Neutral Citation Number: **[2026] EWFC 71 (B)**

Case No: BH25C50160

IN THE FAMILY COURT
SITTING AT BOURNEMOUTH

Date: 05/03/2026

Before :

RECORDER HOWARD

- -

Re A, B, C, D (Extension of assessment; Use of AI: hallucinations)

Between :

BCP Council	**Applicant**
- and -	
A mother	**1st Respondent**
-and-	
A father	**2nd Respondent**
-and-	
The children (through their guardian)	**3rd – 7th Respondents**

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Mr Hand (instructed by **BCP Council legal services**) for the Applicant
Miss Southern (instructed by **Tyrer Roxburgh Solicitors**) for the 1st Respondent
Mr Brimacombe (of **Amicus Law**) for the 2nd Respondent
Miss Henstock-Turner (instructed by **Battens Solicitors LLP**) for the 3rd Respondent
Layla Parsons appeared in person

Hearing dates: 15 January 2026

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Approved Judgment

This judgment was handed down remotely at 10.30am on 5th March 2026 by circulation to the parties or their representatives by e-mail.

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RECORDER HOWARD

This judgment was given in private. The judge gives permission for this version of the judgment to be published on condition that (irrespective of what is contained in the judgment) in any published version of this judgment the anonymity of the children and members of their family must be strictly preserved. All persons, including representatives of the media and legal bloggers, must ensure that this condition is strictly complied with. Failure to do so may be a contempt of court.

Recorder Howard :

1. This case concerns 4 children, a girl age 9, a girl age 7, a girl age 5, and a boy who is 2 ½ years old. The children remain in the care of their mother, at a residential assessment unit.

2. Their father has sadly disengaged from the proceedings and had not provided his solicitor with instructions for this hearing. He has parental responsibility for all the children other than the youngest boy. He has raised questions about paternity, and DNA testing was previously ordered. The father has provided a sample, and samples are being taken from the children. He has not engaged properly in his parenting assessment which is due on 4th March 2026. He has attended hearings, although he did not attend this hearing. I hope that the father chooses to re-engage with this case for the benefit of his children.

Representation

3. The local authority was represented by Mr Hand, the mother by Miss Southern, the father by Mr Brimacombe, and the children by Miss Henstock-Turner.

4. A friend of the mother had made a number of applications in this case, which stood for me to determine today. That friend, Layla Parsons, represented herself.

5. I am grateful to all advocates, and to Ms Parsons, for the helpful and cooperative approach taken by all of them to the issues before me at the hearing, and for their written submissions which I have subsequently received.

The issues

6. The issues that I had to determine in the hearing were:

i) Whether to extend the proceedings for the mother and children to have a further period of assessment at the residential assessment unit;

ii) Whether to join Layla Parsons as a party to the proceedings; and

iii) Whether to direct an urgent re-assessment of Layla Parsons as an interim kinship carer.

7. The issue I then had to determine after conclusion of the hearing, but before handing down this judgment, was:

i) Whether to remove all of Ms Parsons' and a child's personal data from the court bundle.

8. I determined that issue on the papers after receipt of written submissions.

Background

9. By way of relevant background, the mother is a vulnerable adult in her own right. A report from Dr Oyebode says that she suffers from an emotionally unstable personality disorder, which impacts her daily in terms of her emotional regulation and anxiety. Dr Oyebode opines that without psychological treatment the prognosis for providing the children with the care they each need is poor. Questions have been asked of Dr Oyebode by the parties, asking for greater clarity on the timescales for treatment and whether that can be done with the children in the mother's care. Those answers were not available to me at this hearing, and are expected on 26th January 2026.

10. The mother is alleged by the local authority to have made unsafe choices for the children, and to have caused them to be scared by her beliefs that there are people

who are trying to harm them either in their home or outside their home. There have been incidents in which the mother reported frightening things happening around the home, but the local authority says there is no evidence to support what the mother claims has been happening. The mother is also alleged to have made allegations on behalf of the 9 year old (and in front of that child) that the child has been subject to racism; that the 5 year old (when 3) had been sexually touched by a female child at the park, and that the 5 year old (when age 3) has been sexually assaulted by an adult female in a refuge at which the family were staying at that time. When spoken to, neither of those children were able to verify or share what their mother had alleged on their behalf.

11. In September 2025 the mother alleged that the 9 year old girl had been stabbed with a needle at Waterloo train station. This led to the transport police investigating, and the child being subject to a medical assessment including blood tests at hospital. There was no evidence found by the police after reviewing CCTV to support the child having been stabbed with anything.

12. Another area of concern relates the relationship between the mother and father. The father is allegedly the perpetrator of significant domestic abuse against the mother, and the mother asserts he is a risk to her and the children. Despite that assertion, when living away from this area the mother took the children to see their father in 2025. The local authority says that if what the mother alleges about the father is true, meeting up with him will have put her and the children at significant risk. Alternatively, the local authority says that if what the mother says about the relationship and domestic abuse is not true, then the children will have been exposed to further false allegations from her which will have been frightening for them. The

father denies the allegations of domestic abuse, saying that the couple argued over him wanting to raise concerns about the mother's care of the children with professionals.

