



When child arrangements are ordered at a dispute resolution appointment (DRA) or a final hearing

Contents

Who is this document for?	2
What happens at the dispute resolution appointment?	2
Arrangements for a final hearing.....	3
2. How may the child be feeling?	4
3. How can professionals contribute to decisions on who the child should live and spend time with?.....	5
4. How can professionals best help the child?	7
a) Support the child and family's emotional needs	7
b) Keep the child informed and support their participation in the DRA	9
c) Support the child's participation in the final hearing	11
5. Where next?	12
References	13

Who is this document for?

This practice guide is for all professionals involved with a child and family when an application under private law proceedings reaches a **dispute resolution appointment**, in situations where concerns of child sexual abuse are present. It aims to help you understand what is happening, what it means for the child, and how you can contribute to safeguarding and supporting the child at this time.

What happens at the dispute resolution appointment?

In private law proceedings, Dispute Resolution Appointment (DRA) is primarily a welfare-focused hearing where the court reviews evidence, narrows the issues and explores whether agreement can safely be reached. A final order may be made if the court is satisfied that the arrangements are in the child's best interests (a **Child Arrangements Order**), **determining who the child will live with and spend time with may**. **As part of the national rollout of the Child Focused Courts, involvement of the child much earlier in the process may direct earlier outcomes. More can be read about the process of the Child Focused Courts [here](#).**

In making decisions, the court is guided by the paramountcy principle, ensuring that **the child's welfare** is the overriding consideration. It applies the **welfare checklist** under [Section 1\(3\) of the Children Act 1989](#) to systematically assess all factors relevant to the child's wellbeing.

The DRA is typically the second major hearing in the proceedings; however, some complex cases have multiple hearings to resolve disputes, sometimes over a period of months or years. It takes place after the court has received the evidence it directed at the First Hearing Dispute Resolution Appointment (FHDRA), such as:

- If a Section 7 report was directed by the court to be prepared by a Cafcass social worker (Family Court Advisor, or a Children's Guardian if one has been appointed under Rule 16.4 of the Family Procedure Rules 2010) or Children's Services social worker
- If a Section 37 Report was directed by the court to be prepared by a Children's Services social worker
- any expert reports
- any findings from a fact-finding hearing (if one has taken place).

You can find out more about these in our guides [The Family Court holds a first hearing and dispute resolution appointment \(FHDRA\)](#) and [A fact-finding hearing is held](#).

The DRA functions as a 'welfare-focused' resolution hearing, contrasting sharply with the 'fact-focused' nature of a fact-finding hearing. Once the facts have been established (which may or may not include fact of child sexual abuse being found), the DRA shifts attention to the child's arrangements. It uses the verified facts and expert analysis to help make

arrangements that keep the child's needs as the top priority. The judge's role shifts from 'fact-finder' to a facilitator of discussions to resolve outstanding issues.

It should be noted that **not all cases have fact finding hearing** in cases where child sexual abuse is a concern. The decision-making process for determining if a fact finding is necessary will consider if a safe and just decision can be made on the available evidence. The court does not need to resolve all disputed matters to make a decision. If the court decides a decision can be made without a fact-finding hearing, it will do so.

The judge aims to encourage parties to reach an agreement, if safe to do so, helping them avoid both the emotional and financial expense of a disputed final hearing.

The primary purposes of the DRA are to:

- review all the new evidence, any reports and findings
- identify and narrow the issues that remain in dispute between the parties
- provide an opportunity for the parties to reach a final agreement, with the benefit of the new evidence and often with a clear indication from the judge about the likely outcome if the case were to proceed to a final hearing.

The judge will actively manage the DRA to encourage a resolution. The author of any welfare report may be required to attend, to assist the court and the parties. The possible outcomes are:

- **The judge may make a Child Arrangements Order by consent**, if the parties can reach an agreement that the court agrees is in the child's best interests. The order is legally binding and will bring the proceedings to an end.
- If there are still outstanding matters, safeguarding concerns or a report needs updating, the court can **make further case management directions before listing a final hearing**.

Arrangements for a final hearing

If a safe and appropriate agreement cannot be reached at the DRA, the court will list the case for a final contested hearing. It will set a **timetable** for the final steps in preparation, such as the filing of the following documents *by each party*:

- **A final witness statement**, which sets out the party's evidence and position on all outstanding issues, including their specific proposals for the child's future arrangements. It serves as the primary evidence-in-chief for the final hearing, providing the court with a comprehensive narrative and supporting facts to justify why a particular order is in the child's best interests.
- **A skeleton argument**, which is a concise written summary outlining the essential legal principles, key facts and specific orders that the party is seeking from the court. It serves as a roadmap for the judge, streamlining the oral hearing by focusing on the core contested issues rather than exhaustive detail.

