



Family Justice Council Guidance on responding to a child's unexplained reluctance, resistance or refusal to spend time with a parent and allegations of alienating behaviour

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TABLE OF CONTENTS

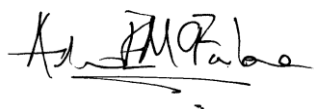
FOREWORD FROM THE PRESIDENT OF THE FAMILY DIVISION AND CHAIR OF THE FAMILY JUSTICE COUNCIL, SIR ANDREW MCFARLANE:	3
GLOSSARY OF TERMS	4
1. INTRODUCTION AND SCOPE OF THE GUIDANCE	5
2. LITIGATION JOURNEY OVERVIEW	7
3. GUIDANCE NOTE ON CASE MANAGEMENT	8
Alienating Behaviours - three necessary elements	8
Early robust case management of Alienating Behaviours allegations	10
Fact-finding hearings	14
Delay	15
Next steps	16
4. GUIDANCE NOTE ON THE VOICE OF THE CHILD	17
5. GUIDANCE NOTE ON WELFARE DECISIONS WHERE FINDINGS OF ALIENATING BEHAVIOUR HAVE BEEN MADE	18
Purpose	18
Preamble	18
Practical Considerations	18
Child Friendly Judgments	23
6. GUIDANCE NOTE ON UNDERSTANDING RELUCTANCE, RESISTANCE AND REFUSAL AND PSYCHOLOGICAL MANIPULATION	24
Psychological manipulation	24
7. GUIDANCE NOTE ON THE USE OF EXPERTS	26
Use of experts	26
Conflict of interest	27
8. ANNEX: ORGANISATIONS THAT RESPONDED TO THE CONSULTATION	29

Foreword from the President of the Family Division and Chair of the Family Justice Council, Sir Andrew McFarlane:

The issue of parental alienation/alienating behaviours is a polarising one which has taken up much court time and public debate. This guidance note reflects the complexity and challenges of this area of family law. It has been long awaited.

I approved this workstream for the Family Justice Council knowing how divisive this topic has become. In my view this guidance is required to ensure greater consistency of approach across the courts and to improve outcomes for children and families and to protect children and victims from litigation abuse. It has my endorsement and I encourage everyone working within the Family Justice system to read it carefully.

I am extremely grateful to the members of the multidisciplinary working group of the Family Justice Council who prepared this guidance note. This final iteration comes after careful consideration of the responses from both individuals and stakeholder groups to the consultation of 2023. It has been one of the largest consultations in the history of the Family Justice Council with almost 100 responses. All responses have been carefully considered alongside the evolving caselaw. This provides an excellent example of how the different stakeholders within our complex system can work together to produce clear and sensible guidance to benefit the families and children who the system serves.

A handwritten signature in black ink, appearing to read 'A. McFarlane', with a horizontal line underneath.

Sir Andrew McFarlane

Glossary of Terms

In this Guidance, the following terms are used to describe the behaviours and emotions under discussion.

- Attachment, affinity and alignment ('AAA') – reasons why children may favour one parent over another, or reject a parent, which are typical emotional responses to parenting experiences and not the result of psychological manipulation by a parent.
 - Appropriate justified rejection ('AJR') – situation where a child's rejection of a parent is an understandable response to that parent's behaviour towards the child and/or the other parent.
 - Alienating Behaviours ('AB') – psychologically manipulative behaviours, intended or otherwise, by a parent towards a child which have resulted in the child's reluctance, resistance or refusal to spend time with the other parent.
[This term is capitalised throughout the guidance to refer to this definition]
 - Protective behaviours ('PB') – behaviours by a parent towards a child in order to protect the child from exposure to abuse by the other parent, or from suffering harm (or greater harm) as a consequence of the other parent's abuse.
 - Reluctance, resistance or refusal ('RRR') – behaviours by a child concerning their relationship with, or spending time with, a parent, which may have a variety of potential causes.
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1. Introduction and Scope of the Guidance

1. There remains considerable tension around the concept of ‘parental alienation’ and the associated term ‘alienating behaviours’. These highly emotive tensions serve to polarise opinion in a way that is often counterproductive to the best interests of children, and which shifts the focus away from the voice of the child. The purpose of this guidance is to assist the court in determining the welfare of the child where allegations of ‘parental alienation’ or ‘alienating behaviours’ are made, by maintaining a focus on the impacts on the child rather than on parental behaviours *per se*.¹
2. A child’s reluctance, resistance or refusal to spend time with a parent is often alleged to be a result of ‘parental alienation’. Despite the lack of research evidence, and international condemnation, reference is still made to the discredited concept of ‘parental alienation syndrome’.² For the avoidance of doubt, the Family Justice Council (FJC) recognises that ‘parental alienation syndrome’ has no evidential basis and is considered a harmful pseudo-science. Concepts of ‘parental alienation syndrome’ and ‘parental alienation’ are increasingly exploited within family litigation.³
3. This guidance does not aim to explore the research surrounding and discrediting the concept of ‘parental alienation’ or the socio-political context in which such allegations arise, or to give an historical account. The importance of such issues is not underestimated. However, the focus of the guidance is to inform the courts and professionals in the wider family justice system as to how allegations of Alienating Behaviours should be considered and responded to; recognising that they are allegations that can arise at different points in the litigation journey and are likely to be made alongside allegations of other harmful behaviour, including domestic abuse or other forms of child abuse.
4. Given that ‘parental alienation syndrome’ has no evidential basis, there are concerns that its use as a term, or any associated terms such as ‘alienating behaviours’, accords it misplaced legitimacy. Whilst this is a concern, it remains an allegation which the family courts in England and Wales are increasingly asked to consider and act upon. The purpose of this guidance is to assist with navigation of the existing system, drawing together best practice in relation to

¹ Although this guidance refers throughout to parents and parental behaviours, it is recognised that other carers and/or relatives may be (alleged to be) involved.

² Dr Claire Sturge and Dr Danya Glaser, ‘Contact and Domestic Violence : The Experts’ Court Report’ [2000] *Family Law* (September) 615, 622-23; Julie Doughty, Nina Maxwell and Tom Slater, *Review of Research and Case Law on Parental Alienation* (Cafcass Cymru, 2018); US National Council of Juvenile and Family Court Judges, *Revised Chapter Four: Families and Children Model Code on Domestic and Family Violence* (2022) 19.

³ The concepts have attracted international condemnation on this basis, and some countries have banned use of the terms in family courts. See, e.g., Convention on the Elimination of All Forms of Discrimination Against Women, *Concluding Observations on the Seventh Periodic Report of Italy* (UNDOC/GEN/N17/227/49, 2017) [para 52\(a\)](#); European Parliament Resolution, ‘The impact of intimate partner violence and custody rights on women and children’ ([TA-9-2021-0406](#)); GREVIO (Council of Europe Group of Experts on Action against Violence against Women and Domestic Violence), *Third General Report on GREVIO’s Activities (2022) 46-52*; Reem Alsalem, UN Special Rapporteur on Violence against Women and Girls, *Custody, Violence against Women and Violence against Children* (A/HRC/53/36, 2023). See also the *President’s Memorandum: Experts in the Family Court* (4 October 2021), referred to in [Re C \(‘Parental Alienation’; Instruction of Expert\) \[2023\] EWHC 345 \(Fam\) para 31](#), which states that “pseudo-science, which is not based on any established body of knowledge, will be inadmissible in the Family Court”.

the law as it stands against a backdrop of an increasing number of cases in which these allegations are raised.

