



RESEARCH PAPER

Lexical Analysis of “Domestic Violence Act” of United Kingdom and Pakistan: A Comparative Study

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ABSTRACT

This study is presented to lexically analyze the "Domestic Violence Act" of the United Kingdom (2021) and Pakistan (2020). This comparative study provides similarities, differences, and the portrayal of social actors within the legal framework. The social actors of “Domestic Violence Act” of Pakistan (2020) are analyzed with the help of Social Actor Representation by Van Leeuwen (2008). Qualitative methodology is employed in this study, data from the Acts are examined to discern lexical and predominant features. The study highlights the significance of linguistic analysis in legal discourse, shedding light on societal dynamics shaping domestic violence legislation. This study contributes to forensic linguistics, informing legal professionals, advocacy groups, and policymakers for enhanced legislation and effective implementation in addressing domestic violence. Findings suggest both Acts prioritize victim protection and justice, with divergent gender-inclusive strategies. While the United Kingdom’s Act (2021) adopts a non-gendered approach, Pakistan's Act (2020) explicitly addresses women's vulnerability. Despite efforts for inclusivity, challenges in implementation persist, particularly in patriarchal contexts, impacting justice delivery.

KEYWORDS Lexical Analysis, Domestic Violence Act, Legal Discourse, Social Actors, Women’s Vulnerability

Introduction

Language plays an important role in shaping a social issue. Language is a powerful tool that defines our perceptions, discourses and the way we respond to social issues. Beyond a shadow of doubt, domestic violence is a significant and common social issue all around the globe today. Domestic violence is an abusive behavior that occurs within a domestic household by the partner, family or other individuals. It can be in any form such as physical violence, psychological abuse, sexual abuse, financial abuse, cultural abuse, religious abuse and also neglect to provide the basic necessities of life (Slabbert & Green, 2013). In order to be safe from domestic violence the countries all around the globe have made safety measures for the victims. Such as law, a law is established for the protection of victim rights to promote fairness, justice and maintain safety within the society. Legal language used in the legislation which has specific rules, vocabulary, patterns and structures. Legal language reflects the norms, values as well as power dynamics of the society. Countries like the United Kingdom and Pakistan also established the law to protect the victims of domestic violence. Almost every country has established the law “Domestic Violence” according to the factors which influence their cultural and societal aspects. The United Kingdom referred to their legislation as Domestic Abuse Act (2021) while Pakistan

referred to their legislation as Domestic Violence Act (2020). To achieve the objectives of the study the term "Domestic Violence Act" is used as a general reference to both legislations. An Act is established by the legislative bodies and it is approved by the parliament. An Act is in the written form. It follows a legislative procedure. In past years, Pakistan has established a number of different laws for the protection of individuals and portrayed them according to societal and cultural factors. Domestic Abuse Act (2021) and Domestic Violence Act (2020) are not the first Act related to Domestic Violence. There are also several laws based on protection of Domestic Violence victims. English language is used in the Domestic violence Act of the United Kingdom (2021) and Pakistan (2020) the law is established for the purpose of effectiveness, successful implementation and to overcome the seriousness of the social issue. In this study, both of the laws on the basis of lexical features are analyzed and compared with one another. Both legislations are different in terms of cultural and societal factors but have the issue to address which is Domestic Violence. Lexical items are words or vocabulary of a language (J.R Firth, 1957). Analyzing lexical items is the initial stage of Critical Discourse Analysis. Critical Discourse Analysis is a qualitative methodology which helps to analyze the text, social context and ideologies. This study provides an extensive understanding of Domestic Violence Act of two different countries.

Literature Review

Singh and Neema (2021) analyze the Domestic Violence bill of Pakistan. In this article, it is written that Pakistan's situation on Domestic Violence is similar to other countries. As both cultural and societal factors play a significant role in shaping a social issue. There is a significant increase in domestic violence cases during the pandemic in Pakistan. This bill aims to ensure the safety of domestic violence victims. Pakistan has signed an agreement with the United Nations to provide protection to the victims of domestic abuse. However, Pakistan prioritizes the rights of its citizens than trying to provide them protection. This bill is criticized by the religious groups that it is against the morals and principles of Islamic ideology. According to religious groups, it is permissible to discipline their wives and one should not interfere in it as it is their personal matter. This ideology is more likely in the favor of the abuser. This kind of thought relates to defending the abuser. Pakistan domestic bill includes other genders as well not only women which is appreciable. In this article, it is recommended that Pakistan should work on the patriarchal societal norms and need to change them. Also, the typical patriarchal mentality about the women's role in the society. This bill is considered as concise and clear about the punishment of the abuser. This bill should be implemented to provide protection, support and justice to the women in the society. This bill Domestic Violence is the need of time and is necessary to pass. However, any delay is totally unacceptable and this law should be executed to ensure the women's safety and their rights.