13. An assessment of the mother in the community did not, according to the local authority, show positive change, but then the mother agreed to go with the children to a residential assessment unit which was due to end on 26th January 2026. According to the placement logs, the placement got off to an inauspicious start, with the mother reportedly being dysregulated, pushing the 9 year old with a fireguard, calling the children unpleasant names, and there being problems with supervision and adherence to boundaries. There were problems with accepting advice and working with professionals, against whom the mother made complaints. Happily, with support and encouragement the mother has started to make progress, and there are green shoots of positive change sufficient for the placement to have filed a report in which they recommend extending the placement for 6 weeks to support the change that they say is now occurring. The local authority suggests an 8-week extension with a final report being filed on 4th March 2026.

Layla Parsons

14. Layla Parsons and the mother got to know each other when Ms Parsons was her lay advocate. They developed a friendship, and Ms Parsons has met the children on a few occasions. In these proceedings Ms Parsons has sought to support the mother, and put herself forward to care for all of the children if they could not remain in the mother's care.

15. Ms Parsons works professionally in a therapeutic capacity, and I have read the references she has exhibited to a statement which speaks of that work in very positive

terms. She also holds herself out as a lawyer, and is an unregistered barrister. Ms Parsons has exhibited a letter dated 11th November 2025 from a company for whom she has worked "as the UK lawyer available to [the company's] document purchasers who opt for paid legal contact in relation to their documents." Ms Parsons charges for that work at a level that I can take judicial notice is within Grade C of the national guideline hourly rates for solicitors. Ms Parsons is said in that letter to provide legal work covering a wide range of areas of legal practice, including related to family law. That letter speaks in unequivocally positive terms about the service Ms Parsons has provided, of her diligence, and of her ability.

16. Ms Parsons in her statement dated 1st December 2025 asserts that the mother's previous legal representation had not been acting in the mother's best interests on several occasions, and that the mother had been forced as a result to dis-instruct them. She has filed a number of skeleton arguments and a statement in which she makes complaints against various other professionals in this case, asserting she had serious concerns about the professionalism and independence of a social worker assessing her; against the independent social worker who she said was unprofessional, offensive, and discriminated against her; about that independent social worker breaching data protection laws and harassing Ms Parsons; alleged that the local authority was suppressing relevant evidence about the mother and the children's needs; and that the Family Court and these proceedings were experienced by her as discriminatory and a procedurally unsafe process. Ms Parsons did not restrict herself to advocating for herself in her documents and also sought to advocate for the mother. Ms Parsons in a position statement for a previous hearing asked the court to supervise the local authority or transfer the case to another local authority (something which the

court has no power to order). Ms Parsons has also made her own complaint against the local authority, alleging discrimination.

17. Perhaps most worryingly, for the hearing before me Ms Parsons sent a number of emails to the court on 14th January 2026, including asking for an email from one of the mother's cousins that purported to be a statement to be uploaded to the public law portal. According to the mother this was done without her consent or permission, at a time when the mother had her own solicitors who could decide what statements should be filed on behalf of their client in support of her case as she wishes to present it. I make no finding about whether Ms Parsons took that step with the knowledge and permission of the mother or not.

Ms Parsons' applications

18. Ms Parsons has made 3 applications in this case. The first was on 28th September 2025 to be joined as a party and for a special guardianship assessment, which was determined by the order of 2nd October 2025 with a special guardianship assessment being directed by an independent social worker, and the application for joinder was not granted.

19. The independent social worker instructed to do that assessment was discharged on 5th December 2025 after withdrawing from the instruction on the basis that she had been threatened with possible legal proceedings against her by Ms Parsons. A new independent social worker was instructed to undertake the special guardianship assessment.

20. The second application Ms Parsons made was on 22nd December 2025, the same day as that hearing. That application again sought for her to be joined as a party to the proceedings, and for other things not relevant to this judgment.

21. On 22nd December 2025 Ms Parsons, at a hearing which she was permitted to attend by video link sat next to the mother, told the court that she no longer wanted to be a special guardian, and preferred to be assessed as a foster carer for the children. That order discharged the special guardianship assessment, and substituted a fostering assessment of Ms Parsons due on 4th March 2026, permitted Ms Parsons to be observed in contact with the children, and provided for Ms Parsons to be sent relevant documents from the case to better inform her in that assessment process. Ms Parsons was not joined as a party to the proceedings at that hearing.

22. A third application was made by Ms Parsons on 8th January 2026, applying (for the third time in 4 months) to be made a party to the proceedings, and for a further viability assessment of her to care for the children as an interim kinship carer. The application form also sought a number of other things, but I was told those were not things that Ms Parsons had intended to leave on the application form, and consequently they did not need determining. In support of her application she lodged a witness statement and a skeleton argument. It is that skeleton argument to which I will return later in this judgment.

