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Alliance for Choice as Agents of Legal Change.

Máiréad Enright

In October 2019, abortion was finally decriminalized in Northern Ireland.¹ For over 150 years, it was a crime to terminate one's own pregnancy, or assist a pregnant person to terminate theirs.² No exceptions were made for rape, severe foetal anomaly or all but 'real and serious' 'long-term' health risks (Rebouche and Fegan 2003, 228–89; O'Rourke 2016, 179–80). Avoiding this law meant travelling to England or illegally using abortion pills supplied by online providers (Calkin 2020, 5). Today in Northern Ireland³ abortion is newly legal on request up to 12 weeks' gestation. From 12-24 weeks, abortions are permitted on health grounds. Thereafter, abortion is only permissible to avoid risk to the woman's life or grave and permanent risk to her health or following a severe or fatal foetal anomaly diagnosis. Despite these restrictions, Northern Irish abortion law is now more liberal, in some respects, than that its English⁴ or Irish⁵ counterparts. Northern Ireland's abortion figures had dropped from 51 in 2012/2013 to just 8 in 2018/19. In the six months after decriminalization, over 650 women terminated pregnancies in Northern Ireland. Recent legal changes have been significant, dramatic and hard-won.

Most legal scholarship on these developments has focused on Stormont, Westminster, courts and international human rights bodies. Much less has been said about grassroots organisers' role in winning and embedding legal change. I offer a brief account of Alliance for Choice's legal activism. Alliance for Choice (AfC) is a feminist, affected-led collective campaigning for 'free, safe and legal' abortion access in Northern Ireland. Rather than presenting AfC's work as ancillary or subordinate to 'formal' law-making,

¹ See s. 9 Northern Ireland (Executive Formation) Act, 2019. As in the Republic of Ireland, this is partial decriminalisation. Doctors who act outside the bounds of the abortion law are vulnerable to criminal sanction. Women who self-induce termination, however, are no longer committing a crime.

² See ss. 58 & 59 Offences Against the Person Act, 1861. Under s. 5 Criminal Law (Northern Ireland) Act, 1967 there was also a duty to report crime, including abortion offences, to the police.

³ Abortion (Northern Ireland) Regulations 2020. These took effect in March 2020 under the 'made affirmative' procedure, and were formally approved at Westminster in June 2020.

⁴ For example, unlike the Abortion Act 1967, the Abortion (Northern Ireland) Regulations 2020 permit access to abortion on request up to 12 weeks, without the need to show grounds, and on the approval of one doctor, rather than two.

⁵ For example, the Health (Regulation of Termination of Pregnancy) 2018 after 12 weeks LMP only if the risk to health is a risk of 'serious harm'. It does not permit termination on health grounds once the foetus has reached viability. It does not permit abortion on foetal anomaly grounds except in a subset of fatal foetal anomaly cases.

this chapter foregrounds them as key agents of legal change. As well as discussing AfC's formal lobbying and advocacy, it focuses on their essential 'critical community building' and 'service work,' situating these activities within a pluralist account of legal transformation.

Alliance for Choice: An Institutional Story

The story of Northern Irish abortion law before Stormont was suspended in January 2017 is one of deadlock. Despite growing public support for abortion reform, the main parties at Stormont were hostile to pro-choice advocacy (Campbell 2018; Sheldon et al. 2020, 776–79, 783–84). Conservative law-makers traded in foetal rights tropes familiar from the global anti-choice movement, and cast themselves paternalistically as the protectors of presumptively vulnerable or misguided women (Pierson and Bloomer 2017; Thomson 2019, 194). Two bouts of strategic litigation had failed to generate significant change. The first, led by the FPANI⁶ was modest: it established a duty on the part of the Department of Health to issue guidance clarifying the scope of the existing abortion law (Sheldon et al. 2020, 779–81). The aim was to address “chilling effects” which drove doctors to interpret the already restrictive health ground even more narrowly than necessary. However, 2009's counter-litigation from SPUC,⁷ and resistance within Stormont, ensured that valid guidance was not published until 2016. Even then, it emphasized criminalization of errant doctors and did little to improve implementation of the law. More importantly, the judgments, issued in 2003-2004, did not centre pregnant people's rights; instead, they pursued a medicalized account of abortion which undermined women's autonomy (Fletcher 2005). The legal status quo remained in place (F. Bloomer and Fegan 2013).