5. In producing this guidance, the Family Justice Council does not seek to add legitimacy to the concept of 'parental alienation'. It has carefully weighed up the advantages and disadvantages of referencing the issue and has responded to the overwhelming call for clarity and guidance as to how these complex cases are best approached. This guidance will therefore refer to a child's unexplained 'reluctance, resistance and refusal' to spend time with a parent (RRR – see Glossary above) wherever possible. However, because it addresses calls from across the sector for practical guidance on how allegations of Alienating Behaviours are responded to, this term will also be used for necessary clarity where psychological manipulation by a parent has resulted in RRR.
6. This guidance acknowledges that where found the harm of Alienating Behaviours to a child can be significant and enduring, akin to other forms of emotional/psychological child abuse. Alienating Behaviours range in intensity and their impact on children, but these harms can be far reaching. They can affect a child's emotional, social and psychological development. Severed relationships and growing up with a false narrative can also have a harmful impact on a child's identity, self-worth and sense of safety in the world. Whilst the focus here is on the welfare outcomes for children, it is also important to recognise the very significant emotional impact on parents of the loss of a relationship with a child.
7. It is hoped that this guidance will contribute to increased understanding, good practice, and ultimately good welfare outcomes for children. The guidance includes sections on the litigation journey; case management; welfare decisions; understanding reluctance, resistance and refusal and psychological manipulation in cases in which Alienating Behaviours are alleged; and the use of experts.
8. The guidance is intended to be of assistance to the court at whatever stage of the proceedings the issue of Alienating Behaviour is to be considered.

2. Litigation Journey Overview

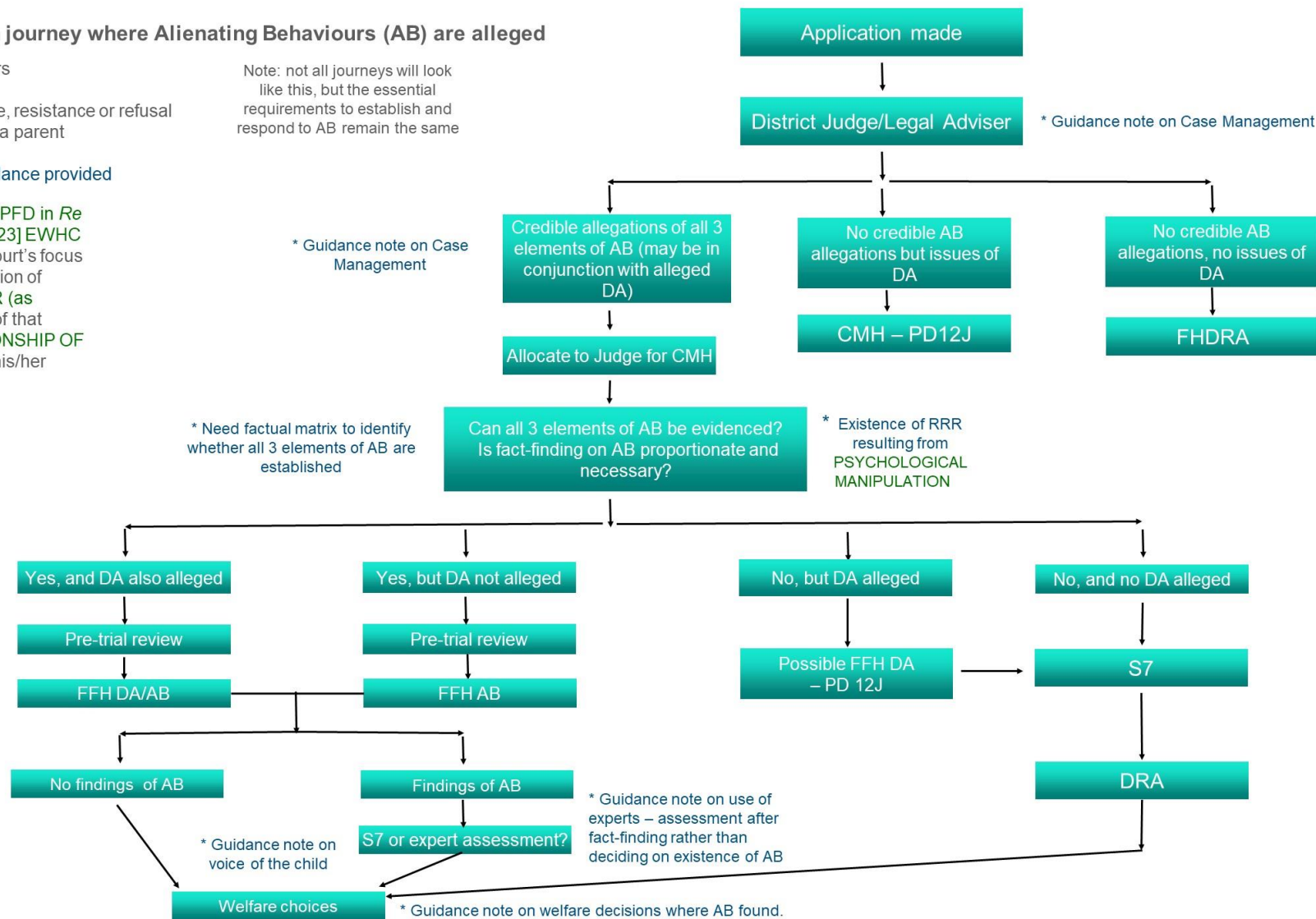
Mapping the litigation journey where Alienating Behaviours (AB) are alleged

AB = Alienating Behaviours
 DA = Domestic Abuse
 RRR = a child's reluctance, resistance or refusal of a relationship/time with a parent

Note: not all journeys will look like this, but the essential requirements to establish and respond to AB remain the same

* denotes area where guidance provided

As per the judgment of the PFD in *Re C (Parental Alienation)* [2023] EWHC 345 (Fam) para 103, the court's focus should be on the identification of ALIENATING BEHAVIOUR (as defined) and the IMPACT of that behaviour on the RELATIONSHIP OF THE CHILD with either of his/her parents.



* Guidance note on Case Management

* Guidance note on Understanding RRR and Psychological Manipulation

* There will be cases where there is no obvious cause of RRR

* Need factual matrix to identify whether all 3 elements of AB are established

* Existence of RRR resulting from PSYCHOLOGICAL MANIPULATION

* Guidance note on voice of the child

* Guidance note on use of experts – assessment after fact-finding rather than deciding on existence of AB

* Guidance note on welfare decisions where AB found.

