, 1980). The Prophet (PBUH) also said, "Could any of you beat his wife as he would beat a slave, and then lie with her in the evening?" (Bukhari and Muslim). The Prophet (PBUH) was known for never striking a woman or children. Aisha is reported to have said, "The Prophet never beat any of his wives or servants; in fact, he did not strike anything with his hand except if he were to struggle in the cause of God." (Al-Asqalani, 1987).

In relation to that, there is a growing recognition in the Islamic world of the need to protect women from violence and abuse. Many Muslim-majority countries have introduced laws and policies to address domestic violence, and there is a growing body of scholarship on Islamic feminism and women's rights in Islam.

For example, in 2004, Morocco introduced a law on violence against women that criminalizes domestic violence and provides for protection and support services for victims. Similarly, in 2016, Pakistan introduced the Protection of Women Against Violence Act, which criminalizes domestic violence and provides for the protection and rehabilitation of victims.

Analysis of the Study

It is important to note that Malaysia has neither ratified the ICCPR nor the ICESCR. That does not imply that Malaysia disregards the worldwide call to safeguard women against domestic violence. For instance, 193 states, including Malaysia, endorsed the Sustainable Development Goals (SDGs), which set out the objectives for changing the world in the interests of all people, including but not limited to women and children.

This said outcome falls under the Goal 5 (gender equality) aim and is linked to domestic violence issues. The same applied to Goal 16 (peace, justice, and strong institutions), which included a goal to end abuse, exploitation, trafficking, and all other forms of violence against and torture children. Goal 16 was intended to promote peaceful and inclusive societies for sustainable development. Below is a discussion of both goals:

To be precise, Goal 5 consists of nine (9) targets in which the first two (2) targets directly addressed violence against women and girls, which are:

- 5.1) *End all forms of discrimination against all women and girls everywhere; and*
- 5.2) *Eliminate all forms of violence against all women and girls in the public and private spheres, including trafficking and sexual and other types of exploitation* (Sustainable Development Goals, 2015a).

Likewise, Goal 16 consists of 12 targets and similar to Goal 9, the first two (2) targets of Goal 16 are aimed directly at the issue of domestic violence, which is:

- 16.1) *Significantly reduce all forms of violence and related death rates everywhere; and*
- 16.2) *End abuse, exploitation, trafficking and all forms of violence against and torture of children* (Sustainable Development Goals, 2015b).

Both goals propose to reduce violence and deaths among women concerning domestic violence. However, Health (2020) believes that due to Covid-19, the trend toward toughening national borders could imperil SDG 5 and 16 objectives to promote peace and safety from violence. As mentioned above, domestic violence is rampant in numerous developing and advanced states. Hence, achieving the SDGs has never been more important; without global collaboration, it would be impossible to accomplish.

Apart from that, the Domestic Violence Act (Amendment) 2017 (DVAA) was subsequently passed by the legislature to further strengthen protection for victims of domestic violence. The DVAA broadens the definition of domestic violence by adding the dishonest misappropriation of a victim's property that results in the victim experiencing distress due to financial loss; threats intended to make the victim fear for their safety and third person's safety, as well as the safety of their property, and communication (by any means) intended to offend the victim's modesty (Singh & Singh, 2020). This protects the sufferer from any kind of psychological injury as well.

Victims can employ one of three safeguards to defend themselves from abusers. Firstly, obtain an Emergency Protection Order (EPO) from the Social Welfare Department (JKM). According to section 3A(2) of DVAA, "an application for an emergency protection order may be made at any time whether or not an interim protection order or a protection order has been previously made." An Emergency Protection Order (EPO) is issued by the social welfare (JKM) officer ordering the perpetrator to stop using violence.

According to Section 3A(8) of the Domestic Violence Act (Amendment) 2017, the Emergency Protection Order is valid for seven days and will play a crucial role in preventing abusers from causing physical harm or fear of physical harm to the victim, including prohibiting the person against whom the order is made from entering any protected person's safe place according to section 3A(7)(c) of Domestic Violence Act (Amendment) 2017.

Meanwhile, EPO is crucial to the protection of victims and a major improvement to DVA 1994. According to this provision, the victim will be given exclusivity over her or his home, and the perpetrator (if they remain there) will be required to leave for a "cooling period" of at least seven days (Yunus, 2017). This represents a significant improvement over earlier DVA, which let the abuser live with the victim. The new amendment makes it illegal for the abuser to enter the victim's home, indirectly stopping the abuser from hurting the victim physically or psychologically.

Furthermore, the most recent DVAA modification is significant because it enhances the Interim Protection Order (IPO) to stop further abuse. With the amendments, an IPO can now include further protections, like forbidding an abuser from approaching a survivor and allowing police to intervene before more violence occurs. IPOs are court orders that forbid abusers from committing abuse and are valid for the duration of the police investigation. So, throughout the critical period of the police investigation, the abuser is barred from hurting the victim in any way, be it physically, mentally, or sexually. It should be underlined that this applies to all victims regardless of their gender, male or female.

Last but not least is Protection Order (PO). During criminal court processes, PO is crucial in protecting the survivors. The Domestic Violence Act has numerous provisions concerning protective orders (POs), which the courts may impose (United Nations Women, 2012). The purpose of the IPO and PO is to prevent the abuser from using domestic violence against the victim. The main difference between IPO and PO regards when it is applicable. Under a provision of the DVA, PO is applicable to safeguard the victim for 12 months throughout judicial proceedings.

