

## Written evidence (CFA0088)

### HOUSE OF LORDS CHILDREN AND FAMILIES ACT 2014 SELECT COMMITTEE INQUIRY

#### Children and Families Act 2014 – Submissions

1. If there were to be a Children and Families Act 2022, what should it include and what might be the barriers to implementation?

#### Summary :

2. In response to this question instead I would like to detail what should **NOT** form part of the Act, and how strongly the Act should even go as far as to say that allegations of Parental Alienation should have **no place** in family court proceedings.

3. In Family Court, mothers are being found guilty of Parental Alienation based on opinions, assumptions and insinuations, often despite evidence for why the child was justified in their natural resistance to spending less time with their mother and increased time with their father.

4. Natural reasons for a child wanting to stay with their mother include affinity, attachment, security, and the child's own views, as well as any domestic abuse that the child may have witnessed or been subjected to. However, these are rarely receive any consideration once Parental Alienation is alleged.

5. Parental Alienation is the standard 'go to' counter allegation when children and/or mothers disclose Domestic Abuse, and is used to deflect from how the father's actions themselves have affected the child.

6. Despite the above and usually no other safeguarding concerns existing apart from Parental Alienation allegations, good mothers are still having their children removed by Judges with immediate effect following a final hearing.

7. This is despite professionals widely acknowledging the significant and immediate emotional harm that a transfer causes to children when it is against their strong wishes.

8. Finding a mother guilty of Parental Alienation following a child disclosing, and a transfer of residence against the children's wishes being ordered solely on this basis, is an immeasurable betrayal of our children.

9. Mothers are often then being given supervised contact only, or no contact at all, so that the children can 'settle in', and so that they don't 'undermine the placement'.

10. In some cases mothers are then being told that unless they accept that they are guilty of Parental Alienation, their contact with their children will decrease even further or even stop altogether. PD12J has been used to restrict the children's contact with mothers in this way, even though this direction relates to Domestic Abuse, not Parental Alienation (which is not included within the definitions of the Domestic Abuse Act).

**11. This trend of Judges forcing confessions of Parental Alienation by withholding contact is highly concerning, as it falsely gives the concept a validation that it does not deserve, and puts children at further risk.**

12. A Judge making *any* increase in contact solely based on an admission, as well as transferring the children to their father due to Parental Alienation alone, violates mother's Human Rights under article 1 of the UN convention on torture.

13. This reads - '*Torture*' means any act by which severe pain or suffering, whether physical or mental, is intentionally inflicted on a person for such purposes as obtaining from him or a third person information or a confession, punishing him for an act he or a third person has committed or is suspected of having committed, or intimidating or coercing him or a third person, or for any reason based on discrimination of any kind, when such pain or suffering is inflicted by or at the instigation of or with the consent or acquiescence of a public official or other person acting in an official capacity.

14. Child removal from a mother against both the child's and mother's wishes would fall under the section about punishing a person for an act they have committed or are suspected of committing (i.e. Parental Alienation) as there is no worse pain than removing a child from their mother.

15. And intentionally inflicting severe mental pain and suffering by doing this and withholding contact to obtain a coerced confession of PA also falls under this Article as this is exactly what some judges are currently doing.

16. Removing children from their mothers against the child's wishes not only violates the mother's Human Rights, but also the child's rights. Both the mother and the child are being punished, or more 'tortured' for disclosing abuse or if their bond is closer than the child has with their father.

17. Parental Alienation is usually a counter allegation made *after* either a child or mum discloses abuse. This should hold no weight in court at all, yet time after time good and protective mothers have their children removed due to Parental Alienation, despite it being called a 'pseudo and regressive theory' by the **United Nations**.

18. It is inexplicable and unjustifiable why it continues to be so common place and highly pursued in the UK's courts when it has been so publicly denounced in so many places and by so many organisations around the rest of the world. The theory and the subsequent actions that are taken to 'correct' it, violates the Human Rights of both mothers and children as I will come on to below.