By the time Stormont was suspended in 2017, two new, potentially more expansive, legal strategies were in motion. First, in 2010, a pro-choice collective invited CEDAW to investigate the position of Northern Irish abortion law under international human rights law. Then, in late 2015, litigation spearheaded by the Northern Ireland Human Rights Commission (NIHRC)⁸ bore fruit in the High Court when Horner J. held that the criminalization of abortion in cases of rape and fatal anomaly violated women's European Convention rights to private and family life. Both tactics marked a shift in campaigners' approach to abortion; framing it as a matter of women's human rights. However, there was little reason for optimism at Stormont. The Department of Justice did not bring forward legislation in response to the High Court judgment. Instead, both the Department and the Attorney General lodged appeals. Department of Justice efforts to legislate narrowly for both rape and fatal foetal anomaly exceptions were repeatedly blocked in

⁶ *FPAI, Re An Application for Judicial Review* [2003] NIQB 48; [2004] NICA 39

⁷ *Society for the Protection of Unborn Children, Re an Application for Judicial Review* [2009] NIQB 92.

⁸ *Northern Ireland Human Rights Commission's Application* [2015] NIQB 96

the Executive (Sheldon et al. 2020, 785). When Stormont collapsed, the three-year hiatus allowed campaigners to make progress elsewhere.

Historically, the major parties at Westminster avoided action on Northern Ireland's abortion law (Thomson 2016; Sheldon et al. 2020). Health is a devolved matter under the Good Friday Agreement. Refusal to intervene on human rights grounds was often justified by reference to Northern Ireland's unique post-conflict political arrangements and supposedly distinctive 'cultural norms' (O'Rourke 2016; Sheldon et al. 2020, 767). However, CEDAW's intervention, the NIHRC's litigation, and a sustained campaign by pro-choice MPs at Westminster combined to reframe MPs' understandings of the relationship between devolution and human rights. Stella Creasy's office advanced a flurry of legislative projects (Sheldon et al. 2020, 789–93). Two were successful. The first required Westminster to take policy responsibility for low-income women living in Northern Ireland by funding their abortion travel.⁹ The second, amending the Northern Ireland (Executive Formation) Act 2019,¹⁰ extended that responsibility by requiring Westminster to act on pressing human rights issues while Stormont was suspended. AfC participated in all three highly-visible legal strategies. They were part of the group that invited CEDAW to investigate the shortcomings in Northern Ireland's abortion law (O'Rourke 2016, 731–32). The Committee confirmed that the law fell short of international human rights standards, and made 13 recommendations for change. AfC seized on these as a clear framework for future legislation. AfC also intervened in the NIHRC litigation and an AfC member, Ashleigh Topley, was amongst the women who gave evidence of lived experience of the restrictive law. When the case reached the UK Supreme Court, the majority drew repeatedly on the CEDAW report, and held that Northern Irish abortion law fell afoul of Article 8 of the European Convention (O'Rourke 2016, 731–32). Finally, AfC were part of the collective of pro-choice organisations working on Stella Creasy's parliamentary agenda. They not only ensured that parliamentarians heard Northern Irish women's stories,¹¹ and mobilized their supporters to lobby MPs, but they consulted on the shape of key legal provisions, resisting restrictive compromises where possible.

It is tempting to think of this institution-bound advocacy as AfC's 'real' contribution to legal change. However, we should not ignore everyday, less public, but equally valuable forms of legal agency (Enright,

⁹ The action took the form of a threatened and well-supported amendment to the 2017 Loyal Address (the Queen's speech) prompting a change in government policy. A slim majority of the UK Supreme Court in *R (on the application of A and B) v Secretary of State for Health* [2017] UKSC 41 had found that the government was not obliged to fund Northern Irish women's abortion care.

¹⁰ An earlier attempt sought to amend the Domestic Abuse Bill, 2019.

¹¹ See e.g. Women and Equalities Committee, *Abortion Law in Northern Ireland: 8th Report of Session 2017-19* (HC. 1584; 2019)

McNeilly, and de Londras 2020). Drapeau-Bisson analysed Derry-based AfC members' account of a period of 'abeyance' around 2014, when Stormont's intransigence sapped motivation for formal lobbying (Drapeau-Bisson 2020). Accordingly, she argues, AfC changed tactics in two ways. First, rather than focus energies on the state, the Alliance concentrated on building 'critical community' where new thinking on reproductive justice could flourish. Second, responding to the increased availability of 'abortion pills' they pursued 'service work'; informing women about the best ways to access and use pills. Rather than think of 'critical community' and 'service work' as strategies pursued when legal work is not possible, I want to think about each of them as 'feminist law work' (Enright, McNeilly, and de Londras 2020) which continues while formal legal change is ongoing and drives that change forward.

