

Disability Hate Crime: The Case Study of Lee Irving

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Abstract

Within the world of criminology, pathologising crime and disability studies are becoming more prominent, not only from a victim standpoint but also from an offender standpoint. This is particularly noticeable within the Criminal Justice System. The emergence of medicalisation is due to The Biomedical Model. This model is used to understand normal and ‘abnormal’ behaviours (Deacon and McKay, 2015) and saw the human body as a biological machine, dividing the mind and body. The Biomedical Model thrived on providing ‘cures’ for disease and discouraged those with disabilities or impairments from feeling comfortable, nor did it empower them to embrace their disability (Deacon and McKay, 2015). From The Biomedical Model the emergence of medicalisation became prominent however due to the diverse needs of those with disabilities and impairments a discriminatory barrier arose as society responded to those with a disability or impairment (Conrad, 2007). Due to the diverse number of disabilities becoming more recognised and accepted within the 21st century, there is always scope for further disability research within the field of criminology. There is a continuous debate of whether it is society that causes social constructs for disabilities or is it the disability itself. Throughout this article there will be reference to Lee Irving, a real case within the Northeast of England who was described as a ‘wonderful, young man’ (Moore, 2015). Lee unfortunately lost his life due to prolonged torture and abuse from those Lee thought were his friends. This case study will examine critical disability studies, hate/mate crime and the neurodiversity movement. Additionally, it will place future recommendations for what can be done to stop the discrimination and segregation against people with a disability.

Keywords: Disability hate crime, deinstitutionalisation, criminology, vulnerability

The case study of Lee Irving is nothing but a disturbing one. Lee Irving was a 24-year-old man who had learning disabilities. He was found deceased in Fawdon, Newcastle, in 2015. Irving was brutally beaten up by what he thought was his friends and unfortunately died. Throughout Irving’s 24 years

on earth, he was continuously targeted for his learning disability and was easily influenced into making bad decisions to fit in with peer groups. Four people were found criminally responsible for Lee Irving's death. Three were convicted for preventing the cause of justice and allowing the death to occur but they were cleared of manslaughter. James Wheatley was convicted of murder; however, he was cleared of committing a disability hate crime. The case reports suggested that James would heavily drug Lee into a sedative state so Lee could not escape. James would then brutally attack Lee and steal his clothes and money. All four involved in the murder of Lee Irving pretended to befriend Irving to gain his trust, only then to exploit him and lead Irving to his death.

Lee Irving was identified as an extremely vulnerable young man and within his case he was sceptical to mate crime. Mate crime is where individuals befriend someone who may be vulnerable to exploit them and take advantage of them (Corcoran & Smith, 2016). Hate crime is when an individual or group intentionally hurt another human because of their vulnerability such as disability or any of the protected characteristics under the Equality Act 2010 (Corcoran & Smith, 2016). In 2015/16 there were 62,518 crimes reported to the Police where hate crime was considered a contributing factor. This was a 19% increase from the previous year. Of those 62,518 recorded crimes, 6% involved disability hate crime. In the year ending of March 2022 there was a total of 155,841 reported offences where hate crime was considered a contributing factor (Home Office, 2022). Within those 155,841 reported crimes, 14,242 were classed as disability hate crimes (Home Office, 2022). The comparison between 2015/16 and 2021/22 statistics show that hate crime is becoming more problematic. Vulnerable people are being targeted more, and throughout this case study a theoretical understanding towards disability hate crime will be demonstrated. It will also show how people with learning disabilities used to be treated medically, and the progress the United Kingdom has made to deinstitutionalise vulnerable people and the movement towards community care.

