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Parental Alienation:
Helping Alienated Families and Dispelling
Misunderstandings



Presented by Dr. Kathleen M. Reay

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Objectives:

- Why It's Important to Learn about Unjustifiable Alienation and Justifiable Alienation
- Cultural Diversity
- Distinguish Between Justifiable Alienation (JA) and Unjustifiable Alienation (UA)
- Gardner's 8 Primary Manifestations
- Kelly & Johnston's Reformulation
- Baker & Darnall's Signs of Exposure to UA

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Objectives Continued:

- Child Abuse and Neglect Reports
- False Allegations of Abuse Reports
- Hybrid Types
- Assessing for Alienation
- Why It's Important Not to Jump to Conclusions
- Levels of Severity

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- Distinguish Between Children Who Are Victims of Bona Fide Abuse and Children Who Are Victims of Legitimate Unjustifiable Alienation
- Assessment for DV, Child Abuse and Neglect
- Dispelling Some Misunderstandings
- A couple of Canadian Landmark Court Decisions
- Q & A Period

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- Parental Alienation is a tragic form of
- ✓ Domestic Violence (DV)
 - ✓ Intimate Partner Violence (IPV)
 - ✓ Child Abuse (CA)

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- Why It's Important to Learn about Parental Alienation
- 80-90 percent of divorces are non-contested and never require formal court interventions
 - High-conflict divorces = toxic divorces (Reay, 2007; 2011) encompasses roughly 10-20 percent of all divorcing families in Canada and the US.
 - Toxic Divorce cases are extremely harmful to the children and the adults concerned.

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Parental Alienation (PA)

- Socio-cultural, economic and familial diversity
- Can occur in intact families, single families, blended families, gay/lesbian families, heterosexual families, separating families, divorcing families and/or post-divorcing families
- Widespread ethnic compositions
- Any type of socio-economic status (poor, middle class, middle-upper class, upper class)
- Widespread educational backgrounds of alienated and alienating parents
- Widespread jobs/careers seen in alienated and alienating parents

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Eight Primary Manifestations of Unjustifiable Alienation (PAS) (Gardner, 1985)

- 1) The child aligns with the alienating parent in a campaign of denigration and hatred against the alienated (also referred to as the target) parent, with the child making active contributions.

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Rationalizations for denigrating the alienated parent are often weak, frivolous, or absurd.

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There seems to be no ambivalence in the child's feelings toward the target parent; thus, animosity toward the alienated parent is demonstrably severe.

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The child states that the decisions to reject the alienated parent are the child's own (referred to as the "Independent Thinker" phenomenon).

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There is an automatic, reflexive support by the child for the alienating parent.

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The child expresses a guiltless disregard for the feelings of the alienated parent.

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The child borrows from various subject matter and jargon of the alienating parent. Thus, the child's denigration of the target parent has a distinct rehearsed quality.

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The child's animosity extends to the alienated parent's extended family, friends and sometimes even pets.

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❖ Gardner’s concept of PAS was important, however, his original articulation was not adequate.

❖ In 2001, Janet Johnston & Joan Kelly “The Reformulation”

- Not a “syndrome”
- Not a “mental disorder” of the child
- Typically not all fault of one parent
- “Alienated Child”

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The Alienated Child (Kelly & Johnston, 2007).

➤ “child who freely and persistently expresses unreasonable negative feelings and beliefs (such as anger, hatred, rejection, and/or fear) toward a parent that are disproportionate to their actual experience of that parent.”

➤ Alienation vs. Justified Rejection [“estrangement”]

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Legitimate Justifiable Alienation (Estrangement)

Clinically-Significant Factors:

- Parental Verbal Abuse
- Parental Mental Abuse
- Parental Emotional Abuse
- Parental Physical Abuse
- Parental Sexual Abuse
- Parental Rejection & Abandonment
- Parental Neglect

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- Other Clinically-Significant Contributing Factors**
- **Parental mental illness**
 - **Parental chronic illness or medical disability**
 - **Parental criminality**
 - **Inadequate parenting skills**
 - **Children/teens who get hooked into cults and brainwashed**
 - **Child abduction by a parent**

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- Other Contributing Factors**
- **Children Who Witness Domestic Violence**
 - **Parental Alcohol Abuse/Dependence, which can be combined with any of the above**
 - **Parental Substance Abuse/Dependence, which can be combined with any of the above**

