

ISSN: 0976-8165

IMPACT FACTOR 7.86

THE CRITERION

AN INTERNATIONAL JOURNAL IN
ENGLISH

Bi-Monthly Peer-Reviewed eJournal

VOL.14 ISSUE 5 OCTOBER 2023

14 Years of Open Access

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ISSN 2278-9529

Galaxy: International Multidisciplinary Research Journal
www.galaxyimrj.com

Women and Crime in the 21st Century UK: Social Context and Severity of Crime

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Article History: Submitted-05/10/2023, Revised-14/10/2023, Accepted-18/10/2023, Published-31/10/2023.

Abstract:

Women and crime have a complicated relationship because they are frequently seen as both victims and offenders of crime. Women who commit crimes are frequently characterised as morally deficient or weak-minded, since historically criminality has been connected with masculinity. Women's perceptions of justice have been impacted by this gendered categorisation since justice systems frequently overlook the socio-psycho-economic causes of crime. Women who commit crimes in the UK are often stigmatised as mentally ill because they are more likely to commit infanticide and witchcraft than males do. This study seeks to identify female offenders as distinct individuals by examining the emotional, socio-psychological, and financial drivers behind their criminal behaviour. The research dispels the myth that women only commit soft crimes like witchcraft and infanticide by examining three female offenders from the UK in the twenty-first century: Margaret James, Charlotte, and Linda Mulhall. For the criminal justice system in the UK to function effectively in the future, it is essential to recognise female offenders as "individual" criminals.

Keywords: Women, Crime, Criminal Justice, Women Offenders, Criminal Behavior.

Introduction

The relationship between women and crime is slightly multi-dimensional, as the two terms – ‘women’ and ‘crime’ can be connected in innumerable ways, such as women as victims, women as offenders, women in criminal justice system, women as influencers of crime, women

and punishment of crime, women criminality and social construction of women's image and lastly, socio-psychological understanding of women criminal behaviour. Hence, when dealing with the notion of women and crime, one needs to focus on the multiple aspects that influence the role of women in crime. This pertains to the women's vulnerability to crime both as victims and offenders and the marginalised position both in society and criminal justice system.

Women were always considered vulnerable to crime, so they were thought to be victims only. It was hard to envision women as offenders, as crime was considered to be related to masculinity, especially during the eighteenth and nineteenth centuries. The theories of crime, criminality and criminal justice also focused on male criminality only; the different forms of criminal behaviour, such as – “aggressiveness, acquisitiveness, competitiveness, initiative” (Emsley 92) – were primarily believed to be masculine traits. The legislation also used male nouns and pronouns for the offenders. Thus, all these things contributed to the perception that crime is associated with masculine behaviour. However, the period of the Revolutionary War (1775-1783) and Napoleonic War (1803-1815) witnessed an increase in women offenders. During the mid-nineteenth century, it was believed that criminals were born with certain qualities and temperaments, evident in their criminal behaviour. So, the approach was to bind female offenders within masculinity by terming their criminal behaviour as a result of masculine traits. Lucia Zedner, a criminologist, in her analysis of female criminals in England, focuses on the shift in female criminality in the latter half of the 19th century from crime as behavioural trait to crime as a biological and psychological reaction to a particular situation, where women criminals were defined as “feeble-minded or moral imbeciles, psychological and social defectives incapable of proper moral judgement and behaviour” (Zedner 6-8). This idea of defective biology and lack of moral capabilities in women criminals reinforced the classical theory of female criminality, thus isolating the women criminals from the socio-economic contexts within which they committed the crime.