Vulnerability

According to the Office for Health Improvement and Disparities (OHID) (Gov.uk, 2022), vulnerable people are defined as those 'in need of special care, support, or protection because of age, disability, risk of abuse or neglect'. Whereas Sparks (1982) defines vulnerability as 'a state in which a person does nothing to put themselves at special risk but finds themselves to be susceptible to being a victim or being at risk.' (Walklate, 2011, P. 181). Although these definitions are many years apart, they are both used within contemporary society. This can be problematic when professionals or even the individual themselves need to identify if they are vulnerable or not. Many people do not like to

associate themselves with being vulnerable but without acknowledging vulnerabilities, miscommunication, misdiagnosis and even a miscarriage of justice can happen. Being vulnerable can be associated with an internal feeling. For example, do women feel safe walking home alone in the dark? Maybe not. However, this is different for people with all aspects of a disability. Disability makes an individual more vulnerable without realising they are vulnerable. People with disabilities do not brand themselves as being vulnerable because they are already labelled as being disabled. Many disabled people have capacity to acknowledge situations where they may become more vulnerable than others, but many do not. It is important that more professionals understand and identify vulnerabilities within people to ensure the correct support can be given. An example of this would be within police custody where vulnerable people are entitled to an appropriate adult. Within this scheme it removed the diagnosis process and instead uses professional judgment or perception to identify if an individual is vulnerable. This ensures an appropriate adult is in place to help the individual understand what is going on and what may happen in the future, removing any barriers. This demonstrates an important and positive progression within police practice when it comes to police custody.

It is important to note that illness, disability, and impairment are all aspects of being vulnerable. Each of these have different meanings however, they all make an individual feel vulnerable. Bury (1982) states illness as a disruption to our ongoing life. He explains acute illness only has a temporary significance on our lives and demonstrates a limited disruption whereas chronic illness changes the underpinning of our lives because the illness creates new and different life conditions (Bury, 1982). Within early thinking of disability, both illness and disability were kept separate. There are multiple definitions of disability, some that still use derogatory terminology. The World Health Organisation (2001, P.28) states 'disability is not an attribute of an individual, but rather a complex collection of conditions, many of which are created by the social environment.' This definition of disability suggests that there are environmental deprivations that are causing people's disabilities. An example of this would be, not having wheelchair access to all buildings or, disabled toilets. These environmental deprivations are known as social constructs. Likewise, an impairment can be an illness, injury or genetic condition that has the possibility of causing psychological and physiological abnormalities (Walker, 1993). Disability is the interaction with society and a loss of opportunities due to the impairment or illness.

The Move Towards Deinstitutionalisation

The history and, how those with any disability used to be treated is somewhat shocking and disturbing. For example, prior to the advent of Christianity, infants who had physical abnormalities were sacrificed to the gods, and 'deformities' were seen as punishments from the gods, meanwhile people with learning disabilities were subjected to slavery (Albrecht 2001; Stiker, 2002). Medicine was practiced by the church under religious means through priests as they believed health, illness and disability were controlled by supernatural forces. By the 18th century the state opened and funded asylums for 'lunatics' and 'idiots' to be detained and taken care of, through the passing of the County Asylums Act 1808. The asylums, however, soon became over run, housing up to 1000 people when the capacity was only designed for approximately 115 beds. More and more people went into the asylum but very few left. People within the asylums they were subjected to inhumane treatments such as being forced to sleep on straw beds, being chained to radiators or walls, given scolding hot baths and subjected to lobotomies, electric shock therapies, and purging (Rushton, 1988). Due to Lee Irving's disability if he were sent to an asylum, he would most likely never have got out and would have been subjected to slavery and the inhumane treatments to 'cure' his learning disability.

By the 1900's, the state closed the asylums and 1962 saw the rise of community care to encourage deinstitutionalisation. Later, with the transition of deinstitutionalisation came new legislation such as the NHS and Community Care Act 1990 and the Care Act 2014. The NHS and Community Care Act 1990 sparked major change to the National Health Service (NHS), as the Act split the establishment and exhibited the start of an internal market within the health service. Additionally, social care departments were given the responsibility for community care. The Care Act 2014 replaced existing legislation around social care within the United Kingdom. The Act requires local authorities to help develop a market that delivers a range of sustainable high-quality care and support services. The Act also introduced national eligibility criteria and the right to independent advocacy; giving more people within the community the chance to be heard.