In addition, anyone who violates an EPO, IPO, or PO is guilty of an offence and, upon conviction, is subject to a fine of up to RM2,000 or six months in jail, whichever comes first. Not to mention, under Section 3E(1) of the DVA, the punishment will be increased if the abuser engages in violence (fine not to exceed RM4,000 or one (1) year in prison or both).

On the other hand, charges under the Penal Code are not limited to domestic violence, so anyone can be held accountable for an offence against anyone. This indicates that the abuser can be charged under the Penal Code using a standard criminal procedure. Section 326A(1) of the Penal Code also strengthens the punishment for the abuser. The Section stated:

Whoever causes hurt to his spouse or former spouse, a child, an incapacitated adult or other member of the family... shall be punished with imprisonment for a term which may extend to twice of the maximum term for which he would have been liable on conviction for that offence under the relevant section.

For instance, under Section 325 of the Penal Code, "if the offender convicted of causing great bodily harm to someone, the abuser faces a maximum sentence of seven years in jail. However, if the abuser in a domestic violence case committed the offence, they might face up to 14 years in jail" (instead of seven years).

Even though various international legal instruments are in place, when it comes to implementation, it remains unclear whether such facilities are being fully utilised to individual communities in a manner that is empowering and take into consideration local and regional history, political and administrative structure as well as tradition (Morgaine, 2007). In order to understand the practicability of implementing a universal framework in local contexts, it is necessary to scrutinise how diverse cultures build their notions about family, marriage, rights, law and violence (Agnello, 2014).

For instance, in Muslim countries where Sharia law is applied, the wife's duty of obedience to her husband contradicts DEVAW beliefs against male dominance. In addition, a state may breach its international legal obligations if it implements its laws in a preferential manner, devoting more focus and means to offences apart from domestic violence. This is one example that highlights the need to critically analyse the general implementation of the human rights framework.

This challenge, however, has been discussed by Katz et al. (2020). This group of international scholars claims that gender inequalities incite domestic violence and tend to increase during the Covid-19 pandemic. Therefore, they proposed that a framework comprising intersectionality must be dispersed into policy efforts to prevent the growth of threatening vulnerable lives and safety during a pandemic.

Apart from that, hence, to this date, the Domestic Violence Act and Penal Code serve as the primary legal framework for dealing with domestic violence cases. Both of these laws seek to penalise the abuser and deter future victimisation by the abuser by serving as an effective barriers to such harm.

We need a society that appreciates and respects women's rights and dignity to end domestic violence against women. Primarily, the community needs to be made aware of women's rights, particularly regarding the socially acceptable behaviour of women. The Government should also establish laws that forbid domestic abuse, emphasising offering victims facilities and services like shelters (Fallahi, 2015). The Government policies and rulings also must be strengthened with the principles outlined in the Quran and Sunnah, as both of these sources provide complete guidance for the rights of men and women in a marriage that must adhere to each other.

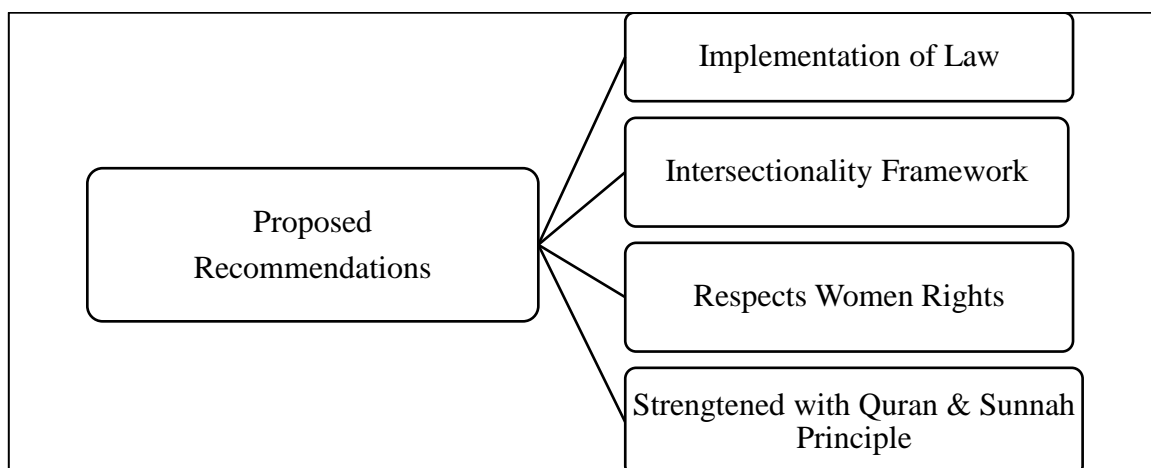


Figure 1: Proposed Recommendations of the research

Conclusion and Recommendation

The evolution of civilisation is significantly impeded by violence towards women. Despite widespread concern about violence as a crime against humanity, partners continue to subject women to various types of abuse. In order to uphold his wife's rights, the husband must treat her with affection rather than the other way around by inflicting harm on her. Domestic violence will not happen if the husbands are fully aware of their wives' rights, outlined in the Quran and Sunnah. The wife and kids will be able to live contentedly as part of a quiet, serene, and harmonious family. The Government should put in place rules that lessen domestic violence and prioritise providing facilities and services for victims to address this issue. In addition, there is a need for an improved platform mechanism that will help women understand their legal rights and remedies, seek help, and act as a comprehensive source of information as they begin the legal procedure to protect their rights against domestic abuse.

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