This dogged notion of judging women's involvement in crime from a gendered perspective and stereotyping the women criminals besmirched female criminal behaviour, as Smart perceives, “Within this paradigm deviant individuals are not considered to be social critics, rebels or even members of a counter culture; rather they are treated as biological anomalies or as psychologically ‘sick’ individuals” (Smart 29). Further, Kermode and Walker, in

their *Women, Crime and the Courts in Early Modern England* (1994), highlight the gendered labelling of crime in modern criminology and record the response to crimes committed by men and women. When men commit crimes, they are criminals, but on the other, when women commit crimes, they are insane. What is this categorisation? Women criminals' approach to justice also gets affected because of this categorization, as the justice imparting agencies don't take the pain to look into the socio-psycho-economic reasons behind crime. Furthermore, criminal acts have also categorised through a gendered perspective in nineteenth-century England. Witchcraft and infanticide were associated with women, not because they had committed these crimes, but because these criminal acts indicated womanhood, while highway robbery and homicide were associated with men because they invoked courage and physical strength. Kermode and Walker put forth that this gendered categorisation of criminal acts and labelling female criminals as mentally sick need to be exterminated and deconstructed (Kermode and Walker 5-6) to give women offenders an independent existence as criminals so that they can be provided with fair chances before criminal justice system as well as can be put into social context.

Hence, this paper attempts to locate women offenders as individual entities to explore the possible reasons which have driven them out to the world of crime. Women offenders will be treated as independent criminals who may have their own personal, socio-psychological and economic reasons, which need to be deconstructed for the women of coming generations in England. This paper discusses three women criminals of 21st century UK – Margaret James, Charlotte and Linda Mulhall and the severity of their crimes, attempting to deconstruct the notion that women commit soft crimes and are only associated with witchcraft and infanticide. The paper serves as a bare ground to understand the women offenders as 'individual' criminals and their place in the social and legal milieu.

Women Criminality in the 21st Century UK

The notion of crime has had a long history in human society that needs to be explored to achieve a proper understanding of crime and its social context. As discussed in the 'Introduction' section, the notion of criminality, especially women's criminality, developed gradually in the UK, and it challenged the prevailing social context. This section focuses on the possible factors

affecting crime as well as on the concept of women's criminality in literature and the visions affecting the recognition of women as criminals.

Crime is always motivated by some reasons/factors that could be social, economic, political, psychological, etc. Criminologists have also claimed that "socio-economic conditions and social inequality play an important role both in why particular individuals become involved in criminal activity and in determining levels of crime within particular societies" (Newburn 01). Since the mid-19th century, criminologists started looking at socio-psychological, economic and biological factors affecting crime. In the mid-nineteenth century, criminal justice system shifted its attention to human behaviour and characteristics to understand the deviant behaviour of criminals. It was persuaded that the criminals were born with a certain temperament, which was later reflected in their criminal acts. Therefore, the scientific approach to crime and criminal behaviour by the last quarter of the 19th century reinterpreted the biological and psychological aspects of the criminal mind (Wiener 240). The relationship between crime and socio-economic aspects in the 19th century can also be explored here. In the mid-19th century, the widespread poverty instigated by the high rates of unemployment and social inflexibilities endangered the political stability, which resulted in an upsurge in crime rates. Criminological theory has also focused on the relation between social disadvantages and criminal acts. The early 1980s crime data of England and Wales demonstrates a variety of factors, including "adverse socio-economic backgrounds such as living in social rented accommodation and multiple occupancy households, and lone parenthood – to be linked with an increased risk of [crime]" (Newburn 06).

These socio-economic and behavioural aspects also affected women's criminality and its reception by law and society. The state and law always treated women criminals from a gendered lens by categorising them as deviant and psychologically frail. In the 20th century, crimes such as witchcraft and infanticide were associated with women. However, the 21st century saw a transformation in this trend and women were charged with murders, even brutal murders in the rage of a moment or a well-thought-out conspiracy. Thus, women's criminality took a decisive turn in the 21st century when the crime could be seen without a gendered lens.

It was only after this shift that the crime stories, either in the form of authentic crime narratives, media coverage or fictional accounts, represented a widespread desire to include criminals in social spectrum. The deviant behaviour of the criminals fascinated the readers

towards the real-life stories of the criminals, which resulted into the development of crime narratives. With the increasing interest in the criminal minds, authentic crime narratives became a persistent feature of British society and culture in the latter half of the 20th century. Crime narratives, especially crime biographies, can be explored through the nature and status of these crime narratives and by situating these biographies in the historical and social context. These crime biographies represent women as crime carriers as they are constructed individually in these narratives. David Ray Papke defined narrative as “a crucial tool for comprehending human existence and for placing ourselves in history and a cosmos” (Papke 01). Hence, these crime biographies are narrated to construct the independent identities of women criminals and depict the social imagery of crime while working for the notion that the ‘self’ can be situated in the social surroundings through language and narrative.

