

Hague Domestic Violence Forum
Expert Paper #4

**Domestic violence,
parental alienation, and
perpetrator tactics in
court proceedings**

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Biography

Dr Adrienne Barnett is a Reader in Law at Brunel University London, and Divisional Lead, Private and Commercial Law. She practised as a Family Law barrister in London for over 25 years. Her specialist area of research for the past 26 years has been domestic abuse and family court proceedings and, more recently, parental alienation. She has published widely on these issues and has presented papers at numerous academic and professional conferences in the UK and abroad. Adrienne was commissioned by the Ministry of Justice to undertake a literature review to support their inquiry into domestic abuse and family court proceedings, published in June 2020. She is a member of the Advisory Group of Rights of Women, a founder member of the SHERA Research Group, and a co-director of Right to Equality's campaign to end the presumption of contact with abusive parents. Her current research projects include domestic abuse and parental alienation in family court proceedings, and Hague Convention judgments in England and Wales.

Introduction

In recent years victims of domestic violence involved in family court proceedings can find themselves facing allegations of so-called 'parental alienation' (PA) which can have profoundly negative implications for the process and outcomes of their cases.¹ They may also increasingly encounter other perpetrator tactics such as claims of 'false allegations' of domestic violence and a strategy known as DARVO (Deny, Attack, Reverse Victim and Offender). These perpetrator strategies also appear to be emerging in Hague Convention proceedings. This briefing considers the origins of PA, its validity and credibility, the deployment of PA in cases of domestic violence, and its impact on victims, children and outcomes. It also discusses the emerging literature on perpetrator tactics in family court proceedings.

The origins and development of 'parental alienation'

'Parental alienation' originated in the form of parental alienation syndrome (PAS), which was a term coined in the 1980s by US psychiatrist, Dr Richard Gardner. He used it to describe what he claimed was a disorder in the child occurring in the context of custody disputes which could be diagnosed from the collective presence of all or most of eight 'signs' in the child (Berns, 2001; Gardner, 2001a; Meier and Dickson, 2017). He opined that the indoctrinating parent is usually the mother and that false allegations of child sexual abuse were highly prevalent in custody litigation and were designed by mothers to exclude fathers from children's lives (Gardner, 1987; see further Bruch, 2002; Kelly and Johnson, 2001). Subsequently, PAS was extended to include cases of all types in which a child refused to visit the noncustodial parent (Bruch, 2002). Gardner recommended transferring custody of the child in serious cases from the custodial parent to the 'rejected' parent or to institutional care for 'deprogramming', during which time the custodial parent should have no contact with the child until the 'brainwashing' had been reversed (Gardner, 1992, 2001b). Many children in the US were removed from mothers and placed with abusive fathers or detained in juvenile or inpatient psychiatric facilities in the 1980s based on Gardner's theory (Bruch, 2002; Kelly and Johnson, 2001; Neilson, 2018).

PAS was discredited by the late 1990s in the USA on grounds of lack of scientific credibility and validity, harm to children and gender bias (Bruch, 2002; Doughty et al., 2018; Kelly and Johnson, 2001; Meier, 2009; Meier and Dickson, 2017; Zaccour, 2018). It was rejected as a diagnostic syndrome and by experts, scholars and the US courts, and subsequently fell (largely) into disuse. In England and Wales, the authenticity of PAS was rejected by the Court of Appeal in the leading case of *Re L, V, H, H (Contact: Domestic Violence)* [2000] Fam 260. Thereafter, proponents and litigants dropped the 'syndrome' from the concept and instead pursued claims of 'parental alienation', presumably to avoid the need to prove a mental health condition (Barnett, 2020).

The validity and credibility of 'parental alienation'

There is no official or commonly accepted definition of PA and a wide range of views on what PA 'is' and how to identify it, even among its advocates (An Roinn Dli Agus Cirt, 2023; Doughty et al., 2018, 2020). A similar inconsistency can be seen in how the courts interpret and define PA, with the terms 'parental alienation syndrome', 'parental alienation' and 'alienating behaviours' often used interchangeably by courts and professionals (Lapierre et al., 2020; Richardson, 2019; Zaccour, 2018).

