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Shining light on an unspeakable crime: necrophilia and the need for legal reform

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ABSTRACT

This article explores the current legal frameworks surrounding necrophilia in the United Kingdom. More specifically, it draws upon Aggrawal's [(2009). A new classification of necrophilia. *Journal of Forensic and Legal Medicine*, 16(6), 316–320] typologies of necrophilia, arguing that a multifaceted definition of necrophilia is required in order to properly legislate against it. The recent case of David Fuller is incorporated into discussions, and efforts towards legal reform are examined accordingly. The article makes recommendations of how future research can progress discussions in this acutely underresearched area of criminology and law.

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Necrophilia is a rare paraphilia in which a person gains sexual pleasure from having sex with, or sexually abusing, the dead. The word necrophilia derives from the Greek words ‘philia’ meaning ‘attraction to/love’, and ‘nekros’ meaning ‘dead body’ (Petherick and Petherick 2019, p. 183). It is defined by Stein et al. (2010, p. 443) as ‘sexual relations with corpses. ... The disorder is considered relatively rare; however, its true prevalence is unknown and is perhaps unknowable’. As noted by Aggrawal (2009, p. 316), necrophilia can be viewed as a stand-alone term or as an umbrella term incorporating a variety of typologies, or it may be seen ‘in association with a number of other paraphilias, namely sadism, cannibalism, vampirism (the practice of drinking blood from a person or animal), necrophagia (eating the flesh of the dead), necropedophilia (sexual attraction to the corpses of children) and necrozoophilia (sexual attraction to the corpses of or killings of animals—also known as necrobstantiality)’. Rosman and Resnick (1989, p. 153) reviewed 122 cases of necrophilic acts or fantasies (88 from world literature and 34 unpublished cases) and found that ‘the most common motive for necrophilia is possession of an unresisting and unrejecting partner’. Kumar et al. (2019, p. 607) further state that ‘most necrophiles identify as heterosexual males and fall between the ages of twenty and fifty, but there are also cases of homosexual and/or female necrophiles’.

The taboo of necrophilia is not a new phenomenon, with strong social norms against it being present since ancient times. As noted by Rosman and Resnick (1989, p. 153),

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‘the ancient Egyptians took precautions against necrophilia by prohibiting the corpses of the wives of men of rank from being delivered immediately to the embalmers, for fear that the embalmers would violate them’ and can also be found in ancient legends ‘such as that of King Herod having sex with his wife Marianne for seven years after he killed her’ (Rosman & Resnick, 1989, p. 153). Another historical case is that of Sergeant François Bertrand, ‘a sergeant in the French army, who during the years 1847–1849 dug up corpses, to have sex with them. It was Bertrand’s case that prompted the Belgian Psychiatrist Joseph Guislain to come up with the term necrophilia’ (Bhaskar, 2020, p. 244).

Necrophilia can likewise be seen in more recent history through its representation in popular culture, from the discernible figures of Dracula and Hannibal Lecter to the more concealed figures of Snow White and Sleeping Beauty. The ‘Netflix and chill’ platform culture (Pilipets, 2019) of today also sensationalises real-life cases of necrophilia through ‘the conception of true crime as guilty-pleasure television’ (Walters, 2021, p. 33) which includes series, films and documentaries on serial killers who have taken advantage of dead victims, such as Ed Gein, Ed Kemper, Jeffrey Dahmer and Gary Ridgeway (Petherick & Petherick, 2019, p. 184). Beyond this, there have been cases that have drawn public attention on a more global scale, such as that of Karen Greenlee, an American apprentice embalmer who, in 1979, was convicted of stealing a hearse and having sex with the 33-year-old male’s corpse it contained. Necrophilia was not illegal in the state of California at the time, so she was only convicted on the grounds of theft and interfering with a funeral, for which she incurred a fine and spent 11 days in prison. Openly describing her necrophilia as an ‘addiction’ and calling herself a ‘morgue rat’, Greenlee confessed to ‘amorous episodes with between twenty to forty dead men’ when interviewed by Jim Morton in his 1987 book *Apocalypse Culture* (MacRae, 2020). It should be noted, however, that female necrophiles are considered a rare breed in comparison to their male counterparts (at least according to the very limited research that exists).