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- Baker & Darnall's Signs of Exposure to Unjustifiable Alienation Behaviours (2006, 2007)**
- Badmouthing**
- Telling the child that the targeted parent was a bad person.
 - Confiding in the child about court cases and or child support conflicts.
 - Telling the child that the targeted parent did not love him/her.
 - Confiding in the child about the marital relationship.
 - Badmouthing the targeted parent's extended family and/or new family.
 - Belittling the targeted parent in front of the child.
 - Telling the child someone else is his/her mother/father is mentioned.
 - Referring to the targeted parent by first name in front of the child.
 - Allowing the child to overhear the alienating parent denigrate the targeted parent.
 - Encouraging the extended family of the alienating parent to put down the targeted parent.
 - Yelling at/or challenging the targeted parent in front of the child.

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- Interfering with Parenting Time/Visitation or Contact**
- Moving away or hiding the child from the alienated parent.
 - Not following through on planned visits.
 - Arranging fun activities during planned visits to entice the child from visiting.
 - Letting the child decide whether or not to visit (contrary to court orders).
 - Frequent contact with the child during the targeted parent's visitation/parenting time.
 - Telling the school to limit the child's contact with the targeted parent.
 - Not allowing the child to see the targeted parent even while visiting that parent's own extended family.
 - Late drop-offs and early pick-ups.
 - Instructing grandparents to forbid contact between the child and targeted parent.
 - Attempting to have targeted parent arrested for attending school functions.
 - Informing targeted parent at the last minute about visitations.
 - No flexibility in visitation schedules, except when in the alienating parent's favor.

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- Limiting/Interfering with Mail and Phone Contact**
- Intercepting calls, e-mails, and phone messages.
 - Eliminating phone and mail contact altogether (not providing address, turning off phone, blocking calls).
 - Monitoring calls, letters, and other forms of contact.
 - Throwing out letters.
 - Only allowing communication through the court-appointed advocate.
 - Refusing any written or verbal communication.

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- Limiting/Interfering with Symbolic Contact**
- Throwing out gifts from the targeted parent to the child.
 - Rewriting the past to distort and/or minimize the targeted parent's role in the child's life.
 - Changing the child's last name (to exclude the targeted parent).
 - Having the child refer to someone else as mom or dad.
 - Limiting any mention and photographs of the alienated parent.
 - Limiting any mention and photographs of the alienated parent's extended family.
 - Not allowing the child to bring items associated with the targeted parent into the alienating parent's home.

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Interfering with Information

- Not providing the targeted parent with information from the school, doctors, and social activities.
- Not providing access to school and doctor information.
- Refusing to communicate.
- Using the child as the messenger.
- Telling the doctor not to give the alienated parent any information about the child.
- Not keeping the alienated parent informed about the child's health.

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Emotional Manipulation

- Forcing the child to reject the targeted parent.
- Making the child feel guilty about the relationship with the targeted parent.
- Forcing the child to choose or express loyalty.
- Withdrawal of love/getting angry if child visits or is positive towards targeted parent.
- Rewarding the child for rejecting the targeted parent.
- Interrogating the child after parenting time with the targeted parent.
- Emotional duress regarding visits.

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Unhealthy Alliance

1. Having the child spy on the targeted parent.
2. Secret phone calls and messages between the alienating parent and child.
3. Cultivating the child's dependency on the alienating parent.
4. Having secret means of communicating with the child

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Miscellaneous

- Making it appear as if the targeted parent rejected the child.
- Creating conflict between the child and the targeted parent.
- Badmouthing targeted parent to friends, teachers, and doctors.
- Badmouthing targeted parent to the authorities.
- Undermining targeted parent's authority.
- Not allowing the child to bring items from alienating parent's home when having parenting time with the targeted parent.
- Putting fights on speaker phone and having the child listen.
- Punishing child for talking to the targeted parent.
- Sending empty boxes as gifts from the children.
- Cutting ties with anyone who will show support of the targeted parent.

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Unjustifiable Alienation

Can be precipitated during other divorce disputes including, but not limited to, child support issues, property division issues, jealousy of an ex-partner engaging in a new intimate relationship, remarriage and financial arrangement issues.

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FACT:

- It's not uncommon to hear about child abuse and neglect reports in alienation cases.
- When you have reasonable cause, suspicion or belief based on your observations, you have a duty to report it.
- Anyone reporting in good faith (with a reasonable belief) may not be criminally prosecuted or sued in civil court for libel, slander, defamation, violation of privacy, or breach of confidentiality.