Robust scientific and empirical studies on how PA is or should be identified, understood, assessed and treated are lacking, the majority being US studies with methodological limitations (An Roinn dli Agus Cirt, 2023; Doughty et al., 2018, 2020; Mercer, 2019, 2021a; Meier, 2021; Trane et al., 2021). Issues have

been raised about research credibility, lack of rigour and representativeness of sampling strategies and small sample sizes, an over-reliance on retrospective accounts, scales and tests to measure PA lacking a credible evidentiary basis, an absence of longitudinal research, and lack of research controls (Doughty et al., 2018, 2020; Mercer, 2021a; Thomas and Richardson, 2015). Many of the 'typical behaviours' listed in the checklists to diagnose PA can equally be associated with numerous child adversities (such as negative parenting practices, domestic violence, extensive parental conflict, excessive litigation, mental health issues, children's realistic fear, lack of parent-child warmth and weak parental attachments with the allegedly alienated parent) (Milchman, 2021; Neilson, 2018). Children's alignment with one parent over another can be a normal consequence of child development or a normal reaction to parental separation (Kelly and Johnson, 2001; Mercer, 2021b).

PA is not identified as a disorder or condition in either of the major international indices – the Diagnostic and Statistical Manual of Mental Disorders (DSM-V) and the International Classification of Diseases 11th edition (ICD-11). The US National Council of Juvenile and Family Court Judges (2022, p. 19) warned against the application of PAS and alienation theory in family law cases, particularly in cases involving allegations of family violence, and has implemented a model that replaces PA terminology with language that more accurately describes children's responses as 'resistance, refusal, or reluctance toward contact with a parent'. The theory of PA has been strongly criticised by the New Zealand Psychological Society (see Elizabeth, 2020; Mackenzie et al., 2020), and the Italian Psychology Society and Ministry of Health (Committee on the Elimination of All Forms of Discrimination against Women, 2017, Paras 51 & 52). The European Association for Psychotherapy (2018) 'considers that the terms and concepts of "PAS" and "PA" are unsuitable for use in any psychotherapeutic practice'. The Canadian Department of Justice concluded that the use of PA terminology increases parental confrontation, fails to take account of the child's needs and wishes, and leads to a tendency to explain anything in 'high-conflict' separations on the basis of PA (Freeman and Freeman, 2022).

Spain is the first country to ban the use of PA by legislation and has explicitly described it as 'pseudoscience'.² The Supreme Court of Italy stated that the sole custody of a child cannot be based only on the diagnosis of PA, and that judges must verify the scientific foundation of any advice that deviates from official medical science.³ In Colombia, the General Council of the Judiciary issued advice against using PA in cases involving domestic violence (Alsalem, 2023, Para 49). CEDAW has called on states to discourage the use of PA by courts and experts (Committee on the Elimination of All Forms of Discrimination against Women, 2017, Para 52(a)). The use of PA has been rejected by GREVIO (Council of Europe's Group of Experts on Action against Violence against Women and Domestic Violence, 2022, pp. 46-52). The European Parliament (2021) has adopted a resolution condemning the term and calling on members to prohibit the use of the term in court proceedings.

The gendered deployment of and response to claims of 'parental alienation'

Research undertaken internationally has found that the vast majority of PA allegations are made by fathers against mothers (Alsalem, 2023; Barnett, 2020; Casas Vila, 2020; Doughty et al., 2020; Feresin, 2020; Gomide et al., 2016; Lapierre et al., 2020; Mackenzie et al., 2020; Meier, 2020; Meier and Dickson, 2017; Rathus, 2020; Sheehy and Boyd, 2020). Two Canadian studies found that mothers were more than twice as likely to be accused of PA than fathers (Sheehy and Boyd, 2020; Zaccour, 2018). The largest survey of court users in England and Wales, conducted by Candour TV (2021) to support the Channel 4 Dispatches programme, *Torn Apart: Family Courts Uncovered*, found that 83-85 percent of all alienation claims were made against mothers, as reported by both mothers and fathers. A similar gendered pattern

can also be discerned in the way in which family courts and professionals respond to claims of PA. Meier and Dickson's (2017) US pilot study found that fathers were more than twice as likely as mothers to win the case when claiming PA (see also Meier, 2020).

