

Overnights and overkill: post-divorce contact for infants and toddlers

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In post-divorce and post-separation contexts, overnight visitation is being recommended with increasing frequency for non-resident parents. However, there is confusion as to whether sleepover access serves the best interests of young children. My purpose in this paper is to raise awareness and to encourage debate on children's needs regarding overnight contact during early developmental phases. I review available research and reflect critically on emerging trends with reference to attachment theory, practical experience, parental and gender rights, cultural considerations, and adversarial legal contexts. I suggest that insistence on overnight contact in highly contested matters may be a form of overkill that serves parental and legal demands more than the best interests of children, and conclude that individual cases should be assessed with reference to, amongst other things, processes of separation, reunion, and attachment.

Keywords: access; attachment; best interests of the child; contact; custody; overnight; parental rights; shared parenting; sleepover; visitation

Post-divorce access models have traditionally taken for granted that sleepover contact for non-resident parents (sometimes referred to as overnight access or overnight visitation) should be restricted until children are older, in order to protect primary attachment bonds (Hodges, 1991; Engelbrecht & Rencken-Wentzel, 1999). However, traditional access models have been challenged as ignoring the potential benefits of overnight visitation (Lamb, 2002; Kelly & Lamb, 2000; Warshak, 2000a).

This paper arose out of the author's experience in the field of forensic assessment of parental rights and responsibilities. Confusion as to whether very young children should stay overnight with non-resident parents became pronounced when the Chief Family Advocate renounced what many had come to consider accepted access guidelines. In the experience of the author, many clinicians eschew the idea of sleepover access for children under three years of age, whereas many forensic evaluators embrace the notion. Steadfast opinions are often offered without research evidence, resulting in confusion for parents and providing fuel for legal disputes.

The paper aims to raise awareness and debate on the best interests of young children and to provide a coherent account of the issues. It discusses the pros and cons of sleepover contact for infants and toddlers with reference to, *inter alia*, attachment needs, parental and gender rights, cultural considerations and adversarial legal contexts. The paper also suggests that in highly contested matters, overnight contact may be a form of overkill — providing more contact than necessary and serving parental and legal demands more than the best interests of children.

The best interest of the child standard

The Children's Act (Republic of South Africa [RSA], 2005) stipulates, "In all matters concerning the care, protection and well-being of a child, the standard that the child's best interest is of paramount importance, must be applied" (section 9). This provision is in keeping with the common law (Schäfer, 1993) and the Constitution (RSA, 1996).

The "best interests of the child" principle is useful and necessary when evaluating circumstances for optimal child development (Strous, 2007). However, what constitutes the best interests of very young children regarding overnight contact has become "a murky realm" (Pruett, Ebling, & Insa-bella, 2004, p. 56) in which traditional standpoints and changing perceptions compete.

Changing perceptions concerning overnight contact

Access schedules that exclude overnight visitation are historically based on notions of the mother's role as a primary caregiver (Warshak, 2000a). Sigmund Freud (1940) championed the mother's role as "unique, without parallel, established unalterably for a whole lifetime as the first and strongest love-object and as the prototype of all later love-relations" (p. 45). John Bowlby (1952) similarly advanced the idea that infants formed a single relationship, before all others, which remained pre-eminent. Goldstein, Anna Freud, and Solnit (1973) also asserted that children had only one *psychological parent*, who should retain sole custody.

Based on early theories that referred to lengthy separations from the primary attachment figure as stressful and perilous in a child's early years (Bowlby, 1973), and more recent research concerning the dangers of disrupted attachment bonds for early brain development (Schore & Schore, 2008), many clinicians consider a child's primary attachment to the mother figure as paramount. This argument draws on attachment theory, which provides the dominant scientific model for the study of early relationships and human social-emotional development (Ainsworth, 1973; Bowlby, 1952; Crowell, Fraley, & Shaver, 2008; Fonagy, Gergely, Jurist, & Target, 2002; Schaffer, 2007; Schore, 2005; Sroufe & Waters, 1977).