Despite deinstitutionalisation and the move towards community care being a progressive shift, it can also be problematic for some individuals. Community care can be funded from the Government, but many people are without recourses due to the expense involved, and this can cause vulnerable people and people with disabilities to become highly isolated. Scholars have argued that this can have a detrimental impact upon people's wellbeing with a contemporary example being the Covid-19 Pandemic where vulnerable people were told to isolate for their well-being but instead were left to feel more isolated and lonelier (Victoria et al, 2021). Many individuals with a disability that have not been diagnosed or misdiagnosed may not be aware of the help and support they can receive. Overall,

deinstitutionalisation is a progressive move but there needs to be more integration within community care to ensure the wider population can acknowledge and appreciate the diversity within contemporary society.

Under the Equality Act 2010, disabled people are protected from discrimination and have the same equal rights and access to opportunities. However, this is not always the case. Disabled people are still discriminated against, indirectly and directly. Disabled people are attached with stigma that they are ‘weak’, ‘feeble-minded’, ‘unable to keep a job’ and, so much more (Macdonald et al, 2018). Disabled people still encounter daily barriers within society. From an early age, Lee Irving was diagnosed with severe speech and learning disabilities (Metcalf, 2021). Not only is there a cognitive impairment, but there are also communication barriers. Many people can have a learning disability and be non-verbal, this is a huge communication barrier as not all individuals know Makaton or sign-language, causing non-verbal individuals to feel and become very isolated. Lee Irving was known to be easily influenced and three years prior to his death he found himself in trouble with the law. Lee Irving was subject to community orders due to being influenced into criminal activity. However, Irving stated he would rather be easily influenced, than be rejected by his peers (Wood, 2017).

The National Probation Service assessed Lee Irving as being extremely vulnerable. Although, there were alerts for severe vulnerability and multi-agency safeguarding measures were implemented to protect Lee, it was not enough. Under the Mental Capacity Act 2005, Lee Irving undertook the Wechsler Adult Intelligence Scale 4th Edition (WAIS-IV) which measured his intellectual cognition. The results from the WAIS-IV confirmed that Lee was a risk to himself in the community, he did not have capacity to make decisions and 99.8% of adults his age would have scored higher on the test (Wood, 2017). This indicated a requirement for many additional services to be involved to ensure Lee was not at risk to himself. Prior to Lee’s death, multi-agencies were working in partnership to provide suitable accommodation for him within Supported Living due to his incapacity to make decisions. One wish of Lee’s was to live independently therefore Support Living was the best solution to prevent his institutionalisation and to enable him to keep his independence. However, over a four-year period from 2011-2015, Irving was reported missing thirteen times and welfare checks were alerted to Northumbria Police.

Lee was serving community orders but due to his lack of engagement with the Probation Service, further support became difficult to implement. Within the Safeguarding Adult Review (Wood, 2017) the National Probation Service had inadequate understanding of the Mental Capacity Act 2005 and how it worked within their role of applying it. Another catastrophe for the Probation Service was

their failure to share information or raise appropriate safeguarding referrals when risk was identified (Wood, 2017). Overall, more than ten organisations were working with Lee Irving and approximately six safeguarding referrals were implemented for him. The referrals were passed onto the Newcastle Safeguarding Adults Board however, the board stated that six safeguarding referrals were insufficient to alert an emergency flag on the system (Wood, 2017); another shocking and missed opportunity to save Lee's life.

Theoretical Underpinnings

The Social Model of Disability in simple terms is understanding that disability is something that can be created because of society (Davis, 2013). The Social Model of Disability is used as a theoretical framework. The Social Model of Disability is enforced to encourage to change people's attitudes towards disabled people and acknowledge the barriers disabled people may face daily for example, a physical barrier such as a wheelchair user not having access to a lift, or it can be mental barrier's such as other people's attitudes towards disabled people (Davis, 2013). With the removal of barriers, it gives equal access and opportunities for disabled people and enhance their choices, control, and independence (Davis, 2013). The Social Model of Disability separates impairment and disability (Davis, 2013). A huge positive from The Social Model of Disability is the modernisation of medicalisation and transitioning the focus from disablism to ableism. Linking to Lee Irving's learning disability, it would be identified as an impairment rather than a disability as it is contemporary society that causes Lee's impairment to become a disability due to the barriers he faced. The Social Model of Disability paved the way how disability and impairment can be distinguished and therefore became the emergence of Critical Disability Studies.

