



Domestic Violence Death Review Committee

Office of the Chief Coroner

Report on the matter of the death of:

**OCC File: 2020-2266 and 2267
(DVDRC 2022-01)**

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Details of deceased:

Name: (child)
Date of death: February 9, 2020
Age: 4 years
Sex: Female

Name: (father)
Date of death: February 9, 2020
Age: 35 years
Sex: Male

Overview (the child died and the adult victim is the mother who survived but was most likely targeted for leaving the relationship and due to prolonged family court litigation):

The Regional Supervising Coroner (Central East) referred this matter to the DVDRC to provide its expert opinion on the apparent domestic issues revealed by the facts of this case. After reviewing an extensive file and employing its expertise in matters of intimate partner violence and the research in the field, the committee has concluded that the deaths of the father and his four-year-old daughter are extremely consistent with past reviewed cases involving intimate partner violence and, in particular, past cases of murder-suicide involving a father and child. There were extensive risk factors known prior to the deaths associated with children killed in the context of domestic violence and the information is more consistent with this pattern than an accidental fall. The DVDRC's mandate is to offer its opinion to the Chief Coroner, but the specific conclusion on the manner of the death is left to the Chief Coroner or an inquest jury if called in this case.

The father and his four-year-old daughter were found at the bottom of a cliff in a conservation area.

The father and the mother had been involved in four years of extensive litigation in family court, trying to promote a cooperative parenting plan, with the daughter spending time with both parents. The mother raised serious issues about the father's mental health and recent conduct. The court asked the Children's Aid Society to complete an updated assessment related to risk and the potential of supervised visits was raised. The Children's Aid Society worker had indicated to the mother that they had serious concerns about unsupervised visits with the father and were going to report to the judge accordingly.

The mother still had to allow her daughter to see the father for a weekend visit on a Friday as part of the existing court order. The court was to review the father's parenting time the following week. However, the daughter died on Sunday.

History of the mother and child:

The mother was 35 years of age at the time of the deaths. She is a physician and is described as hard-working and highly intelligent. She is close to her younger sister who is married. Both reported a happy childhood.

The mother describes her marriage with the father as abusive in multiple ways, including physical, sexual, emotional, and financial. She found the father to consistently lie about many issues, including his life history and educational background. For example, she discovered he had neither the degrees nor attendance at universities he reported. He was unfaithful during the relationship.

The mother had been separated for four years from the father and had been involved in litigation over parenting since the day of separation. The mother had remarried and had a son with her new husband.

The deaths may have been retribution on the part of the father against the mother for terminating the relationship, re-marrying a new partner, and having a new family and/or for the on-going family court litigation. The mother sensed danger as the court seemed to be signaling concern over the father's existing parenting time.

The daughter was attending junior kindergarten.

History of the father:

The father was 35 years old at the time of the deaths. In response to court ordered assessments, he reported that he and his older brother grew up in a happy family. His parents moved from Newfoundland to Ontario and started a manufacturing company. His maternal grandparents provided early care for the father and his brother. He excelled academically and received an engineering degree. He was a licensed engineer and owned an environmental engineering

company. Before the deaths, his business was failing and senior employees were looking for jobs elsewhere.

His family supported him in the marriage to the mother and were aligned with his concerns in the subsequent four years of custody litigation. His mother passed away four years prior to the deaths and her death was reportedly a significant loss to the father. At the time of his death, he had a new partner for over a year who spoke well of him and his dedication to his daughter. His new partner's parents also spoke highly of him. No concerns were expressed about his parenting by anyone in his family. No one in his family seemed to be aware that he had a court-documented pattern of untruthfulness or that reports of intimate partner violence had been made against him by his previous partners.

Police interviews with former partners indicated that he was dishonest and emotionally abusive to them, and was often seeing several women at the same time while professing his love and potential marriage plans. During his relationship with the mother, he sought out many on-line intimate relationships.

He reported being a victim of sexual assault in university. He reported sexual abuse from one partner which the police investigated and dismissed after thorough interviews and a lie-detector test. He lied about having a PhD and lied about having degrees from various universities he did not attend. The court found that he had forged documents.

