



Research Summary

"I wish they knew what they'd stolen from me": child sexual abuse and the Family Court

Morag MacSween
Tunya Petridis
Jodi Death

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Our Research

Children do not give evidence in the Family Court, and do not participate in decision-making. They are frequently framed as unreliable witnesses to their own experience. International activism to address custody reversal and parental alienation relies on the perspectives of adults; the direct experience and meaning making of child victims and survivors of sexual abuse has rarely been captured ¹.

“I wish they knew what they'd stolen from me”: child sexual abuse and the Family Court begins to fill this gap by sharing Annie's, Isabella's and Rachel's experiences as children, and critically, their reflections as adults. Our research tests the implicit and explicit conceptual frameworks which shape the approach to child sexual abuse in the Family Court against the lived and living experience of our participants and the research evidence on child sexual abuse, family violence and complex trauma.

Our research is multidisciplinary. Associate Professor **Jodi Death** is a criminologist and former child protection caseworker, with an extensive body of published research on child sexual abuse and the Family Court. **Tunya Petridis** is a clinical supervisor and former child trauma therapist, with extensive experience of working therapeutically with children participating in the Family Court. Dr **Morag MacSween** is a clinical supervisor, researcher and former sexual violence counsellor and child protection executive leader.

This Research Summary shares:

- the key themes from our case studies and our participants' advice on change
- our observations from the clinical and the child protection perspectives
- our exploration of the conceptual frameworks which shape the Family Court's approach to matters involving allegations of child sexual abuse
- our recommendations for change.

The full report can be found at [hyperlink](#).

case study research

Multiple case studies allow researchers to identify **shared and unique experiences** among a group of participants.

Our research identified what was shared and what was distinct in Isabella's, Annie's, and Rachel's experiences, through the lens of the evidence.

For each of them, the Family Court process compounded the isolation and powerlessness intrinsic to child sexual abuse.

The two strongest themes which emerged from our analysis of their experience were:

- safety and protection
- agency and voice.

Key Themes

Shared and Unique Experiences

Our participants all disclosed to their mothers repeated sexual abuse by their fathers. **Their mothers immediately believed them and took steps to protect them.** For two of our three participants, child sexual abuse and domestic abuse co-occurred. All three were subjected to emotional abuse, and Annie was also subjected to physical and verbal assault.

The abuse stopped for Isabella and Rachel but continued for Annie. Each of our participants talked about how important their mother's belief and protection was for them. Our participants shared **an immediate, sustained and crystal-clear wish not to have contact with their father.**

The impact of sexual abuse was unique to each child. For Isabella, the immediate impacts were terror, anger and resistance; she dissociated from the abuse during her childhood and experienced the impacts somatically as *this crashing weight that I had no idea what it was about.* For Annie, the immediate impact was confusion: she did not know how to make sense of her father's abuse; it took the intensification of the abuse, her growing understanding that it was wrong, and her growing assertiveness to end the abuse. For Rachel, the impact of child sexual abuse was mitigated because she had layers of support. **For Annie and Rachel, the abuse is largely in the past, but for Isabella it remains current.** She is still afraid, and her thoughts are filled with the abuse: *the words in my head like incest are so there and such a constant ... my head is just constantly filled with terror.*

Our participants all noted that the Court does not appear to see the impact of abuse on the family as a unit. It silos the experience of the child, distancing her from natural supports, most critically the non-offending parent, constructing an environment of **solitude and silence** around her experience.

Isabella and Annie identify two sources of trauma in their childhoods: the sexual abuse and the **secondary traumatic impact** of the Family Court, which prevented them establishing the safety and stabilisation required for the first phase of recovery from complex trauma. For Rachel, the individualising approach of the Court prevented her family recovering as a unit, laying *the foundation for so many fractures and separations in our unit when all we had was each other.*

Isabella, Annie and Rachel shared their experience to contribute to change. Annie told us: **I'm going to keep speaking, because I can. I'm doing whatever I can to help, to make sure it gets changed.**

Safety and Protection

As children:

- immediate safety meant not seeing their fathers, the source of danger
- enduring safety meant a final Court decision that they would not have to continue with, or resume, contact
- their mother was the primary protector for all three children: the sole protector for Isabella and Annie, but one of several protective adults in Rachel's life
- for Annie, other adults - including Child Protection - were bystanders rather than protectors
- safety was conditional and protection was contingent, dependent on convincing the Court both that the abuse had happened, and that it had been bad enough to outweigh its belief that contact with fathers is beneficial
- all three developed sophisticated strategies to try to keep themselves - and their families - safe in a context they did not fully understand.