If the case proceeds to a final hearing, both parties will give evidence, if allegations are disputed, call any witnesses, and may be cross-examined by legal representatives. The

judge will hear final legal submissions from the parties' representatives (if they are represented). The judge's task is to consider all the evidence gathered throughout the entire case – including the initial application, Cafcass reports, any findings of fact, and any expert evidence – and apply the [Welfare Checklist](#) to make a final decision. The judge will then issue a final, legally binding Child Arrangements Order (along with other orders if deemed appropriate), which the judge has determined is in the child's best interests.

2. How may the child be feeling?

The feelings a child experiences when a final order is made in private law proceedings are complex, often rooted in the level of distress they may have experienced throughout the proceedings and whether the final decision validates their concerns or addresses their need for protection.

A final order signals **the end of a potentially distressing, traumatic and confusing process** for the child. The court makes decisions about the child's upbringing – such as who they live with and spend time with, how often and where this may take place – which are hugely important and potentially life-changingⁱ.

The child's reaction to the final order can be tied to their experience of participation and whether they feel their views were genuinely considered. They may **not agree with** or be happy with the outcome of proceedings and may react negatively or resist the order. This is especially true if they felt they had little input into the processⁱⁱ. If the child sees the final decision as **ignoring their wishes** or if there is an implication that they have **not been believed**, the communication of the decision can impact their wellbeing and their relationshipsⁱⁱⁱ. If they feel that the court **failed to fully explain the final decision**, this may compound the impression they or their views were not considered important. Children are more likely to accept the decisions made about their arrangements and have a more positive experience if they feel involved in the decision-making process^{iv}.

If the child has been reporting abuse but the court order mandates continued or increased contact with the person of concern, they may feel **betrayed** and experience a profound **loss of faith that they will be protected**^v.

The child may feel they have been subjected to **court-sanctioned abuse and trauma** if final orders are made and they are ordered to live with someone who has abused them. In these circumstances, the child may feel physically and emotionally **unsafe** and that the system has failed to protect them^{vi vii}. If the final order involves a difficult transfer of care or separation from a primary parent, the child will likely perceive decisions and actions as **punitive**^{viii}. If the child has expressed reluctance, resistance or refusal to see a parent (RRR) due to abuse but the court has ordered contact arrangements regardless, they may retain a **sense of resentment or feel unsafe**^{ix}.

The final order ends a period of **uncertainty** and strain but may not resolve feelings of insecurity. Where there are concurrent criminal proceedings, the period of uncertainty may continue. In some cases, children will have been coping with complex and overlapping emotional experiences related to family separation, possible harm, and the stress of proceedings. They may be confused if their trauma symptoms (such as extreme depression

or self-harming behaviours) were addressed **in isolation from the abuse** during the proceedings, leaving them **confused and sad**^x.

However, children may also have a sense of relief that proceedings are over and there is some certainty about what is next. If orders have been made to protect a child from the person who has been abusing them, they may feel able to fully engage in a therapeutic process or reintegrate back into their day to day life without the stress and pressure of the ongoing private proceedings. When the court makes an order to protect a child, it removes the responsibility from them in saying they do not wish to see the person who was abusing them. It evidences the role of safe adults in their lives and can build a sense of trust and justice.

3. How can professionals contribute to decisions on who the child should live and spend time with?

Decisions regarding who the child should live with (**residence**) and spend time with are among the most significant decisions made in private law proceedings. These decisions, formalised through a Child Arrangements Order, are guided by the paramount consideration of the child's best interests^{xi}.

When there are allegations of child sexual abuse or other coexisting harms, domestic abuse or 'alienating parental behaviours', judicial decisions about who the child lives and spends time with may have significant consequences for the child. Such decisions should be grounded in facts, which should have been established through the evidential process and fact-finding procedures. Allegations of abuse, harm and alienating parental behaviours should be evidenced and scrutinised with the same rigour through legal processes, such as fact finding.