Zahoor et al. (2022) conduct a critical analysis of the laws addressing domestic abuse against women. The aim of this study is to emphasize abuse on women in Pakistan. The study is descriptive in nature. For the collection of data, both secondary and primary methods are used in this study. This study discovers that there are major legal loopholes in domestic violence laws in Pakistan. The Criminal Prosecution Act (2004) is passed after a lot of protest by the legal society. The Act defines "honored offences". As the honor crimes commonly perpetrated by household members. This law is not helpful to support or provide justice to the victim. As the abusers have excuses like I murdered because of the honor. However, this law also includes that the murderer can be forgiven. As it is considered that forgiving the crime is a dishonor to the victim. As this is the major problem in this Act. And later, it benefits the murderers. They take advantage of such a legal system. The Women's Protection Act is established in order to protect women from any sort of

violence or abuse. This law also fails to provide protection to women because the major loophole is the political conflicts. However, there are also few problems already existing in the policy making of this law. The criminal law Act based on sexual harassment (2010) lacks in its implementation and effectiveness. The legal professionals have limited knowledge of criminal and ethical principles. It is also found difficult how the victim identify the abuser. If the abuse occurred in the public place. Of course, the abuser escapes and it will be difficult to locate him. It also depends on the victim's knowledge of the abuser. Otherwise, it is considered impossible to locate the abuser. Another Act to prevent sexual harassment at work, 2010 have few loopholes such as the harassment occurred at work place will be difficult to examine. As the authority of the workplace are likely to protect the male employees from accusations. The second revision of Criminal law Act (2011) includes the protection from Acid crimes. This law faces few challenges and it is considered as weak to provide justice to the victims. Such as Ineffective enforcement of this law in rural areas of Pakistan and lack of professional staff. The third revision of Criminal law Act (2011) is inefficient to provide justice to the victims. The loophole of this law is that the forced marriage will not be cancelled. As it will remain as legal marriage. Thus, this is the major loophole and regarded as unfairness and injustice. The Domestic Violence legislation (2012) this law is also not effective as it lacks in creation of commission. Furthermore, two most important protective factors are not taken in account to provide protection to the victims of Domestic Violence. However, officers are appointed and this law establishes safety committees but still they miss out the most important protective factors which make this law less effective. The Sindh Domestic Violence Act (2013) is established in order to prevent domestic violence and to provide protection to the victims of domestic violence in Sindh. This Act is never implemented and hence proved to be ineffective. The loopholes of this law are the government delays in appointing the defense officers to provide support and protection to the victims from the abusers. The filing of complaint is a major issue and the authority is not aware of what to include in the complaint of the victim. The complaints are considered as ambiguous. The legal proceedings of this law are inconsistent. The constitution has not specified the offences. In addition, there are significant gaps in the formation of committees the gaps were not filled. Thus, it causes confusion and delay. The regional committees faces significant challenges such as approval challenges. These are the major reasons which cause challenges to provide protection to the victims of domestic violence. The lack of providing protection to the victims in Sindh is a major concern. In 2016, another Act for preventing women from sexual offences is established. This Act is criticized. The Act is considered as eroded because the Shariah is excluded. The Act is not according to the Islamic norms which is the major reason for criticism of this Act. The purpose of this Act is to provide safety and equality for women, in terms of marriage. Many individuals with different perceptions claimed this Act as anti- Pakistani. This Act is claimed as not according to Islamic ideology and not referring towards Pakistan's agenda, by individuals. In this study, it is concluded to set specific rules in order to prevent domestic violence and to safeguard the victims. The most efficie\nt ways should be made to prevent domestic violence. We should educate about their rights, equal status in society, domestic violence and other brutal acts. Such horrific and brutal acts need to be stopped and protect the individuals by working on the systems responsible for it. Moreover, employment opportunities should be available for the women in rural areas. At last, Pakistan is an Islamic country and Islamic norms should not be neglected while establishing a law.

Tsagas (2022) analyzes that during COVID-19, domestic violence increases. The UK government not only provides protection to them. Also, the UK government passes a new legislation which is Domestic Abuse Act (2021). This Act is passed in order to protect the victims. The law is more focused on punitive measures. It is considered that it is more important to provide support and assistance to the victims rather than focusing on the

punitive measures. This study provides a deep insight on the current rules of the Domestic Abuse Act. According to this study, the victims of domestic violence are afraid of filing a complaint. There are several social factors which cause them to stop from filing a complaint. Such as being ashamed of what happened to them, revenge by the abuser, other societal norms, wanting to safeguard the abuser and considering the report process difficult. In addition, Domestic Abuse Act (2021) included other sorts of violence as well. This Act is not only concerned with physical abuse but others as well. However, it is recommended to seek restorative justice. Restorative justice means to help the victim to heal and also putting efforts to change the abuser to become a better person. As it helps both victim and abuser. Punishment should not be considered as a solution. However, there are other possible methods as well to overcome domestic violence. This study recommends that there should be several changes made in the legislation about this social issue. A deep concern is required to make it more effective and helpful for both the victims and abusers by balancing between punitive measures and restorative justice. Also, the victim's mental health should be considered as important as physical health. At last, specific changes can make this legislation more effective.

