Brief submitted to the Standing Committee on Justice and Human Rights in Support of Bill C-223, *An Act to amend the Divorce Act* (Keeping Children Safe Act)

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The Provincial Association of Transition Houses and Services of Saskatchewan (PATHS) is the member association for agencies that provide shelter and counselling services to survivors of intimate partner violence (IPV) in Saskatchewan. PATHS conducts research, delivers training for professionals, engages in advocacy, and serves as the collective voice for front-line IPV professionals in Saskatchewan.

PATHS has delivered our 15-hour training program, *Understanding the Dynamics of Domestic Violence for Family Law Practitioners*, 23 times to over 320 professionals since 2019. PATHS' current research, funded by Women and Gender Equality Canada (2023- 26), examines survivors' experiences with the legal system and includes surveys with survivors and service providers, as well as interviews and focus groups with survivors and service providers (including judges, lawyers, mediators, police, and IPV professionals). The research design was informed by consultation with an advisory group of survivors and professionals. Findings include survivors' experiences with the family legal system and the impact of post-separation abuse and involvement in the legal system on children. Although data analysis is currently underway, we can provide examples from this research that highlight the importance of the provisions in Bill C-223.

PATHS' recommendations for the Standing Committee on Justice and Human Rights

PATHS supports Bill C-223, *An Act to amend the Divorce Act,* and we hope to see its provisions become law.

We recommend keeping the Bill's protections against "parental alienation" style allegations intact, including proposed *Divorce Act* s. 16(3.1- 3.2) and the limits on reunification therapy and "relationship-repair" orders at s. 16.1(4.1- 4.2).

We also recommend adopting NAWL's proposed clarifying amendments that strengthen safety-focused decision-making (especially on cooperation requirements, inadmissibility of expert evidence regarding whether a child's resistance is the result of manipulation, children being heard safely, meaningful and sustained change by the person using violence and relocation where family violence is present, and relocation).

PATHS' support of Bill C-223

We support the amendments to the *Divorce Act* proposed in Bill C-223, which state that the primary focus of family law must be to promote the safety, dignity, and well-being of all family members, particularly children and survivors of family violence, and to uphold the best interests of the child. We are pleased to see language in the Bill requiring decision-making based on the best interests of the child (rather than on parents' preferences or the presumption of shared parenting). Importantly, the Bill directs courts to more accurately assess the impact of coercive control on a parent-child relationship to ensure that children are protected from family violence/abuse after family separation.

Tabibi and colleagues (2021a) summarized Canadian research, including that of Hyrmak and Hawkins (2021) that demonstrates that survivors of IPV often face five hurdles in the family law system: not being believed about IPV; IPV being minimized or dismissed; IPV being perceived as irrelevant to children's wellbeing; being told to "put the past behind" and co-parent with an abusive ex-spouse, despite the impact of IPV on themselves and their children; and being accused of alienation when survivors or children do not "put the past behind." Bill C-223 has the potential to mitigate these challenges by focusing on "the best interests of the child and evidence-based understandings of trauma, coercive control and the dynamics of abuse rather than gendered myths and stereotypes," and requiring screening for family violence, shifting the presumption from shared parenting to focus on child safety.

It is clear from our own research and conversations with survivors and legal professionals, as well as the work of Canadian legal scholars, that victims/survivors of IPV are often assumed by judges and other legal system professionals to be equally responsible for the abuse. Further, the consideration in the *Divorce Act* of each spouse's willingness to support the development and maintenance of the child's relationship with the other spouse as one of the factors related to the circumstances of the child for courts to consider in determining the best interests of the child led to survivors being held responsible for doing the work to facilitate their children's relationship with the other parent, in the context of ongoing post-separation abuse and legitimate concerns for their children's and their own safety and well-being. We are very pleased that Bill C-223 would repeal paragraph 16(3)(c) of the Act, thus eliminating the onus placed on survivors to facilitate this relationship or risk being viewed as an "unfriendly parent." This change should ensure that the criteria used to determine the best interests of the child are focused on children's safety and best interests, and do not penalize protective parents.