19. Part of the following article sums this up completely

*'If it is to fulfil this goal then the House of Lords needs to recognise PA for the dangerous ruse that it is. There needs to be a clear understanding that it has become a tool used to silence women and minimise violence. Including an amendment that would make PA a form of abuse itself will further entrench accusations of "alienation" as an instrument to manipulate the courts. The state will willingly allow itself to become a weapon that abusive men can use against their children and former partners. It will have fully submitted itself to this repugnant market' (<https://www.politics.co.uk/comment/2021/02/04/the-amendment-threatening-to-derail-the-domestic-abuse-bill/?cmpredirect>)*

20. The reality of it is that there are literally hundreds of mothers and children going through this, but because they cannot discuss/disclose anything from family court, they are actively silenced.

21. The **NSPCC's** recent position on the concept should be given full weight when considering a Children and Families Act 2022, as their concerns are significant and clear, and it's imperative that mothers and children are protected from this moving forwards :

*The NSPCC position is that we will no longer use the term parental alienation in any of our activity. This includes direct service delivery and referrals made by the NSPCC Helpline.*

*Our analysis of the available evidence does not demonstrate that the behaviours involved in a claim of parental alienation are separate and distinct from other forms of abusive behaviour. Therefore, there needs to be evidence of other type of abusive behaviour in these cases. Family law proceedings involving children where there is an allegation of parental alienation should be dealt with extremely carefully by professionals who*

*are highly trained to recognise and respond to the complex dynamics involved.*

*In addition, the courts must ensure that children are heard in these cases. Professionals should have sufficient time to build a relationship with children and there must be separate representation of children. It is also vital that independent therapeutic support is available for children during these proceedings and that family courts must work closely with services and organisations that support children outside of the court process. These measures are essential in order to get to the facts of such cases and ensure that children's voices are heard and taken into account when making decisions about their lives.*

*There is no evidence data to support claims of parental alienation and there are concerning examples where victims of domestic abuse have had children removed from their care on the basis of parental alienation. There are also cases where there is evidence of significant emotional harm being experienced by children who have been made to have contact with or be placed in the care of a parent/carer on the basis of the other parent's alleged parental alienation. Children are not having access to independent legal advocacy to express their views within the family law process on the basis that alleged parental alienation will have influenced them.*

*I hope this helps with your query, but if you should require any further NSPCC advice or information, please do not hesitate to contact us.*

*Kind regards*

*NSPCC Safeguarding Manager*

22. Please also read the **Women's Aid** study 'Child First' in its entirety which concludes

*'The family courts should be a place of safety, where children's rights are put first and where the concerns and fears of survivors of domestic abuse are listened to and respected. However, this report represents a stark reminder of what happens when this is not the case, and child contact proceedings instead become traumatic and dangerous environments for both survivors and their children'*

*(<https://www.womensaid.org.uk/wp-content/uploads/2018/05/Domestic-abuse-human-rights-and-the-family-courts-report.pdf>)*

**Further details about the use of Parental Alienation in Family Court :**

23. The **Supreme Court ruling in Italy** recently banned the use of the theory and associated ones in court completely, calling it **pseudoscience and illegitimate**. The Supreme Court also considered the provision of the judicial authority on the merits to be null for not having listened to the minor.

24. Last year Italy also rebutted parental alienation theory as an unscientific '*Nazi theory*' in domestic abuse cases. **Their supreme court ruled that the theory relies on misogynistic stereotypes and contravenes the Istanbul Convention**, making the point that **the theory is about the punishment of the mother for reporting abuse, rather than about bad parenting**.

25. **Spain** also recently outlawed the use of the theory in family court cases. **Scotland** also does not recognise Parental Alienation and did not consider it appropriate to include parental alienation in the Children Scotland Bill.

26. The use of this theory has raised significant concerns for the **United Nations** who held a conference on it in March 2022. An excellent 2 page summary of their concerns, which again calls it a '**pseudo and regressive theory**' can be found at [https://s3-eu-west-1.amazonaws.com/upload.teamup.com/2487162/ASBuRCTJS6uzGdD7Ycza\\_Concept-20note\\_SRVAW-20side-20event-20CSW-2066\\_parental-20alienation-201-20March-202022-20public-20version.pdf](https://s3-eu-west-1.amazonaws.com/upload.teamup.com/2487162/ASBuRCTJS6uzGdD7Ycza_Concept-20note_SRVAW-20side-20event-20CSW-2066_parental-20alienation-201-20March-202022-20public-20version.pdf)

27. The United Nations Convention on the Rights of the Child, or **UNCRC**, is the basis of all of **Unicef's** work. It is the most complete statement of children's rights ever produced and is the most widely-ratified international human rights treaty in history. This includes :

**Article 3** (*best interests of the child*) *The best interests of the child must be a top priority in all decisions and actions that affect children* (how can the 'perceived/assumed' emotional harm related to Parental Alienation, justify the courts causing ACTUAL severe emotional harm to the children by removing them from their mothers against their will, to stop 'potential future harm'?)