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Fact:

Unfortunately, but true, false allegations of abuse are generally seen in moderate-severe levels of unjustifiable alienation cases

For e.g., false physical and/or sexual abuse allegations can be made by an alienating parent and an aligned child against a target parent.

Important: Swift action must be taken to determine whether a child has been abused or not. Consult with the proper authorities immediately to determine if objective evidence supports it.

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FACT:

Virtual allegations of abuse are also commonly seen in toxic divorce cases (Cartright, 1993).

For e.g., A mother who insinuated sexual abuse by the father by alleging that he had shown the child a pornographic videotape which in fact was just a Hollywood comedy rented from a family video store.

For e.g., an alienating father falsely hints or subtly implies that his ex-wife is physically abusing their child.

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J. Michael Bone, Ph.D.

Briefly discusses false accusations of abuse.

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IMPORTANT NOTE:

In instances where true parental abuse and/or neglect are found, the PAS label or unjustifiable alienation label must never be used.

"When true parental abuse and/or neglect are present, the child's animosity may be justified, and so the parental alienation syndrome explanation for the child's hostility is not applicable" (Gardner, 2006, p. 5).

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Hybrid Types

- Enmeshment + Alienation
- Enmeshment + Alienation + Estrangement
- Enmeshment + Estrangement
- Alienation + Estrangement (Friedlander & Walters, 2010)
- Most commonly seen as opposed to pure alienation cases.
- In cases where there is estrangement as well as alienation (for e.g., where some aversion to the alienated parent would be justified, but the level of the aversion is extreme).
- Mental health professionals and the Courts often fail to identify and/or properly intervene in these types of cases.

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Assessing for Alienation

- Child custody evaluator
- Therapist



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**Whether You're a Child Custody
Evaluator or a Therapist**

- It is critical to do an extensive, comprehensive assessment whenever you receive a referral with the question of potential child alienation, entrenched family conflict, allegations of abuse, violence, or neglect on the part of one parent.
- Perhaps during a CCE or during therapy sessions, you may hypothesize that alienating processes are possibly occurring even though the question/subject has never posed by your client(s).
- Obviously, components of the evaluation process and procedures will differ with both roles.

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Don't Jump to Conclusions

- Oversimplified assessments are problematic
- Justifiable or Unjustifiable Alienation may not be present
- "Contact refusal" is defined as "behaviour of a child/adolescent who adamantly avoids spending time with one of the parents during or after the divorce process that cannot be considered a mental condition, a syndrome or a disorder "(Bernet, 2011).

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**There Are At Least Seven Different
Reasons**

why contact refusal may occur that is not necessarily related to justifiable or unjustifiable alienation dynamics

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**#1 Normal Preferences
(Affinity and Alliance)**

- It's normal for a child/youth to prefer one parent over the other in intact, blended, separating, divorcing, and divorced families.
- Can be related to temperament, gender, shared interests, identification with a parent's physical & psychological attributes, the parenting style of a particular parent, and also attachment security with one parent.

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#1 Normal Preferences Cont'd

- Normal for an older child/teen to prefer to hang out with friends and/or to prefer to attend school/recreational activities rather than be with mom/dad.
- Beyond separation, it's normal for a child/youth to prefer to spend more time at one parent's home than the other parent's. And, especially, when the child remains in the family home.

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#2 Loyalty Disputes

- It's normal for a child/youth to experience feelings of guilt regarding parental divorce and wish for parents to reunite.
- It's normal for a child/youth to feel bad about neglecting a parent, feel concerned and worry about the absent parent, as well as grieve for him/her.

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#3 Anxious and Stressed Child

- (Attachment Theory) Normal reaction for toddlers to feel anxious and stressed when primary caregiver says goodbye even when separation/divorce hasn't occurred.
- When parents separate/divorce, it's only natural for a toddler to continue to experience separation anxiety if it began prior to the separation, or it may resurface or begin at this time.

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Anxious and Stressed Child Cont'd:

- Some children experience persistent and excessive fears, and uncertainties about separation. Rule out separation anxiety disorder or panic disorder.
- Witnessed a lot of parental fighting in toxic divorce cases are at increased risk of developing separation anxiety disorder.