Infants separated from their parents generally experience a series of three stages of emotional reactions: (i) protest, in which the infant cries and refuses to be consoled by others; (ii) despair, in which the infant is sad and passive; and (iii) detachment, in which the infant actively disregards and avoids the parent if the parent returns. Insensitive parental responses to developmentally normal separation anxiety can adversely affect present and future relational security (Kelly & Lamb, 2000; Masterson, 1990; Steele, 2002). Attachment researchers have documented that young children face psychological risks when their attachment to a primary caregiver is disrupted. (Ainsworth, 1973; Berlin, Zeanah, & Lieberman, 2008; Bowlby, 1952; Hazan & Shaver, 1987; Hetherington, Cox, & Cox, 1981; Lamb, 1997).

During early critical periods, insecure attachment histories are encoded in unconscious internal working models and are affectively burnt in the infant's rapidly developing right brain (Schore & Schore, 2008). There are direct connections between traumatic attachment, inefficient right brain emotional regulatory functions, and both maladaptive infant and adult mental health (Schore, 2001). The level of stress experienced in infancy permanently shapes the stress responses in the brain, which then affect memory, attention, and emotion (Gunnar, 1998). Infants who experience chronic relational trauma frequently forfeit potential opportunities for socio-emotional learning during critical periods of right brain development, which can result in an enduring deficit at later points of the life span in the individual's capacity to assimilate novel (and thus stressful) emotional experiences (Schore, 2001).

Repeated changes of primary caregivers that prevent formation of stable relationships (e.g. frequent changes in foster care) can result in reactive attachment disorder of infancy or early childhood (American Psychiatric Association [DSM-IV-TR], 2000). This may take one of two forms: children with inhibited reactive attachment are emotionally withdrawn and seldom respond to or seek out comfort, whereas children with disinhibited reactive attachment are overly sociable and non-selective in eliciting comfort and affection.

Securely attached children tend to be more independent, socially competent, inquisitive, cooperative and empathic than insecurely attached children (Kelly & Lamb, 2000). They tend to enjoy higher self-esteem and demonstrate more persistence and flexibility on problem solving tasks (Ainsworth, 1973, 1989; Bowlby, 1952; Kelly & Lamb, 2000; Sroufe & Waters, 1977). Attachment categorisations may change over time (Waters, Merick, Treboux, Crowell, & Albersheim, 2000), but it is clear that early, secure attachments are desirable. Attachment disorders (Zeanah, Mammen, & Lieberman, 1993) have serious implications for psychopathology, including the development of personality disorders (Fonagy, 2000).

Clinicians who focus on preserving early, secure attachments, particularly the mother-infant attachment, question the wisdom of extended overnight visits with fathers or secondary caregivers. They point to a lack of empirical evidence to justify revising earlier, traditional access guidelines that generally limit overnight stays with non-resident parents until children are older, for example three years of age.

Hodges (1991) has stated that for infants younger than six months, “overnight visits are not likely to be in the child’s best interests, because infants’ eating and sleeping arrangements should be as stable as possible” (p. 175), and for infants 6 to 18 months of age, overnight visits are less than desirable. Hodges stated that children might be able to spend overnights without harm only after reaching three years of age.

In *Divorce: A South African Guide*, Engelbrecht and Rencken-Wentzel (1999) pointed out that a child’s first bond would be with the person providing the most regular and consistent childcare. Generally recommending against shared residence for infants, they provided the following access examples for infants: (1) Monday, 1 hour; Wednesday, 3–5 hours and Saturday/Sunday, 3–6 hours; or (2) Monday, 1 hour; Wednesday, 1 hour and Saturday/Sunday, whole day.

The Chief Family Advocate instructed colleagues via e-mail to renounce “unequivocally” a document of unknown origin and date that came to be known as “The Family Advocate Age Appropriate Guidelines.” These ‘guidelines’ were largely compatible with the recommendations of Engelbrecht and Rencken-Wentzel (1999). The guidelines were considered contradictory to the letter and spirit of the Children’s Act of 2005 for reasons that were not explicated in the e-mail.