3. Guidance Note on Case Management

Alienating Behaviours - three necessary elements

9. In *Re C ('Parental Alienation; Instruction of Expert)*,⁴ Sir Andrew McFarlane adopted the definition proffered by the Association of Clinical Psychologists (ACP-UK) that 'parental alienation' is not a syndrome capable of being diagnosed, but a process of manipulation of children perpetrated by one parent against the other through what are termed as alienating behaviours. He observed that what is important is the particular behaviour that is found to have taken place within the individual family before the court, and the impact that that behaviour may have had on the relationship of a child with either or both of his/her parents.
10. A court would therefore need to be satisfied that **three elements** are established before it could conclude that Alienating Behaviours had occurred:
- 1) the child is reluctant, resisting or refusing to engage in, a relationship with a parent or carer; and
 - 2) the reluctance, resistance or refusal is not consequent on the actions of that parent towards the child or the other parent, which may therefore be an appropriate justified rejection by the child (AJR – see Glossary above), or is not caused by any other factor such as the child's alignment, affinity or attachment (AAA – see Glossary above); and
 - 3) the other parent has engaged in behaviours that have directly or indirectly impacted on the child, leading to the child's reluctance, resistance or refusal to engage in a relationship with that parent.
11. Alienating Behaviours range in intensity and their impact on children. They can be observed in both families where parents remain together and in those where parents separate.
12. Either or both parent(s) could engage in psychological manipulation which may or may not manifest in RRR on the part of a child.

Prevalence

13. Research evidence suggests that Alienating Behaviours which actually impacts on the child's relationship with the other parent are relatively rare.⁵ Therefore, despite an increasing number of allegations being made, findings of Alienating Behaviours (see Glossary above) will also be relatively rare. A child's reluctance, resistance or refusal to see a parent is often attributed to 'parental alienation', in the absence of an alternative explanation. It should be emphasised, however, that RRR cannot in itself amount to evidence of psychological manipulation.

⁴ [Re C \('Parental Alienation; Instruction of Expert\) \[2023\] EWHC 345 \(Fam\)](#) para 103.

⁵ [Ben Hine, Jennifer Herman, Sadie Leder-Elder and Elizabeth Bates, Alienating Behaviours in Separated Mothers and Fathers in the UK \(2024\) 17.](#)

Domestic abuse and allegations of Alienating Behaviours

14. It is recognised that allegations of ‘parental alienation’ are often raised in response to allegations of domestic abuse.⁶
15. Concerns have been raised that allegations of Alienating Behaviours are used as a form of post-separation control/abuse, and as a litigation tactic to silence survivors of domestic abuse (both parents and children) and side-line their allegations and experiences of abuse and harm.⁷ These concerns underscore the need for specificity in the allegations being made.
16. Allegations of domestic abuse feature in at least 50-60% of private law children cases.⁸ The relative relevance and prevalence of domestic abuse places it in an entirely different category to allegations of ‘parental alienation’. Domestic abuse is a crime impacting both adults and children who are victims in their own right.⁹
17. In light of their respective prevalence, and the relative harm to children and adult survivors, allegations of domestic abuse and ‘parental alienation’ cannot be equated. The risk, relevance and weight attached to ‘parental alienation’ and domestic abuse should not automatically be considered equal.
18. Given the relative impact of domestic abuse, the harms that flow from it and the importance of protecting children, Alienating Behaviours will not be found in cases where findings of domestic abuse are made which have resulted in a child’s appropriate justified rejection (AJR), or in protective behaviours (PB) or a traumatic response on the part of the victim parent.

Appropriate justified rejection (AJR) and attachment, affinity and alignment (AAA)

19. The court should remain mindful that a child might withdraw from a relationship with a parent for a variety of reasons.
20. Children can and do come to their own conclusions about what has happened in their family and how this affects their attitude to living with, or spending time with, one of their parents. They may wish to make choices or exert an influence over how they live their lives.
21. The child’s response may be an AJR because of harmful parenting, including neglect or exposure to abuse (of themselves or their other parent).
22. Their actions may arise from alignment or affinity with one parent. They may not have strong negative feelings for the other parent but prefer spending time with one parent. Alignment may arise from the child’s experience of the other parent’s

⁶ Rosemary Hunter, Mandy Burton and Liz Trinder, *Assessing Risk of Harm to Children and Parents in Private Law Children Cases: Final Report* (Ministry of Justice, 2020) (‘The Harm Panel Report’)

⁷ Domestic Abuse Commissioner, *The Family Court and Domestic Abuse: Achieving Cultural Change* (2023) 24-29.

⁸ See Adrienne Barnett, *Domestic Abuse and Private Law Children Cases: A Literature Review* (Ministry of Justice, 2020) 20.

⁹ Note that the [Statutory Guidance on the Domestic Abuse Act 2021](#) and the [Statutory Guidance on Controlling or Coercive Behaviour](#) do not recognise ‘parental alienation’ or ‘alienating behaviours’ as a form of domestic abuse or of controlling or coercive behaviour.

level of involvement in their lives, poor parenting, developmentally inappropriate expectations of a parent or merely differing parenting styles.

23. The child's behaviour and feelings may be an attachment strategy, their way of eliciting care from the parent they live with or protecting that relationship.
24. Alignment and attachment issues can result in RRR without any Alienating Behaviours being perpetrated by an adult. Indeed, it is important to recognise that a child's RRR may remain unexplained, and the lack of a clear explanation does not confirm exposure to Alienating Behaviours. The child may have other reasons or motivations for their actions, e.g., their feelings about a new adult relationship or unhappiness about the practical arrangements in place.

Protective behaviours and traumatic responses

25. The context in which alleged Alienating Behaviours occurs must inform an understanding of parental behaviour. A parent may be engaging in protective behaviours (PB – see Glossary above) to shield a child from (further) harm, such as limiting contact with a perpetrator of abuse or moving away from the area. Indeed, when considering the child's welfare, parents are expected to protect a child from harm. PB therefore cannot amount to Alienating Behaviours.
26. A parent's or child's behaviour may also be a traumatic response to abuse (including litigation abuse) perpetrated against them by the other parent. Such traumatic responses likewise do not constitute Alienating Behaviours.
27. It is important that all participants in the family justice system have sufficient training and awareness to ensure that they can recognise when the behaviour of a parent is appropriately protective, a traumatic response, or Alienating Behaviours.

Early robust case management of Alienating Behaviours allegations

Triage

28. Where the alleged behaviour is mentioned in the original application or response, the Legal Adviser or Judge triaging the case will need to consider the nature, seriousness and complexity of the issues raised in deciding whether the matter can be retained by the Magistrates for case management under the allocation rules. The Legal Adviser or Judge triaging on issue should remind themselves of the elements that those making the allegations of Alienating Behaviours would be required to establish. It is likely that the majority of private law matters allocated to Magistrates will continue to be heard by the Magistrates.
29. Where on initial scrutiny of the allegations it appears that one or more of the three elements (described above and below) is absent, or a court has already considered the allegations to be lacking in any solid evidential base, the matter may remain with the Magistrates unless there are other matters contained in the application that would justify reallocation under the Family Procedure Rules (FPR). The Magistrates must thereafter keep allocation under review in accordance with the allocation guidelines at each stage of the proceedings.