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#4 Reversal of Parenting Role

- Parent feels extremely debilitated
- Regression occurs and become too dependent on one or more offspring
- Depressed, troubled, anxious, lonely, unable to take responsibility for themselves/their children
- Role reversal: child becomes parent's caregiver, confidant, perhaps even therapist
- Child experiences "faulty logic" & takes on excessive amount of responsibility
- Child loves both parents but is caught in role reversal

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#4 Reversal of Parenting Role Cont'd:

- Child doesn't want to leave debilitated parent alone for fear of what may happen in his/her absence
- The other parent hasn't done anything wrong but child may not want to visit him/her
- This is not UA/JA but without proper interventions could possibly occur

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#5 Tenacious Child

- Strong-willed, tenacious, determined, inflexible, oppositional, and stubborn prior to separation/divorce.
- These characteristics intensify during parental separation/divorce
- May be diagnosed with ODD

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#6 Conflict Dodging

- Child/ren love both parents but feel caught in the middle of cont'd parental combat.
- Child/ren use safeguarding devices to protect themselves from further feelings of anxious, tension, fear, shame, and embarrassment and will adopt one parent's point of view and reject the other parent.

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Conflict Dodging Cont'd:

- UA may not actually be occurring because the children are not being systematically programmed to hate the rejected parent.
- Note: Many rejected parents believe their child has been alienated by the favored parent.
- Rule out adjustment disorder w/wo anxiety/depression

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#7 Worry Warts' Inadvertent Programming

- One parent will engage in "accidental" indoctrination (exhibit tremendous anxiety, tension, worry, and fear that the child picks up on). Child tends to feel inclined to align with the anxious parent even though the child loves and enjoys being with both parents.
- Not UA/JA

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Video Vignettes

Three (3) Levels of Severity

Source: *Parental Alienation Awareness DVD*
Available for Purchase Here \$26.25
(includes tax)

Presented by The Nanaimo Men's Resource Centre (2006). Hosted By Theo J. Boere and Carmen Barclay.

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How to Distinguish Between Children Who Are Victims of Bona Fide Abuse and Children Who Are Victims of UA

Some Clinical Markers:

- Many abused children, although not all of them, exhibit symptoms of PTSD, but alienated children rarely exhibit these symptoms.
- Abused children do not exhibit any of the eight symptoms of UA but alienated children exhibit one or more.

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Additional Clinical Markers

- Parents who abuse children are not usually obsessed with seizing opportunities to talk about the abuses with the child. Alienated children have no actual experiences to relate and they need much more input from the programming parent if they are going to get their story straight.
- Accusing parents in bona fide abuse cases are still often appreciative of the importance of the children's involvement with the abuser. Most often they will do everything in their power to reduce the abuse and hope that the situation can be salvaged so that the children may yet enjoy a more benevolent relationship with the abusive parent.

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More Clinical Markers

- Bona-fide child abuse generally runs in families. When one looks into the history of the victimized targeted parent, there is generally no family history of a pattern of bona fide abuse, including abuse that extends back to forbearers. During clinical interviews, the alienating parent will admit that he/she knows of no bona fide abuse in the family background of the target parent.

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• Abusive parents are deficient in their concerns for the physical, emotional, financial, and social well-being of their families. They don't strive to be high earners and often they'll spend their earnings elsewhere. For example, on alcohol and gambling. Abusers have little sense of family responsibility with regard to providing the spouse/ex and children with a reasonable level of food, clothing, and shelter. In most cases, parents who have been targeted as victims of PAS are the opposite in this profile.

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• Parents who abuse their children are typically impulsive. They act out their impulses without consideration for future consequences. They often times have a history of job loss due to their inability to get along with coworkers and supervisors.

• Targeted parents are not likely to have a history of impulsivity.

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• Children who have experienced bona fide abuse often feel a need to continue to have a relationship with the abuser. As mental health professionals, it is not uncommon to work with victims of abuse who still worship, love, care for, yearn for, and feel uncomfortable talking about the abuse. The client also does not like to speak badly about the abuser. This is sometimes even the case when the abuser is deceased. There's still a loyalty bond present.

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• Children being manipulated and programmed by an alienating parent tend to limit contact or have no contact with the target parent. In later years the adult child who experienced alienation earlier on, and never underwent reunification therapy (or for some reason the RT bombed), will continue to not worship, love, care for, and yearn for the rejected parent. As a matter of fact, the adult-child victim of alienation will continue to feel no guilt about badmouthing/denigrating the deceased rejected/estranged parent.

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Assessment for Domestic Violence

- ✓ Numerous assessments that involve potentially alienated children will include allegations of DV.
- ✓ These allegations may be valid, misinterpretations of events, exaggerations of events, or complete fabrications.
- ✓ When they are valid, REMEMBER, this is NOT an alienation case.
- ✓ Allegations of violence are more likely to arise at the time of separation, and actual incidents of violence are common during the process of separation (Hanks, 1992; Johnston, 1992).