When considering who the child should spend time with, be mindful the Government has included measures in the Courts and Tribunals Bill,

The law currently includes a presumption of parental involvement (s1(2A) Children Act 1989), but proposals have been made to amend this. In all cases, involvement must not place the child at risk of harm. More can be read about these changes [here](#). Similar considerations are being given in cases where there has been a serious sexual offence conviction, regarding a parents continued parental responsibility which will happen automatically if the case reaches threshold

Recommendations about who the child should live and spend time with may be made by some professionals. In cases relating to child sexual abuse, it is likely the Children's Guardian will make clear recommendations, alongside a Children's Services social worker if a s37 has been directed by the court. If expert witness professionals have been directed by the court to undertake assessments, such as an independent social worker (ISW) or a regulated psychologist, they may make recommendations or comment on the risk and protective factors of the child living with or spending time with the parent(s) if agreed and instructed by the court to comment on such matters. You can read more about the instruction of regulated psychologists [here](#).

All recommendations should be based on information gathered from professionals involved with the child, to ensure triangulation of the child and parents views, expert opinions and independent observations are considered.

Professionals should consider the following principles when making recommendations about who the child should live and spend time with.

- **The child's welfare is paramount.** Recommendations should be determined by applying the Welfare Checklist (Children Act 1989, S1(3)). There is no statutory default position in favour of parental involvement – the question must be “Are the proposed arrangements in the child's best interests?”
- **Safety is the first priority.** Any evidence indicating past or present harm, or the potential for significant harm in the future – whether sexual, physical, emotional or psychological – should be central to decision-making. Do the proposed recommendations regarding who the child should live and spend time with – whether unsupervised, indirect or supervised – adequately protect the child from the identified risk?
- **The child's lived experience and voice should guide decisions.** Their ascertainable wishes and feelings must be heard and understood, recorded, and given due weight, particularly if they express feelings of fear, anxiety, or objection to the arrangements. The child's perception of safety and the impact of parental behaviour is critical evidence, not merely a preference to be balanced. What are the child's wishes and feelings and how have they been prioritised, particularly when they may conflict with wider family expectations or professional assumptions?

Where the court considers that a child and family would benefit from short-term support following the making of a Child Arrangements Order, it may make a Family Assistance Order (s16 Children Act 1989). This is a time-limited order (up to 12 months) that directs a Cafcass officer or local authority social worker to advise, assist and (where appropriate) befriend the child and family to help put the arrangements into practice and reduce conflict. A Family Assistance Order does not replace safeguarding responsibilities or statutory duties, and its use is typically reserved for cases where there is a clear need for focused support to improve cooperation and sustain safe arrangements. Where Cafcass is appointed, the Family Court Advisor acts independently, working with the child and parents to support implementation of the order, promote the child's welfare, and feedback any ongoing concerns about risk or progress to the court, if required.

Where no findings are made about child sexual abuse, but concerns remain, it doesn't mean that abuse didn't happen or there isn't any risk. Decisions about who the child should live with and spend time with should be based on a holistic assessment of the child's welfare needs. This can be a very complex area for professionals to navigate when concern for child sexual abuse has not been found by the court, but concern for the wellbeing and safety of a child remains.

Legislation directs the least intrusive involvement by courts and statutory services with children and families. However, this is only if it is assessed to be safe for the child without intervention. In cases where there is concern of child sexual abuse and intervention by the courts and statutory services is clearly necessary for the child's

developmental or emotional needs, this will be considered the proportional response.

Where risk toward a child by a parent is deemed significant, professionals should be empowered to make recommendations in the child's best interests and according to their welfare needs, which could include **no direct involvement** or **indirect-only contact**.

The court should make a **clear, time-limited case management plan for safety, considering contact between the child and the parent they are not living with**, detailing:

- the **purpose and objective** of the contact
- the **safeguards** in place (e.g. around location, supervision and restrictions on communication, particularly between the child and the non-resident parent if there continues to be concern)
- the **measures for review** and escalation of concerns should the safeguards fail.

Where a change of residence is being considered, be mindful that a transfer of residence to a person of concern can carry severe risk. In one international study, 88% of children transferred to live with a person of concern or forced into unsupervised contact **reported new abusive incidents afterwards**^{xiii}. Refer to the [Family Justice Council Guidance](#) on considering a change of residence where there are allegations of alienating parental behaviours.

4. How can professionals best help the child?

Much can be done to support the child and their family at this time. Some actions can be taken by any professional supporting them; others are for specific professionals in the family justice system to take. It is important for all professionals to ensure that the child and their family members and support network, understand the help and support available.

This section covers:

- supporting the child's emotional needs
- keeping the child informed and supporting their participation in the DRA
- supporting their participation in a final hearing, if one is directed.