30. Where a Magistrates' Court has determined that allegations of Alienating Behaviours lack substance and the case remains with the Magistrates, the Legal Adviser and Magistrates must ensure that the court's deliberations on welfare do not re-introduce unsubstantiated allegations of Alienating Behaviours.
31. Where, after careful analysis of the information provided to the court in the documents, it appears that all three elements of Alienating Behaviours (described above and below) may be present, the case **must** be transferred for case management and determination by a Judge.

Timing of allegations

32. Whilst allegations of Alienating Behaviour might be raised in the original application or response documents, the allegations might be raised for the first time at any stage in proceedings e.g., at the first case management hearing, or at a subsequent point, as a reason for the breakdown in child/parent relations.
33. It is incumbent on the court to case manage robustly to avoid, whenever possible, Alienating Behaviours being raised as an issue for the first time late in proceedings. Where such allegations are raised after the initial stage in proceedings it is important that the case is allocated/re-allocated to a Judge if there appears to be a solid evidential base necessitating judicial determination of the issue.
34. If, at a later stage in the proceedings, the court is persuaded that there is an issue of a child's RRR caused by a parent's psychological manipulation, which it would be relevant, proportionate, and necessary to determine, earlier case management decisions must be reviewed accordingly.

First hearing

35. The initial case management hearing may be the first opportunity for the court to consider the basis on which the allegation of Alienating Behaviours is made and to give directions accordingly.
36. The safeguarding letter/report from Cafcass / Cafcass Cymru should have been provided by the time the first case management hearing takes place. The letter will include a summary of the issues and the parties' positions. It provides an opening for identifying and examining the issues.
37. At a first case management hearing the court must seek to understand what the parties are saying and why. Simple assertions are not enough. It is incumbent on the parties to help the court understand their case.
38. It is important that the court has enough time at a case management hearing to understand the essence of the parties' positions. It is only by doing this that the court can make meaningful directions for the collation and management of evidence if required.

Are the three elements evidenced?

1. Is there evidence that the child is reluctant, resistant or refusing to engage with a parent?

39. If Alienating Behaviour is raised, the court should ascertain whether it is accepted that the child has been reluctant, resistant or has refused to spend time with the parent. If the child/children is/are spending time regularly with that parent, the assertion of Alienating Behaviour is unlikely to be made out. The court should look for evidence of children being reportedly unwilling to see or stay with the parent and the reasons given for the child's RRR.
40. In some instances, the court may direct Cafcass / Cafcass Cymru or a social worker to meet with the child/children to determine the child's perspective. In cases where the child's view is unclear or unknown and where there are no allegations or evidence of behaviour by either party that might justify the child's unwillingness to see or stay with a parent, consider directing a Section 7 report with a specific direction for an enquiry as to those issues.
41. Cafcass / Cafcass Cymru are not, however, arbiters of fact. It is a judicial function to determine the factual issues in the case. The court and Cafcass / Cafcass Cymru must remain mindful that children can form negative views about a parent without influence or manipulation from the other parent.
42. Cafcass / Cafcass Cymru have a series of practitioner tools to assist in exploring factors that may have contributed to a child's reluctance, resistance or refusal to spend time with the other parent such as AJR or AAA, and in identifying support for children where the parent/child relationship has been disrupted.
43. The court should be cautious about ordering a stand-alone 'wishes and feelings report' as the court may be better able to assess the child's perspective with a contextual report that carefully examines the child's position.

2. Is the child's RRR consequent on the actions of the parent raising the allegations towards the child or the other parent?

44. Children who show reluctance, resistance or refusal to maintain or build a relationship with a parent who has been abusive towards them or towards the other parent, may be found to have a justified response to that parent. The allegation of Alienating Behaviour will thus fail.

3. Has one parent engaged in psychological manipulation that has directly or indirectly impacted on the child, leading to the child's reluctance, resistance or refusal to engage in a relationship with the other parent?

45. The court will need to examine carefully what is alleged. The court will require evidence of manipulation of the child for this third element to be established.

Is a fact-finding hearing relevant, proportionate and necessary?

46. If the facts underpinning a child's reluctance, resistance or refusal to spend time with a parent are in issue, or where the child is alleged to have been exposed to

abuse directly or indirectly, the court will need to consider whether a fact-finding hearing is relevant, proportionate and necessary for determination of the welfare issues.

47. The factual matrix surrounding a case of alleged alienation is one for the court alone. In the same way that the court must gather evidence and list a fact-finding hearing where other forms of abuse are alleged, the court must gather the evidence to make findings in relation to alleged Alienating Behaviour. It is not appropriate for experts to 'diagnose' or risk assess Alienating Behaviours.
48. Failure to grasp this nettle risks appeals, delays and unnecessary costs. Effective case management can reduce the risk of delay, misuse of experts and multiple hearings.
49. A fact-finding hearing will only be required where it is relevant to the ultimate issues to be determined and where such a hearing is both necessary and proportionate. The court must carefully examine what, why and when the allegations of Alienating Behaviour were first reported to be an issue, mindful that allegations of Alienating Behaviour are sometimes raised as a response to allegations of domestic abuse.
50. Where considered relevant, proportionate and necessary a fact-finding hearing should be directed, subject to careful case management. Careful and robust case management requires sufficient time.

Directions for fact-finding

50. The following directions might be considered:

- Joinder of the child and whether direction setting should be postponed pending joinder.
- Narrative statements.
- Independent evidence – consider what evidence the trial court will need by way of disclosure, for instance; medical records, social work records, school records, telephone records.
- Schedules – where appropriate, mindful of the guidance in *Re H-N*.¹⁰ If a course of conduct is alleged, then critical examination of the period and the events is likely to be relevant to disclosure.
- A pre-trial review to consider the evidence.
- Any interim orders necessary – should any orders be made in relation to the child's relationship with the parent with whom the child is reluctant, resistant or refusing to spend time? Are any protective orders necessary to manage risk as a consequence of domestic abuse allegations?
- Participation directions (see below).

51. Where there are competing allegations of domestic abuse and Alienating Behaviours it is unlikely to be practical for these allegations to be heard at separate hearings. However, the court must consider carefully how it will manage the hearing and guard against attaching equivalence to these different types of allegations.

¹⁰ [Re H-N and Others \(Children\) \(Domestic Abuse: Finding of Fact Hearings\) \[2021\] EWCA Civ 448.](#)

52. In most cases the allegations of abuse and Alienating Behaviours can be heard at the same time. The court's deliberations should begin with domestic abuse and review the Alienating Behaviours allegations through that prism. If a court finds that domestic abuse has occurred resulting in AJR by the child, the allegations of alienation will fail.

53. The court must remain mindful of the need to ensure that parties are enabled to participate fairly in proceedings. It will be necessary for the court to keep in mind the potential for the proceedings themselves to be conducted in a way that is abusive. In some exceptional cases the court may consider that the overriding objective will be better met by determining the disputed allegations of domestic abuse at a preliminary fact-finding hearing.