**Article 12** (*respect for the views of the child*) *Every child has the right to express their views, feelings and wishes in all matters affecting them, and to have their views considered and taken seriously. This right applies at all times*

However, once Parental Alienation is alleged the children's voices are **actively silenced**, as their words are viewed as being from the mother, rather than their own.

28. The **American Professional Society on the Abuse of Children** also recently released a statement on 'parental alienation'. Describing PA theory as '**fundamentally weak, opinion based, and unscientific**' - it urges courts to avoid using it. "*PA advocates have used the assertion that these allegations of maltreatment are false to gain leverage in custody disputes. This is a tragic situation for unprotected children and their protective parents.*"

<https://files.ctctusercontent.com/f9c101a1501/7daa44fa-2672-43a3-b5a6-e7fed2bbbcae.pdf?rdr=true>

29. Abusers have rights to contact, but children have an individual right to a voice in proceedings and to live free from mental and physical violence. See the **United Nations Convention on the Rights of the Child** for their human rights. However, Parental Alienation is found in court again and again despite this.

[https://downloads.unicef.org.uk/wp-content/uploads/2019/10/UNCRC\\_summary-1\\_1.pdf](https://downloads.unicef.org.uk/wp-content/uploads/2019/10/UNCRC_summary-1_1.pdf)

30. In Oct 2021 the **President of the Family Division's speech** which accompanied that memorandum he actually mentions parental alienation

<https://www.judiciary.uk/wp-content/uploads/2021/10/Supporting-Families-in-Conflict-Jersey.pdf>

31. The following sections from his speech should make it extremely clear that this 'theory' should have no place in Family Proceedings or in any related Acts....

*One specific problem which is said to arise in cases of domestic abuse is the not infrequent counter assertion that the person making allegations of abuse is themselves causing harm to the child by 'parental alienation'.*

*This is a complex and sensitive issue, and in the short time available in this address I seek to make one and one point only about it.*

*Where the issue of parental alienation is raised and it is suggested to the court that an expert should be instructed, the court must be careful only to authorise such instruction where the individual expert has relevant expertise.*

*This regard I draw attention to the fact that I am about to issue a General Memorandum on the topic of the instruction of experts. Within that I stress that an 'expert must demonstrate to the court that he or she has the relevant knowledge and experience to give either opinion evidence, or factual evidence **which is not based exclusively on personal observation or sensation**'.*

*I also emphasise that an expert must be independent and impartial and that 'the court will refuse to authorise or admit the evidence of an expert whose methodology is not based on any established body of knowledge'.*

*I conclude by saying: 'The Family Court adopts a rigorous approach to the admission of expert evidence. As the references in this memorandum make plain, pseudo-science, which is not based on any established body of knowledge, will be inadmissible in the Family Court.'*

32. **Women's Aid** call the theory of Parental Alienation 'a **dangerous and harmful concept**' - they summarise:

*While there are no robust empirical studies to back up the concept of "parental alienation", and no reliable data on its prevalence there is a growing, and increasingly robust evidence base demonstrating the ways that allegations of alienation are used in the family courts to rebut, obscure and distract from allegations of domestic abuse. Put simply, when mothers raise concerns about whether contact between a perpetrator of domestic abuse and a child is safe, they are accused of attempting to "alienate" the child from the father. They are also accused of making false allegations of domestic or child abuse. Devastatingly, the results can be that children are forced into unsafe child contact with an abusive parent, or even removed from loving parents and placed with perpetrators of abuse.*

33. Parental Alienation theory has also never gained any professional credibility within authoritative psychological and psychiatric bodies. The syndrome has also been dismissed by the American Psychiatric Association, American Psychological Association, and American Medical Association as lacking supporting empirical or clinical evidence and it is not included in the *Diagnostic and Statistical Manual of Mental Disorders* or the *International Classification of Diseases*.