23. Ms Parsons is not able to make any of the applications I am considering (being her applications of 8th January 2026) without the leave of the court, because she does not fall into any of the categories of persons who is permitted to do so as of right under the Children Act 1989. She has not sought that permission, but I have treated her

applications as being for permission to make the applications she seeks to make, and thereafter if permission is granted for the substantive orders in her applications.

This hearing

24. Ms Parsons was unfortunately delayed in attending court, through no fault of her own. She offered appropriate apologies when she arrived, and I accept without reservation that she had a good reason to be late.

25. I decided that I should deal with the parts of the hearing that did not involve Ms Parsons in her absence, she not being a party to the proceedings, and would then go on to hear her applications when she arrived.

26. During the part of the hearing before Ms Parsons arrived, I asked the parties to check a number of citations and other references in Ms Parsons' skeleton argument, because I was unable to find the cases referred to, or to say that certain propositions asserted by Ms Parsons arose from or were supported by the cases or statutory provisions cited. I queried whether artificial intelligence large language models ("AI") may have been used, and allowed the advocates to inform Ms Parsons when she arrived that I would have some questions about those citations so that she was not caught unawares when she joined the hearing later in the morning. I took that course, having read Ms Parsons' documents and identified that she has a number of personal characteristics which I do not need to set out in this judgment, which may have made it harder for her to engage fully in the hearing had I raised my queries in the hearing without her being forewarned.

27. At the conclusion of the hearing, I informed the parties of my decisions on the remaining disputed issues, and that I would give my reasons in writing in this

judgment, which was to follow. I directed that any time for appeal would run from the date that this judgment is handed down. When doing so, I gave directions for the parties to consider the judgment, and to lodge written submissions on whether it should be published and if so whether Ms Parsons should be named, because I indicated to the parties I would be considering whether to publish this judgment to the National Archives.

28. Following the hearing before me, Ms Parsons by email informed me that due to her personal circumstances having unexpectedly changed in ways that I do not need to mention in this judgment, but which are entirely understandable, she feels unable to continue to offer a home for the children or be part of these proceedings. She informed me that she no longer wished to proceed with the assessment to be either a special guardian or foster carer for the children, and sought for her assessment to be "formally withdrawn". Ms Parsons, eloquently, and carefully, explained in that email how her own family's needs had to be considered, and that she was acting, as I without accept without reservation, in what she thought was the best interests of her own family and of the children in this case when making that decision.

29. Ms Parsons, in that email, asked me to destroy all of her and a family member's personal data in the court bundle. I decided to treat that as an application, and gave directions for all parties to file written submissions by 30th January 2026. They have all done so, and I am most grateful for their succinctness and assistance.

The position of the parties

30. The parties had agreed directions extending the residential placement of the mother and the children until 18th March 2026, addressing necessary case management to bring the case on to an effective interim hearing before that placement ended to decide

what should happen next for the family, and case management directions to an issues resolution hearing in early April 2026.

31. The local authority invited me to make those directions, to approve extending the residential assessment, opposed Ms Parsons being joined as a party to the proceedings and opposed preparation of an urgent viability assessment on the basis that Ms Parsons is already having a full assessment.

32. The mother sought an extension of the proceedings so that she could continue to make progress in the residential placement, and agreed the proposed directions. She did not have to set out her position on Ms Parsons being made a party to the proceedings, or the application for a viability assessment.

33. The father had no position, having failed to give instructions to his solicitor or attend the hearing.

34. The guardian agreed the proposed extension of the proceedings, the proposed extension of the residential assessment, and opposed Ms Parsons' applications.

35. Ms Parsons informed me that on reflection she was not seeking party status, but wanted a limited status to be able to be help the mother during the hearings. In respect of the viability assessment she sought either (a) a direction for the independent social worker to prepare a viability assessment sooner than the full report due on 4th March 2026; or (b) directions that in the event that anything happened to warrant removal of the children from their mother before the end of the residential placement an urgent viability assessment of Ms Parsons be undertaken prior to removal occurring.

36. In respect of the application by Ms Parsons for all of her and her child's personal data to be destroyed from the court bundle, the local authority and guardian strongly

oppose that application in their written submissions. I have received no written submissions from the mother on this issue, despite them being directed, and she has not communicated her position on that application to me.

The law

37. The children's welfare is my paramount consideration, and I must consider each child's welfare separately.

38. The rights of the parties pursuant to Article 6 (right to a fair trial) and of the parents, children, and Layla Parsons pursuant to Article 8 (right to family life) are all engaged in this case. I should only interfere with the Article 8 rights to the extent that is necessary and proportionate, and where a child's right to family life conflicts with that of an adult, it is the child's rights that take precedence.

39. I have had regard to my case management powers under the Family Procedure Rules 2010, and to the overriding objective.

