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The Attitude of the Shari'a Courts to Parental Alienation Syndrome: Understanding the Dynamics of the Syndrome in Arab Society

EMAD GITH

Educational Psychological Services, Arraba, Israel, and Department of Psychology, Law, and Ethics, International Center for Health, Law and Ethics, University of Haifa, Haifa, Israel

In addition to the many factors leading to parental alienation syndrome (PAS), including the narcissistic injury felt by the abandoned parent, or the custodial parent's personal difficulty, there are further factors unique to Arab society—including strong influence by the extended family on the child. Although all the components of PAS exist and are well known to the shari'a courts, no parallel concept is found in the Arab legal lexicon. This article presents 1 case of a shari'a court hearing that illustrates this phenomenon. The conclusions indicate that the shari'a court considers this a serious phenomenon and sees coping with the situation as an essential and preliminary condition to the custody hearing.

KEYWORDS best interests of the child, child custody, divorce, parental alienation syndrome, shari'a, shari'a court

The divorce rate in Arab society in Israel has been steadily increasing in recent years. This fact shapes a new reality in which a large number of children live with one parent and have contact with the other parent in accordance with regular visitation or access arrangements. These visitation arrangements are usually determined by both parents acquiescently, and under the supervision of the social services department, or when no agreement is reached about the matter, the decision is given over to the authority of the shari'a court. In most cases, the parents respect the access arrangements, but in more than a few cases, the children refuse to meet with the

Address correspondence to Dr. Emad Gith, Educational Psychological Services, Arraba, Galilee 30812, Israel. E-mail: emadgith@gmail.com

second parent. In legal terminology, this phenomenon is known as *parental alienation syndrome* (PAS). Such a situation requires further intervention by the court, and in most cases, of the social welfare and therapy services.

ADJUSTMENT BY PARENTS AND CHILDREN TO THE BREAKDOWN OF THE FAMILY UNIT

There are about 1.6 million Arabs living in the State of Israel today, including 5,000 divorced Moslem men and 11,800 divorced Moslem women (Central Bureau of Statistics, 2011). A survey of the statistical data regarding the divorce rate over the years indicates a rise in the number of divorced men and women. This increase has been accompanied by grappling with a new and difficult reality, in which many children live with one of their parents (Israel National Council for the Child, 2012), usually the mother, and have meetings with the other parent in accordance with access arrangements.

Divorce itself is considered a traumatic occurrence, and the Holmes–Rahe Life Stress Inventory (Holmes & Rahe, 1967), which examines stress levels due to difficult life events, found divorce caused one of the highest stress levels. Divorce is accompanied by social and psychological change for every member of the family. This change might continue for a relatively short period of time, or over a long period. Researchers have defined three stages of divorce (Carr, 1999):

1. Vagueness of the beginning. This stage is characterized by strong emotional reactions by parents, because the decision to divorce is only rarely mutual. The separation, in the majority of cases, occurs during the course of the conflict, which might be accompanied by verbal and physical violence. At this stage, due to the character of the crisis situation, the parents are likely to find it difficult to regulate their needs and difficulties.
2. Transitional stage. At this stage the parents begin to free themselves from one another and start to develop independent lives. There is an acknowledgment that the previous stage is over. Energies are pointed in new directions. This stage can also be brief, or it could continue for a longer period.
3. Establishment of the household after the divorce. This stage includes establishing a single-parent household, second marriage, and so on.

Each of these three stages demands a different manner of adjustment, with the hardest stage being, due to its inherent nature, the first one. The most conspicuous happening experienced by children at this stage is that of *diminished parenting* (Hatav, 1998). This is a phenomenon that describes the harm to parenting. It can express itself in several ways—in a lack of patience

and ability to care for the child. Sometimes the parent reaches such a state of crisis that he or she has a great need for the child. In such families we find that the roles are reversed—what is known as *parentification*. In a situation like this, the child calms the parent down, is concerned for and cares for his or her younger siblings, and takes on tasks beyond those expected from children of his or her age. According to Finzi and Cohen (2001), one of the common phenomena following divorce is the divorced parents' lack of ability to make a separation between parenting and being in a couple relationship, and there is a danger that the children will become a tool for the continuation of parental attachment and maintaining the marital conflict.