34. The National Council of Juvenile and Family Court Judges – the membership body for judges and other juvenile court staff – in the U.S subsequently recommended that courts do not accept any testimony regarding PA, stating it is **scientifically invalid, and recognising that it was designed to divert the court's attention away from abusive behaviours**.

35. <https://www.womensaid.org.uk/parental-alienation-and-the-family-courts/> - this link explains what it is and the dangers of it being used in family court quite concisely. Dr Adrienne Barnett is a specialist in it in the UK, she's studied Parental Alienation in great depth and was one of the experts who worked on the 'Harm Report' that the government brought out in 2020 which investigated judicial failings and included lots on the use of the concept of PA regarding domestic abuse cases. Sadly the Harm

Report seems to have had minimal impact, with mothers being told that it is 'merely guidance, not law' so does not need to be adhered to in court.

36. There's links below to other articles about Parental Alienation that should be researched about the topic when considering a Children and Families Act 2022 as it's imperative that you get it right about this subject to prevent the harm that's currently being done to mothers and children continuing :

37. <https://www.brunel.ac.uk/news-and-events/news/articles/Playing-the-Parental-Alienation-card-Abusive-parents-use-the-system-to-gain-access-to-children>

38. <https://www.independent.co.uk/news/uk/home-news/domestic-abuse-parental-alienation-family-courts-brunel-study-a9294726.html>

39. <https://www.forbes.com/sites/naomicahn/2020/01/26/why-women-lose-custody/?sh=1168379e4641>

40. <https://www.womensaid.org.uk/parental-alienation-a-dangerous-and-harmful-concept/>

41. <https://thecourtsaid.org/2021/10/12/the-malignant-pseudo-science-of-parental-alienation/>

42. <https://thecourtsaid.org/2021/01/25/briefing-statement-on-the-house-of-lords-committee/>

43. <https://thecourtsaid.org/2021/01/10/parental-alienation-theory/>

44. Sandra Horley, chief executive of lead domestic abuse charity, **Refuge**, said: *"Refuge works with hundreds of women every day and we often hear stories about perpetrators claiming women are 'making up the abuse' as a way to turn children away from them. It is therefore of great concern that 'parental alienation' is increasingly being presented to the courts in cases of domestic abuse"*

The whole article can be found at <https://www.independent.co.uk/news/uk/home-news/domestic-abuse-parental-alienation-family-courts-brunel-study-a9294726.html>

45. This paper on **How the Family Court's Purpose to Protect Children Become Inverted** should also be given weight in the consideration about the Act moving forward.  
[https://drive.google.com/file/d/1hQgBrItQPkl\\_q0szaBVGkLgCIYE\\_qqt6/view](https://drive.google.com/file/d/1hQgBrItQPkl_q0szaBVGkLgCIYE_qqt6/view)

46. Parental Alienation Syndrome was created by a disgraced and disreputable psychiatrist/court reporter purely to deny a parent's abuse of their child. He's written over 200 books that endorse paedophilia. <https://www.independent.co.uk/news/obituaries/dr-richard-gardner-36582.html>

47. **Professor Joan Meier's** groundbreaking study was published in 2020, showing the outcomes of family court cases involving parental alienation and how it affects custody. Her study firmly shone the spotlight on the catastrophic gender-specific harm the theory of parental alienation does and, in particular, the harm it does to child victims of physical and sexual abuse. She rebutted unprofessional attacks on her ground breaking research. <https://thecourtsaid.org/2021/01/26/professor-joan-meier-rebuts-unprofessional-attacks-on-her-groundbreaking-research/>

48. Barrister **Dr Charlotte Proudman** also wrote in one article - '*There is no empirical evidence that a transfer of residence can make a child love the alienated parent, but there is evidence that it can result in further harm to children.*' (the study link is <https://www.tandfonline.com/doi/abs/10.1080/09649069.2019.1701921>)

49. **ADRIANNE BARNETT FOR WOMENSAID** '*My research into the development and consequences of PA in England and Wales was based on an analysis of all reported and published court judgments in which PA or PAS were raised or referred to, producing a total sample of 40 cases between 2000 and May 2019 (Barnett, 2020). The reported cases cannot provide a representative sample of all such cases, as most child arrangements/contact cases are heard by magistrates or district judges whose decisions are not reported or published. However, they provide some insight into the way in which some trial judges respond to PA and into the attitudes and responses of the higher courts. In January 2020 a workshop to identify and explore issues arising from the use of PA in the family courts was held at Brunel University London, attended by 20 academics, professionals, and stakeholder organisations (PA workshop). The discussion that follows draws on my study and the outcomes of the PA workshop, to explore how PA developed and what its consequences are for parents and children involved in private law family court proceedings in England and Wales*