The court found that the father lied about having Indigenous roots in Newfoundland, which had triggered the involvement of an Indigenous Children's Aid Society. He tried to utilize this lineage to have his daughter prevented from going to a Hebrew school because, he argued, she would be alienated from her paternal culture and heritage. The court dismissed this concern based on the father's history of lying. The court found that, "given the father's unfortunate 'propensity to lie' and forge documents, the court should not simply accept this belated revelation at face value...the father's propensity to lie had been the subject of several judicial comments in previous proceedings in relation to this matter". The father also made several other fraudulent representations to the court. One of the judges found that, "I have looked carefully at [the father's] submissions to find an explanation for his attempted fraud on the court. There is none".

History of relationship:

The couple met on-line and were married the following year. They were committed to marriage and having children, as well as believing that they shared common interests and values. These views did not last long. There were numerous conflicts over the marital relationship and parenting. The mother reported a pattern of domestic violence and coercive control. There was a short-lived attempt at marriage counselling.

The mother and father were married for three years and separated at the time of the deaths. They separated when their only child was nine months of age and still breast-feeding. The separation was followed by four years of family court litigation over custody as well as parenting time and decision making.

There were dozens of court hearings and at least ten judges were involved at two different courthouses – there were over 50 decisions made on various motions dealing with parenting time and decision making. The father expressed concerns about the mother’s mental health (anxiety) and worried that she was being unfairly restrictive in agreeing to the father having time with his daughter.

Three different Greater Toronto Area Children’s Aid Societies were involved in this case dealing with abuse allegations: Children’s Aid Society of Toronto, Native Child and Family Services of Toronto and Jewish Family and Child Service (JF&CS). JF&CS eventually had carriage of the case until the death. (Note: The Pediatric Death Review Committee completed analysis of the child welfare involvement in an independent case review.)

The mother was worried that the father would emotionally and/or physically abuse their daughter, including the potential for violent behaviour and abduction. The mother described a pattern of bullying and inability to compromise around developmental issues such as their daughter’s nursing. There were several occasions when the father took the child without consent or did not return the child when required by the agreement.

The father expressed parallel concerns about the mother. The couple had disagreements about many aspects of their daughter’s health needs and emotional development. The Children’s Aid Societies were involved on a regular basis to investigate conflicting allegations of emotional and physical abuse. The police were involved to investigate allegations of sexual assault by the father against the mother and the child not being returned in accordance with existing court orders.

An 11-day trial was held in 2018 giving the father parenting time three days a week and made the mother the principal decisionmaker. The trial judge found that “the relationship between the parties is so toxic that any form of joint parenting, including parallel parenting, would be doomed to failure, and would only exacerbate the conflict.” The trial judge concluded that, “The [father] has demonstrated characteristics that, in my view, would make it unwise to repose decision-making authority with him” and that the father “has demonstrated that he has an aggressive and somewhat bullying approach to the [mother] and to third parties”. The trial judge also concluded “because of his propensity to lie, I do not see how the [mother] will have any confidence in the [father’s] ability to be candid with her as to decisions he has made, or that he will facilitate the provision of information to her regarding [the daughter].”

A psychiatrist, who had been appointed by the court for a parenting assessment, provided a 220-page detailed report recommending a gradual increase in the father’s time from three days a week to a 50-50 time sharing plan over a two-year period. The psychiatrist reported numerous and conflicting concerns expressed by each parent about the other. He found that, “both alleged that the other was abusive, lying, and cunningly deceptive”. He observed each parent with their daughter and saw developmentally appropriate parenting. He made no findings of coercive control or family violence beyond reporting individual incidents. He appeared to try to be balanced in his findings and hoped the parents could eventually co-parent. He drew few conclusions, reporting instead an uncertainty as to what was true.

History of children:

After the daughter's birth, family members described the couple as loving and devoted parents. Disagreements began to arise over multiple issues, including breast feeding and potential gastric problems. The parents had conflicting opinions on many issues about their daughter's needs. The father described the mother as overly anxious, and the mother described the father as abusive and uncaring. The paternal and maternal families were equally divided and aligned with each parent. They continued to hold these views, based on police interviews, after the deaths.

The daughter was described as happy, social, intelligent, and meeting most milestones ahead of schedule. Her Junior Kindergarten report card indicated that she was well-adjusted – "(the child) arrives at school each morning in a calm and relaxed manner, quietly attending to organizing her personal belongings and patiently waiting for the morning circle time to begin. Her sensitive and good nature is evident in her gentle and cooperative behaviour with her peers, by taking turns and sharing classroom equipment and toys whenever the opportunity arises. (The child) has maintained close and loyal friendships within the class, where they are often seen interacting with one another".