Although necrophilia is not a new form of crime, there is scope for it to be more openly discussed today due to (a) the sexualisation of our society and (b) the broader emotional desensitisation to violent crime due, in large part, to media representations (both fictional and not) in contemporary digital culture. However, there continues to be limited research and debate on the topic, which is surprising considering the lack of legal framework surrounding it. This article consequently aims to contextualise necrophilia in both legal and social settings, drawing upon awareness campaigns, mainly linked to the recent case of David Fuller, to further emphasise the need for legal reform in this area. Typologies of necrophilia will first be explored, followed by an interrogation of United Kingdom law and the case for legal reform.

Typologies of necrophilia

The word ‘necrophilia’ tends to be situated within the more general definition of ‘sexual attraction to and/or activity with dead bodies’. This article, however, seeks to understand it as an umbrella term that incorporates several different types. The work of Aggrawal (2009), who is largely considered a leading scholar in this area, contributes a more comprehensive explanation of necrophilia. Aggrawal (2009) proposed a new classification of necrophilia, outlining 10 different types in order of severity. These types are subsequently outlined below in [Table 1](#).

Table 1. Aggrawal's 10 Types of Necrophiles.

Adapted from Aggrawal (2009)

Class I: role players	Do not want to have sex with a dead person. Enjoy sex with a living person pretending to be dead.
Class II: romantic necrophiles	Bereaved people, who would mummify a part of the body of their recently departed loved ones, and keep it with them in order to get a psychosexual stimulation. Would not show a similar interest in any other dead body, ie, body of a person with whom they were not romantically involved in life.
Class III: necrophilic fantasisers	Fantasise intercourse with the dead. May visit cemeteries and funeral parlours and may masturbate in the presence of the dead.
Class IV: tactile necrophiles	Interest in dead bodies increases to the level of touching them. Like to stroke erotic parts of a dead body, such as breasts. May manipulate sexual organs of the dead in order to get an orgasm.
Class V: fetishistic necrophiles	Cut up parts of a dead body—say a breast—mummify it, and keep it in their possession to use it as a fetish for their necrophilic activities. Differ from class II necrophiles in the sense that they (class V) do it with the bodies of strangers with whom they held no romantic relationship in life. Thus they do not do it merely to fill a psychosexual vacuum left by the death of their loved ones.
Class VI: necromutilomaniacs	Interest in dead bodies is more than merely touching them. Necrophilic pleasure comes from mutilating a dead body.
Class VII: opportunistic necrophiles	Actual sexual activity with the dead starts from this class. Normally these necrophiles would be content to have sexual intercourse with the living, but if an opportunity arose, would not refrain from having sexual intercourse with the dead. Necrophilic mortuary attendants belong to this class.
Class VIII: regular necrophiles	The so-called 'classic' necrophiles. They do not enjoy sexual intercourse with the living and prefer dead bodies for intercourse. They can, however, have sex with both living and dead persons. In this sense they differ from class X necrophiles, who can have sex only with dead persons.
Class IX: homicidal necrophiles	This penultimate category is the most dangerous of all, in the sense that they would kill a person in order to have intercourse with him or her. They are, however, capable of having sexual intercourse with the living, but the need for sexual intercourse with the dead is so great that they must kill human beings in order to have sexual intercourse with their dead bodies.
Class X: exclusive necrophiles	Sexual intercourse is possible only with the dead, with the complete exclusion of living partners.

When taking these 10 types into account, we can see that, as with all types of sexuality, there is a broad spectrum of classifications to consider. For example, Class I necrophiles do not seek to engage in sex with a corpse but rather are aroused by the fantasy of death. In contrast, Class IX necrophiles actively seek to kill another human being to achieve sex with their dead body; for this type, the fantasy must become a reality. In further contrast, Class II necrophiles may not be seen as threatening, or even as perverse, depending on the context of the case, for example, the 2013 case of a woman sleeping next to her husband's decaying corpse for almost a year after his death (Kerr, 2013). The pathologist commenting on this case stated at the time: 'this is not the first time I have made a discovery of this kind; I've been faced with two or three other occasions where people have continued to sleep with the corpse of their partner' (Boxho in Kerr, 2013). Such cases may be perceived as disturbed as opposed to perverse; and they certainly would not be considered on a par with the other classifications outlined by Aggrawal (2009). In this context, it may be that the prevention of the lawful and decent burial of a dead body, which is an offence under the common law of England, Wales and Northern Ireland, may be a more fitting justification for conviction than that of necrophilia specifically, depending on whether or not the corpse had been abused. With this in mind, necrophilia continues to be a largely misunderstood term, with little recognition of the diverse array of behaviours it can incorporate.