54. Where allegations of domestic abuse and Alienating Behaviours are being heard at the same hearing the following should be considered:

- Participation directions.
 - Special measures – screens / waiting areas / entrances / use of remote hearings.
 - Witness support – including allowing IDVAs into court.¹¹
 - Other reasonable adjustments necessary to accommodate witnesses' communication needs.
- Witness order – measures should be put in place to prevent re-traumatisation and enable witnesses to achieve best evidence. For instance, the court might consider hearing evidence in chief back-to-back where appropriate.
- Qualified Legal Representatives (QLRs) – the court should consider the necessity and practicalities associated with QLRs where parties are unrepresented.

Fact-finding hearings

The Burden of Proof

55. Whilst psychological manipulation of a child can be subtle and insidious, a parent alleging Alienating Behaviours **must** discharge the burden of establishing both that such harmful behaviour has occurred, and that this behaviour has led to a child's unjustified reluctance, resistance or refusal to spend time with that parent.

Evidence of AB

56. Where Alienating Behaviours is alleged, the court should require those making the allegation to identify the evidence upon which they rely. Such behaviours must be evidenced just as other acts of abuse must be evidenced.

57. Alienating Behaviours present themselves on a spectrum with varying impact on individual children, and the appraisal of this requires a nuanced and holistic

¹¹ See [Practice Guidance : Independent Domestic Violence Advisers and Independent Sexual Violence Advisers \(Family Courts\)](#).

assessment. The court's role is to analyse the behaviour of the adult and its impact on the children in the context of the children's unique experiences, their resilience and vulnerability. The research suggests that adult behaviours rarely manifest in the behaviour of children and findings of Alienating Behaviours will thus be rare.¹²

58. The court should remain mindful that for an allegation of Alienating Behaviours to be made out, all three elements must be established.

Cross allegations

59. There is no equivalence between domestic abuse and Alienating Behaviours. Domestic abuse is a criminal offence and both a parent/carer and a child may be a victim. Where a parent is found to have engaged in Alienating Behaviours a child will have suffered emotional harm.

60. The court's deliberations should begin with domestic abuse and review the Alienating Behaviours allegations through that prism.

Avoidance of default findings

61. The behaviour of a child is not in itself reliable evidence of a specific behaviour of an adult. Thus, the mere fact of a child's reluctance, resistance, or refusal to spend time with the other parent is not evidence of Alienating Behaviours simply because no other explanation can be found.

62. All potential causal factors and explanations, such as domestic abuse or child abuse, PB, or traumatic responses must be adequately and safely considered first when looking at the nexus between a child's RRR and the behaviour of a parent. This remains the case in circumstances where no findings of domestic abuse have been pursued or made. A child may have been impacted by a wider family context which might not give rise to a fact-finding hearing.

63. The court must be cautious when invited to agree a default finding that a parent who fails to establish allegations of domestic abuse or abuse of the child has therefore engaged in Alienating Behaviours. The court must remain alive to the distinction between a parent who is opposed to contact, and a child who is opposed to contact; and between a parent who is engaging in Alienating Behaviours and a child who has an affinity, or has aligned themselves, with a parent or sibling, or are demonstrating an attachment strategy.

64. Failed or false allegations of domestic abuse will not constitute Alienating Behaviour unless there is evidence that the subject child has been manipulated (on the basis of those false/failed allegations) into an unjustified reluctance, resistance or refusal to engage with the allegedly abusive parent.

Delay

¹² Hine et al., see footnote 5 above.

65. A timely determination of the factual matrix is necessary to determine the appropriate welfare outcomes for the children. See *Re S (Parental Alienation: Cult)*¹³ regarding the risk of harm to a child if there is delay. The court should not, however, consider or anticipate the likely impact of adult behaviour without reference to its manifestation in the child. The extent or severity of the impact in the child will of course be relevant to the court's determination of welfare.

Next steps

66. Where the court has made findings of fact (whether of domestic abuse or Alienating Behaviour), the court will need to consider whether further or other evidence is needed for the court to conduct a proper welfare evaluation.

67. The court must not direct the instruction of an expert unless such evidence is both necessary and proportionate to the issues under consideration. The court must consider the type of expert evidence required, always remembering that 'parental alienation' is not a syndrome capable of being diagnosed. The use of an expert at this stage would be to help the court decide on welfare outcomes. Separate sections of this guidance are designed to assist the court on the appointment of experts and welfare outcomes. (See below, Guidance Notes on Welfare Decisions and Use of Experts)

68. The costs of an expert will be considerable. Where the child has been joined as a party (as will usually be the case) all parties will be required to contribute to the costs, except where the court assesses that a party cannot afford to do so.

¹³ [Re: S \(Parental Alienation: Cult\) \[2020\] EWCA Civ 568](#)

4. Guidance Note on the Voice of the Child

69. The importance of a child's participation in decision making about them and considering their ascertainable wishes and feelings when making decisions is well established. The court is directed to have regard to the wishes and feelings of the child concerned – considered in the light of their age and understanding (Children Act 1989¹⁴). There is also good evidence of the potential benefits of such involvement¹⁵, which is highlighted in the work of the Family Justice Young People's Board¹⁶ and the work of the Nuffield Family Justice Observatory¹⁷.
70. Allegations of Alienating Behaviours can impact on how the wishes and feelings a child expresses are viewed. Children in this context can experience professionals as dismissive of their reported experiences and views. This can undermine efforts to promote their wellbeing and their trust in professionals, particularly if they experience repeated questioning as disbelieving of their account, an attempt to alter their expressed wishes or to prove that these are not their 'true' wishes by catching them out in some way.
71. Care should be taken not to dismiss the voice of the child in the absence of compelling evidence to show that psychological manipulation has impacted on their capacity to freely express their wishes. Care should be taken not to assume that the style of language a child uses when speaking to professionals, in isolation, confirms an allegation of Alienating Behaviour or 'coaching'. For example, a child may become increasingly inflexible in response to repeated enquiries due to frustration, or the child may be selective in the account that they give in the hope it may bring about the outcome that they desire. A child who hopes to persuade an adult may employ persuasive language. Additionally, cultural, developmental or neurodevelopmental factors may influence the style and form of language a child uses about their experiences and wishes.
72. It is also important to recognise that a child/young person may not agree with or be happy with the outcome of proceedings and may react negatively or resist. They may require thoughtful support in coming to understand the rationale behind such decisions. The way in which this is communicated can impact on their wellbeing, and their relationships, particularly if there is an implication that they have not been believed or they experience their wishes as ignored.

¹⁴ [Children Act 1989 \(legislation.gov.uk\)](#), Section 1(3)(a)

¹⁵ [Alice Roe, *Children's experience of private law proceedings: six key messages from research*. Spotlight series. Nuffield Family Justice Observatory \(2021\).](#)

¹⁶ [FJYPB top tips | Cafcass](#)

¹⁷ Nuffield Family Justice Observatory, [Uncovering private family law: how often do we hear the voice of the child?](#)

5. Guidance Note on Welfare Decisions where Findings of Alienating Behaviour Have Been Made

Purpose

73. This Guidance Note is intended to have particular relevance to judges making welfare decisions where there have been findings of Alienating Behaviours. Whilst there are points of general application for the courts to consider when determining welfare, this Note is not intended to be a comprehensive note of all welfare considerations.