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- ✓ Keep in mind these may or may not be indicators of long-term domestic violence within the marriage.
- ✓ The occurrence of one single episode of separation induced violence can bring about an opportunity to rewrite history and change the perceptions of the past in families in which alienating dynamics are prominent.
- ✓ Alleged DV incidents are often of the “he said – she said” type and, therefore, involve careful gathering of the details.

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✓ A number of existing instruments and tools used in the field of domestic violence, intimate partner abuse, and child abuse can help facilitate and clarify the likelihood of such allegations (For e.g., the Spousal Abuse Risk Assessment (Kropp, Hart, Webster, & Eaves, 1998).

✓ One of the newest publications called "Family Problems and Family Violence: Reliable Assessment and the ICD-11" (2013) by Foran, Beach, Slep, Heyman, and Wamboldt (Editors) is also very useful.

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**Assessment for
Child Abuse/Neglect**

✓ Like DV, numerous evaluations that involve potentially alienated children will include allegations of child abuse/neglect.

✓ These allegations may be valid, misinterpretations of events, exaggerations of events, or complete fabrications.

✓ When they are valid, REMEMBER, this is NOT an unjustifiable alienation case.

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✓ Interviews with the child and parents will provide some information.

✓ Reports from child protective services and police agencies, as well as interviews of collateral sources will help provide further information (American Professional Society on the Abuse of Children, 1995).

✓ Psychological tests findings of both the child as well as the parents are warranted in these types of allegations.

✓ Consultation with an DV/CA expert may be necessary.

✓ May also be necessary to make a referral to a DV/CA expert for part of the evaluation process.

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Dispelling Some Misunderstandings

For a considerable period of time some distorted facts on parental alienation have been published in popular media and some scientific literature.

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There are individuals and groups who oppose the use of these terms/concepts as a psychiatric diagnosis. For e.g., Bruch, 2001; Faller, 1998; Meier, 2010; The Leadership Council; The National Organization For Women, 2012; Wood, 1994.

Their arguments are not convincing.

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Some Reasons for the Controversy

- ✓ Unfortunately, but true, for rejected parents and their children, unjustifiable alienation is often surrounded by controversy. According to literature, the controversy is multifaceted.
- ✓ Some posit the PAS phenomenon was “invented” by forensic psychiatrist, Dr. Richard Gardner (1985). While Dr. Gardner coined the term, he did not invent this horrific form of abuse. To claim that he invented parental alienation is comparable to stating Freud invented anxiety.

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• For e.g. Parental Alienation was depicted in the literature as early as 1949 by Wilhelm Reich; he wrote Character Analysis. Reich explained that some divorced parents enact revenge, on their ex-partners, by depriving them of a relationship with their children. In order to alienate the child from the partner, lies are told without any reality to the statements.

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✓ PA has been described in legal literature for over 200 years.

✓ PA has been described in psychiatric literature for over 60 years.

(Bernet, 2010)

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Some feminists reject alienation as a concept and argue that mothers only deny access if fathers are abusive (Meier, 2010).

Moreover, some individuals and groups continue to deny the reality of this form of abuse unless the perpetrator is a violent man (For e.g., NOW, 2012).

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Yet, most DV training programs consider coercive control and manipulation as a component of DV. As such, DV can include battering, but a woman or a man can still endure DV without battering.

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National Organization for Women Foundation (NOW)

Mothers, Children at Risk as Fathers' Rights Groups Seek Legitimacy for Phony Mental "Disorder" (June 11, 2012)

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Misunderstanding #1:
"Proponents of PAS, predominantly right-wing "fathers' rights" groups, have been trying for years to force legitimacy upon this unfounded theory."

Dispelling this Misunderstanding:
Various Women's Groups and Father's Groups are working towards the inclusion of Parental Alienation. It is gender-neutral.

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Misunderstanding #2:

"PAS is a tactical ploy used by attorneys whose clients (primarily fathers) are seeking custody of their children."

Dispelling this Misunderstanding:

Sadly, but true, the term alienation can be used as a ploy by either parent. Attorneys can also engage in third-party alienation. Nonetheless, as long as mental health and legal professionals are educated about justifiable and unjustifiable alienation then this won't be an issue.