40. When considering whether to extend the proceedings, I have had regard to the statutory time limit of 26 weeks for care proceedings, and that they should only be extended where necessary to enable the court to determine the proceedings justly. I have had regard to **In re M-F (Children) [2014] EWCA Civ 991**, **In re S (A child) (Interim care order: Residential assessment) [2015] 1 WLR 925**, and in the context of this case, for the need for a robust and realistic assessment of what is possible within the children's timeframes, based not on sentiment and hope, but on a solid evidential foundation. I have reminded myself of Pauffley J's wise words in **Re NL (Appeal: Interim Care Order: Facts and Reasons) [2014] 1 FLR 1384** that "Justice must never be sacrificed upon the alter of speed."

41. When considering whether to remove Layla Parsons' data and that of her family completely from the bundle, I have considered the provisions of the Data Protection Act 2018, the United Kingdom General Data Protection Regulation ("UK GDPR"), and the duties, rights and exemptions they contain. I have, in the context of the judicial exemption had regard to ***X v The Transcription Agency LLP and another [2024] 1 WLR 33**.

Extension of the assessment of the mother

42. All parties agree that this further assessment of the mother and children at the residential unit should occur, and invite me to consider the recent changes that the mother has been making. The final report from the unit recommends a 6 week extension, noting that the mother after struggling to engage meaningfully with professionals and implement advice has more recently worked constructively with support services; has shown signs of an emerging motivation to change; has reduced the incidents that directly impacted on the children's safety (albeit concerns remain); has shown a potential capacity to change; and "has demonstrated late but meaningful progress in addressing concerns, showing motivation and some capacity for change during the final phase of the assessment." The report, however, says that it is in the unit's opinion not safe or in the children's best interests to return to the mother's sole care in the community.

43. I was told by Miss Southern, in her careful and attractive submissions, that the mother has demonstrated insight in her instructions for this hearing by focussing on her children rather than fighting professionals. It was noted that the mother has sent a lot of complaints which she thought demonstrated her passion to fight for her children, but that she now recognises that was not helpful and didn't enable her to focus on her

children. She has also started CBT therapy on 6th January, which may also assist her. I hope that the mother does now focus all her efforts on her children, and that the litigious / complaints driven approach she had been taking to the case whether on her own or with encouragement from anybody supporting her now ceases.

44. I agree with the parties that the extension to the placement, and of the proceedings as a result should occur. I consider the final report from the residential unit gives me a sufficiently solid, evidence based foundation to justify extending the placement to see if the shoots of positive change that have started to appear will grow and flourish. It will benefit the children if they do by giving them the potential, as I hope will come to fruition, of living with their mother through their childhood.

45. I am satisfied that the delay caused by the further assessment is necessary for me or another judge to justly determine these proceedings, and approve it and the necessary extension to the 26 week timetable.

Whether to join Layla Parsons as a party to the proceedings

46. Ms Parsons no longer seeks to be joined to the proceedings. In my judgment that was an entirely sensible and appropriate position to take at the hearing, reflecting that she (at that stage and before her withdrawal from the assessment process) was part way through a full fostering assessment for which she had been provided with all the documents necessary to properly inform her of relevant information from this case.

47. I hope that the sensible position taken by Ms Parsons in this hearing does not slide back into more applications being made by Ms Parsons in the proceedings given her history of engagement with this case. That engagement is not limited to applications within these proceedings, and includes other steps ancillary to the proceedings such as

complaints against the local authority, and I was told by Ms Parsons that she has sent a letter before action of intended judicial review to the local authority. Such applications, formulated in the litigious and conflict driven way that they have been, have the potential to become a distraction from the core issues in the case and the focus all parties should have on the welfare of the children. When saying this, I do not criticise Ms Parsons for acting in what I accept she thinks is the best interests of the mother and children; however I consider her approach to this case, and her applications to have been misguided and misjudged. It has the potential to encourage the mother to a similar approach given her vulnerabilities and underlying behavioural tendencies as identified by the experts in this case. I don't make any findings about that, and accept that each party in this case is entitled to formulate their case and engage with professionals as they see fit, including raising complaints where they consider things have not been done correctly. I go no further than asking everyone involved in this case to ensure throughout that they are firmly focussed on the children and their welfare.

Should I require the local authority to undertake an urgent viability assessment of Ms Parsons?

48. Ms Parsons in her submissions, expressed her motivation for seeking an urgent viability assessment was to try and avoid the children being removed to foster care should the placement with their mother break down for any reason. This is a laudable ambition, and I understand why she wished to support the mother and children by offering them a home in those circumstances.

49. She does not accept the negative outcome of the viability assessment undertaken so far in the proceedings. That viability assessment contains a constellation of factors

that point away from the children being placed in her care if the evidence or information upon which those factors are based is found to be accurate. Ms Parsons says that the assessment is not accurate; however I note that despite the negative outcome of that assessment a full assessment has been directed, and His Honour Judge Simmonds, the allocated judge for this case, has gone as far as changing the nature of that assessment to a fostering assessment when Ms Parsons changed her mind about wanting to be a special guardian, and substituted another independent social worker to do it when Ms Parsons and the originally allocated worker fell out.