Preamble

74. A finding that a parent has acted to alienate a child from the other parent is usually only one part of the factual matrix. The court should not treat a finding of Alienating Behaviour by the parent with whom the child lives as an automatic trigger for a change in a child's placement. The court should examine very carefully all the welfare ramifications for each child if considering making an order for the transfer of a child's care conditional on compliance with a 'time with' order.

75. Just as with findings of other safeguarding risks, the fact that a child's relationship with one parent has been disrupted by the behaviours of the other parent, is a factor to be weighed in the balance in determining the child's overall welfare. The court should bear in mind the wider factual matrix, which may include findings of alignment or other safeguarding issues, when considering next steps.

76. A judgment in which the court draws together its conclusions on the various elements of the factual matrix will be important in helping Cafcass, Cafcass Cymru or an appropriately qualified expert to assist the court with welfare options.

Practical Considerations

Statements

77. Where the court has made findings of Alienating Behaviour, and/or domestic abuse, the court may find it helpful initially to direct statements from the parties in response to its findings of fact judgment. This will help the court understand the parents' level of insight and their willingness to engage in work to address those behaviours and the resultant impact.

The child's representation

78. If the child is not already a party, the court should consider whether to appoint a rule 16.4 Guardian in light of its findings of fact. The Guardian will often be able

to help with next steps after fact-finding has occurred. In appropriate cases the Guardian might be available to assist in informing the child in age-appropriate terms of the progress of the proceedings.

79. If the Guardian would be assisted by a direction permitting disclosure of the court's judgment, then a direction could be made to that end. The Guardian's analysis might consider external interventions which could be of assistance to the children and parents.
80. The Guardian can be asked to consider the impact of the available interventions in their analysis of alternative welfare outcomes.
81. The court should also consider whether the child should be represented separately from the Guardian.

Interim measures

82. In appropriate cases the court, upon making its findings, may want to look at whether there is any form of intervention that can be adopted more or less immediately to ameliorate or reduce the impact of Alienating Behaviours on the children and the relationship with the other parent.
83. There are a number of options that may be available and worth considering to help re-establish the relationship between a child and a parent, even if they have been tried before without enduring success e.g. the safe and managed use of social media, or third-party interventions (such as involvement with school, sporting or religious activities, etc).
84. The court will wish to consult with Cafcass or Cafcass Cymru as to programmes they offer to support families. Some local authority areas have public and private professional services available to assist children and families. The process of reporting, accessing, and monitoring interventions can take time and can lead to delay. Identifying who will deliver any work with the children and parents must be considered with reference to the children's welfare and the reality of the lives of the family.

Assessments

85. In some cases, the court may be invited to direct a whole family psychological assessment to consider the family dynamics and functioning. Additional expert assessments are not always necessary but when one is considered to be so, the court should be mindful of the need to appoint an expert with the relevant qualifications, registration and recognised expertise in the assessment of both adults and children to enable them to conduct a whole family assessment. The court and the parties should take particular note of the guidance from the President in *Re C (Parental Alienation)*¹⁸ together with the recent Revised

¹⁸ [Re C \('Parental Alienation': Instruction of Expert\) \[2023\] EWHC 345 \(Fam\)](#)

Guidance on Psychologists as Expert Witnesses.¹⁹ See Guidance Note 7 on the use of experts.

86. The court will also wish to caution itself against appointing experts to assess a family where the expert has a financial interest in the delivery of subsequent services²⁰. Please refer to guidance note 7 on the use of experts.

87. When considering the ambit of an expert assessment, the court should bear in mind the nature, duration, and impact of the disruption in the relationship between the alienated child and parent against the wider factual matrix, to ensure that any assessment is both balanced and comprehensive.

The child's timetable

88. For some children, time and appropriate support can be effective in reversing the harm consequent on Alienating Behaviours. In some cases, children will have been alienated from the parent's wider family and reparative work may help to re-establish those safe relationships. The court must remain mindful of the child's timetable and the need to manage the court process. Where interventions are found to be outside the child's timetable the court should avoid delay in making difficult final decisions.

Parent's attitude to reparative work

89. The court should avoid making orders for the transfer of the care of children as a sanction for a parent's refusal to help restore the disrupted relationship. Whilst family courts are often asked to transfer care of a child between parents in the private law family arena, there is a qualitative difference as to the likely impact on a child where the child does not have a positive (or indeed any) relationship with the other parent. The court must similarly consider the consequences for a child's welfare when considering making an order that would result in a change of placement as a consequence of non-compliance with a 'time with order'.

Welfare - The paramount consideration

90. The court must remind itself that the welfare of the child/children remains paramount. A parent from whom a child might be moved is highly likely to perceive the prospect of a transfer of care as punitive. It may affect their presentation in court as well as their mental health. Whilst non-compliance with a court order is a serious matter the court must not conflate non-compliance with welfare. Non-compliance with a court order is not, of itself, a reason for a transfer of care albeit non-compliance and capacity to take up and act on professional support and guidance may be relevant factors in the welfare

¹⁹ <https://www.bps.org.uk/guideline/psychologists-expert-witnesses-family-courts-england-wales>

²⁰ [FJC-interim-Guidance-use-of-experts-in-cases-with-allegations-of-alienating-behaviours.pdf](#)

determination.

Interventions

91. Following review, the position of the World Health Organisation is that “*There are no evidence-based health care interventions specifically for parental alienation*”.²¹ Therefore, it is vital that any arrangements or intervention plans are based on holistic welfare considerations.

92. It is also crucial, to avoid iatrogenic harm (harm caused by the assessment or intervention/treatment), that any proposed psychological or psychotherapeutic interventions are:

- tailored to the individual family,
- cognisant of the full range of factors pertinent to the case and the established factual matrix, and
- recommended by a suitably qualified registered psychologist with the requisite training and expertise to do so.

Applying the welfare checklist

93. The welfare checklist will need to be applied as relevant to the individual circumstances of the child and their family. The following provides a non-exhaustive list of issues that may be considered:

Wishes and feelings of the child

- Although likely to reflect a desire for the status quo, opportunities for the child to express their wishes and feelings may offer indications of the viability of reparative work to re-establish the relationship between the child and their parent.

Physical, emotional, and educational needs

- The child’s future relationship with the non-resident parent if there is only indirect contact.
- The impact of a total cessation of contact both direct and indirect.
- The impact of continuity or change of schooling/educational arrangements will often need to be considered.
- The practical and physical arrangements for care of the child during and after any change of residence.
- The role and/or form of any therapeutic support for the family.

The likely effect on the child of any change in their circumstances

- The impact of different contact arrangements for siblings or possible separation from siblings.
- The impact of separation from the current parent with care.
- Contact plans for any new family configuration.
- If a change of residence will lead to a child being brought up with a different

²¹ [WHO – frequently asked questions – parental alienation.](#)

culture, faith, first language or in a very different environment, particular thought should be given to the impact of that, how they could be supported with that transition and their identity needs met.