This situation, which frequently characterizes the transition period after the divorce, paves the way for one of the parents, particularly the one who received custody of the child, to enlist the child against the other parent. This occurs chiefly in situations of conflict and sharp struggles between the two parents—as a result, the child might become the focus for some of the second parent's fury.

Gardner (1998) coined the concept of PAS when he described the situation that primarily arises in the context of custody struggles. This phenomenon occurs when the child participates in the campaign of denigrating one of his or her parents—usually the noncustodial parent—and when such denigration has no basis in reality. Gardner emphasized that PAS is not solely a product of “brainwashing” by one parent, but the combination of the brainwashing along with the contribution of the child himself or herself, meaning the child actively participates in this situation. Beyond the reasons already noted, which are seen as paving the way to PAS, there are further factors unique to Arab society that can also lead to the emergence of this syndrome.

THE EFFECTS OF THE CHARACTERISTICS OF ARAB SOCIETY ON PARENTAL ALIENATION SYNDROME

Arab Patriarchal Society

Arab society in Israel, despite the various transformational processes it has been undergoing, is still a patriarchal society that places the woman on a lower rung within the family hierarchy than her brothers, parents, and husband. The Arab woman is expected to be dependent on her husband, yield to his desires and needs, and serve as a source of support to him and his family. The husband usually accepts on himself the instrumentally dominant roles and serves as the family's primary provider and defender, whereas the woman takes on the expressive roles as housewife. Her roles as a wife and mother and the things expected of her have remained unchanged, with the husband not required to take on any tasks connected with running the house or child care. When a couple divorces, the reality for a woman after her divorce is not very different than what it was while she was married, only

that instead of being dependent on her husband, she is now dependent on her family, particularly her father and brothers. She is expected to continue her function as a mother, and in most cases she continues being the primary, and sometimes sole, carer for her children.

In contrast, the future of the divorced man is not as gloomy as that for the divorced Arab woman. He continues to search for his desired path and to realize his entitlement to a new relationship and formation of a new family. This reality is not only difficult for the woman, who is usually prevented from continuing her independent existence, and among other things, is not entitled to begin a new relationship, but also for her children, who become full of anger at the father who abandoned them and created a new family home for himself. Moreover, he has become a father to additional children outside this family unit.

The Transformation and Change Processes in Arab Society

Societal transformation and change on both an individual and familial level includes a preference for maintaining family relationships and collectivist behavior, over individualistic orientation and behaviors. This provides legitimacy for overintervention by the extended family, particularly in a single-parent family unit. The divorced woman's parents are an inseparable part of coping with divorce. In such a case, a situation can occur in which there is narcissistic injury on the part of the divorced daughter's entire extended family, and, moreover, the insult is felt as originating from the ex-husband's extended family rather than just from him, with one of the results being hostile behavior toward the other parent and his extended family, besmirching their names, and attempting to accuse them of deeds that might have no basis in reality. This family experiences rejection, hurt, and pain, and it tries to moderate these feelings by bringing the children close to them, at the expense of their connection with the second parent and his or her family. In many cases, the family attempts to draw the children closer by turning the children against the parent who abandoned them and left them helpless. We see the immediate effect of this syndrome, set off by the extended family, on the well-being of the child who lives within the nuclear family.

THE RAMIFICATIONS OF PARENTAL ALIENATION SYNDROME

Katz and Peres (1996) claimed that divorce has negative implications for the children, expressed in lower scholastic achievements, more behavioral problems, unsatisfactory adaptation to school rules, and poor self-adjustment. At this point, intervention by a professional is sometimes required. When all of this is accompanied by "brainwashing" and turning the children against the

second parent, it can result in severe mental distress, which can eventually lead to a lifelong psychiatric disorder.

Gottlieb (2004) elaborated on the damage that PAS could cause to a child. He noted 17 areas of possible damage, almost all of which harm the child's well-being. He included the damage of a child learning to behave with hostility and without empathy for others. The experience of parental alienation makes it harder for the child to cope with the divorce process, which constitutes a "traumatic" experience for the child, and thereby perpetuates and worsens the trauma connected with the divorce.