Stories, whether represented by journalists, biographers, or novelists, are dynamic in reconstructing the ‘self’. Crime biographies take their subjects from real-life criminal trials reported in newspapers, which have been developing as significant apparatuses in depicting crime and criminal life. Vann and Van Arsdel suggest that:

“Out of the welter of events, the newspaper makes an arbitrary selection declaring, “This is what happened.” Its readers literally become subscribers to a consensus, tacitly ratifying the news values of the journalist.” (Vann and VanArsdel 04)

Thus, the newspaper stories of everyday crime provided the subjects for the literary and social representation of criminals which attracted the interest of common people because of the involved sensation and a glimpse of the margins of society, i.e. the criminal class.

Social Context and Severity of Women’s Crimes

When women commit crimes, especially murder, the basic social structures based on gendered behaviour are defied and countered. The women criminals challenge the gendered discourse within the patriarchal society by violating both gender and social norms. This ‘deviant’ behaviour of women replicates them within gendered discourse that advocates for appropriate feminine behaviour, resulting in labelling such ‘criminal’ women as mad, bad or victims of both society and law. This labelling can be deliberated as a denial of their individuality by society,

law and the criminal justice system. This notion of women as victims of crime has been supported by many critics as they focused on women as victims within the home and society rather than treating women as perpetrators of crime and violence. However, with the advancement of the Battered Woman Syndrome (BWS), the idea of women both as victims and perpetrators came into public debate. BWS was “developed by the American psychologist Lenore Walker in order to dispel myths and misconceptions about domestic violence and to help establish the reasonableness of homicide by battered women” (Sanghvi 733). Therefore, if a woman displays herself as battered after committing a crime, she needs to conform the gendered discourse that establishes appropriate femininity.

In order to understand the role of social context in determining a woman ‘criminal’, it is necessary to look at some of the women criminals of England in the 21st century. The first woman criminal selected for this paper is Margaret James, who was convicted for the murder of her boyfriend, Peter Solheim.

On the morning of 18 June 2004, a half-naked body of a man, who seemed to be in his late fifties or early sixties, was discovered in Mylor village. The man had suffered eighteen injuries all over the body, including four deep cuts to the head. By 21 June, police revealed that the man was Peter Solheim, a 56-year-old resident of Carnkie, a nearby village. Solheim’s girlfriend, Margaret James, told the police that she drove Solheim to Mylor Harbor on 16 June as he was going on a boating trip with his friend Charlie.

Before looking into the details of the case, it is necessary to understand what kind of man Peter Solheim was. He was a parish councilor who grew up on the outskirts of Falmouth. He was raised almost alone by his mother as his father was a chief engineer on the whaling ship and often remained away from home. In 1971, he married Jean Poley, a clerk and had two children. After some time, Solheim started showing symptoms of manic depression and decided to part ways with his wife and children. His decision to end his relations with his children proved catastrophic as now he was free to explore the other hidden aspects of his personality, such as his obsession with sex and witchcraft. After being rejected in the institution of marriage, Solheim found solace in the arms of other women and started replying the ‘lonely hearts advertisements’. Due to the manic depression, he always wanted more; as Vanessa Howard writes, “No matter how many women he seduced, no matter how many pagan rituals he attended, he always wanted

more” (Howard 110). With the passing of time, his behaviour became extreme, and he found himself in a world from which he could not return. It was in this pursuit for sex that Solheim met Margaret James in 1995, who had lost her husband in 1980s, in an accident and had raised her two children alone. Soon, Margaret learned that she was not the only object of Solheim’s obsession. However, she chose to tolerate his relationship with other women. There was a woman, Jean Knowles in Solheim’s life who returned repeatedly. Jean had married thrice, and her relationship with Solheim stretched for twenty years. His relationship with Margaret seemed healthy, but by 2001, Margaret started researching on poisons and noted down the quantities needed to harm a human being. By 2003, Peter decided to marry Jean and brought her an engagement ring, but asked her not to wear it until he manages to extricate himself from Margaret. At that time, Peter had no idea how dreadful Margaret’s reaction would be.