Shaikh & Ahmed (2022) conduct a study based on forensic investigation in sexual Assault cases in Pakistan. Sexual Assault cases also include domestic violence. The study focuses on the female survivors. This study is carried out in order to provide justice to the victims of sexual Assault. As this study forensic investigation is also related with forensic Linguistics. However, there are a few forensic investigation gaps in Pakistan. In sexual assault cases, forensic investigation is critical. There is limited data available published on forensic systems in Pakistan. The research reveals the causes, gaps, and methods for improving the forensic investigative system. It is a secondary study. The analysis examines data from the last six years of sexual assault reports. In such instances, the function of the police is regarded as the least trusted. It occurs as a result of a lack of training and other circumstances. Sexual Assault victims confront a variety of issues while filing a report against the perpetrator. They are judged based on their appearance. They are held accountable for what occurred to them. Only those with apparent indications of sexual assault are taken into account. This occurred owing to a lack of acknowledgement. The case is then entered into a police record database. The police are in charge of the investigation. The penal code is also quite important. If the information is not submitted correctly, the victim of sexual assault is not sent for additional medical examination. Also, if the cops forwarded the proof of sexual assault directly to the labs. The brutal laws are still in place, with no signs of progress. However, in order to offer justice to sexual assault victims. There are few steps that should be taken by the government. Increase the number of specialist personnel or professionals, for example. The government should set up forensic centres. Also, the government should strengthen laboratory infrastructure. In addition, consider the advancement of technology in the forensic system. To detect sexual perpetrators, the government should establish a national DNA database. This study also advocates the enhancement and establishment of such features that are seen to be useful in forensic inquiry because it is a crucial and severe issue. This matter should be given careful consideration. To bring justice for sexual assault victims. Pakistan must focus on and improve its forensic investigative system. It is also advised to create new regulations that benefit the forensic investigation system. One of the long-term suggestions is that Pakistan has to improve its justice system.

Nisa et al. (2022) conduct a Forensic Discourse Analysis. As this Forensic Discourse Analysis, based on honor killings and violence against women in Pakistan. The aim of this study is the exploration of honor killings in the newspaper "Dawn". This study is descriptive in nature and uses mixed method technique. In this study, Forensic Discourse Analysis is carried out along with textual analysis. The theoretical framework for the

textual analysis used in this study are Fairclough 3- dimensional model, Multimodality, Discourse Analysis and Forensic Analysis. Firstly, the vocabulary is analyzed with the help of Fair Clough 3- dimensional model. Secondly, the grammar is analyzed under the Multimodality model. Thirdly, the connections in cohesion are examined with the help of Discourse Analysis. At last, the structure of the text is analyzed by conducting a Forensic Analysis. For population/ sample, two articles from The Dawn newspaper are selected for the data analysis. The sampling of this study is synchronic. The articles that are selected for analysis are based on honor killing of Pakistani model Qandeel Baloch. This study also discusses societal attitudes towards violence against women. The study also provides a comprehensive overview of the historical and cultural context. It highlights the major factors of honor killing in Pakistan. The findings of the study emphasize the complexity of honor killings. The root causes of honor killings include the social factors of the society such as gender equality and many more. All those factors are responsible for the violence against women. In addition, the Forensic Analysis stresses on the patterns which cause violence against women. This study is the combination of Forensic and textual analysis. So it is regarded as best for newspaper discourse on such a sensitive topic. However, the models used in this study also proved to be accommodating in exploring the roots of honor killings in Pakistan. This study explores the hidden ideologies and how the writers portray the victims of honor killings in their text. This study concludes that the horrific and ongoing social issue "honor killings" should be addressed. Women should be aware of their rights and equality in society. The societal and cultural factors causing honor killings should be abolished. Educational institutions should arrange seminars and educate men and women about this social issue. The typical patriarchal mentality should be changed and women have to struggle for their equal status in the society. Moreover, this study is considered as helpful for further analysis on different topics. This study provides a new dimension in understanding the portrayal of honor killings victims in newspapers.

Razak and Nasrawi (2022) analyze the British news reports on Domestic Violence. It is a Critical discourse analysis of news reports on Domestic Violence. Critical Discourse Analysis aims to uncover the ideologies and purpose of the text. Ideology is one of the most important parts in Critical discourse analysis. This study discusses ideology and representation. How the ideologies are represented in the text. Generally, this study is about the representation of ideologies in a news discourse. This study discusses in detail about news discourse. News discourse is a certain type of media. In this discourse, the ideologies are represented to inform the readers. So, it is very important to portray the ideologies very carefully. The target audience interprets and understands only according to the news. As people believe that news is reality. News discourse combines the social and cultural factors together to represent an ideology. It also depends on the writer who writes the news and publishes it. Such as how the writer interprets the existing information and conveys to the audience to understand it. Qualitative method is used in this study. For analysis, the data is collected from the two international news organizations. And six reports are selected. Van Leeuwen's social category (2008) model is used for Critical Discourse Analysis of selected data. In order to analyze, how the ideologies (social actors) are portrayed in the British news reports of Domestic Violence. Few categories are recorded in detail in the analysis and few categories are not recorded in the text as they were not present in the text. Exclusion and inclusion strategies are employed on the text. It is analyzed that the suppressed social actors are the abusers. On the other hand, in the inclusion strategy women are represented as victims and passive participants. The British journals also explain the relationship of victim and abuser. The abusers are classified as "men". Victims are classified as "women" in the news reports. The men are represented as active participants and abusers in the news reports. Somewhere abusers are not represented as active they are regarded as passive because of the active role of law. This means that no one is more powerful than the law. Furthermore, police, lawyers and

organizations etc. are represented as minor actors in the news reports. Also, they are in an active role as they provide support to the victims. The British news reports represents them as individualization and collectivization as they deserve respect for what they are doing for the victims. However, this study only identified the social categories. No recommendations are provided to improve the news reports on domestic violence.