'Parental alienation' and domestic violence

All the available empirical research strongly indicates that claims of PA are highly prevalent in cases involving domestic violence and that PA is being used in family courts in numerous jurisdictions as a tool by abusers to undermine, discredit, negate and/or detract attention from allegations of domestic violence and child abuse perpetrated by the supposedly alienated parent (Barnett, 2020; Birchall and Choudhry, 2021; Casas Vila, 2020; Dalgarno et al., 2024; Doughty et al., 2020; Feresin, 2020; Gomide et al., 2016; Hunter et al., 2020; Lapierre et al., 2020; Mackenzie et al., 2020; Meier, 2020; Meier and Dickson, 2017; Rathus, 2020; Sheehy and Boyd, 2020). The survey of court users conducted by Candour TV (2021) found that PA allegations were five times more likely to be made against parents who had alleged domestic violence. Allegations of domestic violence can even be used as evidence of PA (Birchall and Choudhry, 2021). Concerns about the widespread use of counter-allegations of PA in order to minimise and divert attention from allegations or even findings of domestic violence have been raised by the GREVIO (Council of Europe's Group of Experts on Action against Violence against Women and Domestic Violence, 2022), the Domestic Abuse Commissioner for England and Wales (2023), the US National Council of Juvenile and Family Court Judges (2022), and the UN Special Rapporteur for Violence Against Women, based on submissions from numerous countries (Alsalem, 2023).

Counter-allegations of PA raised by perpetrators may be taken more seriously by courts and professionals than allegations of domestic violence, even where there is little or no supporting evidence (Domestic Abuse Commissioner for England and Wales, 2023; Hunter et al., 2020; Meier, 2020; Neilson, 2018; Rathus, 2020; Sheehy and Boyd, 2020). Meier (2020) found that courts are more than twice as likely to disbelieve mothers' claims of any type of abuse if fathers counter-claimed PA. Canadian research found that domestic violence was rarely condemned or related to children's best interests in the way that alienation was (Sheehy and Boyd, 2020).

Accusations of PA can silence victims and children

Accusations of PA can be a powerful barrier to victims disclosing their and their children's experiences of abuse to the court. Even raising domestic violence as a safety factor in relation to child contact can be perceived as attempts to obstruct contact for no good reason (Barnett, 2020; Birchall and Choudhry, 2021; Domestic Abuse Commissioner, 2023). Women have reported that they had not raised domestic violence for fear of being accused of PA and losing care of their children to the abuser (Hunter et al., 2020). Numerous studies internationally found that mothers may be advised by their own lawyers not to raise domestic violence in order to avoid being seen as alienating (Birchall and Choudhry, 2021; Domestic Abuse Commissioner for England and Wales, 2023; Hunter et al., 2020; Lapierre and Cote, 2016; Mackenzie et al., 2020; Rathus, 2020; Sheehy and Boyd, 2020).

The use of PA can also result in the silencing of children, which is contrary to their Article 12 UNCRC rights to have their perspectives included and taken into account in legal proceedings that affect them. The Ministry of Justice 'Harm Panel' in England and Wales received numerous submissions about professionals being too ready to see signs of alienation rather than assessing further what the child may have witnessed or experienced (Hunter et al., 2020; see also Barnett, 2020; Women's Aid, 2022). This can mean that plausible explanations for children's resistance to parental contact can be ignored

or overlooked and can obscure the multiple reasons why children may be resistant to contact with a parent (Champion, 2022; Domestic Abuse Commissioner for England and Wales, 2023; Fortin et al., 2012; Mercer, 2019).

PA and child removal

One of the most concerning consequences of the deployment of allegations of PA is the increasing prevalence of transfers of custody of children from primary carer mothers to abusive fathers, sometimes forcibly, with no or decreased contact with the protective parent (Alsalem, 2023; Barnett, 2020; Birchall and Choudhry, 2021; Casas Vila (2020); Elizabeth, 2020; Feresin, 2020; Grey, 2023; Hunter et al., 2020; Lapierre et al., 2020; Mackenzie et al., 2020; Meier, 2020; Rathus, 2020; Sheehy and Boyd, 2020). Case law in Canada and the USA documents children being forcefully removed by police from the homes of primary carers, sometimes repeatedly, and placed with parents the children feared or rejected (Meier and Dickson, 2017; Neilson, 2018; Silberg and Dallam, 2019). Neilson's (2018) analysis of Canadian court judgments found that when courts made definitive PA findings against mothers, they were almost three times more likely to lose custody of their children than when courts made findings of PA against fathers.⁴ Meier's (2020) US study found that fathers' alienation claims roughly doubled mothers' rates of losing custody when mothers claimed domestic violence and fathers cross-claimed PA. PA 'experts' may be instrumental in courts ordering transfers of custody, together with questionable interventions such as reunification therapies and camps (Alsalem, 2023; Chester, 2022; Dallam and Silberg, 2016; Grey, 2023). Concerns have been raised about the 'marketisation' of expert reports (Domestic Abuse Commissioner for England and Wales, 2023), and submissions to the UNSRVAV observed that some unqualified and unregulated experts appear to 'abuse their position for profits or political agenda' (Alsalem, 2023, p. 15).