Considering the variety of typologies identified by Aggrawal (2009), necrophilia still constitutes a relatively small area of criminological research. Indeed, there is scope for more research to be conducted in this area, particularly in terms of the legal frameworks that surround it, as these have undergone limited transformations. As noted by Cini and Grace Vella (2021, p. 15), ‘its taboo and perversion both horrifies and fascinates. The topic provokes investigation, yet eludes it ... despite its notorious exposure in fiction—stories, novels and movies—it lacks an adequate theoretical and academic analysis’. Although Aggrawal’s (2009) 10 types have served to provide a much-needed interrogation of necrophilia as a term, criminology is still in need of more rigorous research in this contentious area, particularly in terms of a closer analysis of the law and cultural attitudes.

Legal frameworks aside, there have been a number of contemporary efforts beyond Aggrawal (2009) which contribute towards profiling necrophiles. Chopin and Beauregard (2020) analysed patterns of necrophilic behaviours in sexual homicide, examining 109 cases of extrafamilial sexual homicides where post-mortem sexual acts were committed by offenders. They found that there are four different patterns of necrophilia in sexual homicide: (1) opportunistic, (2) experimental, (3) preferential and (4) sadistic. These are outlined accordingly in Table 2.

Stein et al. (2010) also conducted research similar to that of Chopin and Beauregard (2020), carrying out a closed case-file review of 211 sexual homicides and identifying 16 cases of necrophilia. They found that the commonly asserted explanation of necrophiles desiring an unresisting partner is not always applicable, stating: ‘since six of our subjects

Table 2. Chopin and Beauregard’s (2020) Four Patterns of Necrophilia in Sexual Homicide.

Adapted from Chopin and Beauregard (2020)

Opportunistic	Offenders are mostly single, consumed alcohol prior to the crime, and are more likely to have prior criminal convictions. These offenders assaulted their victims while they were involved in domestic activities or sleeping. The combination of theft, in the victim’s residence, with a low level of diversity in the sexual acts committed suggest that the primary motivation of these offenders was to perpetrate a burglary. The confrontation with the victim gave them the opportunity to perpetrate ante-mortem and post-mortem sexual acts.
Experimental	Experimental offenders are usually in a relationship, used alcohol/drugs prior to the crime and assaulted only female victims. Based on the diversity of ante-mortem sexual acts perpetrated by experimental offenders, we can assume that they were primarily motivated to have sexual intercourse with a living victim. It is possible that the commission of post-mortem sexual acts by these offenders is motivated by the experimentation of new sexual practices. Such interpretation is congruent with observations made by Rosman and Resnick (1989), who found that pseudonecrophiles had a transient attraction to corpses.
Preferential	Preferential offenders are mostly single, report sexual dysfunctions and have a loner lifestyle. These characteristics are congruent with several studies which identified a marginal lifestyle in some necrophilic offenders. In some cases these offenders tried to have ante-mortem sexual interactions (eg, foreplay) and, faced with the failure of successfully completing the crime (eg, unable to obtain or sustain an erection; victim’s resistance), they chose to kill their victim to have an unresisting and unrejecting partner. In other cases where no ante-mortem interactions were observed, the offender’s main motivation was to obtain a corpse for sexual purposes. In such situations, post-mortem sexual activities are more likely to be combined with body mutilation and criminal dismemberment.
Sadistic	They have a relatively common profile and are well socialised (ie, in a relationship, not a loner lifestyle) which is congruent with previous studies (see, eg, Brittain, 1970). These individuals possessed a sexual collection (ie, movies, pictures involving deviant sexual behaviours) allowing them to feed their deviant sexual fantasies. This class of offenders is congruent with previous studies which identified that the necrophilic behaviour is often associated with or is part of sexual sadism. For the sadistic offenders, post-mortem sexual acts are considered as secondary acts of a process focused on victims’ humiliation, torture and death.

were involved in marital or marital-like relationships and almost half the victims we studied were raped prior to death—as well as after—it would seem that these offenders did not need an unresisting partner in order to perform sexually’ (Stein et al., 2010, p. 445). They also stress their agreement with the work of Dietz et al. (1990, p. 164) who found that clinicians were inclined to ascribe a diagnosis of psychosis to individuals who engaged in extraordinary cruel acts, ‘despite the absence of delusions, hallucinations, or markedly illogical thinking’. However, they further emphasised that most cases of necrophilia not associated with homicide present a different profile of offender entirely. It is such profiles that currently pose a legal challenge, for offenders are unable to be sentenced beyond the current limitations of the *Sexual Offences Act 2003* whereby only a maximum sentence of two years’ imprisonment can be imposed. This issue will be discussed in the section that follows.