Dmitrieva and Glukhova (2022) aim to examine the lexical modifications of the English language in the context of domestic violence. This study aims to provide a deep understanding on approaches to domestic violence, how the English language reflects the issue of family violence, societal attitudes towards the domestic violence in terms of linguistics factors and to understand consequences (linguistic and cognitive) of domestic abuse combat. This study is related to cognitive linguistics. Both quantitative and qualitative methods are used in this study. The data for analysis is collected from textual and audio materials. Critical Discourse Analysis is used for the understanding of cognitive and linguistic factors. Discursive analysis methodology is used in this study to comprehend English language linguistics which relates with domestic violence. This methodology assists to acknowledge the theme of domestic violence. Moreover, the usage of expressions, new words and meanings in the context of domestic violence. It is analyzed that vocabulary plays a significant role in shaping a social issue and an ideology. Such as similar words are used to represent domestic abuse. The symbolic representation of domestic violence issues influences people's mind-set. Also, it is analyzed that domestic abuse is the connection which is related with the female body-women. Women are represented as the victims. The expression use in the discourse points towards women as victims. Women are objected to as victims while men are not. Domestic discourse analysis is carried out with the assistance of corpus. It is completed in three stages. The first stage is the process of lexical classifications. The second stage, classification of words with respect to platforms and genre. The last stage, the frequency of the usage of words. As a result, the approaches use in the analysis turns out helpful in understanding the public opinion on this social issue. The study also differentiates between cognitive side and people's mind-set about this social issue. Moreover, the evaluative traits of the English language is analyzed in this study. Also, the political section uses formal lexica and law uses particular lexica. It is revealed that the public have a fresh understanding and a new point of view about this social issue which is domestic violence. It happens because of the language's transformational tendencies over time.

Gul et al. (2023) conduct a study to analyze the implementation and effectiveness of the Domestic Violence ACT (2009). The purpose of this Act is to provide legal protection for women who are facing domestic violence. Quantitative data is used for analysis. It is observed that the implementation of the Domestic Violence Act suffers a few challenges. Such as the women are not aware of this Act, the lack of practice of law enforcement officials, and also the lack of resources for supporting domestic violence victims. However, previous laws and policies are discussed in this study that address the issue of domestic violence in Pakistan. The key features of the Domestic Violence Act (2009) are discussed in the research. The implementation of this law is considered inadequate and slow. Many women are unaware of this law. Social and cultural obstacles are responsible for the limited effectiveness of the Domestic Violence Act (2009). The obstacles like women are ashamed of not discussing the abuse they have experienced, many women are not aware of their legal rights, the typical patriarchal norms in Pakistan also demotivated the women to report and seek help against domestic violence, fear of the negative response from the abuser also discourages the women to report against the abuse, women are financially dependent on the abusers and the women have no trust the justice system of Pakistan as they thought that they are unable to provide them protection. Moreover, this study provides recommendations for the improvement of the implementation of the

Domestic Violence Act (2009) by including awareness campaigns such as workshops, seminars, and public campaigns to educate women about their legal rights as they are established for women to protect them from domestic abuse. There are shortcomings and a few gaps in the Act. The government should take a comprehensive revision of the Act. And make changes to ensure that it is adequate to protect the victims of domestic violence. Also, it is recommended that legislative bodies should receive sensitization training in order to improve understanding of this sensitive issue and to learn in which ways they can provide/ support the victims by showing a positive attitude towards them. Furthermore, adequate resources should be available to provide support to the victims as there is a lack of adequate resources. The government must increase fundraising and provide support services to women who have experienced domestic violence. To enable them to recover from the horrific experience. The government should ensure that they are strengthened enough to protect women's rights. Women's empowerment should be considered to encourage them that they have an equal status in society as men. They should not be treated as low social class. The cultural factors that cause problems in addressing this issue should be addressed with the help of educational campaigns. The government should collaborate with the agencies and organizations already working to overcome domestic violence. This study elevates a broader understanding and scope of the Act.

Parihar (2023) in his study discusses domestic violence as a global problem. According to the World Health Organization (WHO), women's rights are being violated by domestic violence. It is reported around 2 million women are abused every year all around the globe. Gender differences are one of the main reasons for domestic violence. Domestic violence is not only observed in developing countries, it is also observed in developed countries as well. Countries like Pakistan, the United Kingdom, India, Mexico, China, the United States, and many more reports domestic violence cases on a very large scale. There are social factors that contribute to domestic violence. Every factor depends upon the nature of that specific area. Such factors are poverty, lack of financial assets, low social class of women, lack of education, and many more. Cultural factors are also responsible for domestic violence. Moreover, there are several types of domestic violence like physical abuse, emotional abuse, and verbal aggression. Recent research has shown honor and dowry killings are the major cause of domestic murders globally. According to the World Health Organization (WHO) specified due to domestic violence women and female children are at higher risk of negative health results such as physical and mental health issues, HIV/AIDS, and unwelcomed pregnancy. Both physical and mental health consequences of domestic violence are determined as a severe reproductive health concern for women in Pakistan. 15% of married women are assaulted on a daily basis during pregnancy. In a few countries, women are not allowed to raise their voices against domestic violence. It happens because women are ashamed of sharing this matter, due to their cultural factors (Muzaffar, et. al., 2018)

It is reviewed from the current analysis that the literature is available on the various aspects of domestic violence, including legal frameworks, societal attitudes, cultural norms, and the effectiveness of interventions, across different countries and methodologies. There is the need to analyze law's wording lexically in light of the delicate social problem in the field of linguistics. As this comparative study, provides the variations of English language in two distinct countries Act. Additionally, a linguistics analysis of the Domestic Violence Act is required in order to examine the representations of the social actors.