Bill C-223 adds consideration of family violence to paragraph 16(3)(i) of the Act: "(i) the ability and willingness of each person in respect of whom the order would apply to communicate and cooperate, in particular with one another, on matters affecting the child, taking into consideration any evidence of family violence." We echo the **recommendation for amended wording** proposed by NAWL, which would instead read: "(i) the appropriateness of an arrangement that would require the spouses to cooperate on issues affecting the child, including whether requiring cooperation would increase any risks to the safety, security or well-being of the child or other family members." NAWL states that "the question is not whether the victim is willing and able to cooperate with her abuser, but whether it is appropriate for courts to require cooperation. Courts must consider whether cooperation could endanger the child or family members before imposing such cooperation;" we agree with this recommendation.

Preventing the use of parental alienation allegations

PATHS is pleased to see provisions that would effectively stop the use of parental alienation allegations, which are often levelled to distract from credible allegations of family violence, including IPV and child abuse. In cases involving family violence, parental alienation allegations are frequently used to discredit survivors' safety concerns and can contribute to unsafe outcomes for children and the protective parent.

In January 2024, PATHS joined 250+ feminist organizations in signing an open letter to the Prime Minister and leaders of other federal parties, calling for legal reform to protect survivors from the use of parental alienation accusations (NAWL, 2024). In that letter, we called on the government to take action to enact the recommendation by the UN's Special Rapporteur on violence against women and girls, its causes and consequences, Reem Alsalem, in her report *Custody, violence against women and violence against children* (2023) for "States [to] legislate to prohibit the use of

parental alienation or related pseudo concepts in family law cases and the use of so-called experts in parental alienation and related pseudo-concepts."

We are pleased that Bill C-223 addresses this by aiming to prevent "claims that one parent has engaged in conduct to undermine the relationship of their child with the other parent [. . .] being used in family court to justify changes in parenting time, sometimes leading to the removal of children from the care of their preferred parent." NAWL **recommends the inclusion of a new paragraph**: "Expert evidence not admissible (3.1.1) In determining the best interests of the child, the court shall not admit any expert evidence aimed at determining whether a child's resistance to, reluctance toward, estrangement from, or potential estrangement from a spouse is the result of or might result from manipulation or influence by the other spouse." Given that research demonstrates that alienation allegations are often introduced by "experts" and service providers, PATHS supports NAWL's recommendation.

We have heard concerns regarding the use of parental alienation allegations from family law professionals who participate in our training, and survivors who have participated in our research or contacted us to share their experience with the family law system. Examples shared by survivors in a survey as part of PATHS' WAGE-funded (2023- 26) legal system study included:[1, 2]

> *"I mentioned the abuse, and my first lawyer highly encouraged me not to mention the abuse, so I didn't. I went through five lawyers total until I started representing myself, and several other lawyers said the same thing to me. I disclosed during the custody access assessments, both, and it was ignored. My son's claims during the assessment were ignored as well. I was blamed for parental alienation still. My ex's lawyer first blamed me for this, and the custody assessor did as well."*
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> *" . . . the judge seems to weigh in based on these allegations rather than facts. The focus is always on supporting my ex, nothing about the kids, their rights, their voice, etc. The whole parental alienation thing became a large part of our family court . . ."*

Preliminary findings[1] from the survey of service providers (including lawyers, mediators, police, domestic violence shelter workers, and IPV counsellors) in PATHS' WAGE-funded legal system study show that nearly 70% (68.1%; *n* = 111 of 163) reported that they had worked with clients/cases where "parental alienation" was alleged by an abusive parent to discredit the victim parent, and/or so that allegations of IPV and/or child abuse would not be believed.

A municipal police officer shared:

> *"All of the time. These abusers have fragile egos, and being called a bad parent hurts that ego. So, they blame the other parent for the alienation and run to family court. Even though the victim is trying to protect their children from the abuse they go through, family courts will still award the abuser parenting time."*

A family law lawyer stated: *"Allegations of parental alienation are made regularly."*

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[1] This research project is currently underway, and published findings will be forthcoming. Publications will be posted on pathssk.org when available.

[2] Survivors who participated in the research consented to share their experiences to inform PATHS' advocacy related to the legal system and training for professionals.