50. *A further problem is that PA marginalises or may even invalidate children's wishes and feelings. While some judges in the cases reviewed took children's wishes and feelings very seriously, other judges, encouraged by PA experts, were more than willing to ignore children's expressed wishes and feelings and attribute them to coaching by mothers (see also Birchall and Choudhry, 2018). These findings were*

*echoed by PA workshop participants' experiences – of children's voices not being heard or listened to, and their experiences not understood. Specialist participants reported that this increases children's powerlessness, can retraumatise them, and can impede work in helping children to heal. Coercing mothers into enforcing contact on children who are resistant to contact and afraid of their fathers can also have a detrimental impact on the mother-child relationship, with mothers having to cope with angry, defiant and distressed children (Coy et al., 2012; Thiara and Gill, 2012).*

51. *PA may lead to outcomes in individual cases that are harmful to children, including the enforced removal of children from their primary carers. The case law analysis found that, although transfers of residence were rare (n = 4), the most recent judgments suggest an increased willingness to transfer the care of children from 'alienating' resident mothers to non-resident fathers. This is supported by research by Birchall and Choudhry, 2018 who found a high proportion of women who had had their children removed based on accusations of PA, or had lost contact with them. In three of the five cases I reviewed where residence was transferred to fathers, there were indications of violent and/or abusive behaviour by the fathers which had never been tested and were effectively ignored. In two of these cases, children were returned to their mothers mentally and emotionally damaged, and in two others it appeared likely that the fathers were frustrating the mothers' contact.*

52. The Channel 4 **Despatches** documentary 'Torn apart - Family Court Uncovered' stated that there is no evidence to support that a transfer of residence can create the change it aims for - that there is no research of long term outcomes, nor the damage that that change can do to a child, there are only a few studies on it which are very small scale and cannot be said to be representative.

**53.** Research by **Cardiff University** looked into those studies and **none meet NICE guidelines**.

54. Cardiff University said "There are few to no high quality evaluations of interventions in relation to PA" and that they "**could not find any robust evidence for the effectiveness of interventions**"

55. The study by Cardiff University also concluded that it is '**very rare for a parent to instil false beliefs into a child**'. Here's the study at <https://orca.cardiff.ac.uk/112511/1/review-of-research-and-case-law-on-parental-alienation.pdf>

56. Sections that should be strongly taken into account for this Act in it include

57. *'Trying to coerce an older child into arrangements to which they are opposed can exacerbate the problem. It may be more meaningful to try to provide opportunities for negotiation (Re S (Contact: Children's views [2002] EWHC 540 (Fam)).'*

58. *'The findings suggest that a child's alignment with one parent over another is a normal consequence of child development, although affiliations will change over time according to the needs of the child (Johnston, 2003). For older children, Art 12 UNCRC recognises their evolving capacity to participate in decision making, even if this outweighs parental welfare judgements (see Section 2.2). Parental alignment or parental alienation can also be a normal reaction to parental separation'.*

59. *One problem is the lack of a definition. This review has also identified that there appears to be no consensus on methods to differentiate parental alienation from justifiable estrangement (11); a lack of reliable data on prevalence of alienation and a causal link between characteristics and effects; no meaningful results from the existing measures and tests; and a lack of robust evaluation of intervention models (11 The focus of the review is on refusal of contact in the absence of domestic abuse, so searches were narrowed to exclude these issues, but it was not always possible to know whether the studies themselves had entirely excluded them)*

60. *This review has found the evidence base for parental alienation to be very limited because of a lack of robust empirical studies. There is an absence of literature about how the concept of alienation is understood, assessed and worked with from a practice perspective. The limited empirical evidence suffers from poor sampling, or a focus on specific populations, so cannot easily be generalised. There is a reliance on retrospective accounts, which do not allow for the controlling of extraneous variables or identification for a causal relationship between adverse outcomes and alienation to be established. Research is needed with a range of different stakeholder groups (including families and children). Another problem is that most of the research has focused on specific geographical locations, primarily the USA, where legal and clinical environments are different to those in Wales. Direct references to research in reported court judgments in England and Wales are very rare.*