From the theoretical underpinning of The Social Model of Disability comes the emergence of disability politics which underpins Critical Disability theory. Critical Disability Studies is defined as being the 'location populated by people who advocate building upon the foundational perspectives of disability studies whilst integrating new and transformative agendas associated with postcolonial, queer, and feminist theories' (Goodley, 2016, 190–191). Critical Disability Studies' move towards impairment vs disability as Shakespeare (2017) stated different elements of the body can hurt which can give the body an impairment. Therefore, Critical Disability Studies recognises the reality and does not devalue them (Shakespeare, 2017). Letosa and Retief (2018) defined impairment as 'lacking part of or all of a limb, or having a defective limb, organ or mechanism of the body'. Disability is defined as being 'not an attribute of an individual, but rather a complex collection of conditions, many of

which are created by the social environment' (World Health Organisation, 2001, P.28). The language used has also developed and instead of using the term 'learning Disability' we adopt the term 'intellectual impairment'. Despite this somewhat demonstrating progress, it is important to note that the language used is still derogatory for those with an impairment as they are still segregated from the wider population.

From these positive steps within theories and medicalisation come the Neurodiversity Movement. The Neurodiversity Movement is understanding and recognising the diverse group of people and how they interpret the world around them (Chapman, 2020). Neurodiversity advocates for people with learning disabilities such as dyslexia and other neurological conditions such as autism and ADHD. This movement encourages individuals and organisations to change their views and the language used towards people with intellectual impairments. Another positive from this movement it allows those with neurological conditions to feel accepted within society. In terms of Lee Irving, the progressive movement of medicalisation, including the Neurodiversity Movement could have impacted his life within different ways. For example, if Lee had access to the correct services and support (which was picked up from the Probation Service as they identified Lee as an extremely vulnerable man) to recognise his triggers and barriers within society and ultimately befriend positive social peers.

Hate crime is a prejudiced, motivated attack against another person. Hate crime has many subcategories but in relation to the case study, disability hate crime provides explanations leading up to the death of Lee Irving. Although Disability hate crime is a punitive offence under the Equality Act 2010, it can be hard to prosecute the perpetrators of this offence because of how complex the term 'hate' can be. It can be hard to measure how someone can 'hate' another individual. It can also be hard to prosecute the perpetrator because many disabilities are hidden, and the perpetrator can argue at trial that they did not realise the victim was labelled as 'disabled'. However, there are positive impacts from section 66 of the Sentencing Act 2020, which increased the sentencing powers for disability hate crime. From disability hate crime there is also a sub-category of mate crime. Mate crime is a term used to describe when an individual befriends a vulnerable person and takes advantage of them, for example exploiting the vulnerable person for financial gain. In the case of Lee Irving, he was exploited on a regular basis, he was abused mentally, physically, and financially.

The case of Lee Irving is a disturbing and shocking one, but it is important to acknowledge disability hate crime and mate crime when exploring this case to educate others on what people with disabilities encounter. Since Lee Irving's death, disability hate crime and mate crime is on the rise,

however the acknowledgement of disability hate/mate crime has led to the creation of the charity Stop Hate (2006). Stop Hate is a third-party organisation to help tackle the barriers and discrimination that many people encounter every day. It was founded in 2006 after the Stephen Lawrence inquiry and since has become one of the largest charities to provide a helpline to those most vulnerable. According to Stop Hate (2006) many disabled people would rather report the crimes to third party organisation or charities instead of informing the Police. Disability hate/mate crime is underreported to the Police because of the stigmatisation and victimisation vulnerable individuals face and in fact, start to live their life around the abuse, exploitation, and segregation they face daily. In Lee Irving's case he was described as a 'wonderful, young man' (Moore, 2015) who was unable to identify the vulnerable positions he was in. Lee wanted to make friends and unfortunately, he made 'friends' with people who exploited and abused him. James Wheatley was found guilty of Murder but avoided a disability hate crime charge due to flaws within legislation and within the criminal justice system. The Crown Prosecution Service (CPS) was highly criticised for this, and Lee Irving's death was not the only death that was not passed for a disability hate crime. A CPS spokesman stated there was not enough evidence under section 146 of the Criminal Justice Act 2003 to prosecute James Wheatley for the offence. This does not give reassurance to those in similar positions as Lee Irving's family as justice has not been met. On the other hand, the Sentencing Act 2020 has increased the punishment under sentencing guidelines in accordance with the crimes committed but only by six months. Again, this does not give families and friends the closure and justice they need when coming to terms with the murder of a loved one due to their disability.