Any harm the child has suffered or is at risk of suffering

- The risk of harm to the child from exposure to continuing Alienating Behaviours (and disruption to the relationship with one parent).
- The risk of harm to the child from disruption of their current living arrangements.
- The risk of harm to the child of disruption of their relationship with their current parent with care and siblings.
- Impact of placement with a parent with whom they have had a limited or disrupted relationship (potentially comparable to a child being moved to a stranger placement/foster care).
- Risk of breakdown of any changed living arrangements for the child.

How capable each parent (and any other person in relation to whom the court considers the question to be relevant) is of meeting the child's needs

- The quality of care generally provided to the child by the current parent with care.
- The potential for deterioration in the mental health of either parent consequent on the court's order.
- In the case of contemplated transfer of residence, the quality of care likely to be provided by the other parent.

The range of the powers available to the court in the proceedings in question

- Whether the status quo could be maintained, and if so how.
- Whether contact with members of the wider family of the alienated parent could ameliorate the harm.
- Whether the child's placement should be changed and if so where they should be placed.
- Whether bridging options would assist where there is no current relationship between the child and alienated parent.
- What contingency planning might be put in place.

94. Even if on some dimension another care-giving environment may be better than the child's current one, decision-making should assign considerable weight to the value of continuity of "good-enough" care.²² The court must remain mindful that the trauma of removal and the manner of it must be weighed in balance when considering any fundamental change in the child's living arrangements.

The Guardian's role if a change of placement is contemplated

95. Where removal from the current parent with care is contemplated, the Guardian may invite the court to make a direction for the local authority to prepare a section 37 report pursuant to the guidance of Wall J (as he then was) in *CDM v CM* [2003] 2 FLR 636 :

"The action contemplated (removal of the children from the residential parent's care either for an assessment or with a view to a change of

²² Forslund et al., [Attachment goes to court: child protection and custody issues \(2022\)](#)

residence) must be in the children's best interests. The consequences of the removal must be thought through: there must, in short, be a coherent care plan of which temporary or permanent removal from the residential parent's care is an integral part."²³

96. In such a case, the Guardian will make a recommendation about whether a change of placement is appropriate and/or practical. The Guardian is not in a position to assist with the mechanics of a move should one be proposed. Cafcass have no authority to take charge of a child or to be practically or physically involved in a transfer of care.
97. In appropriate cases the Guardian may make a referral to the local authority if they consider that a child is at risk and provide the relevant safeguarding information. A local authority may provide a bridging placement for a child to stabilise before a change of placement or to act as a neutral base from which they can build up / develop a relationship with the alienated parent where there has been an absence of opportunity for them to spend time together. There may be very rare cases where the child is unable to continue to live within the family.
98. Where a change of placement has taken place, the Guardian will make recommendations as to how to build a positive relationship with both parents, and how the child may best be protected from exposure to further Alienating Behaviours.

Review

99. Even where the court has conducted its own welfare analysis and carefully weighed in the balance the risks of harm to the child under the various options, the court should keep its decision under careful review consistent with the child's welfare and a potentially changing landscape.

Child Friendly Judgments

100. Where a child's relationship with a parent has been fundamentally undermined, the welfare decisions will always be difficult. The consequent orders made are not a punishment or admonishment, albeit the family are likely to feel them to be so. In the extreme cases the child may lose all contact with a parent and at the other extreme, experience a change of placement. The court will no doubt wish to ensure that its decision is delivered as sensitively as possible. A short summary of the court's decision in child friendly terms or a letter to the child, may help the child understand and in appropriate cases leave open the option for a relationship with the parent who has been found to have engaged in Alienating Behaviours at a later date.

²³ [CDM v CM & Ors \[2003\] EWHC 1024 \(Fam\), Para 11.2](#)

6. Guidance Note on Understanding Reluctance, Resistance and Refusal and Psychological Manipulation

101. It is easy to assume that a child's negative reaction, in particular their initial reaction to parental separation, is a stable and pervasive indication of a decision about their desire for a relationship with a parent, or that resistance at some level will be implacable/unchanging. In response to a parental separation children may be expected to experience a wide range of emotions and react with initial anger or resentment due to the situation they find themselves in, and for this to be directed at the parent that they perceive to be at fault for the relationship breakdown.
102. This resistance may include a range of behaviours from refusing to speak to or see a parent, throwing away things that they associate with them, to angry or challenging reactions to that parent, e.g. in response to typical parental boundary setting. It can also include making derogatory remarks about that parent to others, e.g. a teacher, or being critical about them. None of these behaviours can in themselves be taken to indicate evidence of exposure to psychological manipulation by the other parent in their own right. It can be helpful to consider the reaction to the relationship breakdown around them as a loss reaction, and to consider that observed behaviour may alter over time as this loss is processed by the child.
103. It is important to recognise that there will be situations in which there is no obvious cause or reason that can be identified for a child demonstrating RRR. The lack of a rationale or explanation may cause there to be concern that the child has been exposed to psychological manipulation, but the absence of an identified justification does not in isolation evidence such manipulation.
104. Crucially, it is when there is no known justification for the rejection of a parent in combination with evidence of psychological manipulation that it may be determined that the child is in what is sometimes referred to as an 'alienated position' in the family dynamic.

Psychological manipulation

105. It is well established in law that some parents manipulate their children, and this can include being manipulated to make false allegations in family law proceedings, e.g., *Re H (Children)* [2014] EWCA Civ 733 (Parker J). Examples of such harmful parental behaviour can include a parent reinforcing 'loyalty' and rejection of the other parent with emotional warmth or withdrawing emotional warmth in response to perceived disloyalty/a child wishing to maintain a relationship with the other parent. This can also include engendering a developmentally inappropriate need to protect the emotional fragility of the parent, e.g. through sharing of inappropriate information about the adult relationship or portraying the other parent as a source of harm to the wellbeing of that parent where there is no basis for doing so.

106. Children who have experienced loss arising from parental separation may anticipate the loss of another relationship or threat to the security of that relationship and be motivated by their attachment needs to protect that relationship over their other competing needs. What is often described in these scenarios is a parent struggling to maintain a boundary between their own psychological needs and those of their child – the parent’s capacity to prioritise a child’s emotional and psychological needs over their own.
107. Where findings of Alienating Behaviour have been made, understanding the parent’s capacity to change such behaviour, with or without support, may require the assistance of an appropriately qualified and registered psychologist expert.