Jurisdiction and Legal Pluralism: What Counts as Legal Agency?

The word 'jurisdiction' - the right to 'speak the law' (Dorsett and McVeigh 2012) - describes the authority to judge an action's legal status: to interpret the prevailing law and apply it to lived events. Jurisdiction also encompasses the power to act upon or enforce such a judgment. Usually, we associate jurisdiction with the state. For example, the state asserts jurisdiction over women's reproductive lives by criminalising abortions. However, jurisdiction is not state-bound. Rather it describes a range of social practices that bring law into being. To be effective, authoritative interpretations of the law must be received by ordinary people who integrate them with their 'situated knowledge' (Flynn 2016, 105) and apply them in their daily lives. Along these lines, Margaret Davies writes that:

law is discursive, performed, assumed, located, relational and material. It is emergent in social space - through performances, intra-actions and material relations, and also through the imaginings, narratives and self-constructions that inform and are informed by these things...(Davies 2017, 89)

From this perspective, jurisdiction operates horizontally as well as vertically (Davies 2017, 33): it is not only produced in state discourse and actions, but co-produced in how we engage with law in our encounters with one another (Graham, Davies, and Godden 2017). Everyday engagement with jurisdiction can be eventful; as when women are reported to police by people they trusted, and this leads to prosecution. However, jurisdiction is not always eventful. Sometimes it is upheld in private spaces when doctors refuse or do not offer certain treatments. Sometimes, it is maintained by passivity; as when women know not to even ask for an abortion. Rather than imagining jurisdiction as present only in the moments and spaces where officials assert or enforce it, it may be better to think of jurisdiction as mundane;(Flynn 2016, 105) albeit starkly visible when the state gets involved. From this pluralist perspective we can think of AfC's 'critical community building' and 'service work' as 'law work' (Enright, McNeilly, and de Londras 2020).

‘Critical Community’

Stable jurisdictions emerge from repetition of certain authoritative interpretations of law, dispersed across whole populations, over time (Davies 2016, 105). State jurisdiction has force because groups of people recognise it, agreeing to defer to its accounts of what is legal/illegal. However, this is a complex process. We know – not least from the example of AfC – that state performances of jurisdiction¹² are received differently by differently-situated audiences. People bring their other normative expectations and commitments - medical, social, religious, political- into their engagements with law (Hendry 2019). Official legal pronouncements are often flexible or open-ended. For these reasons, Margaret Davies argues that law is:

intrinsically plural - differentiated by different knowledges, subjectivities, locations, performances. It is also solid and fluid - predictable, merely probable, but also contestable and transient (Davies 2017, 89).

If law is intrinsically plural, then the force of jurisdiction depends on shared interpretations. Interpretation is generally inter-subjective: done together other people, or with other people in mind. Harding and Peele use the term ‘polyphonic legality’ to explain how ‘lay’ people work together to co-construct legal meaning (Harding and Peel 2019). We ask one another for explanations, opinions and resources. We may choose from competing alternatives. For example, an abortion-seeking woman may work out what the abortion law means for her through conversations with friends, family, doctors and other advisors. Law, on this interpretation-centred view, is

a permanent interplay of ideas and principles in peoples’ minds, gleaned from innumerable sources, that resolves into ‘the law’ for any one person in any one situation (Anker 2016, 187).

AfC built a ‘critical community’ within which abortion access was destigmatised and normalized. Core strategies included adult community education (F. K. Bloomer, O’Dowd, and Macleod 2017), outreach, values and destigmatisation workshops, conferences, information stalls, protests, pageants, clothing, theatre and music. AfC also worked in solidarity with other social movements including marriage equality campaigners and Repeal campaigners in the Republic of Ireland (McKay 2018; Gallen 2018). They established one of the few Northern Irish spaces where it was always safe to speak about abortion. Emma Gallen wrote, for example, of her work on AfC’s street stalls:

¹² State jurisdiction is also intrinsically plural because it is exercised by a variety of people and groups; many different kinds of state agent can engage with state jurisdiction; (Cooper 2019)

I have heard heartbreaking stories of abuse, told to me in daylight on the street because they know we won't judge, in a country that's been shrouded in shame (Gallen 2018).