50. The local authority and guardian considered that directing a further viability assessment of Ms Parsons was not necessary. Firstly, Ms Parsons was part way through a full fostering assessment, and as Mr Hand pointed out in his balanced submissions the viability stage has been passed. Secondly, in the event of an urgent situation requiring the local authority to seek removal of the children from the mother, the local authority offered to consider whether on what they knew of her at that time, placement with Ms Parsons was appropriate reflecting on their duty to consider that option.

51. The mother did not take a particular position on whether a viability assessment was needed, but through Miss Southern made it clear that if she can't care for her children, she trusts Ms Parsons to do so.

52. I agree with the local authority and the guardian that the time for a viability assessment has passed, and it would be an unnecessary assessment when Ms Parsons is part way through a full fostering assessment. That fostering assessment in my judgment is where the information and analysis about the suitability and ability of Ms Parsons to foster one or more of the children should be done. I considered whether to

direct an assessment that amounts to a partial or viability assessment in the event the residential placement breaks down, but have decided that to do so would place limits on the ability of the court to deal with any urgent applications that arise should something unexpected happen in the placement. I accept the local authority's recognition of their duty to consider Ms Parsons as an alternative carer in those circumstances, but do not prescribe how that consideration is to be done. I expect, however, that consideration to be full and proper, and will direct that the local authority must use its best endeavours in the event of an urgent hearing seeking separation of the children from their mother to file a statement from the independent social worker assessing Ms Parsons setting out as much up to date information as possible about Ms Parsons' suitability and capacity to care for any of the children. That approach, in my judgment balances the need for the court to have evidence before it at such a hearing about the potential to place the children with Ms Parsons, with the existing directions and assessments.

Should Ms Parsons continue to support the mother at court?

53. The mother initial indicated that she did want Ms Parsons to be able to sit in court and support her at future hearings, and take notes etc. in that role for her. I invited the parties to consider that position in light of the real potential for conflict to arise between the positions of Ms Parsons and the mother, particularly related to assessment of Ms Parsons' protective ability. I noted that it was reasonably foreseeable at any interim separation hearing or final hearing that the mother might argue for the children to remain with her, and Ms Parsons might take an objective view that the safety of the children means she should seek to care for them (at least in the interim). I also raised my concern that as recently as 14th January 2026 Ms Parsons

had taken steps in the litigation, by filing a document on behalf of the mother's case without the mother's agreement (at least according to the mother) which in my view may influence the suitability of Ms Parsons to continue in that supportive role.

54. The parties returned after I rose to give them time to consider their positions, and the mother in my view very sensibly sought for a lay advocate from an advocacy service known to the court to be appointed to offer her formal support instead of Ms Parsons taking on that role. All other parties, and Ms Parsons agreed that would be better, and I agreed. I approve the proposed directions for that support to be provided to the mother by the lay advocacy service.

Ms Parsons' request to withdraw from assessment

55. I have read Ms Parsons' email with care where she explains why she feels unable due to the circumstances that have unexpectedly arisen in her family to continue to offer a potential home to the children. Given what she has set out in that email, which I do not need to summarise in this judgment, and which I accept without hesitation, Ms Parsons is making a sensible and child focussed decision not to progress with the fostering assessment.

56. In her written submissions received after that email, however, Ms Parsons asserts that the potential for this judgment to be published and criticism of her for misleading the court by using an AI tool is what caused her to withdraw. I reject that contention entirely, coming as it does after an email in which Ms Parsons set out entirely good and child focussed reasons for withdrawing from further assessment to care for the children and this later assertion being inconsistent with the contents of that earlier email.

57. Ms Parsons in her response to the local authority written submissions after the hearing has told me that she has emailed the local authority after withdrawing from assessment to offer a home for the children "if the LA have an emergency and feel confident to reassess me as Kinship Foster in future…". She confirms that she has no intention of playing a further role in this case, has withdrawn her complaints and judicial review letter before action to the local authority.

58. Upon receipt of the request to withdraw from further proceedings, I accepted that request, and discharged the directions for a fostering assessment of Ms Parsons. No further assessment of Ms Parsons should be undertaken in respect of these proceedings without further order upon application.

Should Ms Parsons' personal data be removed from the case?

59. Ms Parsons in her written submissions asks me to direct that all personal data related to her or family members is destroyed. She rightly points out that the data is highly personal, and includes special category data about her and her family. Ms Parsons asserts that the continued retention of her data is neither necessary nor proportionate now that she has withdrawn from the proceedings "and is no longer a party" - pausing here she has never in fact been a party, but this submission from Ms Parsons perhaps identifies the central problem related to her engagement with these proceedings. She thinks she is a party and behaves as though she were one.