Results and Discussion

Lexical Features

Both Acts United Kingdom (Domestic Abuse Act) and Pakistan (Domestic Violence Act) comprises of few similar and different lexical features which are discussed in detail below;

Table 1
Comparison of Lexical features of both Acts

United Kingdom Domestic Abuse Act (2021)	Pakistan Domestic Violence Act (2020)
Formal and precise language is used. Formal structure is used such as proper headings, paragraphs and sections.	Formal and precise language is used. Formal structure is used such as proper headings, paragraphs and sections.
Clear definition of Domestic Abuse is provided.	Clear definition of Domestic Violence is provided.
Nouns are used in this Act. Such as the victim is represented as Person B and the perpetrator as Person A.	Nouns are used in this Act. Such as the victim is represented as an aggrieved person which includes women, child, vulnerable person or any other person and the perpetrator as respondent.
Verbs such as coercing, controlling, threatening, isolating, monitoring, exercising, intimidating, to control, to criminalize, engages and obstructs etc. used to describe different actions as associated with different kinds of domestic abuse.	Verbs such as inflicted, includes, causes, suffers, threatens, compelling, prohibiting and restraining etc. are used to describe different actions as associated with different kinds of domestic violence.
Modal verbs such as shall, may, will, must, can, may, might, would, could, should are used to signify necessities, possibilities, obligations and authorizations.	Modal verbs such as shall, may, must, can, must, will, should, could, would are used to signify necessities, possibilities, obligations and authorizations.
Both direct and indirect adjectives are used in the United Kingdom Domestic Abuse Act.	Both direct and indirect adjectives are used in the United Kingdom Domestic Abuse Act.
Direct adjectives such as physical, immediate and prohibited etc. Indirect adjectives such as harmful, protective and effective etc.	Direct adjectives such as physical abuse, sexual abuse, economic abuse and grave violence etc. Indirect Adjectives such as shared household, protection committee and monetary relief etc.
Different kinds of adverbs are used in this Act. Such as effectively, promptly, responsibly, thoroughly, appropriately, consistently, compassionately, transparently and fairly etc. these adverbs emphasized the clarity, actions and different circumstances.	Different kinds of adverbs are used in this Act. Violently, abruptly, intentionally, repeatedly, routinely, significantly, severely, seriously, locally, regularly and deliberately etc. these adverbs emphasized the clarity, actions and different circumstances.
Prepositions are used in this Act to convey the numerous aspects of this social issue. Such as across, regardless of, within, of, to, between, with, about, as and throughout etc.	Prepositions are used in this Act to convey the numerous aspects of this social issue. Such as among, for, within, of, to, between, with, about, as, throughout etc.
Conjunctions like and, or, but, if, while, because and so etc. are used in this Act.	Conjunctions like and, or, but, if, while, because, so etc. are in this Act.
No personal pronouns are used.	Personal Pronouns like he, she, him, her, his and them are used to address the social actors presented in the text.
Formal, Authoritative and emphatic tone is used in this Act.	Formal, Authoritative, Serious and emphatic tone is used in this Act.
Legalistic, technical, inclusive, directive, accessible and prescriptive language style is used in this Act. Simple, declarative, imperative, interrogative, exclamatory, conditional, complex and compound sentences are used in this Act.	Legalistic, technical, inclusive, directive, accessible, objective and prescriptive language style is used in this Act. Simple, declarative, imperative, interrogative, exclamatory, conditional, complex and compound sentences are used in this Act.

Addressing terms that are used in this Act are Person A, Person B, applicant, parent/guardian, child, court, police officer, judge/magistrate, local authority, support worker, legal representative and health professionals etc.

Addressing terms that are used in this Act are Aggrieved person, respondent, protection officer, protection committee, court and service provider, etc.

The United Kingdom Domestic Abuse Act (2021) and Pakistan Domestic Violence Act (2020) both employ formal and precise language with a structured format, including proper headings, paragraphs, and sections. Each Act provides a clear definition of domestic abuse or violence. In the UK Act, nouns such as Person A for the perpetrator and Person B for the victim are used, while the Pakistan Act uses terms such as aggrieved person and respondent. Verbs such as coercing, controlling, and intimidating are used in the UK Act to describe various abusive actions, whereas the Pakistan Act uses verbs such as inflicted, includes, and suffers. Both Acts utilize modal verbs like shall, may, must, and should to signify necessities and obligations. Adjectives are used both directly (e.g., physical, immediate) and indirectly (e.g., harmful, protective) in the UK Act, and similarly, the Pakistan Act uses direct adjectives (e.g., physical abuse, economic abuse) and indirect ones (e.g., shared household, protection committee). Adverbs in the UK Act such as effectively and fairly emphasize clarity and action, while the Pakistan Act uses adverbs such as violently and deliberately. Prepositions in both Acts convey various aspects of the issue, including terms like within, of, to, and about. Conjunctions such as and, or, but, and if are used in both acts. Personal pronouns are absent in the UK Act but present in the Pakistan Act, including he, she, and them. Both Acts use a formal, authoritative, and emphatic tone, with the Pakistan Act also being serious. The language style in both Acts is legalistic, technical, inclusive, directive, and prescriptive, with a variety of sentence structures. Addressing terms in the UK Act include Person A, Person B, court, and police officer, while in the Pakistan Act, terms like aggrieved person, respondent, and protection officer are used.