It should be mentioned that the shari'a courts have also considered the damage caused to children following their refusal to meet with the noncustodial parent, have stated what they believe regarding this matter, and have determined that such a refusal harms the child and often causes irreversible damage. These children grow up in an unhealthy manner, carry with them their hatred toward their other parent, and, even more important, lose the benefits they could have received both here and in the afterlife, should they have had a positive connection with their parent, and should their father have been pleased with them.

TYPES OF PARENTAL ALIENATION SYNDROME AND ITS COMPONENTS

Without a doubt, PAS is found in differing versions in different families, or even within the same in line with the various stages after divorce. We can, therefore, list three types of alienation—minor, moderate, and extremely serious. Thus, the methods employed in tackling the problem by the intervening bodies (welfare services, psychologists, courts, etc.) should also be different. There is a need here to distinguish between PAS and "regular" problems regarding divorce that are characterized by much strife, when during such situations, particularly at the climax of such strife, there is tension in the air that can also be passed on to the children due to the nature of the situation.

The court must know the possible components of PAS so as to identify whether the case before it meets the criteria. Gardner listed eight components, which I now enumerate, and I then add several more components that might be unique to families in Arab society, due to the aforementioned distinctive characteristics.

1. A campaign of denigration and hatred.
2. Weak, frivolous, or even absurd rationalizations for this denigration and hatred.
3. The child's lack of ambivalence.
4. The independent-thinker phenomenon, meaning a parent who says, "This is what the child wants—what can I do?"

5. Automatic support for the denigrating parent in the conflict between parents.
6. Lack of guilt over the cruelty to, or exploitation of, the other parent.
7. Use of borrowed scenarios, meaning that the child justifies his or her claims with things outside the normal framework of experience of a child his or her age.
8. Spread of the hatred to the other parent's extended family.

Gottlieb (2004) added several more components, and we add one of them to the preceding list:

9. Saying things, and thoughts, inappropriate to a child of his or her age.

THE RESPONSE OF THE SHARI'A COURTS IN CASES OF PARENTAL ALIENATION SYNDROME

We have studied in this article how the shari'a court system deals, in particular, with situations of parental alienation.

I believe that the shari'a court system does not possess in its legal lexicon an Arabic term equivalent to that of the English term *parental alienation syndrome*, nor do I find it surprising, as the tendency in cases that might involve emotional baggage or ill-defined cases is not to rush to "call a spade a spade." Thus, even if all the evidence exists that we are discussing a case considered parental alienation, the court still will not describe the incident as a syndrome. At the same time, the actual components of this syndrome are known to the shari'a court system. For this reason I decided to present one case from the shari'a courts and discuss it, in an attempt to examine if this is a regular case of parental alienation, despite the fact that nowhere in the decision is there a mention that the syndrome was present. After presenting it, I examine the method used by the shari'a courts to deal with this specific case.

Case Study

The shari'a court in Safed (Case No. 2008/16) was asked to rule regarding the transfer of custody of two daughters from their mother to their father, because the woman had remarried. The two girls were approximately 9 and 12 years old at the time of the court hearing, which took place on October 11, 2011.

It should be noted that during that hearing, the discussion focused on the relationship between the two girls and their biological father. The qadi called the two girls to testify to hear their opinion about being transferred

to their father's custody. After hearing the two girls' testimony, the court summarized what they had said in this way:

The two girls expressed their desire to remain with their mother and her new partner. They unequivocally refuse to move to live with their biological father. Moreover, they totally refuse to even meet with him. It should be noted that the court gained the impression that the two girls were almost coordinated in their testimony and what they related, which indicates that they had rehearsed before giving their testimony. . . . Anyone who listens to their testimony will conclude that they totally coordinated the story of how the events unfolded and their expression of feelings and position regarding the move, and even orchestrated which expressions they would use to communicate their joint stand, in which they unequivocally refuse to move to live with their biological father. They had also coordinated their description of their positive experience with their mother's partner—they commented extensively that they enjoy being with him, and that he spoils them and behaves toward them in a nice and respectful manner. In contrast, the two girls noted that their relationship with their father's wife is not good and that she doesn't behave nicely toward them, and noted that their father was very considerate of her feelings.