There is no systematic or longitudinal research on the outcomes for children of transferring custody. One study found that transfers of residence in these circumstances can undermine children's resilience and leave them without protection or support (Graham-Bermann et al., 2009). A small-scale US study found that removal of children from the care of a so-called alienating parent, either to the care of the other parent or to institutional or foster care can cause continuing abuse and lasting psychological harm to children, particularly if all contact is suspended between children and their primary carer (Silberg and Dallam, 2019).

Perpetrator tactics: 'false allegations' of domestic violence and child abuse

The rise in allegations of PA has been accompanied by increasing claims that mothers make false allegations of domestic violence or child abuse in order to exclude children from fathers' lives. There is no systematic data on the incidence of false allegations in family court proceedings, and no data to suggest that false allegations are prevalent. The available evidence indicates, on the contrary, that false allegations by mothers are very rare. Additionally, the courts have emphasised that '[f]ailure to find a fact proved on the balance of probabilities does not equate, without more, to a finding that the allegation is false. ... It is not a correct proposition of law that a rejection of evidence mandates a judge to find that something is false'.⁵

A report by the Crown Prosecution Service in England and Wales found that in the 17-month review period there were 111,891 prosecutions for domestic violence but only six prosecutions for making false allegations of domestic violence (Crown Prosecution Service, 2013). Information disclosed by the Metropolitan Police (2022) revealed that in the four-year period from 2018 to 2021 inclusive, a total of 276,834 offences of domestic violence with female victims were recorded, 39 of which were flagged

as false (less than 0.01%). Australia's National Domestic and Family Violence Bench Book instructs judges that 'false denials of true allegations are more common' than false allegations of family violence (Australian Government, Attorney-General's Department, 2023, Para 4.1). In private law children cases, despite the barriers to proving domestic violence (Hunter et al., 2020), the majority (83 percent) of the 623 judicial and professional respondents surveyed by Hunter and Barnett (2013) considered that some of the contested allegations of domestic violence would quite often or very often be found proven. A study of 7,600 child welfare investigations conducted across Canada found that the rate of intentionally false allegations of child abuse or neglect was very low (4 percent of all allegations) (Trocme and Bala, 2005). False allegations were somewhat higher in cases of parental separation than in other cases, but the non-custodial parent (usually the father) was significantly more likely to deliberately fabricate allegations of child abuse than were mothers.

The data and research discussed above indicates that claims of 'false allegations' made against mothers who plead Article 13(1)(b) on the basis of domestic violence should therefore be viewed with extreme caution. Courts need to be mindful that this is a common perpetrator tactic in family and other court proceedings (Koshan, 2023). The credibility of all claims (by alleged victims and perpetrators) should be assessed without making prejudicial or stereotypical assumptions.

Perpetrator tactics: DARVO

Deny, Attack and Reverse Victim and Offender (DARVO) describes a strategy by which perpetrators of domestic violence deny or minimise the alleged behaviour, attack the victim's credibility, and claim the victim role, with the actual victim positioned as the perpetrator (Freyd, 1997). Harsey et al. (2017) found that this is a common strategy of perpetrators. A study by Harsey and Freyd (2020), using an experimental methodology, has made a significant contribution to the limited research on this strategy. The researchers found that a perpetrator's use of DARVO does lead to victims being viewed as more abusive than the actual perpetrator and as more responsible for abuse perpetrated against them, and to perpetrators being viewed as less abusive and less responsible for the abuse they committed. They also found that these perceptions can be mitigated by awareness of the strategy of DARVO. The researchers concluded that DARVO can succeed as a strategy because, 'in a society steeped in commonly-believed myths about interpersonal violence', it 'exacerbates the preexisting doubts surrounding the innocence of victims and culpability of perpetrators.' (Harsey and Freyd, 2020, p. 913)

Conclusions

Courts seeking to determine disputed allegations of domestic violence and child abuse, to the limited extent that this is possible in Convention proceedings, for the purposes of undertaking the unenviable role of risk assessment under Article 13(1)(b) need an awareness of the strategies used by abusive parents to deflect, negate, detract attention from and obscure the abuse and violence they have perpetrated. This Briefing has provided an overview of some common tactics used by perpetrators in this respect, namely, accusations of 'parental alienation', claims of 'false allegations' of domestic violence and child abuse, and DARVO.