What if it was just too much and she just died? Or stopped or was crazy, like grandmother, or it was just too much. It was really scary having just one person to protect me from everything. When she got ill, I was terrified ... I felt scared because safety felt conditional.

Isabella

As adults:

- their wish not to see their fathers was their own independent view - and it was correct
- for the Family Court, safety mean the absence of immediate physical risk; it seemed to be unaware of, or unconcerned about, emotional and psychological safety
- they cannot understand how the Court arrived at the view that contact with their fathers would be safe
- Annie now appreciates that agencies as well as victims and their families can be groomed by abusers, and she knows that adults can miss red flags that are obvious to children
- Isabella's key insight as an adult is the critical need for the Family Court to understand the centrality of mothers to children's sense of safety: *there should be much more focus on keeping the protective parent/primary caregiver safe.*
- Rachel was astonished to learn that a single point in time observation continues to be considered a credible way to assess child-parent relationships.

I can't understand how anybody could have thought I would be safe with him.

Annie

Agency and Voice

As children:

- our participants understood agency as being held by adults who they had never met and could not speak to directly, and whose decisions were both unexplained and inexplicable.
- they did not see themselves as having meaningful input to decisions, but felt enormous pressure around both what they said, and how they said it; where they did have a voice, it was constrained.
- for Rachel, having to keep her interactions with the court social worker confidential from her mother operated as the most significant constraint on her voice and agency.

It was all of these, you know, private conversations. Don't talk to each other. The extension of that is this is something not to be talked about, which you then think is something of a deficit in you.

Rachel

As adults:

- our participants are strongly critical of the mediation of the voice of the child through social workers and psychologists
- giving children a direct voice would require protection from retaliation, understanding of how children disclose, and an open mind about the benefits and dangers of contact
- agency and voice also require good information; as a child, Rachel did not always know which adults worked for the court, which worked for the hospital, and which worked for the police
- from this experience, she argues that children need resources, and they need to have an avenue for feedback and complaints.

If I was looking after that child ... I would just protect them without them needing to be good and nice and kind and polite. There would be no criteria for protection. I would just protect them.

Isabella

Observations

the clinical lens

Two of us - Tunya Petridis and Morag MacSween - have extensive experience of providing therapeutic and psychosocial support to victims and survivors of child sexual abuse.

We were struck by the stark contrast between best practice in responding to child sexual abuse and the experience of our participants going through the Family Court process as children.

Trauma and Recovery

We know that involvement in the legal system is often retraumatising. In practice ⁱⁱ, and unintentionally, **the Family Court process is both retraumatising and an 'anti-recovery' experience** for victims and survivors of child sexual abuse.

Our experience has taught us **what children need to recover from the traumatic impact of child sexual abuse**: belief, transparency and protection when they disclose; an end to the abuse and security that it is over; safety and stabilisation, critically including strengthening the relationship with the primary caregiver; developing a clear narrative of the traumatic experience which integrates events, thoughts and feelings, and integrating new understandings and learning into everyday life.

By contrast, child victims and survivors involved in the Family Court have an **anti-recovery experience**:

- they either are, or perceive themselves to be, disbelieved
- some are forced into continued contact with the perpetrator and thus continue to be abused
- others experience temporary physical safety but enduring emotional danger
- they are not able to develop the safety and stabilisation needed to process trauma
- barriers are introduced into their relationship with their primary caregiver
- their primary caregiver is under continuous financial, emotional, and psychological stress.

The Courts have undertaken training around trauma. ⁱⁱⁱ There are opportunities to build on this. Guidance on adopting **trauma-informed practices** has been produced by the Judicial Commission of NSW and the Australasian Institute of Judicial Administration. ^{iv} The former includes an adaptation of the trauma-informed practice principles - with which we are familiar as clinicians - to the court environment.

the child protection lens

Two of us - Morag MacSween and Jodi Death - have frontline and executive experience in statutory child protection.

We were struck by the contrast between best practice investigation of allegations of child sexual abuse in child protection, and the approach taken in the Family Court.

Investigating Child Sexual Abuse

Family Court Judges are, in practice, making the same decisions as are made in child abuse investigations. In doing so, they are informed by, but not obliged to rely upon, the expert witness evidence provided in the form of Family Reports.