Although parents (often those who perpetrate IPV) may denigrate the other parent or make efforts to undermine their child's relationship with the other parent (for example, 77.8% [*n* = 112 of 140] women who responded to the survivor survey in PATHS' WAGE-funded legal system study[1] reported feeling like their abusive partner tried to turn the children against them during the relationship), a challenge arises when parents' (often victims/survivors of IPV) legitimate concerns for their children's safety, due to a history of family violence, and their attempts to protect their children are mislabeled as "alienation" (Hrymak & Hawkins, 2021; Lapierre et al., 2020; Neilson, 2018; Sheehy & Boyd, 2020; Tabibi et al., 2021a, 2021b; Zaccour, 2018). Although some parents will malign and denigrate the other parent in an attempt to negatively impact the child's relationship with that other parent, Tabibi and colleagues assert that "such alienating behaviours cannot be accurately assessed when there is a history of IPV or child maltreatment and when a parent or child may rightfully be anxious or scared about contact with the parent who uses abusive behaviours" (2021a, p. 3).

Abusive parents may allege parental alienation when the victim parent alleges IPV or child maltreatment, stating that abuse allegations have been fabricated as part of a campaign of alienation. They may also preemptively allege alienation when they are aware that survivors or children will likely disclose abuse. This misuse of such an allegation can mislead the court, diverting attention from IPV and child abuse and from the best interests of the child, resulting in increased danger to victims/survivors and their children.

Despite decades of research evidence demonstrating that experience of and exposure to intimate partner and family violence has significant consequences for children and adult victim/survivors, courts often fail to take this into account and consider the risk to be mitigated after separation. Bill C-223 aims to address this by "address[ing] certain myths or stereotypes regarding family violence by providing that courts, in determining its impact, are not to make certain inferences, including that violence no longer occurs once spouses have separated or a divorce proceeding has commenced." Bill C-223 highlights the need to "assess the risk of family violence and, if there is a risk, to take steps to implement an appropriate plan."

Further, despite the breadth of research evidence demonstrating the ongoing risk to adult IPV victim/survivors and their children after separation, a review of Canadian family law cases involving claims of parental alienation and family violence by researchers Elizabeth Sheehy and Susan B. Boyd (2020) found that Canadian family law cases involving claims of parental alienation and family violence steadily increased from 2014 to 2018 and that parental alienation was taken into account more frequently than IPV. Sheehy and Boyd (2020) found that "Judges are more likely to focus on alienating behaviours than IPV when determining custody and access. IPV is rarely condemned or related to children's best interests in the way that alienation is" (p. 88). They also found that when parental alienation was alleged, IPV was neutralized by judges, with some determining that it was a "one-off occurrence," or a mutual "couple's conflict" (Sheehy & Boyd, 2020).

Survivors who participated in the survey and focus groups[1] as part of our legal system study shared that judges:

> *". . . actually dismissed the assault . . . he just said it was typical, it was a one-off . . . it was an unfortunate event."*
>
> *"Disregarded, said it is in the past, and that it should not diminish abuser's capacity to parent."*

Another survivor explained why she did not disclose IPV when participating in the family legal system:

> *"I didn't disclose the abuse because [my lawyer] had told me that if I disclosed the abuse, judges would often take custody away from mothers and give more custody to the father, so I followed that guidance."*

There are also examples in Sheehy and Boyd's (2020) article of judges who stated that IPV, including violence enacted in the presence of a child, did not impact the child's safety or well-being. Our experience working with IPV service providers and survivors in Saskatchewan also highlights deficits in some professionals', including judges', understanding of the impact of IPV. Therefore, we are happy to see it stated in the preamble of Bill C-223 that "the primary focus of family law must be to promote the safety, dignity and well-being of all family members, particularly children and survivors of family violence" and that "courts and decision-makers must be guided by the best interests of the child and evidence-based understandings of trauma, coercive control and the dynamics of abuse rather than gendered myths and stereotypes."

Other Canadian scholars, including Simon Lapierre and Linda Nielson, have highlighted that when children articulate fear, concern, or a desire not to be with an (abusive) parent and are consistent with their siblings or the victim parent, judges see it as "suspicious" or "coached." When viewed through the lens of parental alienation, legitimate concerns can be viewed as "unwarranted" or the result of "manipulation" by the other (victim) parent. A survivor who participated in our research[1] regarding the legal system shared:

> *"[The custody assessor] told me that a lot of the complaints my son was making were similar to mine, so it must be influenced by me or another adult."*