While investigating the death of Peter Solheim, the police came to know that both Margaret and Jean received texts from Peter after 16 June. Nevertheless, Jean said that those texts were not sent by Peter because they both used some code words for Margaret, but in these texts Margaret’s full name was used. It was later traced that those texts were sent using Peter’s mobile from Margaret’s mother’s home. The centre of investigation was now Margaret, and the police started questioning the people who knew Margaret. Her ex-husband confessed that Margaret was unhappy with her relationship with Peter and had even asked him about someone who could help her in getting rid of Peter. With this investigation, a case involving Margaret as a mastermind of Peter’s murder was registered in February 2005. The police came up with the story that Peter was poisoned first, then was held captive for 48 hours in Margaret’s mother’s home, was beaten viciously, transferred to the boat and dumped into the sea. The trial began in 2006, where Judge Graham Cottle summarised the case on the basis of the ‘police investigation’, as Margaret did not confess anything:

“It was you who wanted him dead and you who masterminded and orchestrated the events which culminated in his death. I have no doubt at all that the arrangement for his abduction, torture and disposal were of your making. And what you orchestrated was a horrific and slow death.” (Howards 125)

Furthermore, with this conclusion, Margaret James was sentenced to twenty years.

No strong pieces of evidence were found against Margaret, except her unpleasantness over Solheim's relationship with other women. How did the police establish the fact that due to her anger, Margaret killed Solheim? Notably, Margaret had no criminal records, except for not being 'fit in' the society. Margaret was a widow who bought a cottage in Cornwall with the insurance money and lived with her mother. At first, her fate and circumstances brought sympathy from neighbours, but soon after, her peculiar behaviour changed their views. Vanessa Howard writes:

“It wasn't because she was a vegan or that she embraced paganism, swimming naked or walking barefoot in all weathers – anyone is entitled to their beliefs no matter how off-centre – what concerned some was that Margaret had little desire to 'fit in' and many disapproved of the manner in which she kept her home –some even claimed it was 'filthy'.”

Thus, she became easy prey for the police because she was not liked by society, as she spent her life on her terms only; she didn't try to fit into the societal norms. There was no one to support her. Though it was stated that Margaret stole money from Solheim, like other evidences, it too was never proved. So, here are some questions that arise –

- Who else was questioned by the police about this case?
- Did Solheim actually get into his boat with a man called 'Charlie'? Who and where was Charlie? Did the police try to find out?
- Can the mobile phone evidence be re-evaluated to determine whether the texts sent after Solheim's death came from Margaret herself or his killer out in the sea?
- Were the injuries of Solheim examined to regulate whether these were caused by a propeller or because of falling from the boat?

These are some of the questions that can be asked to determine the authenticity of the case investigation and framing Margaret as the murderer of Peter Solheim. It is evident through the analysis that the social position of Margaret James as a 'deviant' becomes the main reason for her conviction as the police make her the only suspect of the case, despite the involvement of two other characters - Jean Knowles, the other woman in Peter's life and Charlie, mentioned by Margaret.

Now, coming to another case, we will discuss the brutal murder of Noor by the Mulhall sisters. On 21 March 2005, a headless male torso was found in Royal Canal at Ballybough Bridge in Dublin. It was soon revealed that the main guilty of the murder were two sisters, Charlotte and Linda Mulhall. It was stated that they were not professional criminals; still, they were proven guilty of the most violent murder of that time.