60. Ms Parsons submits that retention of the data presents a real and ongoing risk of harm to her due to experiences of stalking and harassment she has suffered previously, and risk of people finding her. Ms Parsons relies on information she says she has been passed by 3rd parties, saying that people who have previously harassed her have used institutional processes as part of the harassment. She says that she can no longer

regard "this forum" as a place where her personal data can be safely retained without risk of misuse.

61. The local authority in a careful skeleton argument point out that Ms Parsons has chosen to become involved in these proceedings, and has provided her personal data as part of assessments to which she consented and indeed sought. They point out that she has through her actions inserted herself into the case in such a way that it makes her a central character to the proceedings, and has played an active and what they say is a vociferous role in them despite not being a party to the proceedings. The local authority says that artificially removing Ms Parsons from the history of this case would be fundamentally flawed and procedurally incorrect.

62. The local authority also points to the need for the court to maintain an accurate court record for the children, whilst acknowledging the power of the court to order the removal or redaction of documents. They point to the protections against disclosure related to cases concerning children pursuant to Part IV Children Act 1989.

63. Finally, the local authority points to the history of Ms Parsons vacillating about whether to offer care for the children, and the potential for Ms Parsons to appear as a person involved with other families with whom the local authority is involved.

64. The guardian, in their written submissions, points to the extent of the documentation that Ms Parsons has filed in this case, which is interwoven with the fabric of the case. The guardian points to Ms Parsons numerous emails to the court and other parties whilst purporting to support the mother, and concerns that the highly litigious approach taken by Ms Parsons may have influenced the mother to behave in a similar manner. I note the mother, who is a vulnerable adult, has previously adopted Ms Parsons' written submissions at earlier hearings in their entirety. There are also issues,

in the guardian's view, that may be likely to be relevant at final hearing about whether the mother has misrepresented the extent of Ms Parsons' relationship with the children, in respect of which the personal data of Ms Parsons already admitted into the proceedings would be relevant. Ultimately, the guardian invites me to accept that Ms Parsons' evidence, and her documentation in this case, is crucial to understanding any influence she may have had over the mother which may in light of the mother's vulnerabilities have distracted or deflected the mother from engaging properly with professionals and other help to improve her ability to care for her children.

65. I am satisfied on the evidence in the bundle that Ms Parsons has a demonstrated history in this case of offering to care for the children, withdrawing that offer, and then making it again. I note that after her email asking to withdraw from offering the children a home, Ms Parsons filed an email response to the local authority's written submissions in which she says suggests the potential for the local authority to re-assess her in an emergency, and offers to be a contact supervisor for the children if needed. In my judgment, this factor points strongly to the need to retain the information currently known about Ms Parsons in the assessments undertaken to date on the court file and in the court bundle (i.e. within the proceedings and the local authority records) so that they are available for any further or future assessments Ms Parsons or the mother might seek related to Ms Parsons involvement with the children. The existing evidence and personal data is directly relevant to any further assessments, and is also relevant in my judgment when considering whether Ms Parsons was a suitable person to propose to care for the children, or if the mother seeks at a later hearing to assert that Ms Parsons has influenced her approach to engagement with professionals.

66. I reject the local authority suggestion, no doubt intended to be helpful, that I should redact Ms Parsons' personal data in certain ways, including by use of initials and removal of addresses and identifying information related to family members. I reject that suggestion because a) the children have a right to be able to inspect their records and properly understand their life story and how and why steps have been taken in the way they have through these proceedings; b) the data is already confidential and protected by the restrictions of section 12 Administration of Justice Act 1960 unless those protections are relaxed on application by any party; c) everybody in this case knows to whom that information with pseudo anonymisation relates; and d) it is reasonably foreseeable that the data in complete form will be needed for further assessments of Ms Parsons (if permitted in these proceedings, or after the proceedings if the local authority remain involved with the mother caring for the children in the community) in light of the history I have recited in summary above.

67. I am entirely satisfied that the exemptions to the rights to erasure, restrictions on processing, right to rectification, and right to objections to processing that relate to judicial proceedings allow me to refuse Ms Parsons' request for her data to be erased. I refuse her application.

Use of AI and misleading the court

68. After I raised that the majority of the citations in Ms Parsons' skeleton argument did not relate to the cases named or the propositions said to arise from them, and that some statutory provisions cited also did not support the propositions Ms Parsons asserted they did, the advocates assisted me by helpfully checking all the citations and propositions. It was agreed by all advocates that they were erroneous in the case of 4 of the citations or propositions said to be demonstrated by the case.

69. Ms Parsons for her part accepts that she used a widely known publicly available AI tool to assist her in preparing her skeleton argument for this hearing. There is no problem with using such a tool, whether as a reasonable adjustment needed because of a litigant's personal circumstances or otherwise, provided that the confidentiality of the proceedings is fully safeguarded by the person using that tool. She confirmed that she had not uploaded any documents from the bundle in this case to that AI tool.