Predominant Features

Both Acts United Kingdom (Domestic Abuse Act) and Pakistan (Domestic Violence Act) comprises of Predominant features which are discussed in detail below;

Table 2
Comparison of Predominant features of both Acts

United Kingdom Domestic Abuse Act (2021)	Pakistan Domestic Violence Act (2020)
Domestic abuse is defined properly in the Act. It focuses on the behavior of Person B towards Person A. The Act highlights arrogant and dominating behavior alongside physical injury and violence.	The Act includes the definition of Domestic Violence. It focuses on the "aggrieved person" Domestic Violence is clearly defined in detail with respect to the relevant terms of domestic violence.
The Act emphasizes on different sorts of abusive behavior such as physical, emotional, sexual, controlling, coercive, threatening, economic or other abuse.	The Act emphasizes on different sorts of domestic violence such as physical, emotional, sexual and financial stress as well.
It clearly states that it is the duty of local authorities to help Person A and their children.	It clearly states that it is the duty of government and service providers to help aggrieved person and their children.
Sharing images such as private sexual images of person A in order to cause harm is marked as a serious offence. In addition, it is referred to as "revenge porn" which is extended in accordance with the Act.	Stalking, harassment and invasion of aggrieved person privacy are considered as serious offences.
The Act places a strong emphasis on offering the person A children (under the age of eighteen) assistance and safety.	When allocating custody, the court takes into account who is in the best interests of the children (who are under the age of eighteen).
The Act describes the court hearings, report filing, and protective order processes. A hearing schedule,	The Act describes the court hearings, report filing, and protective order processes. A hearing schedule and case resolution are also guaranteed by the Act.

case resolution and access to justice are also guaranteed by the Act.

The Act presents Domestic Abuse Protection Orders (DAPOs), which are intended to safeguard person A from domestic abuse and place restrictions on person B. The directives stated that those who are identified as person B (abusers) are prohibited from purchasing weapons.

The Act does not specifically mention the purchasing of weapons.

Monetary relief is also included in the Act. Such as compensations, medical expenses and harm to the property of the person A.

Monetary relief is also included in the Act. Such as compensations, medical expenses and harm to the property of the aggrieved person.

The Act strictly prohibits cross-examination of person A by person B in the family court because it could cause additional emotional stress and trauma.

The Act does not specifically mention the prohibition of cross-examination of aggrieved person by the respondent in the family court.

Protection and Residence Orders are considered in this Act. To ensure the person A is safe, not evicted from their house and can also arrange a different place to stay.

Protection and Residence Orders are considered in this Act. To ensure the aggrieved person is safe, not evicted from their house and can also arrange a different place to stay.

Depending on the severity, factors and seriousness of domestic abuse the penalties vary and are different in each case.

The offences which fall under Pakistan Penal Code (PPC) the penalty will be as specified by the PPC. And the offences that do not fall under PPC are imprisonment of minimum six months and maximum three years. Also, fine minimum twenty thousand rupees and maximum one hundred thousand rupees. Depending on the seriousness of domestic violence.

The United Kingdom Domestic Abuse Act (2021) and Pakistan Domestic Violence Act (2020) both define domestic abuse and violence, focusing on the behaviors of Person B towards Person A and the "aggrieved person," respectively. The UK Act highlights various abusive behaviors, such as physical, emotional, sexual, controlling, coercive, threatening, economic abuse, and explicitly addresses serious offenses like revenge porn. The Pakistan Act similarly emphasizes different types of domestic violence, including physical, emotional, sexual, and financial stress, and considers stalking, harassment, and invasion of privacy as serious offenses. Both acts mandate local authorities, government, and service providers to assist victims and their children. The UK Act prioritizes protecting children under eighteen and introduces Domestic Abuse Protection Orders (DAPOs) to safeguard victims and restrict abusers, including prohibiting them from purchasing weapons, which is not mentioned in the Pakistan Act. Both Acts outline court procedures, hearings, and protective orders, ensuring justice and case resolution. Monetary relief for compensations, medical expenses, and property damage is included in both Acts. The UK Act prohibits cross-examination of victims by abusers in family court to prevent additional trauma, a provision not specified in the Pakistan Act. Protection and Residence Orders ensure victims are safe and not evicted, with penalties varying based on the severity of abuse in the UK, while in Pakistan, penalties align with the Pakistan Penal Code (PPC) or range from six months to three years imprisonment and fines, depending on the seriousness of the violence.