Mother of the Mulhall Sisters, Kathleen, moved in with her boyfriend Noor in 2005 and on the St. Patrick's Day weekend, the Mulhall Sisters decided to spend their weekend with Kathleen and Noor. As an excuse of St. Patrick Day, Noor drank much vodka that afternoon, and the Mulhall Sisters also took some ecstasy tablets. Soon after this, Kathleen and Noor started arguing and Kathleen crushed an ecstasy tablet in a glass of water and gave it to Noor to escape his aggression. She thought this would improve Noor's behaviour, but it turned out just the opposite, and his thoughts turned to sex. It didn't seem a problem to Kathleen until she realized he wanted Linda for that night. Kathleen pushed Noor into the bedroom, but he grabbed Linda's waist. While he refused to let her go, Charlotte, in order to save her sister, brought a Stanley knife from the kitchen. She asked Noor to leave Linda, but he refused. "Linda was crying, her mother shouting and Charlotte did not know what to do, she just wanted Noor to get his hands off Linda. Then it happened. Charlotte thrust the Stanley blade into Noor's neck" (Howard 162). The situation grew more severe as Noor was now wounded, and the three women realised that they had left with no option – "kill him or he'll kill us all" (Howard 162).

This moment of panic and horror resulted in the most gruesome murder of that time. Linda was handed a hammer, and both sisters began to attack injured Noor. Charlotte brought the bread knife and then started stabbing Noor mercilessly, who might have died till then because of the repeated blows of the hammer on his head. Finally, the women, in a state of exhaustion, looked down on the bloodied body of Noor, which was unrecognisable. The ferocity of the attack can be understood through Howard's description of the incident –

"...stabbing into his flesh with so much force that she ruptured his kidneys, his liver and punctured both lungs... Linda left indentations on the floorboards beneath the carpet each time she missed or slipped when targeting Noor's head. The attack had obliterated his features..." (Howard 163)

Later, to eliminate the mess, the Mulhall sisters dragged Noor's body into the bathroom, and decided to chop him off. Both the sisters sat down to cut the body into pieces and during this frenzy act, Linda cut off Noor's penis also [the motif and significance of cutting down the penis is discussed later in the paper]. Finally, after many hours, both the sisters had cut off Noor's body in eight separate sections.

Meanwhile, they also called their father before midnight and informed him about Noor's death. As John began to worry about his daughters, he visited Kathleen and inquired about Noor. Linda led him to the bedroom and "pointed to the black bin liners in the corner of the room" (Howard 168). At the sight of Noor's butchered body, John told his daughters that "he wanted nothing to do with what they had done... He walked away and the sisters broke down" (Howard 168-169). Then, the sisters decided to dispose of the body of Noor, leaving the head behind to dispose of later. The dismembered body parts of Noor were placed in sports bags and dumped in the canal. After disposing of the head in a landscaped park, the sisters returned to their father's home.

On 30 March, Noor's body parts were recovered from the canal, but the victim could not be identified until six weeks. Mohammed Ali Abu Bakaar read an article about finding a torso in the canal and saw the pictures of the clothes recovered from the body. He recognized an Irish football shirt of Noor and called the police. On 21 May, the police arrived at Kathleen's flat and found she had moved out. Kathleen's moving out of the flat proved fatal for the incident, as the police could easily collect the samples from the flat. The samples matched with Noor's. The prime suspects of the murder were the Mulhalls, but the police could not establish anything against them instantly. It was after some days that John decided to talk about the murder with the police because:

"[he] had watched both daughters as they slid further into alcohol dependency, morbid fear and guilt... As much as he loved his girls, he could see no other way out than their facing up to the consequences of their still inexplicable actions."
(Howard 180)

The detectives talked to Linda; she broke down and confessed her crime and was arrested on 14 September. Eventually, after four weeks of her sister's arrest, Charlotte broke down and was arrested on 17 October. In October 2006, the jury found Charlotte guilty of murder and

Linda guilty of manslaughter. In December 2006, Charlotte was given a life sentence and Linda, a fifteen-year term in prison.

Hence, the readers can ponder upon the reasons that led the sisters to such a horrible crime. The reasons might be poverty, drug abuse, alcohol, sexual abuse, depression, fear and anger.