However, there were reports that the daughter struggled with being away from her mother for longer periods of time. She had been seeing a therapist related to separation anxiety from her mother when going to visits with her father. The therapist was seen by the court as a neutral party. Although she worked on the girl's distress with the parenting schedule, she indicated that the girl was attached to both parents but missed her mother when she was away from her. The therapist reported that she was a loving and sensitive child – she was "cognitively extremely bright but emotionally didn't have the tools to cope with separation from her mother without considerable assistance and support." The father was reportedly unable to provide this support.

Synopsis of events leading up to death:

After four years of extensive litigation, with the family court trying to promote a cooperative parenting plan with the daughter spending time with both parents, matters appeared to be reaching a crisis point. In the weeks leading up to the deaths, the mother raised serious issues about the father's mental health and inappropriate conduct.

The court asked JF&CS to complete an updated assessment related to risk and the potential of supervised visits was raised. The Children's Aid Society worker had indicated to the mother that they had serious concerns about unsupervised visits with the father and were going to report this to the judge accordingly. The father had an opportunity to review the file that contained these concerns and information from third parties.

The Children's Aid Society worker was considering a protection application but needed to talk to her manager first. However, the mother still had to release her daughter for a weekend visit on Friday, February 7th, as part of the existing court order. Her daughter died on Sunday, February 9th. The deaths happened on the weekend before the court was to review the father's parenting time.

During the father's time with his daughter, he took her to a conservation area and appears to have gone off the designated trail to a cliff. He was known to be familiar with the area. When the father did not respond to his partner's calls and text messages, and did not return to attend their planned dinner date with her parents, she called the police. Upon investigation of the area, the father and his daughter were found at the base of a 100-foot cliff.

Risk factors identified:

There were at least 22 risk factors of intimate partner homicide identified:

- Perpetrator was abused and/or witnessed intimate partner violence as a child
- Actual or pending separation
- New partner in mother's life
- Child custody or access disputes
- Father unemployed
- Other mental health or psychiatric problems – father
- Failure to comply with authority
- Sexual jealousy
- Misogynistic attitudes – father
- Prior destruction or deprivation of mother's property
- History of domestic violence - Previous partners
- History of domestic violence - Current partner/mother
- Prior attempts to isolate the mother
- Controlled most or all of the mother's daily activities
- Prior hostage-taking and/or forcible confinement
- Prior forced sexual acts and/or assaults during sex
- Choked/strangled the mother in past
- Prior violence against family pets
- Perpetrator threatened and/or harmed children
- Extreme minimization and/or denial of spousal assault history
- After risk assessment, perpetrator had access to the mother
- The mother's intuitive sense of fear of the father

Overarching Issues:

In January 2021, the coroner suggested that “the case be reviewed by the Domestic Violence Death Review Committee, with the support of the Child and Youth Death Review and Analysis Team related to the child welfare involvement”.

There are at least 22 known risk factors that existed or occurred prior to the deaths, which are consistent with cases deemed predictable and preventable by the DVDRC (i.e. where there are seven or more risk factors present). The pattern is consistent with the research and risk factors on paternal filicide (e.g., see Jaffe, P. G., Campbell, M., Olszowy, L., & Hamilton, L. H. A. (2014). Paternal filicide in the context of domestic violence: Challenges in risk assessment and risk management for community and justice professionals. *Child abuse review*, 23(2), 142-153.)

The context of the incident is critical in understanding why this case bears resemblance to cases involving a murder-suicide. The mother in this case told the court and the Children's Aid Society that she was concerned that the father would harm their daughter prior to the fatal weekend visit. The Children's Aid Society worker expressed concern that the father was displaying signs consistent with the behaviour of someone who may harm their children.

The judge signaled a potential reduction in father's parenting time and the Children's Aid Society communicated their concerns to the mother. The Children's Aid Society worker shared their file with the father prior to the fatal weekend. This file contained all the information the Society had gathered, including the concerns held by the worker about the father and those expressed by third parties.

Police were called days before the deaths because the father would not release the child following his interview with the Children's Aid Society. The emerging crisis was the culmination of four years of extreme child custody litigation during which the court found the father had lied, forged documents, and committed fraud. His new partner and his family did not seem to be aware of this history.