Necrophilia and United Kingdom law

United Kingdom law does not take different types of necrophilia into account; instead, it is classified under one general definition. Section 70 of the *Sexual Offences Act 2003* makes it an offence for a person:

(A) intentionally to penetrate any part of the body of a dead person (B) with his penis, any other body part (for example his finger), or any other object, where that penetration is sexual. The offence is committed when A knows or is reckless as to whether he is penetrating any part of a dead body. This is intended to cover when A knows he is penetrating a dead body, for example in a mortuary, or where A is reckless as to whether B is alive or dead. It will not cover situations where A penetrates B fully believing B to be alive, but in fact B is dead, or where B unexpectedly dies during intercourse. The penetration must be sexual. A definition of sexual is given in section 78. This is to exclude legitimate penetration of corpses, for example that which occurs during an autopsy.

This definition of necrophilia is problematic for several reasons. Principally, the definition overlooks Aggrawal’s (2009) typologies of necrophilia, meaning that the severity and context of the offence is not taken into consideration. Where, for example, do Class II necrophiles—such as the 2013 case of a woman sleeping next to her husband’s decaying corpse for almost a year after his death—fall within this definition? They may not have penetrated any part of their loved one, so are arguably not liable to prosecution. Can we assume that a husband who keeps his wife’s corpse for years as he cannot find the will to be parted from her is therefore within the law, so long as no penetration of the corpse has occurred? Should we be legislating against this and, if so, under what law should this fall?

Until recently, there were no cases of necrophilia brought before United Kingdom courts and, prior to 2003, necrophilia was not illegal. Under the previous *Sexual Offences Act* of 1956, ‘it was argued the dead body ceased to have rights in law, and so it was arguable that it was not a victim’ (Davies, 2021). At present, under the *Sexual Offences Act 2003*, the maximum sentence that can be imposed for the crime of necrophilia is two years’ imprisonment. Also of note is the *Public Health (Control of Disease) Act 1984*, which includes instructions pertinent to burial and cremation. The Act touches upon the ‘wishes of the deceased’ and assigns the responsibility of bodies to local authorities when ‘no suitable arrangements for the disposal of the body have

been or are being made otherwise than by the authority' (*Public Health (Control of Disease) Act 1984*). However, the issues raised in this Act are pertinent to burials/cremations and expenses and do nothing to address the problem of the rights and 'wishes' of the deceased beyond this.

The 2021 case of David Fuller has called the maximum sentence of two years' imprisonment for crimes of necrophilia into question and, due to extensive media coverage of the case, has highlighted this primitive area of law. In what is believed to be the 'worst case of necrophilia in British legal history' (Dodd & Grierson, 2021), campaigners are calling for sentences to be increased to a minimum of 10 years. David Fuller killed two women in two separate attacks in 1987 and abused more than 100 female corpses, including children, in two Kent morgues over 12 years whilst working as a hospital electrician (BBC News, 2021). He was not linked to the 1987 murders until 2020, and it was consequently uncovered that he had also committed numerous acts of necrophilia (managing to gain frequent access to a morgue due to his position as a hospital maintenance supervisor), alongside being in possession of extreme pornography. In 2021, Fuller received two whole life sentences for the murders he committed and, at the same time, 'he was given concurrent sentences totalling 12 years, in respect of sexual offences against 78 deceased females at mortuaries in Tunbridge Wells Hospital' (Kent Police, 2022). This equates to a sentence of around 1.8 months per victim. In 2022, Fuller received an additional four-year sentence after an investigation 'provided evidence of a further 23 victims (making a total of 101 deceased females abused in these mortuary settings, between 2005 and 2020)' (Kent Police, 2022). The youngest victim was 9 years of age and the oldest had reached 100 years before the time of her death. The judge in this case, The Hon. Mrs Justice Cheema-Grubb, stated: 'There is no evidence to connect him to any further mortuary offences and I do hope that now these enquiries have finally drawn to a close that all those affected by Fuller's crimes can take some comfort, knowing that he will spend the rest of his life in prison' (Kent Police, 2022). It is, however, the cases of double murder that have secured his life sentences, not the multiple cases of necrophilia.