Before moving to the analysis of the Mulhall sisters, it is necessary to understand the character of Noor, the 'victim'. Noor had arrived in Ireland in December 1996 from Kenya. By 2005, Kathleen moved in with Noor in an apartment in Dublin to get a peaceful life, which is all she wanted, but little did she know that Noor would remind her of John while in a drunken state. She was beaten up by Noor several times and yet never chose to end the relationship in the hope of a better future someday. He was aggressive and dominating. Kathleen was not the only woman to face the dark side of Noor's character. Noor had a relationship with a young girl before Kathleen, which ended on a bitter note. Noor turned out to be a domestic abuser; first, he isolated his girlfriend, then terrorised her into complete submission. They had a son, but the use of violence increased with time. To humiliate his girlfriend, Noor started raping her. When her family learnt about her plight, they rescued both the mother and the child. Hence, we can see that Noor was violent with women and considered them objects of his sadistic pleasure. So, the claims of the Mulhall sisters about Noor advancing towards Linda that night cannot be subsided. The instant action of Charlotte, hitting Noor with knife, can be justified on the grounds of self-defence. However, to understand the ultra-violence that followed the first blow, a more in-depth discussion of the circumstances is needed.

Here, it is essential to note the environment in which the Mulhall sisters were brought up. Charlotte and Linda were brought up in a household where "using alcohol to escape day-to-day life was the norm" (Howard 152). Their father, John, was a heavy drinker, and the family had to bear his temper in the past. He used to beat their mother, Kathleen, on several occasions. Though with the passing of time, his temper had cooled, the children had seen the damage alcohol abuse can do to a family. By 2005, Kathleen had left John and moved in with her boyfriend, Noor. This divided family left the children divided as they tried to maintain good relations with both parents. Their family home was in Fettercairn, at the foot of the Dublin Mountains. The environment that

surrounded their lives outside home was also not favourable to raise children, as Vanessa Howard writes:

“Unemployment and school drop-out rates are high, one in five families is headed by a lone parent and unplanned pregnancies are common. As well as a lack of opportunities, the estate is troubled by antisocial behaviour with burnt-out cars, graffiti and boarded-up and vacant houses all contributing to a sense of despair.

Residents claim that they are reluctant to call the Garda if they see criminal incidents for fear of reprisal. That may be no more than a perception but it adds to the high level of stress many of the locals feel.” (Howards 153)

It may be because of this ‘falling apart family’ that Linda could not fit herself into the institution of marriage and was left with four children to raise on her own as none of her relationships worked well. She went back to her father’s house and adored her children, but she could not keep herself away from drugs and alcohol. In contemporary England, drugs, such as ecstasy, had become a tool of escape from reality for Linda’s generation. The same has been discussed by Vanessa Howard in the book “Women Who Kill” as she writes –

“The idea of stepping outside your life for a few hours of drug-induced oblivion was seen as no bad thing. Life on the poverty line is a punishing blend of monotony and stress so the temptation to escape by bingeing can be a strong one.” (Howard 154)

Hence, the Mulhall sisters were brought up in an environment that was not suitable for an ideal life; they had to suffer, and this led them to drugs. During the trial, the defence team stressed that the sisters had come from a tough family background and unfavourable environment, but it was argued that their third sister, Marie, was also brought up in the same environment, yet she constantly reminded her sisters that they had committed a terrible crime and needed to cooperate with the police. Here, it can be said that though Marie was brought up in the same family and environment, she was not the one trapped in the threatening situation with Noor. We cannot assume that if she had been with her sisters that night, her reaction would have been identical or not. So, it is needless to compare Marie with the other two Mulhall sisters, as

their reaction to the situation was not affected by their family background, except the use of ecstasy.

If we look at their state during the crime, it makes sense to comment on the influence of drugs here. They were under the influence of drugs when they violently attacked Noor. Their drug-induced psychosis would have left them with no logical thinking. However, it is also true that when the drugs' influence waned off, neither of them addressed the incident, despite they continued taking part in their barbaric act by disposing of the body parts. Additionally, Kathleen had not taken drugs, so in all her capacity, she could have stopped her daughters from committing such fierce crime. Though she did not actively participate in the murder, she helped in disposing of the body. Hence, the influence of drugs does not play an active role in this violent crime; still, it turned them into more violent; had they not taken the drugs, the barbarism would not have taken place.