Domestic Violence in Pakistan

In Pakistan, domestic violence is a significant problem. In Pakistani society, both men and women can be perpetrators or victims of domestic violence but women are disproportionately affected. Large number of women face domestic violence in their household. In 2020, it was reported by HRCP that more than 90 percent of Pakistani women have experienced domestic violence at some point in their lives (Bhatti, 2023). Different factors contribute towards domestic violence in Pakistan. The factors are the patriarchal norms (these norms are deeply rooted in Pakistani society), lack of awareness, lack of education about women's right, gender inequalities, women's financial reliance on their

husband/families and different cultural norms rationalize violence against women. Women are treated as second class citizen in Pakistani society, according to Samaa TV news report. The Aurat Foundation also known as a non-governmental organization in Pakistan shared the yearly reported cases of domestic violence which is about 2,297 in 2020. Cases of domestic violence have risen during COVID-19 pandemic in different parts of the world including Pakistan. During COVID-19, the issue of domestic violence was represented in Pakistani media. It is categorized as violence, abuse and control. The messages conveyed by the media sources regarding domestic violence in Pakistan were to provide security, support and wellbeing. The women are represented as powerless, voiceless and passive individuals (Ali & Khalid, 2021).

Victims of domestic violence frequently face exclusion because of several institutional, social, and cultural elements, especially women. Mainly husbands are considered as responsible for domestic violence. In addition to societal standards, incorrect interpretations of religious beliefs, inferior status, economic dependability, and a lack of legal recourse, women suffered in silence (Rabbani et al., 2008). Spousal violence is particularly prevalent (Amir-ud-din et al., 2019). Domestic Violence victims, mainly women, frequently deal with the shame as well as stigma which is connected to their experiences. However, the social standards also place a considerable emphasis on family honor and gender roles which lead towards victim-blaming. Furthermore, it demotivates and discourages the victim to seek help/aid. Women are typically placed in the subordinate positions and are considered as inferior, due to the traditional gender norms of Pakistani society. While on the other hand, males are considered as superior and authority is provided to them within families. This typical placement of gender has the potential to normalize violence against women and also keep family honor over addressing injustice. Economic dependency is considered as another barrier to report domestic violence. Many victims economically and financially depend on the abusers. It also causes difficulty and makes it challenging for the victims to leave hostile environments. The legal obstacles to acquiring property ownership or inheritance expand the victim's financial/economic fragility. And it also limits the victim's potential to seek protection and assistance. According to Zakar et al. (2015), women living in rural areas of Pakistan are particularly susceptible to domestic violence as compared to the women living in urban areas. Victims face exclusion due to the lack of education and awareness about their rights. Domestic Violence is an issue of health and human rights. Insufficient or no knowledge about the legal rights, prevention, protection, assistance from social services is a serious concern. Victims feel marginalized and suffer because they are unaware regarding available resources.

Violence against women and domestic violence is a serious issue in Pakistan. In addition, there are several Acts passed by the Parliament of Pakistan to address this social issue.

Table 3
Domestic Violence Acts of Pakistan

No.	Act	Year
1	The Family Courts Act	1997
2	Protection of Women (Criminal Laws Amendment) Act	2004
3	Protection of Women (Criminal Laws Amendment) Act	2006
4	The Domestic Violence (Prevention and Protection) Act	2009
5	The Domestic Violence (Prevention and Protection) Act	2012
6	Sindh Domestic Violence (Prevention and Protection) Act	2013
7	Baluchistan Domestic Violence (Prevention and Protection) Act	2014
8	Punjab Protection of Women against Violence Act	2016

9	Khyber Pakhtunkhwa Domestic Violence against Women Act	2019
10	The Domestic Violence (Prevention and Protection) Act	2020

The Domestic Violence Acts have been revised many times. Over the years, these Acts have gone through various revisions and amendments. Focusing on the changes in society perspectives, legal framework, and attempts to enhance the protection of individuals from domestic violence. In past few years, Pakistan's Judiciary has taken significant steps to address the seriousness of this issue.

Domestic Violence (Prevention and Protection) Act 2020

The Act clearly portrays the involvement/inclusion of social actors which falls into inclusion strategy and mentioned the involvement of social actors. These social actors are the "Aggrieved person" who is the victim, "Respondent" who is the perpetrator, "women" adult females who experience domestic violence "Child" living in an abusive household or any other "vulnerable person". Others are the "Protection Officer", "Protection Committee", "Court" and "Service provider" which are responsible for implementation and enforcement as mentioned in Pakistan's Act. Every social actor is identified in detail. By providing the context of their functions, responsibilities as well as the interactions within the legal system. Furthermore, the Act focuses on the relationships, circumstances and situations within the legal framework which are domestic relationship, domestic violence and vulnerable person. The Act acknowledges the major inclusion of legal procedures and authorities. Protection officers, Protection committees, Court and Service providers are the active participants in this Act. Protection officer allocated by the ministry of human rights is responsible to assist the victim. Protection committees are responsible to provide protection to the victims. The Act specifies the important role of the court in providing justice to the victims and reported cases of domestic violence. The Act identifies the "Service providers" as the active participants that are responsible for offering legal, medical, shelter homes as well as financial support to the victims of domestic violence. The Act emphasizes the fact that the victims of domestic violence will receive support systems in difficult situations. It promotes the inclusion and accessibility to the resources. Protection officers, Protection committees and Court have a significant and powerful role in the Act. Since they are in charge of protecting the rights of victims and making sure those who violate them (the perpetrators) are held responsible. Aggrieved person and respondents are also the active participants in this legal framework. Aggrieved person is portrayed as an active participant in seeking justice, protection and relief from the harm caused by the respondent. Respondent is portrayed as the active participants as they are responsible and accused of harming the aggrieved person. As the respondent is engaged in various type of violence such as physical, emotional and sexual abuse.

