From: Road Victim Support Northern Ireland and Donegal [redacted]
Sent: Friday, 23 October 2026 09:54:07
To: Frew, Paul <paul.frew@mla.niassembly.gov.uk>
Cc: McGlone, Patsy <patsy.mcglone@mla.niassembly.gov.uk>
Subject: Re: Request for Meeting Regarding Caoimhè's Law and Victims' Rights Legislation

Dear Committee Members,

On behalf of Road Victims Support Northern Ireland–Donegal (RVSNID), please find attached our formal submission of supporting evidence in relation to **Caoimhè's Law**, for consideration by the Committee for Justice as part of its scrutiny of the Victims and Witnesses of Crime Bill.

Firstly, we would like to express our sincere appreciation to the Committee members who took the time to meet with us, listen to the experiences of bereaved families and discuss the possibility of progressing Caoimhè's Law through an amendment to the Bill.

Our submission brings together the lived experiences of families who have endured additional and entirely avoidable trauma following fatal road traffic collisions, alongside relevant legislative comparisons, our engagement with press regulators and the preventative education work being undertaken by our charity.

We have also included testimonies shared with the full consent of the families concerned. Their experiences demonstrate why we believe there is an urgent need to consider greater legal protection for victims and their loved ones.

As a family-led organisation, we recognise that legislation cannot prevent the devastation of losing someone in a road traffic collision. However, we believe meaningful steps can be taken to protect families from further harm caused by the inappropriate recording, sharing and publication of distressing images and information.

The cost of doing nothing is immeasurable. We must start somewhere, and we sincerely hope that the Committee will give careful consideration to the evidence presented and the opportunity to progress these protections through the current Bill.

We would welcome the opportunity to provide any further clarification, supporting information or additional family evidence that may assist the Committee in its deliberations.

Thank you once again for your time, consideration and willingness to listen to the voices of those directly affected.

Kind regards,

[redacted]
Secretary

About RVSNID:

Road Victim Support Northern Ireland–Donegal is a peer-led organisation made up of families who have lost loved ones to road collisions. We provide trauma-informed post-collision support, advocate for safer roads, and deliver impactful prevention campaigns. With representation across all council areas, we ensure families' voices are always heard and supported.

Helpline: NI-07748570558

ROI-083 183 7324

Website: Road Victim Support Northern Ireland-Donegal

Facebook:(2) Road Victim Support Northern Ireland-Donegal | Facebook

Instagram:https://bit.ly/4m0zx2M

RVSNID
ROAD VICTIM SUPPORT NORTHERN IRELAND DONEGAL

ASIST
Applied Suicide Intervention Skills Training

Mental Health First Aid
MHFA
Northern Ireland

CAOIMHÈ'S LAW

Protecting the dignity and privacy of road traffic collision victims and bereaved families

COMBINED WRITTEN EVIDENCE SUBMISSION • 22 OCTOBER 2026

To: Northern Ireland Assembly Committee for Justice
Regarding: Victims and Witnesses of Crime Bill (Bill 39/22–27)
From: Road Victims Support Northern Ireland–Donegal (RVSNID)
Written evidence submitted for Committee consideration

1. Executive summary

RVSNID respectfully submits evidence concerning Caoimhè's Law, a proposal to protect people involved in fatal and serious road traffic collisions, and their families, from intrusive recording, unauthorised dissemination of distressing imagery and premature identification before next-of-kin notification.

The proposal is informed by lived experience, direct family support, engagement with regulatory organisations, preventative education and comparative European legislation. This document identifies questions for legislative scrutiny rather than purporting to provide settled legislative drafting.

RVSNID specifically asks the Committee to consider a Caoimhè's Law amendment to the Victims and Witnesses of Crime Bill, subject to legal competence, scope, drafting and procedural advice. If that route is not feasible, RVSNID asks for a defined alternative legislative route, accountable lead and timetable.

2. About RVSNID

RVSNID is a family-led organisation working across Northern Ireland and Donegal to support people bereaved by fatal road traffic collisions. Services include early intervention, counselling, peer support, family liaison and court/inquest support, remembrance and preventative road safety education.

Our experience brings a particular perspective: families should not have to discover traumatic events through images, speculation or identifying information circulating online, nor be required to navigate complex reporting systems alone during acute grief.

3. Harm and evidential questions

Images of injured or deceased people, identifying vehicle details and speculation can spread quickly through social media, private groups and other channels. Families report

concerns about privacy, dignity, the possibility of learning of a collision before formal notification, and recurring exposure to distressing content.

The family accounts below provide direct lived-experience evidence of these harms. They should be considered alongside questions of legal scope, proportionality, evidential requirements and safeguards.