61. *Where a court does make a finding of parental alienation that amounts to a risk of emotional harm (short of significant harm), family court advisers need to be cautious in assessing or recommending a particular intervention because the evidence base for interventions is very limited*

62. In another study on Parental Alienation done by **Cardiff University** (<https://orca.cardiff.ac.uk/125904/1/Doughty%2BMaxwell%2B%26%2BSlater%2BSeptember%2B2019%2Bpre%2Bprint%2Bcopy.docx.doc.pdf>) it was concluded

*63. No reliable mechanism for identifying parental alienation was found to exist. Similarly, studies into the intervention and treatment of parental alienation tended to be small scale and lacked effective evaluation. The tools that do exist are unhelpful, poorly validated **and serve to undermine the focus on the child.** There is a risk that the assessments, and debates about them, might serve to mislead the court and practice generally.*

64. **Baroness Brinton** spoke in The House of Lords on the 25th January 2021 when the Domestic Abuse Bill was being debated. She highlighted that *"parental alienation remains a controversial subject...There is no commonly accepted definition, no reliable data on its prevalence, and a lack of peer-reviewed and robust academic studies to give confidence in any such definition. It is worth noting that these moves are unanimously opposed by all of the victims' and domestic abuse commissioners, as well as domestic abuse charities...They tell us that there is worrying evidence that the concept of parental alienation has gained a significant foothold in the UK family courts and is already being used in judgments relating to child safety. Worse, there is also alarming evidence that the fears of false allegations of parental alienation are becoming a barrier to victims of abuse telling the courts about their experience. The Ministry of Justice report, Assessing Risk of Harm to Children and Parents in Private Law Children Cases, published in June 2020, makes that plain."*

Domestic abuse experts have grave concerns about "parent alienation," since they have seen *"a direct relationship between allegations of parental alienation and potentially unsafe child contact or residence arrangements."*

65. **Baroness Natalie Bennett** said *"children need to be listened to. The PA narrative prevents that happening. Kids disclosing abuse deserve to have their needs centred not sidelined"*. Her speech was excellent, 7 mins and is here - <https://fb.watch/47EbMm6utQ/>

66. **Baroness Helic** described how the concept of parental alienation is so open to misuse as a means of covering up domestic abuse. She stressed the unacceptable behaviour of the parental alienation lobby, who have perpetrated 'vitriolic attacks' on anyone voicing serious and valid concerns about the concept of PA - <https://fb.watch/47GYNc3qRG/>

67. *"Parental Alienation Syndrome is a bogus, pro-pedophilic fraud concocted by Richard Gardner. I was the last attorney to cross examine*

Gardner. In Paterson, NJ, he admitted that he has not spoken to the Dean of Columbia's medical school for over 15 years, and has not had hospital admitting privileges for over 25 years. He has not been court appointed to do anything for decades.

The only two appellate courts in the country who have considered the question of whether PAS meets the Frye test, i.e., whether it is generally accepted in the scientific community, said it does not. As Dr. Paul Fink, former president of the American Psychiatric Association has stated, Dr. Gardner and PAS should be only a "pathetic footnote" in psychiatric history. Gardner and his bogus theory have done untold damage to sexually and physically abused children and their protective parents. PAS has been rejected by every reputable organization considering it.

In a Florida case in which I was recently involved, when the judge insisted on a Frye hearing, Gardner simply did not show up. Perhaps because he finally realized that the entire nation was on to his scam, he committed suicide on May 25. Let's pray that his ridiculous, dangerous PAS foolishness died with him."

- Richard Ducote, Attorney at Law (June 1st 2003)

68. "It was a total privilege co-writing with Dr Mukesh Kapila CBE and Dr Liz Dalgarno **about the debunked pseudo-science that is responsible for "allowing for violence against children and their mothers to remain undetected, and/or contested"** [European Association for Psychotherapy, World Health Organisation].

69. "The tragic irony is that it is worse to accuse than to abuse because many judges, attorneys, and psychologists believe in the notion of 'parental alienation' as explaining most abuse allegations. The perverse consequence of this is that evidence of real abuse is discredited even before it is properly investigated."

<https://mukeshkapilablog.org/2021/10/09/the-malignant-pseudo-science-of-parental-alienation>

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