Whatever your role, remember that the support you give the child should be tailored to them, taking account of factors such as their age and stage of development; their sex; their ethnicity, religion and culture; any neurodiversity, disabilities or learning difficulties they may have; and their sexual orientation and gender identity. Our practice guide [Taking account of diversity](#) contains more information. It is important to make no assumptions about a particular child. Some children may welcome the intervention and decisions of the court; others may not. Some are keen to have their day in court, and make robust witnesses, while others may be more apprehensive and require more support.

a) Support the child and family's emotional needs

There is a common misconception that the child cannot receive emotional support or therapy during a police investigation, criminal proceedings or family law proceedings where child sexual abuse is a concern. This is not true: the [Crown Prosecution Service's 2022 legal](#)

[guidance](#) makes clear that the child can and should be supported. If you are the child's social worker or another professional working with the child and family, you should consider **referring the child for therapeutic support at the earliest opportunity**. The child's health and wellbeing should always be the determining factor in whether, when and with whom they can receive therapy – and you can help by **reassuring the child that what they say in therapy remains with the therapist, unless it *has* to be shared to safeguard them**. Be mindful that there are certain circumstances where therapy notes can be disclosed by direction of the court.

Children may not currently be ready for therapeutic support, and their needs should remain under review. Therapy can be accessed at any point; if they are not ready now, this can be revisited in the future. Be mindful that there can be long waiting lists for therapy, and work with other safe adults to consider how you all can support the child.

To support the child and family's emotional needs effectively, you should consider:

- the child's immediate and long-term care, support and therapeutic needs
- the parent / carer who is caring for the child, to consider their own emotional and support needs, to help them understand their child's needs
- the immediate and long-term care and support needs of other children and vulnerable people in the home, not least because they too may have been sexually abused
- the care, support and therapeutic needs of any children in the home who have engaged in harmful sexual behaviour.
- When therapy is not appropriate at this time, including any barriers to the child accessing therapy and reasons why there may be opposition to therapy from family or professionals

Any therapeutic support should have clear ground rules and should be mindful of any open investigations and the potential to impact or influence any evidence the child may give in any ongoing criminal law proceedings. The therapist should avoid questioning the child about their account or asking too many questions which could be perceived as coaching or influence. Check with statutory and legal professionals about any ground rules that might enable the child to receive support without impacting on proceedings.

To learn more about how you can support the child and their family, see our guides:

- [Supporting the child's emotional health and wellbeing](#)
- [Supporting the child's physical health and wellbeing](#)
- [Supporting the child's relationships with their family and friends](#)
- [Supporting the child's education](#)
- [Supporting parents and carers: A guide for those working with families affected by child sexual abuse](#)

It's important to think about how different aspects of the child's life may be affected by the final decision on who they will live with and spend time with – take the time to listen and understand what the child needs and who is best placed to help them. In particular:

- Emotional wellbeing (especially if the decision has gone against their wishes) – what steps can be taken to support their understanding? Consider any needs the child has in understanding the decision and how it was reached, how this can best be explained, and who is best placed to do so
- school life – would the child benefit from having time out from lessons and/or support from a trusted adult in the school environment, for example?
- family relationships, friendships and activities such as clubs they attend –what can you do to ensure that, where the child wants to continue with these in their new living arrangements, their life and the things they enjoy are supported?

b) Keep the child informed and support their participation in the DRA

Most children (and parents) won't understand what a DRA is, how it is different from a final hearing, why it is important, and what to expect.

Resources

Any professional can support children and parents by ensuring they have access to **adequate and timely information** presented in child-focused and accessible ways. This may include sharing resources that explain the court process, who is making decisions, the possible outcomes, the length of the process, and how their views will be considered.

The [Family Justice Young Peoples Board \(FJYPB\)](#) have prepared a range of resources tailored to children, including:

- A [useful glossary](#) explaining some of the words and phrases which children and young people may hear during a family court case and may have difficulty understanding
- a [video](#) that explains how Cafcass helps children and young people involved in the family court
- a range of FJYPB [top tips for professionals](#) working with children and young people in family justice proceedings.

Supporting the parents and carers to understand family law proceedings may help the child to understand. Cafcass have prepared a range of resources, advice and guidance to help separated parents, follow the link [here](#).

The Family Rights Groups has helpful information about private law proceedings, [here](#). Parents may need support to find a solicitor. Even if a parent hasn't had a solicitor throughout proceedings, it may be helpful to have one for the DRA and Final Hearing, and this can be done via The Law Society who provide information [here](#). Family Rights Group provides information on finding a solicitor, [here](#).