There has been a shift from earlier guidelines in international jurisdictions too. In California and Wisconsin, one third of children younger than two-years-old in divorced families spend overnight time with their second parent (Pruett, Ebling, & Insabella, 2004). It is possible that a non-resident father’s contact will even be held to override a mother’s breastfeeding schedule (Kelly, 2009).

In South Africa, there have been recent cases in which some private practitioners and the Office of the Family Advocate have recommended, and the High Court has conferred, weekend contact of 36 hours or more as well as holiday contact of close to a week in contested matters involving very young children. This emerging trend finds support in some interpretations of attachment theory, and refutation in others.

An earlier historical context of stay-at-home mothers and fathers as sole breadwinners has shifted towards somewhat less gendered roles and more shared parenting. A move towards an ethos of shared parental responsibility, in which maternal preference is no longer taken for granted, has seen earlier access (contact) guidelines questioned. In opposition to traditional models, proponents of shared parental responsibility de-emphasise the stress of separating from one primary attachment figure (Lamb, 2002; Kelly & Lamb, 2000). They recognize that children usually have more than one significant caregiver providing emotional security, and advocate sleepovers to facilitate bonding with non-residential caregivers (usually fathers)

Traditional access arrangements have invited discursive rhetoric between pro-mother and pro-father groups. Maternal preference in custody matters has often excluded fathers from the lives of their younger children unnecessarily (Gardner, 1998; Solomon & Biringen, 2001), inviting charges of gender discrimination. Mothers are often referred to as “gatekeepers” to young children’s relations with their fathers (Pruett *et al.*, 2007). This gatekeeping may be *bona* or *mala fides*. Some mothers actively frustrate meaningful contact as a form of malicious parental alienation. Some limit contact to maintain traditional roles. Other mothers restrict contact out of genuine concern about a father’s parenting competencies, and experience their parental rights as undermined when fathers demand contact that they consider harmful.

Distressed 12- to 18-month-old infants typically turn to their mothers rather than their fathers when they have the choice (Lamb, 1982; Cassidy & Shaver, 2008). Kelly and Lamb (2000) point out that this preference often disappears by 18 months, but Solomon and Biringen (2001) draw attention

to research that they believe indicates marked preferences for mothers (Ainsworth, 1967; Lamb, Frodi, Hwang & Frodi, 1983). While school-age children often long for more time with each parent (Emery, 1999; Fabricius & Hall, 2000; Kelly, 2000; Laumann-Billings & Emery 2000; Warshak, 2004), clinical perspectives inform us that different children will express their preferences differently. Children's best interests should not be sacrificed at the altar of either father's or mother's rights.

Mental health practitioners must be sensitive to issues of culture, gender, race and social context when making decisions concerning overnight contact, especially in the South African context. One reason, by way of example, is that a number of black households may entrust the raising of children to a grandmother who may act as a primary caregiver. South African society is multicultural and in flux, and South African mental health professionals must be mindful of processes of acculturation within the country's transitional process (Nortier & Theron, 1998). However, we need to be careful of extreme positions of contextual relativism. Overemphasis on cultural or geographic specifics could disregard human universals. A useful multicultural perspective explains behaviour both in terms of culturally learnt perspectives that are unique to a particular culture and common ground universals that are shared across cultures (Pedersen, 1991). Research from around the world supports the claim that all infants develop attachment relationships, secure or insecure, with their primary caregivers, and that secure attachments are highly prized.

One of the greatest contributions to date of cross-cultural studies on attachment is the understanding that children have relationships with several attachment figures, rather than just one. Fundamental questions underpinning recent debate about sleepover contact for very young children are whether all attachments are equal and how separation anxiety should be managed.