Judges in England and Wales are increasingly alive to these tactics. In *Re V and W (Hague Return Order, Lithuania)* [2022] EWHC 739 (Fam) the mother made serious allegations of rape, physical abuse and coercive and controlling behaviour, and of physical abuse of the children. The father made counter-allegations against the mother of controlling behaviour, prostitution and drug and alcohol misuse, as well as accusations amounting to 'parental alienation'. Mr Justice Poole found that the mother's and

children's fears of the father were justified, that there was a substantial risk to the mother's mental health and a real risk of psychological harm to the children if returned to Lithuania. He also found that the protective measures offered by the father (undertakings and an agreement that the children live with the mother on return) 'do not provide for a 'soft landing' for the children but a very 'hard landing', potentially leaving their mother's care upon or shortly after return.' [Para 62]

The Domestic Abuse Commissioner for England and Wales (2023) has recommended that training for family court judges to provide a better understanding of domestic violence should include perpetrator tactics such as the use of allegations of 'parental alienation'. It is suggested that such training would benefit all judges and professionals tasked with Convention cases.

1. In England and Wales, the author's jurisdiction, the term 'domestic abuse' is used. For the purposes of an international readership, the term 'domestic violence' will be used in this Briefing.
2. Organic Law 8/2021 on the Comprehensive Protection of Children and Adolescents Against Violence (Ley Orgánica 8/2021, de 4 de junio, de protección integral a la infancia y la adolescencia frente a la violencia)
3. Supreme Court of Cassation, 24 March 2022, Case No. 9691
4. Similar findings were made by Sheehy and Boyd's (2020) Canadian study and Zaccour's (2018) Quebec study.
5. *Re GB (Parental Alienation: Fact Findings)* [2024] EWFC 75 per HHJ Middleton-Roy at [66]. See also *Re M (Children)* [2013] EWCA Civ 388.