In 'critical community' with others, AfC's members could learn the law, connect it to their own experiences, identify its shortcomings, and strategise about how to change it. AfC took law out of its ordinary institutional and medical spaces, politicizing it and opening it up to peer-to-peer education (Fletcher 2018, 236). What Drapeau-Bisson has called 'critical community', scholars of legal pluralism sometimes call *nomos*: a shared set of values, customs, habits and lifestyles; a backdrop of alternative social norms that shape their community's attitudes to law. Critical community is the environment in which activists can co-produce, share and pursue subversive interpretations of the abortion law; defying existing legal categories and imagining or perhaps demanding alternatives (Kleinhans and Macdonald 1997, 25). Over time, in critical community AfC fostered radical approaches to law which animated their activism and advocacy. Here are some of its key features.

First, AfC privileged personal autonomy over national sovereignty. Whereas Stormont and Westminster emphasized abortion law as an arena of national self-determination, AfC sought to address the law's impact at the level of the individual body. In part, this attitude is a product of AfC's need to address identitarian divisions within a political system which assumes that nationalists and unionists have no shared concerns. AfC addressed both conservative unionist insistence that human rights were a nationalist issue, and nationalist reluctance to demand changes to 'British law' at Westminster. AfC became a cross-community organization where members put "their social identity before their national one" (Cafolla 2019). This meant that AfC could push beyond legal solutions built around a cautious approach to devolution. For example, in 2017, Westminster presented its fund to enable Northern Irish women to access abortions in England on the NHS as a compromise: offering some support to women while respecting Stormont's right to decide the abortion issue on its own terms. AfC immediately used this compromise to strengthen the argument for change; reasserting its insistence that devolution did not justify unequal access to healthcare. If Northern Irish women could access abortions in another part of the United Kingdom, why not at home? (Horgan 2017)

Second, AfC were skeptical of liberal demands for 'law reform'. They did not necessarily think of law as empowering or protective (Enright, McNeilly, and de Londras 2020). Often the tone of their legal commentary was sarcastic or playful (Campbell 2018; 2016). Quoting Rosa Luxembourge in a 2018 article, Kellie O'Dowd associated law with violence:

What presents itself to us as bourgeois legality is nothing but the violence of the ruling class, a violence raised to an obligatory norm from the outset (O'Dowd 2018).

AfC is committed to 'free, safe and legal' abortion. This, in principle, means tolerating as few restrictions as possible on people's reproductive choices. This commitment partly explains AfC's essentially anti-carceral approaches to abortion access. It also informs AfC's critical approach to established liberal legal modes of abortion regulation. For instance, AfC shifted some years ago from demanding the extension of the Abortion Act, 1967 to Northern Ireland to a more radical demand for decriminalization. This was because AfC objected to the 1967 Act's continued criminalization of women, and its unnecessary emphasis on medical oversight in early pregnancy. Similarly, although they engaged vigorously with CEDAW, AfC's critical community was not exclusively built around rights discourse (Pierson and Bloomer 2017). In part, this is because international human rights law tends to be most useful in advocating for the so-called 'hard cases', and less useful where everyday entitlement to access early medical abortion is concerned (Fletcher 2018, 236).

The work of critical community continues even when law reform has apparently been achieved. Following eventual decriminalization in October 2019, the Northern Ireland Office opened a consultation on the shape of future abortion regulations. AfC immediately mobilized the techniques of critical community; producing a page-by-page guide to encourage individual women to respond to the consultation (Alliance for Choice 2019), and running 'consultation cafes' where they offered assistance in responding effectively to the consultation questions. The original consultation encouraged respondents to choose between tightly defined options. Many of these assumed restrictions which were eventually included in the final regulations, including time limits, restrictions on who may offer abortion care, and controls on where it may be provided. AfC's guide asked women to ignore the prescribed 'tick boxes' and instead write to support alternatives which were closer to CEDAW's recommendations and to AfC's own commitment to 'free, safe, legal' abortion. Although its arguments were not reflected in the legislation's final text, AfC used the consultation to educate participants on the flawed policy arguments underpinning the restrictive dimensions of the consultation.

'Service Work' in Critical Community.