There are three key distinctions between fact finding on child sexual abuse by the Family Court and investigation of child sexual abuse by Police and State Child Protection: **specialism, structure and integration**. For example, in New South Wales the Joint Child Protection Response Program:

- is a **specialist** tri-agency response, including a medical, forensic and psycho-social response from Health, specialist investigatory skills from the Police Child Abuse Squad, and child sexual abuse assessment and safety planning from the Department of Communities and Justice (DCJ).
- investigations are **structured** by the multiagency Local Planning and Response process; child sexual abuse assessment and safety planning follows the *See, understand and respond to child sexual abuse* Resource Kit and the DCJ Practice Standards.
- the process **integrates** investigation, safety planning and therapeutic response.^v

By contrast, Family Report writers and Judges are expected to be competent in the law and practice around family separation and family violence; **they are not expected to be child abuse, or child sexual abuse, specialists**. They have significant discretion in how they approach report writing, and determination of fact. Their focus is on reaching a judgement, not on providing a therapeutic response to the child.

The Family Court was never intended to function as a family violence specialist court, or a child abuse specialist court, but in practice, these are the matters that come before it. The main response to this challenge to date has been seeking to improve the way the State and Territory and Federal Jurisdictions work together^{vi}. By contrast, our research suggests that attention should instead be focused on assessing the strengths and weaknesses, benefits and costs of the Family Court attempting to supplement capacity in child protection by running what is in effect **its own parallel system of child sexual abuse investigation**.

Alongside this question, we also recognise the most significant improvement in the Court's approach to child sexual abuse to date. Until recently, a finding of unacceptable future risk to the child was predicated on a finding that abuse had occurred. The judgement in *Isles vs Nelissen* in 2022 confirmed that the correct test to determine whether children face unacceptable risk of harm is **the possibility of a child being harmed in the future and whether that possibility amounts to an unacceptable risk**. This determination can be made, as it was in this case, without a *finding of positive fact* that child sexual abuse occurred.^{vii}

case study methodology

Case study methodology allows researchers to explore and deepen theoretical and conceptual frameworks through in-depth exploration of lived and living experience.

The Family Court has not yet articulated a distinct conceptual framework around child sexual abuse.

It is not clear whether the Court has not recognised, or does not recognise, the need for an explicit framework around child sexual abuse, or whether its assumption is that its (extensive) documentation and guidance around family violence is sufficient.

Conceptual Frameworks

Explicit

The closest the Court arrives at articulating a conceptual framework around child sexual abuse is in the description of its Magellan List. This tells us that the Court believes that **child sexual abuse requires a different approach where allegations have been made within 12 months**. They involve the most vulnerable children, are resource intensive, require information from multiple sources and multidisciplinary case management ^{viii}.

The focus on disclosure within the previous 12 months appears to assume that a protective response and/or investigation is likely to occur within 12 months of a disclosure. **Lived experience and the evidence does not support this assumption.**

Our participants had made recent disclosures, and their mothers responded protectively. They do not know if their matters were allocated to the Magellan List. Their experience challenges the assumption about recent disclosures, in two ways:

- their mothers' **protective response to their disclosures did not resolve risk** in the face of their fathers' denial of the abuse; and
- the Family Court process **extended the period during which they were at risk of continued sexual abuse**; for Annie, the abuse continued.

New research on the co-occurrence of family violence and child sexual abuse tells us that at least 207 and up to 7550 child victims and survivors of sexual abuse may engage with the Court each year ^{ix}. **A conceptual framework which focuses on prevention as well as response** has the potential to be life-altering for thousands of children who have not been able to disclose, or who have disclosed and been disbelieved.

Implicit

Empirical analysis of cases where there are allegations of child sexual abuse identifies an implicit conceptual framework which sits alongside the articulated position of the Courts. ^x Our analysis identifies **three core beliefs**, none of which are supported by the experience of our participants, or the evidence.

Firstly, Judges' satisfaction that child sexual abuse has occurred is understood to be a **reasonable test**. More evidence is required for Judges to reach the degree of satisfaction required where there are allegations of child sexual abuse than in other matters ^{xi}. While Judges determine facts, Family Report Writers and Independent Children's Lawyers are competent to provide expert evidence in matters where there are allegations of sexual abuse.

*In hindsight, having seen the report from the social worker, she certainly didn't understand what was happening. She didn't believe it was happening. My experience was sent to her which wasn't believed, which was then reframed. **I don't think the family court got any insight into me at all - all they got was her take on me.** The family court social worker is saying the five-year-old is wrong.*

Rachel

Secondly, most allegations of child sexual abuse in the context of custody disputes are **false or mistaken** ^{xii}. A child's wish not to have contact with a parent against whom allegations of child sexual abuse have been made is not sufficient for that to occur and may well be the result of coaching for purposes of parental alienation.