References

- Alsalem, R. (2023) *Custody, violence against women and violence against children Report of the Special Rapporteur on violence against women and girls, its causes and consequences*. Geneva: United Nations General Assembly. Available at: <https://documents.un.org/doc/undoc/gen/g23/070/18/pdf/g2307018.pdf?token=GMBqvR3ZqxNppls4Av&fe=true>
- An Roinn Dli Agus Cirt (2023) *Parental Alienation: A Review of Understandings, Assessment and Interventions*. Dublin: Department of Justice. Available at: <https://www.gov.ie/ga/foilsuichan/20df3-parental-alienation-research-report-and-policy-paper/>
- Australian Government, Attorney-General's Department (2023) *National Domestic and Family Violence Benchbook*. Australian Government, The Australasian Institute of Judicial Administration, The University of Queensland, The University of Melbourne. Available at: [Contents - National Domestic and Family Violence Bench Book \(ajia.org.au\)](https://ajia.org.au/Contents-National-Domestic-and-Family-Violence-Bench-Book)
- Barnett, A. (2020) 'A genealogy of hostility: parental alienation in England and Wales', *Journal of Social Welfare and Family Law*, 42(1), 18-29.
- Berns, S. (2001) 'Parents behaving badly: Parental alienation syndrome in the Family Court – magic bullet or poisoned chalice', *Australian Journal of Family Law*, 15, 191-214.
- Birchall, J. and Choudhry, S. (2021) ' "I was punished for telling the truth": how allegations of parental alienation are used to silence, sideline and disempower survivors of domestic abuse in family law proceedings', *Journal of Gender-Based Violence*, 6(1), 115-131.
- Bruch, C. (2002) 'Parental Alienation Syndrome and Parental Alienation: Getting it Wrong in Child Custody Cases', *Family Law Quarterly*, 35, 527-552.
- Candour TV, 'Family Courts Uncovered: A Survey of Family Court Users and Professionals'. Candour TV. Available at: <https://candour.tv/films/torn-apart>
- Casas Vila, G. (2020) 'Parental alienation syndrome in Spain: opposed by the Government but accepted in the Courts', *Journal of Social Welfare and Family Law*, 42(1), 45-55.
- Champion, K.M. (2022) 'Coercion in Families and child resistance to contact with a parent after family separation', *Journal of Family Trauma, Child Custody & Child Development*, 19(3-4), 230-243.
- Chester, S. (2022) 'Reunification, alienation, or re-traumatization? Let's start listening to the child', *Journal of Family Trauma, Child Custody & Child Development*, 19, 359– 382.
- Committee on the Elimination of All Forms of Discrimination against Women (2017) *Concluding observations on the seventh periodic report of Italy*. Geneva: United Nations. Available at: <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N17/227/49/PDF/N1722749.pdf?OpenElement>
- Council of Europe's Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO) (2022) *3rd General Report on GREVIO's Activities*. Strasbourg: Council of Europe. Available at: <https://www.coe.int/en/web/istanbul-convention/-/3rd-general-report-on-grevio-s-activities>
- Crown Prosecution Service (2013) *Charging perverting the course of justice and wasting police time in cases involving allegedly false rape and domestic violence allegations*. London: Crown Prosecution Service Equality and Diversity Unit. Available at: https://www.cps.gov.uk/sites/default/files/documents/legal_guidance/perverting-course-of-justice-march-2013.pdf
- Dalgarno, E., Bramwell, D., Ayeb-Karlsson, S., Barnett, A. and Verma, A. 'Health-Related Experiences of Family Court and Domestic Abuse in England: A Looming Public Health Crisis', *Journal of Family Trauma, Child Custody & Child Development*, published online.
- Dallam, S. and Silberg, J. (2016) 'Recommended treatments for "parental alienation syndrome" may cause children foreseeable and lasting psychological harm', *Journal of Child Custody*, 2(3) 134-143.
- Domestic Abuse Commissioner for England and Wales (2023) *The Family Court and domestic abuse: achieving cultural change*. London: Domestic Abuse Commissioner for England and Wales. Available at: https://domesticabusecommissioner.uk/wp-content/uploads/2023/07/DAC_Family-Court-Report-_2023_Digital.pdf
- Freeman, R. and Freeman, G. (2022) *Managing Contact Difficulties: A Child-Centred Approach*. Toronto: Department of Justice Canada. Available at: https://www.justice.gc.ca/eng/rp-pr/fl-lf/famil/2003_5/pdf/2003_5.pdf
- Doughty, J., Maxwell, N. and Slater, R. (2018) *Review of research and case law on parental alienation*. Cardiff: Cafcass Cymru and University of Cardiff. Available at: <https://www.gov.wales/sites/default/files/publications/2018-05/review-of-research-and-case-law-on-parental-alienation.pdf>
- Doughty, J., Maxwell, N. and Slater, T. (2020) 'Professional responses to "parental alienation": research-informed practice', *Journal of Social Welfare and Family Law*, 42(1), 68-79.