The descent from the cliff happened in a conservation area that the father reportedly visited before. The top of the cliff is off the trail, difficult to access and is clearly a precarious place to take a four-year-old. There has only been one other death in the past five years (involving an adult). A review of available resources found no child deaths or parent-child deaths had happened at this site.

The father was also facing other stressors, such as his engineering company failing and his senior employees looking for jobs elsewhere. He had been discovered to have lied about his academic credentials and there were concerns expressed about his ability to take on the projects he had accepted.

Major Themes:

The major theme in the following recommendations is the need for enhanced training and changes in policy and practice for Children's Aid Societies, judges, lawyers, and mental health professionals when completing parenting (custody) assessments. This training is necessary to fully understand all forms of family violence including coercive control and litigation abuse versus the label of "conflict", as well as understanding the implication of family violence for parenting plans that promote child and mother safety. This theme is especially critical considering changes to the *Divorce Act* and *Children's Law Reform Act* which explicitly state that family violence and coercive control are factors to consider in determining the best interests of children after separation (see https://www.fvfl-vfdf.ca/briefs/Family_Violence_Family_Law_Brief-3-.pdf).

The DVDRC has made previous recommendations about the importance of professional education about family violence for all professionals involved in family court, including judges, lawyers, parenting/custody evaluators and Children's Aid Society workers. Many of these recommendations are repeated and expanded on below.

Recommendations:

To the Ministry of Children, Community and Social Services - Child Welfare and Protection Division working together with the Ontario Association of Children's Aid Societies:

1. Implement annual mandatory training on domestic violence and coercive control, and the impact of this violence and risk to children, and adult parents, as well as safety planning and risk management in these circumstances. Part of the training needs to include collaboration with community partners, understanding the differences between "conflict" and family violence, and managing cases with protective parents who are involved with private parenting disputes under the *Divorce Act* or *Children's Law Reform Act*.

Rationale: The three Children's Aid Societies involved in this matter had accumulated an extensive record on the mother and father in their litigation over parenting time and decision-making for their daughter. Near the time of the deaths, the Children's Aid Society was asked to assess the level of risk that the father presented and the potential need to supervise parenting time. The case seemed to be designated as a case of parental conflict rather than domestic violence and coercive control. An earlier differentiated assessment may have led to different interventions. The severity of risk of harm was not identified until just prior to the fatal weekend visit.

In the past ten years, the DVDRC has made 11 recommendations directed at the Ministry of Children, Community and Social Services and the Ontario Association of Children's Aid Societies (OACAS) for enhanced educational programs for Children's Aid Society workers on domestic violence and the impact on children and parenting. Many programs have been developed and resources are available. However, this training has been voluntary and should be mandatory given the cases reviewed over the years including this case, which is reflective of many of the same issues raised in the past.

To the Ontario College of Psychologists, Ontario College of Social Workers and the College of Physicians and Surgeons:

2. Require that any psychologist, social worker, or psychiatrists involved in parenting evaluations/assessment for the court (e.g., Section 30 of the *Children's Law Reform Act* or Social Work Reports for the Office of the Children's Lawyer) undertake at least 16 hours of professional development on family violence and coercive control dynamics in family law given the critical nature of these issues in mother and child safety and then four hours on an annual basis thereafter, provided by experts in the field.

Rationale: Ontario courts often turn to mental health professionals to provide independent parenting assessments in child custody/parenting disputes. In this matter, a comprehensive assessment was prepared for the court that did not fully address the family violence and coercive control issues in the matter and did not factor these issues into developing a parenting plan that recognized the potential risks to the child. This recommendation is consistent with the guidelines on this area published by the Association of Family and

Conciliation Courts (AFCC) – see <https://www.afccnet.org/Resource-Center/Practice-Guidelines>. Allegations of family violence and alienation are common in prolonged litigation and focused assessments are necessary to properly address them.