In a 2019 letter to pro-choice activists in Alabama, AfC summarized the service work they were doing to circumvent the abortion law. They put women in touch with the Abortion Support Network, which funds abortion travel, and with the online abortion pill providers Women on Web and Women Help Women [REF

this collection]. They worked at the boundaries of legality. Even talking to women who had performed DIY abortions and declining to report them to the police was law-breaking (Fletcher 2018, 236). AfC wrote:

You will have to become the people – instead of clinicians, that offer advice and help to women and pregnant people who need abortions, you will have to find ways of sharing the information that helps the most people without getting yourselves into trouble...[Y]ou and the people you help might actually get arrested, you might have your homes searched and your workplaces raided....(Alliance for Choice 2019)

AfC's work made the law survivable for women otherwise denied abortions. Service work for survivability is often necessary, even where abortion access is legal. Many AfC members knew this from their time as clinic escorts, enabling women to access limited legal services at Marie Stopes Belfast [**REF this collection**]. However, illegal service provision is also “work to make the law unworkable” (Press Association 2016). From this perspective, its illegality, or what Duffy might call its anarchism (Duffy 2020), is central to its success. Illegal ‘service work’ is necessarily often clandestine and cautious. Sometimes, however, it can ground public protest. For example, in 2015 when a woman was prosecuted for obtaining abortion pills for her daughter,¹³ over 200 AfC members wrote to the DPP admitting to offences relating to assisting women to have abortions, and demanding that police “take us all on rather than picking on a single person” (Sanghani 2015; McDonald 2015).¹⁴ The woman prosecuted remained anonymous, while AfC members able to risk prosecution put themselves forward. They publicized their transgressive service work in order to challenge the law's legitimacy. In highlighting their own apparent immunity, they emphasized that the most vulnerable people were the law's real targets (Cahill 2015). In early 2016, when another woman was prosecuted for terminating her own pregnancy,¹⁵ AfC protested in solidarity, reporting that they were considering handing themselves in to police (McDonald 2016). They argued that, had the young woman been able to afford travel, she could have avoided prosecution. They also insisted that the pills she used were safe: indeed they were taken by many women accessing NHS care in England. That same year AfC members Diana King, Colette Devlin and Kitty O’Kane, all retired professionals, presented themselves at Derry’s Strand Road Police station and asked to be arrested, confessing to offences related to assisting women to terminate pregnancies with pills. In addition to insisting that she had no duty to obey an unjust law, King claimed a defence (King 2016). The law referred to procuring a miscarriage with “poison”, but King argued that the pills she had provided to women were “essential medicines” (Wright 2015; Gentleman 2016). The activists were not arrested.

¹³ The charges were not dropped until abortion was decriminalised in 2019

¹⁴ This action built on a 2013 letter with 100 signatories.

¹⁵ She later received a suspended sentence

This action shows that ‘critical community’ and ‘service work’ are intertwined in several ways. First, over time, people’s capacity to envision and enact alternative legal regimes in ‘critical community’ may undermine the legitimacy of the state’s legal order, reinforcing their willingness to disobey (Cooper 2019). In turn, service work is a constant reminder of repressive law’s human costs and inspires often-complex critique. As AfC wrote in 2018:

We [...] deal with people who access pills first-hand, indeed some of us have taken those medications ourselves,¹⁶ yet we are not criminals, we are just citizens who deserve to be treated with equanimity and compassion. (Alliance for Choice 2018)

Second, experience of service work confers authority on some claims made in critical community. For instance, when AfC insisted that abortion pills were not ‘poison’, they advanced an alternative legal interpretation, developed in ‘critical community’ and drawing on their own intimate knowledge of the pills as safe medication. Third, illegal ‘service work’ may perform aspects of the kind of law imagined through the jurisdiction of ‘critical community’ and give it material presence. It is ‘world-making’ work (Delaney 2010, 161). By assisting women to access abortions without medical or state permission, AfC showed, in practical terms, that things could be different. They offered themselves up for prosecution, and nothing happened; the police could not, at least directly, to punish their disobedience. Their precarious immunity borne of critical community and its solidarities. As Fionnghuala Nic Robeáird observed, “If you touch one of us, you touch all of us.”(Eric-Odorie 2015)