Importantly, Bill C-223 aims to halt the practice of disregarding children's views and preferences under the pretense that they have been "manipulated" by a parent. The Bill states that "the court shall not take into consideration any allegation that a spouse has, or is likely to, through deliberate manipulation, persuade or encourage a child to become estranged from or resist contact with the other spouse," and provides provisions for the court to hear evidence from the child (5 1.1) and provides a process for the court to obtain information or evidence directly from the child under proposed *Divorce Act* s. 16.1(1.1- 1.2), including safeguards around safety, privacy, and disclosure. We would, however, also **recommend amendments to the wording** of the provisions regarding evidence from a child, as recommended by NAWL. These include adding "the child wishes to be heard" as an additional criterion, and specifying "or" (versus "and") between the other criteria (it is in the best interests of the child to provide the information or evidence, both spouses agree, and court is of the opinion that the safety and privacy of the child would not be compromised).

Sheehy and Boyd (2020) found that mothers were more than twice as likely to be accused of parental alienation as fathers. Whether or not judges made a finding that alienation had occurred, the allegation led to worse outcomes for survivors in many cases. In many cases, this resulted in increased parenting time for fathers who had been abusive. Importantly, the preamble to Bill C-223 acknowledges that "there is increasing concern that such claims may be used in cases of domestic abuse or child sexual assault to support the accused parent and provide the accused parent with continued access to their children, thereby putting the children's safety at risk."

Research has also illustrated that parental alienation allegations by violent men resulted in children being removed from the care of the protective parent (the mother/victim of IPV). Bill C-

223 acknowledges this by stating that “claims that one parent has engaged in conduct to undermine the relationship of their child with the other parent are being used in family court to justify changes in parenting time, sometimes leading to the removal of children from the care of their preferred parent” and aims to prohibit this practice by stating that “The court shall not, in the order . . . restrict the parenting time of a spouse with whom the child has a close connection for the purpose of improving a child’s relationship with the other spouse.”

Canadian researchers have also highlighted that the concept of parental alienation is sometimes alleged, even without using the specific term “parental alienation.” We appreciate the wording in Bill C-223, which specifies “claims that one parent has engaged in conduct to undermine the relationship of their child with the other parent are being used in family court to justify changes in parenting time . . .” In our view, it is important that the courts identify specific behaviours, and that this be understood within the context of intimate partner and family violence, including coercive control and child abuse.

Preventing children from being ordered to attend reunification therapy

The article by Sheehy and Boyd (2020) provides several relevant examples from published Canadian decisions, including those where parental alienation allegations by violent men resulted in increased access, cancellation of supervised access, and children being ordered to participate in reunification programs with parents who had been abusive.

Importantly, Bill C-223 aims to prohibit the use of reunification therapy by stating that “The court shall not, in the order . . . require a child to attend reunification therapy or allow a spouse to consent to the child attending reunification therapy without seeking the consent of the other spouse.”

We echo the statement made by NAWL in their Brief to the Committee that paragraph (4.1), as it is currently written, is crucial “to protect children from being forced into contact *before* they have a positive relationship with the parent. When a parent has a poor relationship with their child, they should work on their parenting deficits and develop that relationship before the child is entrusted to their care. Restricting children’s time with a parent with whom they are bonded and who cares well for them to force them to spend time with a parent with whom they don’t have a relationship is cruel. Children deserve safety and stability with however many parents they feel safe with. Forced therapy is problematic, even more so when a child is forced into therapy to respond to parenting deficits. Reunification therapy is traumatic to children and should never be ordered or forced by a parent.”

Relating to orders for children to participate in reunification therapy, survivors who participated in our research[1] regarding the legal system shared:

> *“ . . . The judge allowed my ex to 'pick and choose' what he would do, there was no assessment of how things were going, the kids were not allowed to give input on same nor was I. My ex was returned to full visits after a few supervised visits. This was despite ongoing physical and emotional abuse. After several court dates, there was an order of an update to the assessment. The new assessment person took over a year to do same and was very unprofessional. Despite this, he documented coercion of teachers, counsellors, and others by the kids' dad. The ongoing abuse and control was evident. The assessor interviewed the 'expert witness' in parental alienation, even though they had never met nor spoke with the kids nor myself. He even documented my ex getting very angry with the assessor inappropriately. However, the end recommendation was 'reunification therapy.' I did not trust the process in both cases,*

but having said that, the reports did demonstrate clear abuse of the kids, the controlling and manipulative nature of their dad, and despite this, the judge continued to push for visits (unsupervised) as well as reunification therapy."