Other jurisdictions like California do not allow an assessor or evaluator to be appointed by the court without at least 16 hours of training within a 12-month period and then four hours thereafter on an annual basis.

https://www.courts.ca.gov/cms/rules/index.cfm?title=five&linkid=rule5_230

The following is an excerpt from California regulations:

Sixteen hours of advanced training must be completed within a 12-month period. The training must include the following:

(A) Twelve hours of instruction, as approved by Judicial Council staff, in:

(i) The appropriate structuring of the child custody evaluation process, including, but not limited to, maximizing safety for clients, evaluators, and court personnel; maintaining objectivity; providing and gathering balanced information from both parties and controlling for bias; providing for separate sessions at separate times (as specified in Family Code section 3113); and considering the impact of the evaluation report and recommendations with particular attention to the dynamics of domestic violence;

a. The effects of exposure to domestic violence and psychological trauma on children; the relationship between child physical abuse, child sexual abuse, and domestic violence; the differential family dynamics related to parent-child attachments in families with domestic violence; intergenerational transmission of familial violence; and manifestations of post-traumatic stress disorders in children;

(2) Annual update training

Four hours of update training are required each year after the year in which the advanced training is completed. These four hours must consist of instruction focused on, but not limited to, an update of changes or modifications in local court practices, case law, and state and federal legislation related to domestic violence, and an update of current social science research and theory, particularly regarding the impact on children of exposure to domestic violence.

This recommendation is consistent with the expectation that already exist for other Ontario legal professionals and court-related professionals, such as mediators.

To the Ontario Ministry of the Attorney General and the Department of Justice Canada:

3. Work with the Ontario and federal Chief Justices and the respective Family Law Rules Committee to promote the use of ‘one family-one judge’ for families involved in ongoing litigation in order to ensure a coordinated and informed approach to questions, such as the identification of the relevant issues; the ways children will participate, including the

appointment of an independent lawyer for the child; whether a parenting assessment is needed and if so, what qualifications should the assessor have; how the relevant facts required by family law legislation will be obtained and presented as evidence; the appropriateness of alternate dispute resolution processes, including judicial dispute resolution; and when it arises, interim and “final” decision making, including making parenting plans.

The need for judicial continuity is well recognized and requires promoting the use of a systemic early identification system which would identify, for management by one judge, all cases which raise issues of family violence. The family rules already contain circumstances where a case can be managed by one judge; however, these rules could be amended to provide authority to judges on high conflict cases to appoint a single judge as a case manager, either upon application by a party or on the judge’s own motion. This case management judge would then hear all conferences and motions with respect to that case. As part of this process, judges have a responsibility to consider relevant information about family violence. See Martinson, D., & Jackson, M. (2017). Family violence and evolving judicial roles: Judges as equality guardians in family law cases. *Can. J. Fam. L.*, 30, 11. As stated at page 44:

To be accountable to the public as guardians of our constitutional values, we suggest that judges, whether there are lawyers involved in a case or not, must use their specialized knowledge and skill at all stages of the judicial process to ask questions in a neutral, non-adversarial way to ensure that they have the relevant information and arguments they need. This can be done in a way that conforms to the modern views of judicial independence and impartiality we have described.

Rationale: At least ten judges in two different courthouses were involved in multiple hearings trying to address parenting time and decision-making in this complex case. Some judges made clear findings about the father’s conduct (lying, fraud, forged documents, family violence and bullying) while other judges made more narrow decisions without reference to the extensive history of the case.

There were conflicting analyses of the case and critical issues. One judge, especially one with specialized background in family law, assigned to manage this case from the outset may have been better able to identify the patterns of abuse and offer earlier protection to the child in these proceedings. Canadian judges and scholars have pointed to the importance of this model (e.g., see Bala, N., Birnbaum, R., & Martinson, D. (2010). One judge for one family: Differentiated case management for families in continuing conflict. *Can. J. Fam. L.*, 26, 395. & Martinson, D. J. (2010). One Case–One Specialized Judge: Why Courts Have an Obligation to Manage Alienation and Other High-Conflict Cases. *Family Court Review*, 48(1), 180-189).

Having so many judges involved with this case over many years can not only negatively impact the proper handling of a case but also undermine faith in the justice system both by the parties and the public. This can also lead to unnecessary and often harmful delays that negatively impact family members and especially children. (E.g. The UN Committee on the

Rights of the Child states that avoiding delay is one of eight essential safeguards in ensuring the best interests of children.) More at <https://childrightsconnect.org/un-committee-on-the-rights-of-the-child/>.

These changes should be encouraged with judges and require thoughtful discussions between government and the courts. While judicial independence is a cornerstone of our justice system it must be exercised in ways that, through the principles of judicial accountability, ensure fair, just, and equality-based outcomes for those being judged.