The shari'a court concluded that there had been incitement on the mother's part, and noted regarding this issue:

We noticed that the mother incites against the father; the relationship between the father and his two daughters was excellent until the two parents separated and before the mother remarried, and this was also consistent with what the witnesses for the mother's side testified in previous hearings. . . . The witnesses testified that the girls always reported positive things about their father when in the presence of others; they related that he brought them all kinds of things, and anyone hearing them would get the impression that they tended to be very fond of him.

The court noted unequivocally that, "even in a case in which a fight begins between a father and his child, the parent hits or curses him, or will not take him on a trip, all of this does not justify the mother inciting the child against the father, nor does it justify severing their relationship."

In addition, it noted:

The refusal of the two girls to meet their father is not a true and independent expression on the part of the girls, but is a result of the two girls' attempt to please their mother, in whose custody they are. . . . The custodial parent has tremendous influence on the child and his views on a particular topic, and it is inconceivable that the two girls will not see their father solely because a particular argument or fight was started between

them on a specific topic. It is obvious that this is a frequent occurrence between parents and children, but does not always lead to a severing of the relationship, as in our case, something which causes great harm to the two girls. . . .

The father bears the relatively heavy responsibility for this argument and the severance of the relationship. He should have taken responsibility as a father and tried to improve his relationship with his two daughters, attempting to tone down the tense atmosphere between himself and his ex-wife, and refraining from bringing the two girls into the fight, as the mother had done. The father's refusal to meet with the social worker and be counseled, so as to improve his connection with his two daughters, was also one of the reasons for the continuation of the severance of the relationship. He stated further that the responsibility lies first and foremost with the custodial parent, because he or she is the one raising and educating the child, he or she is the one living with the child, and the one with them the majority of the time. As a result the child is influenced by his or her values, customs, and behavior, and even adopts opinions, stances, and behaviors which can appease and make that parent happy, and is greatly influenced by him or her and his or her attitude towards the other parent. Even if the custodial parent does not complain to them about the distress caused by the second parent, they can feel this from his or her behaviors and what they say. Therefore, in cases where there is an unexplained refusal by the children to meet with their second parent, logic would dictate that it is connected with, and even a result of, the attitude of the custodial parent towards the other parent. And this is the result of direct or indirect incitement, as noted, by this parent against the other parent. All the more so in a case when the relationship had been good in the past, and the attitude suddenly changed, and the children stopped meeting with the parent without there being a convincing and clear reason. In such a case, we are talking about incitement by the custodial parent, and he bears all the responsibility, since he harmed his children, often causing them irreversible damage—these children grow up in an unhealthy manner, carry with them hatred towards this parent, and, most importantly, lose the benefits they could have received both here and in the afterlife, should their father have been pleased with them.

Case Analysis in Accordance With the Components of Parental Alienation Syndrome

A CAMPAIGN OF DENIGRATION AND HATRED

The girls' refusal to meet with their biological father is the result of a campaign of denigration. The girls' father is portrayed to them as someone who does not deserve the status of a father; they have "another" father, who is their mother's partner, and the girls see him as a figure more worthy to serve as their father than their own biological father.

WEAK, FRIVOLOUS, OR EVEN ABSURD RATIONALIZATIONS FOR THIS DENIGRATION AND HATRED

The two girls claimed that their father took the side of his new wife, and he did not behave well to them and hasn't taken steps to change this.

THE CHILD'S LACK OF AMBIVALENCE

The two girls are absolutely certain that they do not want their father, and only want their mother.

THE INDEPENDENT-THINKER PHENOMENON

This refers to cases in which a parent says, "This is what the child wants. What can I do?" There was no opportunity in this case to check this, as the mother's testimony was not obtained.

AUTOMATIC SUPPORT FOR THE DENIGRATING PARENT IN THE CONFLICT BETWEEN PARENTS

The support in our case is not only for the mother, but also for the mother's new partner.

LACK OF GUILT OVER THE CRUELTY TO, OR EXPLOITATION OF, THE OTHER PARENT

The two girls did not show any guilty feelings for "punishing" their father with their refusal to meet with him.

USE OF BORROWED SCENARIOS

This means that the child justifies his or her claims with things outside the normal framework of experience of a child his or her age. This component is not sufficiently obvious in the case we described.