It is clear that Charlotte and Linda were not the serial killers. Noor's murder resulted from a moment of psychotic frenzy under the influence of drugs, but once they decided to chop the Noor's body into pieces, their names were carved among the most notorious killers of that time. Their attack on Noor may have been considered an attempt of self-defence if the Mulhall sisters or Kathleen had called the Garda after hitting Noor once. Charlotte would have had enough time to call the Garda, as her knife's blow to Noor's neck was a fatal one. If she had done this, she could prove in court that she had hit Noor to protect her sister. The jury would have also believed her reasons to lash out at Noor, and Noor's history of attacking women would have supported their claims. Nevertheless, the violence that followed the first blow turned it into a vicious crime.

Here, it is significant to discuss the barbarism of this crime as the status of the criminals as 'women' had been stressed a lot during the trial. Mr. Justice Carney emphasised that "...if she [Linda] was a good mother of four children she would not be getting herself into a situation like that" (Howard 183). This particular comment on Linda being a 'mother' has left Linda, a 'woman' unidentified. Why can't a woman be justified on the grounds of a 'woman' only? What Linda did to Noor was concerned only with her womanhood, not with her motherhood. If she reacted like a 'woman', it doesn't mean she is not a mother. Linda's retaliation against Noor's sexual advances signified her being a 'woman'. As discussed earlier, while chopping Noor's

body into pieces, Linda cut off his penis. This incident has great significance for the crime as well as for the criminal. Cutting off Noor's penis had nothing to do with disposing the corpse; instead, it turned out to be a retaliation against his sexual advances. This suggests that Linda might have tasted 'power' while cutting off the penis as it indicated 'male supremacy'. Being a victim of Noor's sexual advances, Linda might have felt satisfied after sexually mutilating Noor. Perhaps the knowledge that Noor had raped Kathleen during their relationship, and his advances towards Linda that night were enough to provoke Linda for revenge. Whatever the motivation behind Linda's act of retaliation, it was an act of high significance as a 'woman' was all set to seek revenge of her disgrace. Hence, Noor was no longer one man for Linda; rather, he symbolised every man who had tortured, betrayed and hit her.

Thus, it was a retaliation crime against a man who tried to molest the daughter of his girlfriend. The Mulhall sisters committed the crime and have been facing the consequences. The only thing that makes this case stand apart is the violence and barbarism included in this crime. It shall be accepted that a woman can also commit a vicious crime; it is not required for her to be under any influence to commit any violence. The law and the court should treat them as individual 'women' rather than commenting on the influence of drugs or their ability to be 'good mothers'.

Conclusion

Treating female criminality as something soft and delicate is one of the significant phenomena in the world of crime and law. Crime, especially violent crime, was believed to be a male phenomenon until a few decades ago, and this resulted in female criminality being ultimately rejected or neglected. However, in the contemporary age, female criminality has been receiving much attention, and the violence involved in these crimes has also been reflected. In this research paper, the author has stressed the nature of crime in terms of female criminality in the UK in the 21st century. The women criminals discussed in this paper have been subject to their socio-psychological surroundings, but their individuality as 'women criminals' cannot be denied. It is evident from the discussion that society has always treated women as secondary citizens, and it has affected the psyche of women to a significant amount. So, whenever women are provided with the opportunity to exercise their power, they don't seem to lose it and become violent if the situation demands it. While exercising this 'power', they step into the world of

crime where they are also treated on the basis of a gendered discourse. The law and court need to understand that women can also commit a barbaric crime, and should be treated equally before the law, not through gendered lens. The author does not intend to defend the crime, instead stresses that the severity of the crime and the gender of criminals are not attached together. A woman can also be a vicious as a man if put into similar circumstances. Hence, this paper attempts to treat these women criminals as 'individual entities' and has discussed their individual reasons behind such vicious crimes.

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