7. Guidance Note on the Use of Experts

Use of experts

108. It is inappropriate for experts to be asked to step into fact-finding or determination of Alienating Behaviours – as such, the timing and type of expert evidence needed is crucial. In determining the welfare outcome, when the presence of such harmful behaviours has been identified, it may be necessary to have expert evidence from a psychologist expert.
109. Determining the appropriate type of psychologist expert should be in accordance with the Family Justice Council (FJC)/British Psychological Society (BPS) guidance for Psychologist expert witnesses.²⁴ This updated guidance includes additional points in relation to the instruction of psychologist expert witnesses, specifically the scrutiny of their regulation, their qualifications, and their access to psychological tests, given in *Re C ('Parental Alienation')*.²⁵
110. These assessments should not be undertaken by academic psychologists or psychological researchers in the field of alienation. The guidance from the BPS is that *Only HCPC Registered psychologists have the relevant clinical experience and training to conduct psychological assessments of people and make clinical diagnoses and recommendations for treatment or interventions, whereas, academic psychologists, who should be Chartered, but who are not registered with the HCPC, would not normally have the clinical experience and training in order to complete psychological assessments or make clinical diagnoses.*
111. Given the complexity of these cases and the often interacting psychological factors at play in the adults and the children, it is likely that assessments which will assist the court in determining welfare outcomes are those offered by HCPC regulated Practitioner Psychologists with competence in assessing adults and children, e.g., Clinical Psychologists/Counselling Psychologists. Although there are differences in their training competencies, both are trained to assess both adults and children. The training proficiencies and proficiency exclusions of different types of practitioner psychologists are set out in appendix 2 of the FJC/BPS guidance for Psychologist expert witnesses.
112. There is an inherent risk of confirmatory bias if instructions and assessments are framed solely in terms of allegations of Alienating Behaviours. It is important that the instructions for psychological evidence when there are findings of Alienating Behaviours are not narrowed in focus but retain the breadth and scope typical to holistic psychological assessments of parents and children in the family courts. The Law Society provide template letters of instruction with

²⁴ [Guidance on the use of Psychologists as Expert Witnesses in the Family Courts in England and Wales \(Standards and Competencies\) - June 2023 | BPS](#)

²⁵ [Re C \('Parental Alienation'; Instruction of Expert\) \[2023\] EWHC 345 \(Fam\)](#) . See also the test for admissibility of expert evidence set out by the Supreme Court in [Kennedy v Cordia \(Services\) LLP \(Scotland\) \[2016\] UKSC 6](#).

sample questions for holistic psychological assessments.²⁶

113. Assessments of children should focus on their cognitive, educational, emotional, social, and behavioural development, and comment on any matters of concern. They should comment upon any harm which the children may have suffered in respect of their psychological, intellectual, educational, emotional, social, and behavioural development and assess what the cause of such harm may be and advise on the support services (including therapeutic support) that should be put in place to promote the child's welfare.
114. Assessments of adults should focus on a parent's psychological functioning, including childhood experiences/developmental concerns, their intellectual functioning, past and present relationships, the impact of any drug and/or alcohol misuse, mental health or personality difficulties on their parenting capacity. They should comment on prognosis, a parent's ability to prioritise the child(ren)'s needs above their own, their understanding, insight and acknowledgement of any findings made by the court and concerns raised by professionals, their ability to make changes in their own behaviour and their capacity to engage in work to secure a favourable outcome for the child(ren), including any recommended therapeutic intervention or any other necessary intervention or support to promote the child(ren)'s welfare.

Conflict of interest

115. The FJC/BPS guidance for Psychologist expert witnesses (2023) emphasises the importance of the expert being alert to potential conflicts of interest. It notes that:

"The expert witness's overriding duty is to the Court and to be impartial in their evidence; the impartiality of expert witnesses is essential to their evidence; if the psychologist has a view that is controversial as between experts or that might be derived from partiality, she or he must declare the extent of that interest. This is particularly relevant when a psychologist expert recommends an intervention or therapy that they or an associate would benefit financially from delivering. Whilst this may be experienced as helpful and facilitative to the court, this would be a clear conflict of interest and threat to the independence of their expert evidence."²⁷

116. The President of the Family Division's Memorandum on the use of experts in the family court (October 2021)²⁸ emphasises the rigorous approach to be taken by the family courts in admitting expert evidence and the need for a reliable body of knowledge or experience to underpin the expert's evidence.
117. The importance of robust psychological approaches consistent with this memorandum is highlighted in the FJC/BPS guidance. This includes

²⁶ [Templates for instructing experts in family and children court proceedings | The Law Society](#)

²⁷ [Guidance on the use of Psychologists as Expert Witnesses in the Family Courts in England and Wales\(Standards and Competencies\) - June 2023 | BPS, Page 17, para 7.2.](#)

²⁸ [President's Memorandum: Experts in the Family Court \(2021\)](#)

assessments drawing on a range of different sources and methods (to combat biases inherent in any single approach) to inform therapeutic recommendations in the opinion given. Recommendations should be consistent with typical current psychological practice and evidence base and flow from a rationale based on recognised assessment methodology. This is a marker of a good quality psychological report. The court should expect a range of options in psychological opinion and recommendations that are:

- Transparent as to the intervention and requisite qualifications needed to effect desired change.
- Interpretable by a wide range of practitioners in the field.
- Deliverable by any suitably qualified practitioners.

118. Recommendations for interventions deliverable only by the instructed expert or their associates are inconsistent with this. It increases the risk of bias, can limit appropriate oversight of interventions and risks delays as it may create barriers to families accessing appropriate, timely support local to them.

119. The court should be extremely cautious when asked to consider assessment and treatment packages offered by the same or linked providers.

8. Annex: Organisations that responded to the consultation

The consultation ended on 16 October 2024²⁹. In total 96 responses were received, which comprised of:

61 individuals

35 organisations

The Family Justice Council thanks all those that responded to the consultation.

Details of the organisations who submitted responses:

1.	Association for Family Therapy & Systemic Practice
2.	Association of Lawyers for Children [ALC]
3.	Children and Family Court Advisory and Support Service [Cafcass]
4.	Children and Family Court Advisory and Support Service, Cymru [Cafcass Cymru]
5.	Dads Unlimited
6.	Domestic Abuse Commissioner [DAC]
7.	Family Court Crisis
8.	Family Court Reform Coalition
9.	Family Law Bar Association [FLBA]
10.	Family Law in Partnership [FLIP]
11.	Families Need Fathers
12.	Family Separation Clinic LLP
13.	Family Sub Committee of the Council of Circuit Judges
14.	Joint response from various HCPC registered psychologists
15.	Justices', Legal Advisers' and Court Officers' Service (JCS) Family Committee
16.	Just Stop Abuse
17.	London's Victims' Commissioner
18.	Magistrates' Association
19.	MATCHMothers Charity

²⁹ Some organisations were granted limited extensions until 23 and 30 October to provide responses.

20.	Nagalro, The Professional Association for Children's Guardians, Family Court Advisers, and Independent Social Workers
21.	Parental Alienation Awareness
22.	Project Lighthouse
23.	Refuge
24.	Resolution
25.	Right to Equality
26.	Rights of Women
27.	Split The Difference
28.	Support Not Separation and Women Against Rape (Legal Action for Women)
29.	The Association of His Majesty's District Judges
30.	The Autonomy Hotline
31.	The British Psychological Society (BPS)
32.	The Change for Children International
33.	The ManKind Initiative
34.	Welsh Women's Aid
35.	Women's Aid