4. Family testimonies presented to the Minister of Justice

Three bereaved families shared their experiences directly with Justice Minister Naomi Long at a meeting, as reported by RVSNID. Those three accounts and a further consented family account below are faithful narrative summaries of the families' experiences provided to RVSNID, not verbatim quotations. RVSNID confirms that the families have consented to their statements being included in this submission. Identifying details should be used only to the extent covered by that consent.

Account A — Notification concerning a 16-year-old daughter

A mother was putting away her shopping on a Saturday when a Facebook notification appeared on her phone stating "R.I.P. Lisa", referring to her 16-year-old daughter. Her other daughter, studying at university in Liverpool, telephoned in distress after seeing comments appearing on Facebook. The mother was trying to reassure her while calls from members of the public were coming in. According to the family account, it was a further approximately 35 minutes before police attended her home. The account illustrates the harm of premature identification and the loss of the opportunity for sensitive notification.

Account B — Tagged in an image of a collision scene

Another mother woke to social-media notifications after people tagged her name beneath a photograph of a collision scene, asking whether the person involved was her son. She learned that her son had died before police attended her home. This account demonstrates how an image, accompanying comments and tagging can combine to identify a victim before formal notification.

Account C — Maria O'Brien's experience

Maria O'Brien describes urgently trying to reach her son, who was living in England, to tell him of his sister's death. Her daughter's name had already circulated through group chats and Facebook before the PSNI officially released the name. Her account highlights how quickly information may spread beyond a family's control, including across borders, during the period in which relatives are trying to contact one another.

These consented accounts are included as lived-experience evidence of the impact of premature online identification. They are not presented as proof that any particular individual or publication committed a criminal offence. No direct quotations are attributed to the families beyond the notification wording reported in Account A.

Account D — Recording and circulation of final moments

A bereaved family has consented to RVSNID sharing an account in which a loved one's final moments were recorded on Snapchat. The footage showed attempts to resuscitate the person and the moments surrounding their death. The recording was circulated through Snapchat and was subsequently shown to family members during their loved one's wake. This account illustrates the potential for profound additional distress caused by the recording and circulation of such footage, including when it reaches relatives at a time of mourning. The account is a family-provided narrative summary; it does not establish the identity or criminal liability of the person who recorded or shared the footage.

5. IPSO engagement, family complaints guidance and the Caoimhè's Law website

RVSNID engaged with the Independent Press Standards Organisation (IPSO) and Ofcom while developing practical support for families concerned about intrusive images and reporting. RVSNID developed the public-facing Caoimhè's Law website, https://caoimheslaw.com/, to signpost families and their representatives towards relevant reporting and complaints routes. RVSNID describes this as collaborative work with IPSO; the correspondence supplied provides specific evidence of a meeting, practical guidance and an offer to promote the resource, rather than an explicit statement that IPSO jointly authored every part of the website.

In follow-up correspondence provided by RVSNID, an IPSO representative, Elena, thanked the charity for meeting and sharing testimonies, said IPSO was committed to working with campaigners to improve press standards, requested examples of publications carrying the material, and offered to share RVSNID's webpage on IPSO's external resources page and through its publisher newsletter. The email supplied links to the Editors' Codebook (particularly Clauses 1–4), guidance on deaths and inquests, a list of regulated publications and information on complaints. The correspondence is reproduced in extract in the evidence schedule and can be supplied to the Committee.

The practical guidance also explains how a bereaved person may ask journalists not to contact them, seek help concerning intrusive approaches, and use privacy notices; the email correctly notes that privacy notices are not legal injunctions. IPSO regulates participating publications, not every social-media user or platform. Existing press complaints mechanisms therefore complement, but do not replace, examination of any new criminal offence. IPSO's assistance should not be described as a formal endorsement of Caoimhè's Law legislation without a separate explicit statement.

6. The proposed conduct to be examined

A. Intrusive recording: deliberate, unauthorised capture of an identifiable deceased or seriously injured collision victim in circumstances defined by legislation, even where the image is not subsequently shared. The fourth family account demonstrates why the act of recording itself merits separate consideration.

B. Unlawful sharing or publication: knowingly or recklessly transmitting, uploading, republishing or otherwise disseminating qualifying intrusive material without lawful justification.

C. Premature identification: knowingly disclosing identifying information before formal next-of-kin notification in defined circumstances. The feasibility, exceptions and enforceability of this distinct proposal require especially careful analysis.

The Committee should consider clear definitions, the necessary mental element, evidential thresholds, and proportionate safeguards. Incidental recording, legitimate evidence preservation, police and emergency service work, protected journalism and genuine public-interest activities must be assessed explicitly.