To find a local or national support service for children who have been sexually abuse or support or advice for their parent, follow [this link](#).

Children may also have questions about their parent's separation. Some parents may think that they are protecting the child by not sharing information, however, this 'information void' might be filled in by the child with imagination, fear and anxiety. Any professional with a good working relationship, can support a parent to find a clear and age-appropriate narrative

about the separation and proceedings. It is helpful to understand the narrative that parents have shared with the child, which may be conflicting. It is also helpful to think through what the child already knows (or might know) and how to find a balance between too much information and not enough.

Where a Family Court Advisor, Children’s Guardian, Children’s Services social worker, or child’s solicitor is involved

Where there is a Family Court Advisor, Children’s Guardian, Children’s Services social worker, or children’s solicitor, they should support the child to understand what happens at the DRA and final hearing, and give them an opportunity to ask questions. Professionals should agree who is best placed to have these conversations, noting the child’s view on who they trust and feel comfortable speaking to.

Where allocated and directed, the Family Court Advisor, Children’s Guardian or Children’s Services social worker will make recommendation to the court about who the child should live and spend time. Children who feel heard and understood during any statutory investigation, assessment process and proceedings may feel more empowered and report higher levels of satisfaction with the outcomes, regardless of whether decisions are aligned with their preferences. When children understand the court’s decision, they may also be more likely to accept it, even if it is against their wishes.

Professionals can help prepare the child for the final decision and involve them in the decision-making process. The Family Justice Young Peoples Board (FJYPB) say^{xiii}:

- *“Make sure all plans for us are made with us.”*
- *“Help us to understand the reasons behind the recommendations that you make and record our thoughts about them in your reports.”*

Before the DRA, where there is a Family Court Advisor, Children’s Guardian, Children’s Services social worker, or children’s solicitor, tell the child that you have made a recommendation to the court, based on all the evidence, about who they should live and spend time with. Take the time to discuss with them:

- what you have recommended, and why
- the facts that the judge found at the fact-finding hearing (if one happened), the evidence that has been provided to the court, and how this evidence has influenced your recommendation
- your understanding of their wishes and feelings
- how their account of their abuse, and their wishes and feelings, have influenced your recommendation
- that the decision may not be exactly what they want, but their views have been shared with the court.

Support the child to understand:

- the purpose of the DRA and (if one is needed) the final hearing
- that a decision could be made at the DRA or at a final hearing

- who will be at court
- what they will talk about
- how you will share the child's views with the court, and how they may influence what happens
- how the child can participate in proceedings – see below
- what decisions will be made
- how the decisions will be made
- how you will inform the child about what happens at the DRA.

Supporting participation

Children don't usually attend hearings in family law proceedings, but there are many ways for them to participate and remain central to proceedings. Professionals can support the child's participation by:

- checking if they want to meet the judge or visit the court
- asking the judge to write the child a letter explaining any big decisions that have been made
- supporting the child to write a letter to the judge.

After the DRA, be sure to follow the plan you agreed with the child about how to keep them informed, and let them know **what decisions were made** and **how this will affect them**.

If a final hearing was directed, help them understand:

- when it will be and what it means for them
- the timetable that has been agreed
- any suggestion or decisions that were made about how they will participate
- whether they will need to give evidence, and what support is available to help them do so

Always ask the child whether there is any more information that they would like to share with the court.

c) Support the child's participation in the final hearing

If a final hearing is directed, supporting the child's participation in it will depend on their age, understanding and specific needs.

The court may have decided that it is necessary for the child to provide evidence. This will only happen if the court decides the child has the sufficient maturity, intelligence, and emotional understanding to make their own decisions and comprehend the implications of giving evidence. Some children 'want their day in court' while others might feel more hesitant about providing evidence and if their evidence is necessary to resolve the issues in the proceedings, the legal test and measure set out in *Re W (Children) [2010] UKSC 12*, the

Supreme Court confirmed that there is no presumption against a child giving evidence in family proceedings. Instead, the court must decide this on a case-by-case basis by undertaking a careful balancing exercise between the potential benefits of hearing directly from the child to ensure a fair trial, and the possible impact on the child's welfare and wellbeing. In making this decision, the court will consider a range of factors, including the child's age, maturity and wishes, the nature and importance of their evidence, the quality of other available evidence, and whether the issues can be fairly determined without the child giving evidence. The Family Justice Council (FJC) have prepared [Guidelines in relation to children giving evidence in family proceedings](#) to help decide what's best.