In her sentencing remarks The Hon. Mrs Justice Cheema-Grubb described the mortuary offences as being in the 'highest category of harm' and addressed Fuller directly, stating: 'You spent the subsequent years living a lie, the façade of a mild and ordinary life, while in seclusion you committed revolting and outrageous acts of the deepest darkness. ... It is almost impossible to believe that a single man can cause the misery, to so many, that you have done' (Cheema-Grubb, 2022). The sentencing remarks also drew attention to the lack of legal framework surrounding necrophilia, stating: 'There is no sentencing guideline for sexual penetration of a corpse or for possessing extreme pornography. The maximum sentence for both offences is 2 years imprisonment' (Cheema-Grubb, 2022).

The need for legal reform

The case of David Fuller marked a turning point in public awareness, and it is likely that it will serve to transform legislation in this area. An independent inquiry into the issues raised by the David Fuller case is now underway and will investigate how Fuller was able to carry out such acts of depravity in the mortuary of Maidstone and Tunbridge Wells NHS Trust (Independent Inquiry into the Issues Raised by the David Fuller Case, 2023). Beyond this,

campaigning efforts are increasing awareness of the need for legal reform. The Centre for Women's Justice launched a paid internship programme in memory of one of Fuller's victims, Azra Kemal. They have stated that 'women and girls are never safe from male violence, even in death' (Centre for Women's Justice, 2021), acknowledging that the maximum sentence of 2 years for crimes of necrophilia is not enough and encouraging a more open dialogue to take place. They have commended the campaigning efforts of Nevres Kemal, Azra's mother, in speaking out, stating that 'there is no shame to Azra or to herself in speaking of violation ... the shame resides in Fuller and the Chief Executive of the NHS Trust who failed to prevent his actions' (Centre for Women's Justice, 2021). A government scheme has also now been established, overseen by the Department of Health and Social Care, which enables close family members of those abused by Fuller to claim up to £32,500 (Cooney, 2022).

Although awareness campaigns and inquiries will do much to shape public consciousness in this area, legal reform is essential to produce lasting and effective change. The current maximum sentence of two years' imprisonment for crimes of necrophilia is not proportionate. This has been recognised by Nusrat Ghani, MP for Wealden, who has been calling for tougher sentencing for those found guilty of necrophilia. Ghani issued a joint statement with eight local MPs regarding the sentencing of David Fuller, stating: 'the maximum sentence allowed by the law of only two years' imprisonment for each of these heinous crimes of the sexual abuse of dead bodies must be raised significantly' (Ghani, 2023). Following on from this, in December 2021, Baroness Noakes presented an amendment to the Government's Police, Crime, Sentencing and Courts Bill, to increase the maximum sentence to 10 years for each offence of necrophilia (McPolin, 2021).

Although the proposed amendment was a sign of necessary progress in terms of political awareness and commitment, it has still not been implemented. Proposed amendment 78DA, which was to substitute '2' with '10' years' maximum sentence for crimes of necrophilia, 'was withdrawn after debate and no decision was taken on it' (UK Parliament, 2023). This was because the debate in the House of Lords concluded that it was important to await the findings of the Independent Inquiry into the issues raised by the David Fuller case before amending current legislation. Baroness Noakes agreed to withdraw the amendment, emphasising that her arguments were a 'probing amendment' as opposed to a 'pressing amendment' (Hansard of Baroness Noakes Amendment, 2021). Although it was clear that there was support in the House of Lords for an increased sentence for crimes of necrophilia, there was some debate over whether 10 years was an appropriate sentence to impose. Lord Sandhurst stated: 'is 10 years really too long a maximum sentence for someone such as Mr Fuller? ... If we are looking for a comparator, brief research has disclosed what happens in Canada, where the offence carries a maximum sentence of 5 years. I question whether even that is sufficient in the worst case, but I leave it to others to consider' (Hansard of Baroness Noakes Amendment, 2021). Until the Independent Inquiry into the issues raised by the David Fuller case publishes its final report, which is scheduled to be released in the first half of 2023, it appears that legal reform in this area is currently stalled. For now, crimes of necrophilia will continue to carry a maximum penalty of two years' imprisonment in the United Kingdom.