The evidence is clear that false allegations of child sexual abuse are rare, occurring in the range of 2 - 5% overall, and in the range of 4.7 - 15% in custody disputes. Researchers and experienced practitioners argue that the more common phenomenon is **false denials** - children who deny or minimise sexual abuse ^{xiii}

With the benefit of adult hindsight, Isabella, Annie and Rachel are clear that their determined wish not to have contact with their fathers was their own independent view and was necessary to secure their safety from abuse and their emotional safety.

Thirdly, it is appropriate to require children and young people who are victims and survivors of child sexual abuse to keep their discussions with Family Court personnel **confidential**, including from the parent to whom they disclosed. It is appropriate on some occasions to prevent child victims and survivors from receiving **counselling**, and to prevent children and their non-offending parents from making further **disclosures** of sexual abuse ^{xiv}.

One of the key findings of our research is that preventing children from talking to their mothers about the Family Court process separates them from their **key natural support**. Access to **counselling is a key component in recovery** from complex trauma for many victims and survivors. We also know that child sexual abuse is usually continuous, and that **disclosure is a process**, rather than a one-off event. ^{xv}

What needs to change?

Isabella

Isabella is not optimistic about change in the Family Court:

I don't know that part. I was thinking about it yesterday, and that was a hard one. **I don't really have any faith in the court system.** I think it's misogynistic and colonial and capitalistic. So, I find it hard to be optimistic about the future or editing it to make it better.

She recommends that the Court look beyond immediate risk and see context. In her case:

I think that if they had, it would have been a much shorter court process. **It took ten years.**

I think that if they had really paid any sort of attention, they would have seen how important mum was. And the relationship with the primary care giver - that should be more important and protected. When I spent time with my grandmother - time away from my primary caregiver - this was time that I was not safe - so constantly taking me away from my mother was hurting me, even though it wasn't direct. So that should be much more of a priority, making sure that she wasn't constantly in danger of him showing up... There should be **much more focus on keeping the protective parent/primary caregiver safe.**

Isabella's views on the recent changes to the Family Law Act are complex:

If legislation is changed to solely prioritise safety over contact, then some people would be taken from their parents when they shouldn't have been. So, I know it's complicated, but **for me, I don't understand how anyone could have thought that I would be safe with him.** So, it must have been because they wanted us to have a relationship, because otherwise I cannot fathom what drove the decision making.

But where there are allegations of child sexual abuse and the Family Court is weighing up whether the mother is lying, or whether the father is an abuser, this dilemma has a simple solution:

I say it all the time, I would much rather believe a potential liar than a potential rapist.

Annie

Annie argues that it is critical that the Family Court understands that their current process prevents children from speaking freely, and speaking safely, including about abuse they are currently experiencing. While the most recent legislative change prioritises safety, in Annie's opinion:

*I don't think it's gone far enough. **It doesn't do anything to protect the child who wants to disclose abuse.***

She recommends easier avenues for adults who participated in Family Court as children to give feedback and make complaints:

I don't think that you can try and improve the Family Court system without the input of those who've been through it. It just does not make sense. I think you can go to the Attorney General, but that's the first point of call and it's quite extreme.

Professionals involved in the Family Court, particularly Family Report writers, need to understand the realities of disclosure:

Half the time when kids disclose abuse, it's not even on purpose. They're not sitting down and saying, this is happening. It's small comments that you don't even realise as a child what you just said.

Children going through the Court process need resources:

*There's no resources for kids in the Family Court system. Like nothing, **you can't even find a fact sheet of the rights of children, let alone someone that kids can ask questions about what's going on.*** It's just, there's nothing.

Annie notes that the Human Rights Commission has described the Family Law Act as violating children's human rights. She agrees, and argues:

We need a Court system that puts children actually first.

Rachel

For Rachel, the mediation of the child's voice through a social worker, and the assessment of safety in a relationship by observing an unnatural interaction is ineffective:

***The social worker as the voice of the child is just so problematic.** I suspect I had a particularly not great social worker (but) having one person tasked with representing the child is really complicated, and it's also really tricky, just by the nature of the work they deal with every day. While it gives them some expertise, lots of expertise in fact, it also really shapes their view of normal.*

Rachel knew she was safe during observed interactions with her father, and that influenced how she acted:

*The behavioural analysis was just nuts. I can see what logically they think it's going to achieve, but I vividly remember how weird it was. You're not objectively looking at this interaction. I feel like it's such a contrived scenario, you're looking at behaviour in **a very unnatural setting that doesn't replicate what things might be like.***

Critically, the Family Court needs to work with families as families:

*I think that if they had considered us as a family, that **what had happened to me actually happened to the whole family**, (considering) how that unfolds in future and protecting that sibling relationship. I feel like it laid the foundation for so many fractures and separations in our unit when all we had was each other, we didn't have any external family support.*

The lack of family, seeing it as a family, I think, is the biggest thing.