"[abusive ex-spouse] chose the psychologist. I was very concerned that that person had a parental alienation leaning. . . He had requested that she attend the reunification camp so she would be removed from school, and she's an athlete, and that she would be removed from her sports and friendship support groups indefinitely. I was terrified that she was going to be removed from not just me, but everything healthy in her life and school indefinitely." Luckily, in this situation, the child was not sent to a reunification camp, likely in part because there was no reunification camp in the geographic area.

Another survivor described being threatened by her ex-spouse's lawyer that a reunification therapy camp would be used to remove her child from her care:

"My ex's lawyer was awful and twisted things said in emails or from the custody access report to paint me in a negative light. It was truly awful; she skirted around the law often to favour getting what she wanted for my ex. Even in an email to me directly she threatened to make an application [to] the courts to have my son attend reunification camp for three months if I did not agree to the child support (under government guidelines)."

Steps taken by the person engaging in family violence to change their behaviour must result in meaningful and sustained change

Revised wording for 16(4)(g) of the Act states that "evidence that any steps taken by the person engaging in the family violence to change their behaviour will improve their ability to care for and meet the needs of the child and will prevent further family violence from occurring."

Meta-analyses and systematic reviews of studies of the effectiveness of IPV treatment/intervention programs show a minimal effect on post-treatment reoffending (Cheng et al., 2021; Fernández-Fernández et al., 2022; Wilson et al., 2021). Evidence from research indicates that different types of perpetrators have varying levels of engagement in treatment and differ in rates of treatment completion and recidivism (Giesbrecht et al., submitted).

Survivors who participated in our research[1] regarding the legal system shared:

"He went through the [IPV intervention/treatment program], which I think ended up causing more harm because he just got the language to abuse better."

"[The facilitator] wrote a letter about how great of a leader he was . . . and that letter screwed me over both in family court and criminal court, and he hasn't changed. He's still the same."

It is clear that participation in a treatment/intervention program does not guarantee that the person who has engaged in violence will change their behaviour, desist from using violent and abusive behaviour, and ensure that violence will not recur. Nor does participation guarantee that they will be able to adequately care for and meet the needs of the child. Further, "any steps taken" does not mean participation in—and completion of—an IPV treatment/intervention program. This could mean any step, however small, regardless of whether this step actually leads to changed behaviour, desistance from violence, and improved safety and care for children.

Therefore, we echo the **recommendation for amended wording** proposed by NAWL. This recommendation specifies that the steps taken must result in a meaningful and sustained change: "(g) evidence that ~~any~~ steps taken by the person engaging in the family violence to change their behaviour *have resulted in meaningful and sustained change* and will *significantly* improve their ability to care for and meet the needs of the child and ~~will~~ prevent further family violence from occurring"

Relocation

We are aware of situations where survivors of IPV have moved to another community or another province to escape the threat of continued violence from their former partner and/or to be closer to family and other supports, but have been ordered by the court to return to where their former partner resides. We are also aware of situations where survivors of IPV have made applications for relocation and been denied, despite ongoing abuse in the presence of children post-separation.

We are in agreement with **wording clarifications or potential alternatives** suggested by NAWL, which would prohibit relocation only if: "(a) the relocation is not in the best interests of the child; and (b) it is in the best interests of the child to reside primarily with the spouse opposing the relocation; and (c) the spouse opposing relocation has not engaged in family violence."

In conclusion

PATHS is in support of Bill C-223*, An Act to amend the Divorce Act,* and we hope to see the provisions within this Bill become law.

PATHS urges the Committee to (1) retain the proposed amendments to *Divorce Act* s. 16(3.1-3.2) and s. 16.1(4.1- 4.2) keeping the Bill's protections against the use of "parental alienation" allegations intact without weakening amendments, (2) adopt NAWL's wording changes to ensure courts consider whether cooperation requirements increase risk, (3) strengthen the child-evidence provision so children can be heard safely and only when they wish to be heard, (4) legislate the inadmissibility of expert evidence regarding whether a child's resistance is the result of manipulation, (5) require "meaningful and sustained change" before courts rely on the steps taken by the person who used family violence, and (6) clarify relocation so survivors and children are not forced back toward risk.

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