Future Recommendations

From the research carried out within this case study there is certainly room for improvements within the Criminal Justice System, the legislation, and how vulnerable people with a disability could be made aware of the support they are entitled to. In the case of Lee Irving, the family express two main future recommendations:

- 1) 'The need for the move from children's services to adults' services to be better managed, ensuring the smoother transition without any loss of support. Additionally, the importance of noting the capacity of an individual rather than focussing on their age (Wood, 2017).

- 2) Ensure families remain part of the decision-making process in the case of vulnerable adults and be entirely involved and consulted on the “best interest” and other decisions relating to family members (Wood, 2017).

The case of Lee Irving demonstrates the recognition of the theoretical underpinnings and explains the rationale for disability hate crime holistically. Unfortunately, Lee is not the only case now or in the future that will exhibit the discrimination and failures from safeguarding and protective agencies. However, this case study can present us with potential reforms too. Firstly, a Parliament should ensure legislation constantly reviewed to remove ambiguity, remove potential flaws and modified to keep up with contemporary society. In Lee Irving’s case, his murder was not sentencing under disability hate crime as the judge refuted it due to the prosecutions failure to satisfy the court that James Wheatley showed any hate towards Lee at the time of his death (Wood, 2017). Although, there was proof from text messages referring Lee to a ‘spastic’ (Wood, 2017) and the injuries Lee suffered, it was still not substantial enough for disability hate crime prosecution. Therefore, a future recommendation would be for legislation to consider all aspects of abuse over a long or short time that attribute to hate crime and the sub-categories within.

A future recommendation that is already implemented within certain agencies is the mandatory training for the Mental Capacity Act 2005 and recognising the diversity and how to apply it within certain professional judgements. A huge let down from the National Probation Service within the case of Lee Irving, was the inadequate application of the Mental Capacity Act 2005 as they were unsure or unaware they were within their right to implement such measures. All professions need mandatory training that needs to be reviewed yearly to ensure knowledge is kept up to date with important legislation. Likewise, with the Equality Act 2010, it is important to know that all individuals regardless of disability, ethnicity, gender, or anything that is likely to make them vulnerable are entitled to equal opportunities and to live a life free from discrimination. However, there is still huge stigma attached to those who are listed under a protected characteristic therefore they are susceptible to victimisation.

A final future recommendation would be to enhance the awareness and diversity from a young age. The United Kingdom can implement all the relevant legislation to protect individuals by law. But law does not shape how individuals perceive one another. Providing diversity in schools opens individuals’ interpretation and awareness to the diverse needs that others may have. For example, children with disabilities are still being kept within separate schools for ‘additional needs.’ This does not give mainstream and special educational schools the opportunity to merge and identify that people

can be different and again, that is acceptable. Educating and showing differences within contemporary society from a young age, can help how they perceive other people while transitioning through their adolescences. Without this interaction, people with or without a disability do not know how to conduct themselves around each other because they are both perceived as different. Educating from a young age can plant a seed of thought that can create future movements to stop discrimination and ensure equality for all.

In conclusion, from the research carried out within this case study there is room for improvement, but it is important to identify the progression over time such as the move toward deinstitutionalisation, how medicalisation has improved, and the development of further awareness of the diverse needs the most vulnerable. There is also slow progression within practice to show an understanding of the Neurodiversity Movement for example, Neurodiversity rooms for group discussions or interviews are now in place; making those with disabilities or impairments more accepted within society and ensuring they feel comfortable. However, the key points of concern from the case of Lee Irving have not gone unnoticed and future adaptations within legislation such as the Sentencing Act 2020 is making slow but progressive movements in correlation with the rise of disability hate crime. Lee Irving is not the only case to have been discriminated, abused, segregated, and ultimately killed from disability hate crime. Lee's case will live on to educate the wider population of the barriers and dangers that vulnerable and disabled people encounter daily. He will always be remembered.

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