- Elizabeth, V. (2020) 'The affective burden of separated mothers in PA(S) inflected custody law systems: a New Zealand case study', *Journal of Social Welfare and Family Law*, 42(1), 118-129.
- European Association for Psychotherapy (2018) *EAP Statement on Parent Alienation Syndrome (PAS) – Parent Alienation (PA)*. Vienna: European Association for Psychotherapy. Available at: <https://www.europsyche.org/quality-standards/eap-guidelines/parent-alienation-syndrome-pas-parental-alienation-pa/#:~:text=A%20Statement%20from%20the%20European.use%20in%20any%20psychotherapeutic%20practice>
- European Parliament (2021) *The impact of intimate partner violence and custody rights on women and children*. Brussels: European Parliament. Available at: https://www.europarl.europa.eu/doceo/document/TA-9-2021-0406_EN.html
- Feresin, M. (2020) 'Parental alienation (syndrome) in child custody cases: survivors' experiences and the logic of psychosocial and legal services in Italy', *Journal of Social Welfare and Family Law*, 42(1), 56-67.
- Fortin, J., Hunt, J. and Scanlan, L. (2012) *Taking a longer view of contact: The perspectives of young adults who experienced parental separation in their youth*. Brighton: University of Sussex Law School. No longer available online. Summary available at: https://sussex.figshare.com/articles/report/Taking_a_longer_view_of_contact_the_perspectives_of_young_adults_who_experience_parental_separation_in_their_youth/23395454
- Freyd, J.J. (1997) 'Violations of power, adaptive blindness, and betrayal trauma theory', *Feminism & Psychology*, 7(1), 22-32.
- Gardner, R.A. (1987) *The Parental Alienation Syndrome and the Differentiation Between Fabricated and Genuine Child Sex Abuse*. Cresskill, New Jersey: Creative Therapeutics.
- Gardner, R.A. (1992) *The Parental Alienation Syndrome*. Cresskill, New Jersey: Creative Therapeutics.
- Gardner, R.A. (2001a) 'Parental Alienation Syndrome (PAS) Sixteen Years Later' (2001) *Academy Forum*, 45.
- Gardner, R.A. (2001b) *Therapeutic Interventions for Children with Parental Alienation Syndrome*. Cresskill, New Jersey: Creative Therapeutics 2001.
- Gomide, P.I.C., Camargo, E.B. and Fernandes, M.G. (2016) 'Analysis of the psychometric properties of a parental alienation scale', *Paidéia*, 26(65), 291-298.
- Graham-Bermann, S.A., Gruber, G., Howell, K.H. and Girz, L. (2009) 'Factors discriminating among profiles of resilience and psychopathology in children exposed to intimate partner violence', *Child Abuse and Neglect*, 33(9), 648-660.
- Grey, R. (2023) "'Catastrophic": a qualitative exploration of survivors experiences of expert instruction in private law child arrangements proceedings', *Journal of Social Welfare and Family Law*, 45(4), 344-362.
- Harsey, S. and Freyd, J.J. (2020) 'Deny, Attack, and Reverse Victim and Offender (DARVO): What is the Influence on Perceived Perpetrator and Victim Credibility?', *Journal of Aggression, Maltreatment & Trauma*, 29(8), 897-916.
- Harsey, S.J., Zurbriggen, E.L. and Freyd, J.J. (2017) 'Perpetrator Responses to Victim Confrontation: DARVO and Victim Self-Blame', *Journal of Aggression, Maltreatment and Trauma*, 26(6), 644-663.
- Hunter, R. and Barnett, A. (2013) *Fact-finding hearings and the implementation of the President's Practice Direction: Residence and contact orders: Domestic violence and harm*. London: Family Justice Council. Available at: <https://kar.kent.ac.uk/35678/1/FFH%20report%20January%202013.pdf>
- Hunter, R., Burton, M. and Trinder, L. (2020) *Assessing Risk of Harm to Children and Parents in Private Law Children Cases*. London: Ministry of Justice. Available at: https://assets.publishing.service.gov.uk/media/5ef3dcdade90e075c4e144bfd/assessing-risk-harm-children-parents-pl-childrens-cases-report_.pdf
- Kelly, J.B. and Johnson, J.R. (2001) 'The Alienated Child: A Reformulation of Parental Alienation Syndrome', *Family Court Review*, 39(3), 249-266.
- Koshan, J. (2023) 'The Myth of False Allegations of Intimate Partner Violence', Calgary, Canada: University of Calgary ABlawg. Available at: <https://ablawg.ca/2023/11/08/the-myth-of-false-allegations-of-intimate-partner-violence/>
- Lapierre, S. and Cote, S. (2016) 'Abused women and the threat of parental alienation: shelter workers' perspectives', *Children and Youth Services Review*, 65, 120-126.
- Lapierre, S., Ladouceur, P., Frenette, M. and Côté, I. (2020) 'The legitimization and institutionalization of "parental alienation" in the Province of Quebec', *Journal of Social Welfare and Family Law*, 42(1), 30-44.
- Mackenzie, D., Herbert, R. and Robertson, N. (2020) ' "It's Not OK", but "It" never happened: parental alienation accusations undermine children's safety in the New Zealand Family Court', *Journal of Social Welfare and Family Law*, 42(1), 106-117.
- Meier, J. (2009) 'A Historical Perspective on Parental Alienation Syndrome and Parental Alienation', *Journal of Child Custody*, 6, 232-257.
- Meier, J. (2020) 'U.S. child custody outcomes in cases involving parental alienation and abuse allegations: what do the data show?', *Journal of Social Welfare and Family Law*, 42(1), 92-105.