7. International legislative comparisons

GERMANY — Criminal Code, section 201a: addresses specified unauthorised images that expose helplessness, grossly offensive images of deceased persons, and certain uses/disclosures. The maximum penalty is imprisonment of up to two years or a fine. This is the closest identified comparator, but it is not an identical collision-scene law. [S1]

FRANCE — Penal Code, article 226-1: addresses specified intentional violations of private life, including recording/transmitting a person's image in a private place without consent. Basic maximum: one year's imprisonment and a €45,000 fine. It does not generally prohibit photographing road collisions in public places. [S2]

PORTUGAL — Penal Code, article 199: addresses certain unlawful photographs and recordings and their use; penalties can include up to one year's imprisonment or a statutory day-fine. Its application depends on the elements of the offence; it is not a direct collision-scene equivalent. [S3]

These examples are comparative provisions, not exact equivalents of the proposed law. The precise legal elements, exceptions and current penalty levels should be confirmed by legislative counsel before any amendment is tabled. None is cited as imposing a general ban on identification before next-of-kin notification.

8. Charges, trial and sentencing considerations

The Committee is asked to examine whether recording and dissemination should be separate offences, whether premature identification warrants a separate offence, and

whether aggravating factors should include deliberate exploitation, repeated publication, attempts to evade takedown requests, or conduct directed at a bereaved family.

Germany's maximum penalty of two years or a fine is one comparative benchmark, not a requested fixed Northern Ireland sentence. Local sentencing maxima, summary versus indictable/either-way procedures, proportionality, prosecutorial discretion and human rights compatibility require specialist advice.

Any proposed offence should clarify who may complain, what prosecutors must prove, the role of consent, defences and lawful authority, and how evidence can be preserved without requiring families to keep viewing harmful content.

9. Education and observed behavioural change

Through Drive to Arrive, RVSNID educates young people aged 16 and over about responsible social media use, the privacy and dignity of collision victims, and the consequences of photographing or sharing distressing scenes. The programme links Caoimhè's Law with the awareness message 'It's Not Your Story to Tell'.

Since public campaigning began, RVSNID has observed more members of the public challenging inappropriate collision imagery in comments, and apparent changes in some media outlets' choices of images and reporting details. These are organisational observations, not proof of causation. Dated examples, publication comparisons and independent media statements would help assess the trend.

RVSNID considers education, accessible complaints processes and legally clear boundaries to be complementary measures.

As at 22 October 2026, RVSNID confirms that 53 people have died on Northern Ireland's roads during the 2026 calendar year. This is the figure confirmed by RVSNID for this submission. Each death represents a life lost and families and communities affected by bereavement. The figure is a dated snapshot, not a prediction of fatalities during the remainder of the year.

10. Campaign chronology and institutional engagement

RVSNID reports that all eleven Northern Ireland councils passed motions supporting the campaign during 2025 and that the Assembly debated Caoimhè's Law on 8 December 2025. The relevant council resolutions and Assembly record provide further context for Committee consideration.

The Committee's minutes of 19 February 2026 record both support for the principle and concerns about policy-development and drafting capacity. The Department of Justice lists a paper titled 'Caoimhé's Law Amendment' dated 9 March 2026. RVSNID recognises that any amendment requires detailed legal and operational scrutiny. [S5][S6]

RVSNID met two Committee members in October 2026 and was invited to provide written evidence in support of further consideration of the proposal.

11. Safeguards, practical operation and legal feasibility

Key issues include legal competence in Northern Ireland; interaction with existing criminal, communications and online-safety legislation; privacy and freedom of expression; evidential preservation; jurisdiction where platforms or publishers are outside Northern Ireland; and the resources needed for police, prosecutors, guidance and training.

The distinction between recording, retaining, sharing with investigators and public dissemination is central. The Committee may wish to hear from PSNI collision investigators, family liaison officers, prosecutors, trauma professionals, media regulators and journalists before finalising any drafting instructions.

12. Requests to the Committee

RVSNID respectfully asks the Committee to receive the submission and family testimony; seek advice on legal competence and Bill scope; assess comparative laws and the proposed offence structure; invite relevant professional evidence; consider the role and limits of complaints mechanisms; and identify an appropriate legislative pathway with next steps if amendment to the current Bill is not feasible.

In particular, RVSNID asks the Committee to consider a Caoimhè's Law amendment to the Victims and Witnesses of Crime Bill, including seeking drafting and competence advice from the Department of Justice and Assembly legal advisers. This is the legislative route RVSNID understood to have been discussed with Minister Naomi Long and Committee members; the suggestion is attributed to those discussions rather than represented as a confirmed ministerial commitment.