At this stage, the facts have been established (either by agreement or by the judgment from the fact-finding hearing). The focus of the final hearing moves to decisions about who the child will live and spend time with. The child may be asked to contribute to these decisions, but it is more likely that their views will be represented by the Family Court Advisor or Children's Guardian or in a letter to the judge. If they do provide evidence in court, they may be asked about their preferences; this could be upsetting to the child.

If the child (or any other vulnerable witness) is to give evidence at the final hearing, a **ground rules hearing** (GRH) will be scheduled beforehand. The sole purpose of the GRH is for the judge to establish and reach agreement upon the specific **special measures** (or **participation directions**) that will be used to ensure that the witness can participate effectively, and that the quality of their evidence is maximised without causing them undue fear or distress.

5. Where next?

Once the final decision about who the child should live and spend time with has been made at the DRA or final hearing, professionals around the child must take steps to follow the Child Arrangements Order. This could include one or more of:

- a change of residence
- setting up contact arrangements or the inclusion of no contact between the parent and child
- agreeing a Safety Plan.

Read our response pathway summary guide on a [Family Help or early help plan](#), or return to [this summary guide](#) in the response pathway.

References

-
- ⁱ Hargreaves, C., and others, *Uncovering private family law: How often do we hear the voice of the child?* (London, Nuffield Family Justice Observatory, 2024). [Child participation 08-02-24.pdf](#)
- ⁱⁱ Nuffield Family Justice Observatory, Children's Experience of Private Law Proceedings: Six Key Messages from Research (London, Nuffield Family Justice Observatory, 2022). <https://www.nuffieldfjo.org.uk/resource/childrens-experience-of-private-law-proceedings-six-key-messages-from-research>
- ⁱⁱⁱ Family Justice Council, Guidance on Responding to Allegations of Alienating Behaviour (London, Family Justice Council, 2024). [Family-Justice-Council-Guidance-on-responding-to-allegations-of-alienating-behaviour-2024-1-1.pdf](#)
- ^{iv} Nuffield Family Justice Observatory, Children's Experience of Private Law Proceedings: Six Key Messages from Research (London, Nuffield Family Justice Observatory, 2022). <https://www.nuffieldfjo.org.uk/resource/childrens-experience-of-private-law-proceedings-six-key-messages-from-research>
- ^v Child Safeguarding Practice Review Panel (CSPRP), I wanted them all to notice (CSPRP, 2024), https://assets.publishing.service.gov.uk/media/67446a8a81f809b32c8568d3/CSPRP_-_I_wanted_them_all_to_notice.pdf
- ^{vi} Ministry of Justice, *Assessing Risk of Harm to Children and Parents in Private Law Children's Cases: Final Report* (June 2020) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/895186/assessing-risk-harm-children-parents-pl-childrens-cases-report.pdf accessed 27 February 2026.
- ^{vii} Dalgarno, E., and others, "Let's excuse abusive men from abusing and enable sexual abuse": child sexual abuse investigations in England's private family courts', *Journal of Social Welfare and Family Law*, vol. 46, no. 1, 2024, pp. 3–26. [Full article: 'Let's excuse abusive men from abusing and enable sexual abuse': child sexual abuse investigations in England's private family courts](#)
- ^{viii} Family Justice Council, Guidance on Responding to Allegations of Alienating Behaviour (London, Family Justice Council, 2024). [Family-Justice-Council-Guidance-on-responding-to-allegations-of-alienating-behaviour-2024-1-1.pdf](#)
- ^{ix} Symonds, J., and others, *Separating families: Experiences of separation and support* (London, Nuffield Family Justice Observatory, 2022). [nfjo_report_private_law_separating_families_20221128-1.pdf](#)
- ^x Child Safeguarding Practice Review Panel (CSPRP), I wanted them all to notice (CSPRP, 2024), https://assets.publishing.service.gov.uk/media/67446a8a81f809b32c8568d3/CSPRP_-_I_wanted_them_all_to_notice.pdf
- ^{xi} Hargreaves, C., and others, *Uncovering private family law: How often do we hear the voice of the child?* (London, Nuffield Family Justice Observatory, 2024). [Child participation 08-02-24.pdf](#)
- ^{xii} Silberg, J. and Dallam, S., 2019. Abusers gaining custody in family courts: a case series of overturned decisions. *Journal of child custody*, 16(2), 140–169. doi:10.1080/15379418.2019.1613204.
- ^{xiii} Our shoes