70. Ms Parsons offered immediate apologies in the hearing for misleading the court having relied on the output of the AI tool that she used. Ms Parsons expressed that she was now fully aware that the AI tool may give you information that is incorrect, but had not appreciated that to be the case before.

71. Ms Parsons in her written submissions received after the hearing, has focussed on whether use of AI as a reasonable adjustment is permitted. She invited me to have regard to relevant aspects of the guidance to the judiciary related to her relevant characteristics. I have done so, and had done so before the hearing to refresh myself of their provisions. That Ms Parsons should be able to use an AI tool should she wish was never in issue, and has never so far as I am aware been suggested to be impermissible in the Family Court provided that privacy and confidentiality restrictions in respect of proceedings related to children heard in private are respected, and that any use of the AI tool is consistent with data protection principles.

72. Ms Parsons in her oral and written submissions has also focussed on her role in this case being as a litigant in person, rather than working for another person as a McKenzie friend or lawyer. She says her website through which she offered legal services is no longer accessible, and she no longer does that work. She has explained

to me how she has experienced a traumatic experience before a tribunal, and has been discriminated against.

73. Whilst it is right that Ms Parsons was a litigant in person before me, I note that she is an unregistered barrister, and holds herself out as a lawyer. I do not say that to indicate that I have applied a higher duty or standard on her than on litigants in person, but simply to reflect that she has professional training and has held herself out to the public as a lawyer. I apply the same duty and standard to her as is on all litigants in person, which is not to mislead the court.

74. As noted by Lord Justice Baker as recently as 9th December 2025 in **Re D (A Child) (Recusal) [2025] EWCA Civ 1570** at paragraph 83:

> "Finally, I return to the issue raised by the father's representatives about the mother's erroneous citation of authority (see in particular paragraph 54 above). I absolve the mother of any intention to mislead the court. Litigants in person are in a difficult position putting forward legal arguments. It is entirely understandable that they should resort to artificial intelligence for help. Used properly and responsibly, artificial intelligence can be of assistance to litigants and lawyers when preparing cases. But it is not an authoritative or infallible body of legal knowledge. There are a growing number of reports of "hallucinations" infecting legal arguments through the citation of cases for propositions for which they are not authority and, in some instances, the citation of cases that do not exist at all. At worst, this may lead to the other parties and the court being misled. In any event, it means that extra time is taken and costs are incurred in cross-checking and correcting the errors. All parties – represented and unrepresented – owe a

duty to the court to ensure that cases cited in legal argument are genuine and provide authority for the proposition advanced."

[My underlining for emphasis]

75. It is the duty to the court owed by Ms Parsons as a litigant in person to ensure that the cases cited in legal argument are genuine and provide authority for the proposition advance with which I am concerned. She accepts that she did not do so, and apologises. She says that the mistakes were unintentional, and seeks to justify herself by saying the main authority upon which she relied was sent to me (as it was). Having heard from her, and read her submissions, I absolve her of any intention to mislead the court, but remain concerned that Ms Parsons minimises the seriousness of misleading the court and goes so far as to assert that criticising use of AI risks setting a harmful precedent for disabled litigants in person and will discourage access to justice.

76. I will invite further submissions once the parties and Ms Parsons have been able to read this judgment in draft about whether the judgment should be published as a further example of the risks of using AI tools uncritically, and whether given she has and may well in the future hold herself out to paying members of the public as a lawyer, there may be a public interest in naming Ms Parsons in light of her failure to grasp, in my judgment, her duties to the court even as a litigant in person, and the seriousness of not checking the citations and statutory provisions upon which she sought to persuade me she relied in support of her case.

77. That is my judgment.

POSTSCRIPT

78. Following the circulation of my draft judgment, Layla Parsons emailed the court a copy of a self-report she had made to the Bar Standards Board in respect of the mis-stated matters in her skeleton argument. I consider that a responsible step for her to have taken, and do not know what action, if any, the Bar Standards Board will take. I do not, however, consider that obviates the need to consider naming Layla Parsons in the published judgment because the Bar Standards Board may take no action, and whatever action they do take is unlikely to prevent Layla Parsons from being able to continue to hold herself out as a lawyer and undertake unregulated legal work for the public.

79. I have received written submissions from Ms Parsons and the local authority on the issue of whether this judgment should be published by uploading to the National Archives, and whether if it is published Ms Parsons should be identified by name in the judgment. The local authority invites me to publish this judgment as a further example to highlight the issues and potential difficulties in relying on AI for legal research, which they rightly say is an important topic. The local authority is neutral on whether Layla Parsons is named in the judgment. Ms Parsons invites me to neither publish the judgment nor name her. Neither the mother nor the guardian have lodged any submissions or suggested that this judgment should not be published.