These relationships between the defiance of illegal service work, and the alternative legality nurtured in critical community establish AfC’s alternative jurisdiction over abortion. Others’ interpretative efforts did not produce the same effects. For example, there was a time when some doctors in Northern Ireland would terminate pregnancies for reasons of severe foetal anomaly (Side 2006, 100). This practice depended on legal interpretation, since the letter of the law made no exceptions for foetal anomaly. Perhaps doctors implicitly understood that requiring a woman to continue such a pregnancy would expose her to the kinds of severe health risks which did justify an abortion under law (Rebouche and Fegan 2003, 227). This medical engagement with law differed from AfC’s work in two ways. First because doctors aimed, or were required, to obey the law, their flexible practice was readily extinguished once obedience was policed with more forceful threats of criminalisation. Second, and more importantly, the practice was not publicly presented as transgressive, or rooted in a desire to alter the law. Indeed, the question of doctors’ engagement

¹⁶ It was not necessarily safe for AfC members who had themselves taken pills to openly and individually disclose this (Kenny 2019)

with abortion law was subsequently presented in terms of clarity and confusion around rather than in terms of a principled desire to interpret the law more liberally. The dual ingredients of transgression and community ground AfC's jurisdiction.

Today, despite significant changes in Northern Irish abortion law, AfC activists continue to pursue service work in critical community with one another. From October 2019, when abortion was decriminalized, until Stormont re-opened in January 2020. Although anti-choice MLAs made some symbolic efforts to halt decriminalization and alter the new abortion regulations, the content of the new abortion law was out of their hands (Ferguson 2019; Gorman 2020; Moriarty 2020). Implementation, however, was the Executive's responsibility. The new DUP Health Minister, Robin Swann, has obstructed implementation of the new regulations (Yeginsu 2020). Formal services were not in place when the regulations took effect in late March, as COVID-19 swept across Europe. It seemed that, despite the change in the law, women would still be required to travel for abortions. With air travel suspended, some went to Liverpool by freight ferry; an 8-hour journey (Yeginsu 2020). In mid-April, under growing pressure, Robin Swann permitted willing hospitals to go ahead with plans to provide early medical abortion (Cafolla 2020). However, this did not improve the position for many women who still needed to travel within Northern Ireland or abroad during the pandemic. At the time of writing, no provision has been made for telemedicine, and it is extremely difficult to access an abortion in Northern Ireland after 10 weeks' pregnancy. AfC is the first port of call for many women needing abortions (Higgins 2020). As well as demanding that the government make establish abortion telemedicine services for the duration of the pandemic (McHugh 2020), AfC continues to organize service work in critical community. Their website currently directs abortion-seeking women who are less than 12 weeks pregnant and unable to access abortions in Northern Ireland to the most appropriate online provider. It also offers a mobile phone number that women can call if they need advice when self-inducing an abortion. As was the case pre-decriminalisation, this activism carefully negotiates the boundaries of the criminal law, though the stakes are now somewhat lower. Women themselves can no longer be prosecuted for using abortion pills. However, an activist found to have 'procured' the termination otherwise than on the restrictive grounds provided for by law may be fined.¹⁷

Conclusion: Co-producing Law?

This chapter argues that AfC can be understood as actively producing legal changes, and reshaping the established boundaries of formal law-making authority in Northern Ireland. Even if we only acknowledged AfC's repeated engagement advocacy within law-making institutions, we could read their influence in

¹⁷ S.11 Abortion (Northern Ireland) Regulations 2020

recent changes to Northern Ireland's abortion law. However, it is their service work in critical community that radically challenges inadequate law. The new law is not everything AfC would have wished for. Writing in 2020 as co-convenor of AfC, Naomi Connor spoke directly to those still obstructing abortion access:

‘We will not be silenced. We will not be deterred. We are here, standing strong in our rightful place (Connor 2019).

Critical community and service work continue to be part of AfC's efforts to address unjust laws. AfC recently piloted an abortion doula programme, “Lucht Cabhrach”. An eventual network of doula is intended to supplement the limited statutory framework for abortion in Northern Ireland by advocating for abortion-seeking women and support legal abortion ‘self-care’.¹⁸ This formalization of AfC's service work represents a potential new departure; working the space created by decriminalization of self-induced abortion and infusing a legal experience with the ethos of autonomy, solidarity and tolerance of necessary disobedience that have characterized AfC's critical community. It demonstrates that AfC will continue to challenge law's limits, thoughtfully, strategically, and in full awareness of their disobedience. Their ability to seize that ‘rightful place’ is at the root of their radical legal agency.

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