Aggrieved person who is the victim is represented as a passive participant in this Act, as subjected to domestic violence. Aggrieved person is represented as the beneficiary of certain actions taken by court, protection committee, protection officer and service providers as well. The actions taken by these active social actors towards the aggrieved person are positive. Such as, the protection officer is responsible for filing the applications, legal aid and most essential to provide shelter to the aggrieved person. Providing compensation and monetary relief to the aggrieved person are mandatory, as mentioned in the Act. It is mandatory because an aggrieved person suffered due to domestic violence. Aggrieved person as a passive social actor is the beneficiary receiving positive actions (protection and financial support) by the active social actors in this Act. Aggrieved person as a passive social actor is subjected to the various types of violence perpetrated by the respondent. Subjection of the aggrieved person occurs due to the vulnerability of their status in a domestic relation. Various characteristics, including age, gender, social position, and economic dependency, may contribute to this susceptibility. Dependency on the

perpetrator for financial and emotional support also leads towards the subjection. The imbalance of power between the victim and abuser contributes to the subjection of the victim. The victim due to the inferior and low status in a domestic relationship is seen as powerless. While the abuser exerts dominance and power on the victim, resulting in the subjection of the victim. Child as a vulnerable person in this Act, is a passive participant. Children are passivated because of their vulnerability, dependency and legal protection. In case of domestic violence, a child (under the age of eighteen years) and a vulnerable person suffer significant harm as they experience abusive situations occurring in their household. As a result, it affects their mental health such as causing emotional distress and trauma. A child is dependent on adults such as parents or caregivers and lacks power. The child depending on the adult for his/her need could be the perpetrators of domestic violence. In this Act, the child and vulnerable person is beneficalized by getting the legal protection, assistance and support mechanism. Also, to ensure removing them from abusive environments. The needs of the passive participants such as the child and vulnerable are addressed, in this Act. The respondent faces subjection such as being subjected to legal measures and consequences because of their abusive actions towards the aggrieved person, child or any other vulnerable person. According to the Domestic Violence Act, respondent is subjected to restrictions, punishment, penalties and legal consequences.

The Act personalizes the experiences and vulnerabilities of the social actors within the legal framework, such as the victims of domestic violence. The Act highlights the distinct identities affected by domestic violence which are categorized as women, child, vulnerable person or any other person. These identities are represented as a group of individuals. The Act focuses on various experiences by describing different kinds of abuse such as physical, emotional, mental, economic and sexual abuse. By personalizing the experiences, the Act acknowledges to full-fill the needs, protection and rights of the aggrieved person who is subjected to domestic violence by the respondent. The usage of formal language and legal terminologies in this Act revealed impersonalization specifically in the sections related to orders and legal proceedings. Impersonalization is observed in different terms like Protection Officer, Protection Committee, Service Provider and Court. In this legal framework, they are referred to as entities and in a depersonalized way, as these are represented as institutionalized and abstract, emphasizing their functions and roles.

Conclusion

To sum up, this study reveals both similarities and differences between the lexical and predominant features of both Acts. Both Acts tend to provide comprehensive definitions, protection, prevention and penalties to help the victim to seek justice. The differences lie in the way they are addressing this social issue according to their societal and cultural aspects. Moreover, the Domestic Abuse Act of the United Kingdom (2021) is non-gendered in nature. This Act considers every individual equal. Regardless of the victim's or abuser's gender, the Act seeks to be neutral and inclusive in resolving domestic violence. While the Domestic Violence Act of Pakistan (2020) is neutral as well as gendered in nature. The Act explicitly mentions women because they are largely affected by domestic violence. This study shows that both legal documents include the prime and basic aspects in providing protection, support and justice to the victims. However, their implementation and effectiveness are still questionable. In addition, the way social actors are represented in the context of the Domestic Violence Act of Pakistan (2020) demonstrates that the legal document is fair, law is transparent and neutral. The Act represents the inclusivity, social justice and balance of power dynamics. When it comes to justice, it is not provided in many cases particularly to women due to the lack of implementation,

effectiveness and the patriarchal structure of the Pakistani society. Furthermore, many cases go unreported due to various factors which contribute to Domestic Violence. Providing justice is the responsibility of the powerful agency. In the landscape of Pakistan, the agency is the patriarchal society.

Recommendations

- Increase public awareness and education about domestic violence laws and victims' rights. Pakistan should implement nationwide campaigns, incorporate legal education into school curriculums.
- Provide more resources and training for legal and support services to assist victims. Especially in rural and underserved areas, to assist victims effectively.
- Foster gender equality and challenge cultural beliefs that perpetuate domestic violence by conducting workshops, training sessions and media campaigns for both men and women.

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