Recommendations

Our participants' expertise from lived experience highlights the importance of the Family Court:

1. Recognising the importance of the relationship between the child and the safe parent and the child and their siblings, safeguarding those relationships by:
 - a. developing processes to routinely include a whole of family perspective on outcomes which align with the best interests of the family; and
 - b. in all matters where there are allegations of child sexual abuse, safety planning with the safe parent on how best to manage the impacts of the Family Court process on the family as a whole.
2. Where the Court is considering both allegations of parental alienation and allegations of child sexual abuse, its judgement clearly setting out:
 - a. how the judgment has responded to the evidence that allegations of parental alienation in the context of domestic or child sexual abuse should be subject to critical analysis, and the evidence that allegations of child sexual abuse are likely to be true; and
 - b. that the judgement has separated its findings in relation to child sexual abuse from its findings on the risk of future harm to the child.
3. Developing and consulting on strategies to ensure that the Court functions as a safe space for children who wish to disclose sexual abuse.
4. Ensuring that all Family Report Writers and Independent Children's Lawyers either:
 - a. demonstrate existing capacity to recognise the range of ways in which children disclose sexual abuse and respond appropriately; or
 - b. are enrolled in training on disclosure and response from a reputable agency.
5. Developing processes for children and young people to:
 - a. ask questions about the Family Court;
 - b. if they choose, provide an unmediated message to the Magistrate about the outcome they see as in their best interests; and
 - c. if they choose, provide feedback at the end of their involvement with the Family Court on both process and outcome.
6. Commissioning an expert independent review of the risks and benefits of relying on one-off relationship evaluation as an indicator of the safety of children and young people with a parent against whom allegations of abuse have been made, making the review and the Court's response publicly available.

The research team recommends that the Chief Magistrate:

7. Responds publicly to the recommendations made by our participants.
8. Commissions an expert independent review of the pathways through the Family Court process for child victims and survivors of sexual abuse, their siblings and their safe parent. The review should identify trigger points for retraumatisation, strategies to minimise retraumatisation, and opportunities to support recovery. The Chief Magistrate should make public the review and the Court's response to it.

9. With the leadership team, considers the findings of our research on decision making, and makes public the Court's response to them:
 - a. Family Court Judges do not have available to them the rigorous specialist assessment required to conclude, on balance of probabilities, whether child sexual abuse did or did not occur in most of the matters before them.
 - b. Absent that assessment, where there are allegations of child sexual abuse which have not been or cannot be properly investigated, in our view children remain at unacceptable risk of harm in unsupervised contact with the alleged perpetrator.
 - c. The application of the Briginshaw Principle in matters where there are allegations of child sexual abuse should reach conclusions on the three considerations identified in Justice Dixon's original formulation which align with the best available research evidence summarised in this report (<https://www.austlii.edu.au/au/cases/cth/HCA/1938/34.pdf>; accessed March 2025).
10. Commissions and makes public a review of the extent to which Judges are in practice treating as separate:
 - a. the finding of fact on whether child sexual abuse did or did not occur on balance of probabilities; and
 - b. the predictive finding whether there is an unacceptable risk to the child in contact with a person against whom allegations of child sexual abuse have been made.
11. Issues, and make publicly available, guidance on the tests which should be applied by Family Consultants and Judges in cases where there are coinciding allegations of child sexual abuse and parental alienation. The guidance should be based on David Mandel's 'call to action' to lawyers involved in the Court who are faced with allegations of parental alienation in domestic abuse matters:

For actual parental alienation to exist:

There must have been a prior positive, nurturing, abuse-free relationship between the child and the parent they are resisting. In domestic violence cases this is rarely the case. Many children have never had a safe, nurturing or trusting relationship with the abusive parent.

The child's resistance must be unreasonable or unjustified. But children frequently have reasonable, experience-based, and developmentally valid reasons to feel afraid, ambivalent, or unwilling to engage in contact. This does not even require a history of abuse— in many cases neglect is sufficient. When we center children's experiences, the justification becomes clearer.