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Misunderstanding #3:

"A protective parent who accuses her/his ex-spouse of harming their child(ren) is deemed mentally ill — solely by virtue of the accusation."

Dispelling this Misunderstanding:

- Legitimate unjustifiable alienation (PAS) in no way suggests that the parent who accuses his/her ex-partner of harming the children is deemed mentally ill — solely by

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virtue of the accusation.

- Legitimate unjustifiable alienation involves an identifiable parent who systematically programs one or more children or youths in the same family against the other parent who has been a good, loving parent prior to the alienation occurring.

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- True legitimate unjustifiable alienation also necessitates that the alienated child or youth makes active contributions to the vilification of the target parent. In other words the child has succumbed to the effects of the alienation.

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Misunderstanding #4:
"Ludicrously, the PAS theory holds that the protective parent and child can only be "cured" of their "disease" by being totally separated."

Dispelling this Misunderstanding:
A significant amount of experts in the field consistently agree that children need to have a relationship with both parents (For e.g., Baker, 2005, 2006, 2007; Darnall, 2010; Gottlieb, 2012; Kelly & Johnston, 2001, 2004; Reay, 2007, 2012; Warshak,2010).

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Misunderstanding #5:
"Children may go through a phase of "splitting" their parents, lavishing love on one and anger toward the other. Responsible research has shown these phases to be temporary."

Dispelling this Misunderstanding:
Some children can undergo a temporary phase of uncertainty during the normal divorce process. Sadly, with legitimate unjustifiable alienation cases, the greater

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the level of severity (mild, moderate, severe), the greater the likelihood that the child will never rebuild a relationship with the rejected parent (Baker, 2005, 2006, 2007, Darnall, 2010; Kelly & Johnston, 2001, 2004; Reay, 2007, 2012; Warshak, 2010).

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Misunderstanding #6:
"No valid, empirical evidence exists for such a mental disorder (PAS)."
Dispelling this Misunderstanding:
To date, hundreds of studies have shown that unjustifiable alienation (PAS) is a scientifically valid concept in well over 30 countries (For e.g., Baker, 2007; Gottlieb, 2012; Kihlbom, 1998; Kopetski, 2006; Lorandos, 2006; Lowenstein, 2006; Reay, 2007, 2012; Sauber, 2006; Steinberger, 2006; Szabo, 2002; Warshak, 2001, 2006, 2010).

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FACT

- "Despite controversies regarding terminology and etiology, the phenomenon of parental alienation is almost universally accepted by psychiatrists, psychologists, social workers, and family counselors who evaluate and treat children of high-conflict divorces" (Bernet, 2010).

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Scientific validity vs. "Junk science"
Please consider viewing
Part 1 – Part 8
You Tube Videos by D. Lorandos, Ph.D., J.D.
called "Is Parental Alienation Syndrome
Scientific?"
Source: Canadian Symposium for Parental
Alienation Studies (2009).


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Brief 4-Minute Video Clip

- This will attempt to help you get a "flavour" for why it's so very important to watch all 8 parts!
- **D. Lorandos, Ph.D., J.D. - Is Parental Alienation Syndrome Scientific?**
...12/08/2009<http://www.PASattorney.com> D. Lorandos, Ph.D., J.D. - Is Parental Alienation Syndrome - Scientific? - Part 6 from the Canadian National Symposium on Parental Alienation - 2009
http://www.youtube.com/watch?v=ipk_3zbbvmc

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It's Not Business As Usual



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Reunification Therapy

- Trends suggest that one of the most promising therapeutic interventions to date is called Reunification Therapy (RT).
- Family Reflections Reunification Model (Reay, 2011).
- Family Reflections Reunification Program (Reay, 2011).

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The Importance for Professionals and Courts to Exercise Caution

Prior to Accepting Allegations of Abuse as True

- ✓ Clearly, children must be kept from being placed in the care of physically and psychologically abusive parents.
- ✓ This concern, however, must not stop MH and legal professionals from protecting children against the cruelty of being manipulated by one parent to hatefully reject their other healthy, nurturing parent.

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A Couple of Examples of Canadian Landmark Court Decisions

- A.A. V. S.N.A. (British Columbia, July 2007).
- R. V. Gettliffe-Grant (British Columbia, January 2007).
- C.S. v. M.S. (Ontario, February 2007).

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The End

- Dr. Kathleen Reay is available for consultations with parents, significant others, and professionals.
- Clinical Supervision is also offered.

Email drkathleenreay@gmail.com for more info.