80. In deciding whether to publish the judgment, I have had regard to the guidance of the President of the Family Division dated 19th June 2024 on transparency in the family courts and publication of judgments. I have had regard to the principles summarised at paragraph 22 of **Re J (A Child) [2013] EWHC 2694 (Fam), [2014] 1 FLR 523.** I recognise the starting point is the principle of open justice, and that it is generally in the public interest to publish judgments whether or not the proceedings are held in

private. I have had regard to all the circumstances of this case, and I have considered the balance of the respective European Convention on Human Rights Article 6, 8 and 10 rights of the parties and Layla Parsons. I have ensured that all parties and Layla Parsons have had the opportunity to make representations on publication and anonymisation through written submissions.

81. When I measure the impact on each child of publication, I have prepared this judgment in a manner that anonymises the children and their family. No specific identifying features are present, and the risk of jigsaw identification in my judgment from the necessary information I have included is minimal whether or not Layla Parsons is identified by name. She has only met the children a handful of times, and is not part of their family. I am also satisfied that the impact on any of the children of publication is small because even were they to identify themselves in this judgment at some later date, the information in it is all included in their social work files and will have been available to them growing up. I do not consider there is any real risk of identification by peers or the child's local community because of the manner in which I have limited the details about the family in the judgment.

82. I remind myself that one of the key principles of anonymisation is that it is only permissible where it is specifically justified on the facts of the case, and anonymisation of professionals is only usually justified where its purpose is to ensure the anonymisation of the child/family.

83. I have had close regard to the Article 8 rights of Ms Parsons and acknowledge that they include the wellbeing and psychological integrity of the individual. I have considered Ms Parsons's written submissions that naming her places her at risk of actual and psychological harm. She says that it is foreseeable that publication of the

judgment at all would result in serious harm to her and her children, and identification of her would lead to identification of any protected personal characteristics that she may have. I reject that the judgment will identify such characteristics, because I have taken care not to mention them if they exist.

84. Ms Parsons stresses that she has been involved in this case solely as a litigant in person, and as I have said above, focusses in her submissions on the use of AI tools being permitted, whilst in my judgment avoiding responsibility and failing to recognise that what she had done wrong was not checking the citations produced by that tool and consequently misleading the court. Ms Parsons says there is no public interest in publication and that it would amount to a character assassination. Finally, Ms Parsons says that if I were to publish the judgment or name her within the judgment if published, it would have a disproportionate impact on women, disabled persons, and litigants in person, and would be a misuse of power. She says that when considering proportionality and the interests of justice, the balance falls not to publish the judgment at all.

85. I have had careful regard to the information about Ms Parsons' personal history included in the viability assessment filed in the bundle, and her documentation filed on her own behalf. That evidence leads me to be cautious about the assertions that Ms Parsons will suffer risk of harm by people finding her, harassing her, or otherwise place her at risk. The evidence in that assessment and other evidence, which I will not recite here because it is deeply personal, indicates that the risks asserted by Ms Parsons are likely to be greatly exaggerated.

86. When deciding whether or not to publish this judgment at all, in my judgment having considered the competing rights and the transparency guidance, it is a judgment that

should be published. It is an example of the day to day working of the Family Court, the issues that can arise in these difficult cases, and another example where AI hallucinations have led to the court being misled by a person representing themselves relying on the AI tool without reference to their duty to check the citations.

87. I recognise that in this case Ms Parsons has been involved as a person offering care to the children, and then as a litigant in person. I have taken care to avoid including in this judgment any special category data that is not necessary to be mentioned, or reciting the details of why for example the viability assessment was negative. I have taken care in preparation of this judgment to anonymise the children and parents' details, and have taken an approach to preparation of the judgment that from the start avoids any personal information of Ms Parsons that is not strictly necessary being included in it.

88. I reflect, however, that Ms Parsons is also a person who holds herself out as a lawyer. She offers, or has offered, paid legal work to members of the public. This is an important consideration. I am satisfied having read her written submissions lodged since the hearing that Layla Parsons still does not really acknowledge or accept that her actions in not checking the citations and propositions she included in her skeleton argument were serious. I consider in light of the letter dated 11th November 2025 from a company for whom she has worked "as the UK lawyer available to [the company] document purchasers who opt for paid legal contact in relation to their documents" which is written as at November 2025 as though Ms Parsons was still engaged in that role, that there is a real and not fanciful possibility that Ms Parsons will in the future offer legal services to members of the public. I consider that this factor, and the need for any person engaging the services of Ms Parsons in legal proceedings to know that

she has misled the court (albeit unintentionally) and does not in my judgment properly understand what she has done wrong is a strong and overwhelming factor in favour of naming Ms Parsons. When I balance that factor against the risks Ms Parsons asserts, I consider it strongly outweighs the risks to her, and that naming her is a necessary and proportionate interference with her right to family life.

89. I direct that the version of this judgment published to the National Archives has the case name anonymised so as to avoid identification of the children or parents involved in the case, but that all references to Layla Parsons in the judgment will remain, and she will consequently be identified in the published judgment. Such publication will not occur for 8 days, to allow time for any party or Layla Parsons to seek permission to appeal and/or a stay of that direction.