Other explanations must be ruled out before alienation is considered. Even the suspicion of domestic abuse or coercive control should remove parental alienation from consideration until those dynamics are fully explored (Mandel 2025).

12. Make public the results of the Court's consideration of the research of Webb et al. flagged in 2021. (Federal Circuit and Family Court of Australia 2021).

End Notes

- ⁱ Priolo-Filho, S., Goldfarb, D., Shestowsky, D., Sampana, J., Williams, L. C. A., Goodman, G. S. (2018). Judgments regarding parental alienation when parental hostility or child sexual abuse is alleged. *Journal of Child Custody* 15(4) 302-329. <https://doi.org/10.1080/15379418.2018.1544531>.
- ⁱⁱ Murphy, A. Lumley, K. (2022) Trauma-informed courts: Guidance for trauma-informed judicial practices. Judicial Commission of New South Wales. <https://www.judcom.nsw.gov.au/bench-books/trauma-informed-courts-guidance-trauma-informed-judicial-practices>
- ⁱⁱⁱ Federal Circuit and Family Court of Australia (2024). FCFCOA Annual Reports 2023-2024. https://www.fcfcoa.gov.au/fcfcoa_annual_report_23-24
- ^{iv} Murphy & Lumley (2022) op cit; Australasian Institute of Judicial Administration (2024) Trauma-informed Judicial Practice. <https://dfvbenchbook.aija.org.au/article/1080291>
- ^v Joint Child Protection Response Program NSW www.health.nsw.gov.au/jcprp; www.police.nsw.gov.au/crime/child_abuse; dcj.nsw.gov.au/jcprp
- ^{vi} Standing Committee on Social Policy and Legal Affairs (2025) Inquiry into family violence orders. Parliament of Australia. https://www.aph.gov.au/Inquiry_into_family_violence_orders
- ^{vii} Isles & Nelissen [2022] *FedCFamC1A 97*; accessed April 2025); comments from Ragozzino, C. & Zhou, R. (2022) Unacceptable risk in abuse cases: a shift in the law. Kennedy Partners Lawyers <https://www.kennedypartnerslawyers.com.au/the-unacceptable-risk-in-sexual-abuse-cases-a-shift-in-the-law/>
- ^{viii} <https://www.fcfcoa.gov.au/fl/fv/magellan-list>; accessed February 2025
- ^{ix} Olejnikova, L., Dragiewicz, M., Woodlock, D., Salter, M. (2025) Co-occurrence of domestic and family violence and child sexual abuse: Fact sheet. University of New South Wales <https://www.unsw.edu.au/dv-csa-fact-sheet-childlight>; Data and assumptions behind this calculation are set out in the Research Report.
- ^x Webb, N., Moloney, L. J., Smyth, B. M., Murphy, R. L. (2021) Allegations of child sexual abuse: An empirical analysis of published judgements from the Family Court of Australia 2012-2019. *Australian Journal of Social Issues* 56(3) 322-343. <https://onlinelibrary.wiley.com/doi/full/10.1002/ajs4.171?msocid=31c06e8ad1ee6ac61b477b2cd0146b86>
- ^{xi} Pepper, R. (2013) Briginshaw in Land and Environment Court Proceedings - Introductory Observations from the Judicial Perspective, Judicial Commission of NSW. https://lpab.nsw.gov.au/speeches-and-papers/pepper_briginshaw
- ^{xii} Webb et al (2021) op cit.
- ^{xiii} O'Donohue, W., Cummings, C., Willis, B. (2018) The Frequency of False Allegations of Child Sexual Abuse: A Critical Review. *Journal of Child Sexual Abuse* 27(5) 459-475. doi: 10.1080/10538712.2018.1477224; Trocme, N., Bala, N. (2005) False allegations of abuse and neglect when parents separate. *Child Abuse & Neglect* 29(12) 1333-1345. <http://dx.doi.org/10.1016/j.chiabu.2004.06.016>; Everson, M. D., Boat, B. W., Bourg, S., Robertson, K. R. (1996). Beliefs Among Professionals About Rates of False Allegations of Child Sexual Abuse. *Journal of Interpersonal Violence* 11(4) 541-553. <https://doi.org/10.1177/088626096011004006>
- ^{xiv} Webb et al (2021) op cit
- ^{xv} National Office for Child Safety. Child Sexual Abuse: get the Facts. <https://www.childsafety.gov.au/resources/child-sexual-abuse-get-facts>