SPREAD OF THE HATRED TO THE OTHER PARENT'S EXTENDED FAMILY

In this case, this was obvious, particularly regarding its spread to the father's family (his new partner).

It should be noted that beyond these components, there is an obvious additional and significant component that can serve as an indication of parental alienation behavior. In cases where there is more than one child,

the impression is gained that the children have coordinated everything concerning attitudes, emotions, and what will be said about the parent against whom they are being incited.

Parental Alienation in Shari'a Law

Moslem religious law requires a son to honor his parents, particularly during their old age, even if they deprived him of things, as the Prophet Mohammed said, and according to the words of God, blessed be His name, in the Quran:

Thy Lord hath decreed that ye worship none but Him, and that ye be kind and respect your parents. Whether one or both of them attain old age, say not to them a word of contempt, nor repel them, but address them in terms of honor. And, out of kindness, lower to them the wing of humility, and say: "My Lord! Bestow on them thy mercy even as they cherished me in childhood." (Surah 17, verses 23–24)

Therefore, the parent who orders his or her children to refuse the other parent's wishes, either for his or her own personal reasons or as a result of the other parent's behavior toward him or her, or as a way to punish or take revenge following their separation, is committing a great sin in that he or she does not obey God's commandment. The Prophet Mohammed said, "Do you not wish that I tell you which is the greatest sin?" The Prophet's friends said, "Yes, oh prophet." He said, "To worship other gods together with God, and to refuse something the parents asked, and to bear false witness, and to bear false witness, and to bear false witness."

Further regarding this matter, the prophet guided the Moslem maidservant by saying, "God's satisfaction is a result of the parents' satisfaction, and His anger is a result of their anger." Therefore, people who rebel against their parents will receive their punishment while alive, before the afterlife, without this lessening their punishment on the Day of Judgment. That is, their punishment will be doubled. People's success in life emanates from God's satisfaction with them, which is a result of their parents' satisfaction with them.

The court concluded that the two girls refuse to meet with their father, and that this in itself, assuming there is no evidence to the contrary, is due to the mother's incitement against their father, which causes extremely great ongoing harm to the two girls and to their father.

The Decisions of the Shari'a Court in This Specific Case

Before the shari'a court came to a decision regarding the transfer of custody, it empowered the social welfare departments in both villages—where the father lives separately, and where the mother and two daughters live

separately—to work on restoring the good relationship that had previously existed between the girls and their father. The court also allowed the father to see his two daughters, to maintain a good, warm, and loving relationship, because avoiding meeting with him would bring about great harm for the girls in the future, causing them difficulty in healing. The proof of this is their current attitude toward their father.

HOW CAN WE REDUCE THE RISKS OF PARENTAL ALIENATION SYNDROME?

Despite the fact that there is no miracle cure to prevent PAS, there are a few ways in which we can reduce the risk of its occurrence. Following are several points.

1. The relationship between the two parents after divorce is extremely important. Many researchers have determined that it was the relationship after the divorce that was decisive (see, e.g., Healy, Malley, & Stewart, 1990; Johnston, Kline, & Tschann, 1989). When both parents maintain a calmer and less hostile and tension-charged relationship, the child can develop a reasonable and appropriate relationship with each of his or her parents, without feeling guilty about the other parent. There is great importance in a positive stable, continuous, and warm relationship. Such a connection can strengthen the resistance to attempts by other people to incite the child against the parent.
2. How the second parent relates to the child is important, meaning that the responsibility is also his or hers. The importance does not lie in the frequency of meetings, but in the quality and nature of the relationship of the noncustodial parent (see, e.g., Munsch, Woodward, & Darling, 1995). The more the parent serves as a source of support for the child in general, and during difficult times in particular, the more he or she will be functionally important to the child.
3. Due to the importance of the preceding two points, it is essential that these conditions are anchored in the criteria for determining parental fitness. Parents who do not enable a psychological and emotional relationship with the other parent demonstrate a lack of parenting competence (see, e.g., Bricklin, 1995; Gardner, 1982). A parent who cannot enable this does not possess parenting competence, because this is emotional abuse for which, I believe, a parent must answer. In extreme cases, the child should be transferred from the custody of this parent.
4. Attachment theory offers insights into how to deal with this phenomenon, with the parents' communication styles determining how much the parent is aware of the importance of the child's continued relationship with both

parents. Cohen and Finzi (2001) suggested that the parents' personality traits (e.g., a personality with narcissistic traits, a dependent personality) greatly influence and determine the way the parent reacts. In addition, personality traits can affect the way in which children experience their parents' divorce, and they might feel anger toward their parents, along with guilt, rejection, and confusion. The counselor bears an important role here in helping children contain negative feelings and understand their source, so as to help overcome them.