- Meier, J. (2021) 'Questioning the Scientific Validity of the Parental Alienation Label in Abuse Cases' in J. Mercer and M. Drew (eds), *Challenging Parental Alienation: New Directions for Professionals and Parents*. New York: Routledge 2021.
- Joan Meier, M. and Dickson, S. (2017) 'Mapping Gender: Shedding Empirical Light on Family Court's Treatment of Cases Involving Abuse and Alienation', *Law and Inequality*, 35(2), 311– 334.
- Mercer, J. (2019) 'Are intensive parental alienation treatments effective and safe for children and adolescents?', *Journal of Child Custody: Research, Issues and Practices*, 16(1), 67–113.
- Mercer, J. (2021a) 'Parental Alienation, Science, and Pseudoscience' in J. Mercer and M. Drew (eds), *Challenging Parental Alienation: New Directions for Professionals and Parents*. New York: Routledge.
- Mercer, J. (2021b) 'Developmental Changes in Children and Adolescents: Relevance for Parental Alienation Discussions' in J. Mercer and M. Drew (eds), *Challenging Parental Alienation: New Directions for Professionals and Parents*. New York: Routledge.
- Metropolitan Police (2022) *False Allegations in Domestic Violent Cases from 2018 to 2021*. London: Metropolitan Police. Available at: <https://www.met.police.uk/foi-ai/metropolitan-police/d/february-2022/false-allegations-in-domestic-violent-cases-from-2018-to-2021/>
- Milchman, M.S. (2021) 'Distinguishing parental alienation from child abuse and adverse parenting' in J. Mercer and M. Drew (eds), *Challenging Parental Alienation: New Directions for Professionals and Parents*. New York: Routledge.
- National Council of Juvenile and Family Court Judges (2022) *Revised Chapter Four: Families and Children Model Code on Domestic and Family Violence*. National Council of Juvenile and Family Court Judges. Available at: <https://www.ncjfcj.org/publications/revised-chapter-four-families-and-children-model-code-on-domestic-and-family-violence/>
- Neilson, L. (2018) *Parental Alienation Empirical Analysis: Child Best Interests or Parental Rights?* Fredericton, New Brunswick: Muriel McQueen Fergusson Centre for Family Violence, FREDA Centre for Research on Violence Against Women and Children. Available at: <https://www.fredacentre.com/wp-content/uploads/Parental-Alienation-Linda-Neilson.pdf>
- Rathus, R. (2020) 'A history of the use of the concept of parental alienation in the Australian family law system: contradictions, collisions and their consequences', *Journal of Social Welfare and Family Law*, 42(1), 5-17.
- Richardson, M. (2019) 'Parental alienation: the vital early stages of litigation', *Family Law* 278.
- Sheehy, E. and Boyd, S.B. (2020) 'Penalizing women's fear: intimate partner violence and parental alienation in Canadian child custody cases', *Journal of Social Welfare and Family Law*, 42(1), 80-91.
- Silberg, J. and Dallam, S. (2019) 'Abusers gaining custody in family courts: A case series of over turned decisions', *Journal of Child Custody*, 16(2) 140–169.
- Thomas, R.M. and Richardson, J.T. (2015) 'Parental Alienation Syndrome: 30 years On and Still Junk Science', *Judge's Journal*, 54(3), 22-24.
- Trane, S.T., Champion, K.M. and Hupp, S.D.A. (2021) 'Comparison of Parental Alienation Treatments and Evidence-Based Treatments for Children' in J. Mercer and M. Drew (eds), *Challenging Parental Alienation: New Directions for Professionals and Parents*. New York: Routledge 2021.
- Trocme, N. and Bala, N. (2005) 'False allegations of abuse and neglect when parents separate', *Child Abuse & Neglect*, 29, 1333-1345.
- Women's Aid (2022) *Two years, too long: Mapping action on the Harm Panel's findings*. Bristol: Women's Aid. Available at: <https://www.womensaid.org.uk/wp-content/uploads/2022/06/Two-Years-Too-Long-2022.pdf>
- Zaccour, S. (2018) 'Parental Alienation in Quebec Custody Litigation', *Les Cahiers de Droit*, 59(4), 1073-1111.

FiLiA Hague Mothers

[FiLiA Hague Mothers](#) is a MVAWG project. Our overarching aim is to end the injustices created by The Hague Convention on the Civil Aspects of International Child Abduction, specifically for mothers and children who are victims of domestic abuse.