13. Family testimony and evidence schedule

RVSNID confirms consent to include all four family accounts set out in section 4. The accounts are narrative summaries rather than sworn statements or verbatim quotations. The IPSO correspondence and the public Caoimhè's Law website are additional supporting material.

Supporting material identified: (A) four consented family accounts in section 4; (B) IPSO follow-up correspondence supplied to RVSNID; (C) Caoimhè's Law website, https://caoimheslaw.com/; (D) published IPSO guidance and Editors' Code; and (E) relevant Assembly, Department and international legislative references listed below.

RVSNID is willing to assist the Committee with further information about the accounts and practical consequences for families, subject to the families' continuing privacy preferences.

14. Closing statement

The central concern of Caoimhè's Law is the dignity of those involved in serious road traffic collisions and the protection of families during traumatic bereavement. RVSNID welcomes detailed, proportionate legislative scrutiny and offers its lived-experience evidence and practical regulatory and educational work to inform that process.

As at 22 October 2026, RVSNID confirms 53 road fatalities in Northern Ireland during 2026. Behind each death are families and communities confronting profound loss. RVSNID's position is that the human cost of doing nothing is immeasurable: legislation cannot undo a death, but proportionate protections could reduce the additional trauma of intrusive recording, circulation of a person's final moments and premature disclosure before families have been informed. We must start somewhere. RVSNID asks the Committee to examine an achievable legislative route, including a possible amendment to the Victims and Witnesses of Crime Bill, while addressing the safeguards and practical questions identified in this submission.

Submitted on behalf of Road Victims Support Northern Ireland–Donegal
Debbie Mullan, Chairperson
Keria Mullan-Logan, Secretary

Supporting exhibit: Caoimhè's Law public website

Website: https://caoimheslaw.com/ — RVSNID family-facing complaints and reporting guidance. The IPSO email provided by RVSNID documents practical assistance, relevant guidance, and an offer to share the webpage on IPSO's external resources page and in its publisher newsletter. The email does not establish that IPSO formally endorsed the proposed criminal offence. Website content and referral pathways should be checked periodically as regulatory procedures change.

IPSO correspondence — evidence extract

In an email supplied by RVSNID following a meeting, an IPSO representative wrote: "We care very much about protecting the public and are committed to working with campaigners to help improve standards across the press, particularly in such sensitive areas."

The same email stated: "We'd also be happy to share your page on our external resources page and circulate this via our publisher newsletter."

The correspondence directed RVSNID to IPSO's Editors' Codebook, public and journalist guidance on deaths and inquests, regulated titles and complaint procedures. It also explained privacy notices, support with intrusive media approaches and the treatment of publicly available social-media material. These excerpts are included with permission of the recipient organisation as evidence of engagement; the original email screenshots can be made available on request.

IPSO's own published guidance recognises the risk of news of a death reaching families through online reporting and emphasises sensitive handling of photographs and the need to consider whether relatives are aware before further details are published. [S8]

Official sources and verification references

[S9] PSNI road traffic collision statistics and 2026 daily fatality update: https://www.psni.police.uk/about-us/our-publications-and-reports/official-statistics/road-traffic-collision-statistics

[S1] German Criminal Code, section 201a: https://www.gesetze-im-internet.de/englisch_stgb/englisch_stgb.html

[S2] France, Penal Code article 226-1: https://www.legifrance.gouv.fr/codes/article_lc/LEGIARTI000049312755/2026-08-23

[S3] Portugal, Penal Code article 199: https://diariodarepublica.pt/dr/legislacao-consolidada/decreto-lei/1995-34437675-49676375

[S4] IPSO Editors' Code of Practice: https://www.ipso.co.uk/editors-code-of-practice/ ; reporting major incidents: https://www.ipso.co.uk/resources/guidance-on-reporting-major-incidents/

[S5] Committee for Justice minutes, 19 February 2026: https://www.niassembly.gov.uk/assembly-business/committees/2022-2027/justice/minutes-of-proceedings/session-2025---2026/19-february-2026/

[S6] Department of Justice papers including 9 March 2026 amendment paper: https://www.niassembly.gov.uk/assembly-business/committees/2022-2027/justice/legislation/bills-primary-legislation/victims-and-witnesses-of-crime-bill/memoranda-and-papers-from-the-department-of-justice/

[S7] Committee call for evidence and Clerk contact: https://www.niassembly.gov.uk/assembly-business/committees/2022-2027/justice/

Bill overview: https://www.niassembly.gov.uk/assembly-business/legislation/2022-2027-mandate/primary-legislation-bills-22-27-mandate/victims-and-witnesses-of-crime-bill/

[S8] IPSO guidance on social media and reporting deaths: https://www.ipso.co.uk/wp-content/uploads/2024/04/social-media-guidance-2022.pdf