5. To cope with this problem, it is best that therapeutic intervention should be free of any aspiration to restore a model of a conventional nuclear family. Instead, the therapist should support the creation of new norms and rules that are suitable for the new family unit, made up of one custodial parent and one with whom there are fixed access arrangements.

SUMMARY

PAS is a known phenomenon in the Israeli court system. There is no parallel concept in the Islamic legal system in Israel. At the same time, the components of this syndrome are known to the shari'a courts. The shari'a courts sometimes encounter cases in which the children refuse to maintain contact with one of the parents, usually the noncustodial parent. Thus, even if such a case is not designated as PAS, it serves as a routine case for illustrating the syndrome. The shari'a court takes these cases seriously and usually assigns the responsibility to both parents, but primarily to the parent who is inciting against the other parent. It sees this as one of the greatest sins a parent can perpetrate, because according to Islamic religious law, someone who does not honor one or both of his or her parents bears one of the greatest sins; thus, when someone persuades others to behave in this way, his or her deeds are considered part of the sin. The court also places the responsibility for the damage, which can be irreversible, on this parent, who persuaded his or her children to break off contact from the other parent.

REFERENCES

- Bricklin, B. (1995). *The custody evaluation handbook: Research based solutions & applications*. New York, NY: Brunner/ Mazel.
- Carr, A. (1999). *Separation and divorce: The handbook of child and adolescent clinical psychology: A contextual approach*. New York, NY: Routledge.
- Central Bureau of Statistics. (2011). *Statistical abstract of Israel*. Jerusalem, Israel: Author.
- Cohen, O., & Finzi, R. (2001). Parental narcissism—The difficulties of the non-custodial father. *Sichot, 16*, 64–73.

- Finzi, R., & Cohen, O. (2001). Couples in divorce: A contribution of attachment theory. *Sichot, 15*, 235–244.
- Gardner, R. A. (1982). *Family evaluation in child custody litigation*. Cresskill, NJ: Creative Therapeutics.
- Gardner, R. A. (1998). *The parental alienation syndrome* (2nd ed.). Cresskill, NJ: Creative Therapeutics.
- Gottlieb, D. (2004). Parental alienation syndrome. *Medicine and Law, 31*, 106–116.
- Hataf, Y. (1998). Children of divorced parents. In S. Tiano (Ed.), *Psychiatry of the child and adolescent* (pp. 495–502). Tel Aviv, Israel: Dionon.
- Healy, J. M., Malley, J. E., & Stewart, A. J. (1990). Children and their fathers after parental separation. *American Journal of Orthopsychiatry, 60*, 531–543.
- Holmes, T. H., & Rahe, R. H. (1967). The Social Readjustment Rating Scale. *Journal of Psychosomatic Research, 11*(2), 213–218. doi:10.1016/0022-3999(67)900010-4
- Israel National Council for the Child. 2012. *The state of the child in Israel: Annual statistical abstract*. [In Hebrew.] Jerusalem, Israel: Author. Retrieved from <http://www.children.org/il/Files/File/SHNATION/%20%202012.pdf>
- Johnston, J. R., Kline, M., & Tschann, J. M. (1989). Ongoing post divorce conflict: Effects on children of joint custody and frequent access. *American Journal of Orthopsychiatry, 59*, 576–592.
- Katz, R., & Peres, Y. (1996). Divorce trends in Israel and their implications for family therapy. *Hevra VeRevava, 16*, 483–502.
- Munsch, J. E., Woodward, J., & Darling, N. (1995). Children's perceptions of their relationships with coresiding and non-coresiding fathers. *Journal of Divorce & Remarriage, 23*, 39–54.