With decisions on maximum sentences still undergoing a consultation period, and with there being limited precedent to aid the consultations, discussions should consider

typologies such as those of Aggrawal (2009) so that offenders can be properly classified. Instead of attempting to reach a general agreement on a singular maximum sentence which incorporates all types of necrophilia, law makers should consider defining separate offences of necrophilia based on different types. When the report from the Independent Inquiry into the issues raised by the David Fuller case is released, discussions should begin to focus on the type of necrophile Fuller is, so that sentencing guidelines can be properly revised to deliver proportionate justice for the secondary victims of the deceased. Further consideration should also be attributed to the issue of rights after death. At present, an executor takes responsibility for the deceased's estate but there is nothing written in law pertaining to the rights individuals have over their bodies after death beyond whether they wish to be buried or cremated. The 1882 case of *Williams v Williams* still has relevance today, as it concluded that 'there is no property in a corpse' and that 'any directions given by the deceased with regard to the disposal of his body are not enforceable as a matter of law' (Swarb, 2022). If we are to continue in this manner, a number of questions emerge regarding rights over our own bodies after death. When applied to the context of necrophilia, the deceased cannot be regarded as a victim if their body is not legally defined as their own property. Issues of bodily ownership and victimisation are thus muddled by current legislation.

In terms of classifying different types of necrophilia, it is necessary for legislators to look at existing laws regarding sexual offences. In contrast to the current law governing necrophilia, sexual offences are properly categorised and sentenced accordingly. The Sentencing Council (2023) outline over 50 offences in the definitive guidelines for sexual offences (for example, the sentencing guidelines for rape of a child under 13—maximum sentence of life imprisonment—are different to those for possession of indecent images of children—maximum sentence of five years). In the Fuller case, one of his victims was under 13, yet the maximum sentence for sexual abuse in this instance was far below the life sentence that could have been imposed had the victim been alive at the time of the assault. These discrepancies must be taken into proper consideration so that new sentencing guidelines for necrophilia follow a similar trajectory to the laws that oversee sexual offences pertaining to the living.

In terms of treatment, there is very little written on this and, even by today's standards, 'no one has treated a sufficient number of necrophiles to determine effective treatment' (Rosman & Resnick, 1989, p. 161). Research purports that 'necrophilia often occurs in combination with other paraphilias, [such as] fetishism' (Ehrlich et al., 2000, p. 225), and it is therefore likely that treatment interventions should include psychotherapeutic support such as cognitive behavioural therapy (Brankley et al., 2016). At present, necrophilia is not included in the Diagnostic and Statistical Manual of Mental Disorders, Fifth Edition (DSM-5), which again highlights the need for more rigorous research into this paraphilia. Treatment options should also be considered in discussions on sentencing, with more research by criminal psychologists needed to provide suitable recommendations.

Conclusion

Future research will need to monitor progress in this area, closely analysing the recommendations of the Independent Inquiry and examining the legal decisions made as a result of this. There is also scope to explore public responses to crimes of this

nature, through analysing media discourse, or through implementing more rigorous empirical investigations of public attitudes. Finally, the issue of typologies poses a pressing quandary for legal frameworks and social attitudes—for example, Aggrawal’s Class I necrophiles. As is the case with existing crimes of sexual depravity, if the pornography industry is allowed to continue with morally dubious depictions, from depictions of underage sex to depictions of necrophilia, it is questionable as to how effective the law alone can truly be. Nevertheless, legal reform is certainly also required so that the punishment for necrophilia aligns more closely with sentencing for sexual offences against the living. The dead cannot consent, and their vulnerability in this context extends far beyond the violation of their corpse; it also violates their families and friends, disrupts the process of grieving and informs our wider societal and cultural values surrounding death, trust in healthcare and mortuary services and our expectations of justice in both life and death. Necrophilia harms secondary victims and society to such a degree that it demands longer sentences. At present, our criminal justice system is upholding the message that, if our bodies are to be sexually assaulted or raped after death, we as citizens agree that a maximum sentence of two years’ imprisonment for the offender is acceptable. Longer sentencing will help to clarify society’s moral codes and may serve to deter offenders, although such deterrence will be difficult to predict or measure due to the often-undetected nature of this crime. Changes to sentencing are thus urgently required so that proportionate justice can be delivered by British courts which, in turn, will serve as a model for other countries to follow.

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