To the Ministry of the Attorney General Ontario and Department of Justice Canada:

4. Work with Ontario and federal courts to ensure that every judge hearing family law cases has mandatory professional development opportunities to enhance understanding of the dynamics of family violence, including coercive control and the implications for parenting and children's well-being. The Canadian Judicial Council should make this education available through their work with the National Judicial Institute, which delivers programs for all federal, provincial, and territorial judges. The programs need to be ongoing, credible, in-depth, comprehensive, and developed in collaboration with experts in the field.

Rationale: Family court judges are facing increasingly complex cases, often involving parents without legal representation, and need to have the most up to date research on the nature of family violence and its impact on parenting and children's well-being. This need is especially urgent considering amendments to the *Divorce Act* and *Children's Law Reform Act* dealing with family violence, including coercive control, as factors to considering in determining children's best interests.

Legal scholars and judges have supported the foundation of this recommendation. In the words of Martinson and Jackson 2017, pp 40-42:

The National Action Committee on Access to Justice recommends specialized judges for family law – those who either have, or are willing to acquire, the necessary expertise, ideally judging in a unified family court or a version of it with the features of a unified family court. The recommendation comes from Meaningful Change for Family Justice: Beyond Wise Words, which states¹:

The judges presiding over proceedings in the court should be specialized. They should have or be willing to acquire substantive and procedural expertise in family law; the ability to bring strong dispute resolution skills to bear on family cases; training in and sensitivity to the psychological and social dimensions of family law cases (in particular, family violence and the impact of separation and divorce on children); and an awareness of the range of family justice services available to the families appearing before them.

¹ Family Justice Working Group. (2012). *Meaningful change for family justice: Beyond wise words*. Action Committee on Access to Justice in Civil and Family Matters.

Current knowledge of social context, including the lived reality of women discussed in the previous section, together with up-to-date knowledge about equality principles applicable to family law, are essential components of that specialization. The Canadian Judicial Council, in 2005, reinforced its support in the 1990s for credible, in-depth, and comprehensive social context education for judges by its recognition that such education must be an ongoing part of judicial education². The kind of education required must be credible, both from the perspective of the judiciary and the public. It requires a professional commitment to continually be informed and updated. A one-time course or program is completely inadequate to meet these competency requirements. We agree with retired B.C. Supreme Court Justice Lynn Smith when, as Dean of Law at the law school at the University of British Columbia, she described social context education as a lifestyle change rather than a one-time “inoculation”³. We support the conclusion of Professor Richard Devlin, the Honourable Justice C. Adele Kent and Susan Lightstone that judges have ethical obligations to do their work competently. They describe social context responsiveness as an ethical obligation.

Judges who hear family law cases have a responsibility to attend social context education programming relevant to family law and courts as institutions have a responsibility to make that happen. As we said at the outset, generalist judges do not have the same opportunities to attend family law related programs and specialized judges do. Yet doing so is an aspect of judicial accountability.

To the Law Society of Ontario:

5. Ensure mandatory training on domestic violence for all lawyers practicing family law and this subject matter should be in Law Society bar preparation materials and exams to reflect that this is a core aspect of necessary competency for lawyers practicing family or criminal law.

Rationale: For all the reasons described above in prior recommendations in reference to Children’s Aid Society, custody/parenting evaluators and judges – lawyers practicing family law need the most up to date training on family violence consistent with changes in legislation and the number of child deaths in the context of domestic violence.

To the Ministry of Colleges and Universities:

6. Require that all Ontario universities providing academic degrees for professional practices in law, social work, psychology, nursing, and medicine receive education on family violence as part of their academic program.

Rationale: Education on family violence should be part of pre-service education in addition to ongoing professional development once an individual is licensed to practice in a particular

² National Judicial Institute Social Context Education Board of Governors, October 2009, at p. 1. The nature of this programming, and how it has developed in a way that is consistent with the concepts of judicial independence, impartiality, and accountability, is described by Professor Cairns Way in *Contradictory or Complementary? Reconciling Judicial Independence with Judicial Social Context*

³ Lynn Smith, *Statement of Needs and Objectives for Continuing Judicial Education on the Social Context of Judicial Decision Making*, (Ottawa: National Judicial Institute, 1996).

field. There is an uneven approach to pre-service education on family violence across different disciplines and the time had come to ensure that every discipline had this critical background information as a foundation for future learning in practice. In this case, multiple sectors and systems were involved. This recommendation has been made in the past by the DVDRC and needs to be elevated to a mandatory category to ensure compliance and implementation based on the facts of this case and patterns in prior child homicides reviewed by the DVDRC.