Arguments for overnight access

There are significant benefits for children when non-resident parents actively parent (Amato & Gilbreth, 1999). Most children of divorce long for more time with each parent and wish their parents would reunite (Emery, 1999; Fabricius & Hall, 2000; Hetherington, Cox, & Cox, 1981; Kelly, 2000; Laumann-Billings & Emery, 2000). Arguments for sleepover access emphasise that children profit from multiple simultaneous attachments (Lamb, 1997).

According to Warshak (2000b), contemporary attachment theory has abandoned "monotropy" (p. 429), the notion that children have a biological need to develop a selective attachment with just one person. Kelly and Lamb (2000) assert that there is no empirical support for the claim that infants must learn how to attach with one primary attachment figure before they can generalize attachment skills to anyone else. Lamb (2002) states that most infants form meaningful attachments to both of their parents at roughly six to seven months.

Because of their undeveloped memory and poor concept of time, infrequent contact with primary caregivers places very young children at risk for disrupted relationships, a profound sense of loss, and severe depression in later life (Kelly, 2005). Lamb (2002) argues that both parents should therefore engage regularly in a broad array of daytime and night-time activities, during both weekdays and weekends. He recommends consideration of frequent overnight visits, and even suggests alternating which parent the child stays with night-to-night (Lamb, 2002). Reflecting this, Kelly and Lamb (2000) state:

Evening and overnight periods provide opportunities for crucial social interactions and nurturing activities, including bathing, soothing hurts and anxieties, bedtime rituals, comforting in the middle of the night, and the reassurance and security of snuggling in the morning after awakening, that 1- to 2-hour visits cannot provide. These everyday activities promote and maintain trust and confidence in the parents while deepening and strengthening child-parent attachments ... There is absolutely no evidence that children's psychological adjustment or the relationships between children and their parents are harmed when children spend overnight periods with their other parents. Indeed, there is no evidence that breast-fed babies form closer

or more secure relationships to their parents than do bottle-fed babies ... It is not crucial that the two residential beds or environments be the same, as infants adapt quickly to these differences. It may be more important that feeding and sleep routines be similar in each household to ensure stability. (p. 304)

Warshak (2000a) posits that therapists who imagine that infants feel uncomfortable with more than one regular sleeping environment, may themselves feel the same way, thus “adultomorphizing” babies (p. 435). According to him, the opinion that children can tolerate sleeping during the day in their fathers’ presence, and in the presence of hired attendants in day care centres, but not at night with their fathers, cannot be said to express a scientific judgment. He points out, “Infants and toddlers often sleep away from their mothers and away from their cribs. They sleep in strollers, car seats, bassinets, and parents’ arms. They sleep in day care, in church, and in grandparents’ homes” (p. 433).

Few controlled studies have explicitly investigated the effects of sleepover contact on infants and toddlers in divorce situations. One study provides preliminary data suggesting, according to the researchers, Pruett *et al.*, (2004), that worry about overnight visits is misplaced. Based on parent feedback on psychological and behavioural checklists, Pruett *et al.* (2004) examined the effects of multiple caregiving when periods of placement away from the primary parent included overnights. Mothers and fathers who participated in the study had, at some point during the first 18 months of separation, agreed to a placement plan by means other than court-based evaluation or litigation. Pruett *et al.* (2004) found, *inter alia*, that:

- Overnight visits do not adversely affect young children’s short-term social-emotional adjustment.
- According to parents’ feedback, children who spent at least one overnight per week with the non-residential parent had fewer social problems. Mothers also reported fewer attention problems and thought problems.
- Both mothers and fathers reported that girls who experienced at least one overnight per week with the non-residential parent displayed less withdrawn behaviour. (Boys experienced more difficulty adapting to overnight placement schedules than girls, particularly in the age group 0 to 3 years.)
- For children with more than one caregiver in the non-residential parent’s household, mothers reported fewer social problems and attention problems (but more sleep problems, and mothers linked the involvement of multiple caregivers to higher incidences of anxious and depressed behaviour.)
- Children with consistent access schedules had fewer social problems than did children with inconsistent schedules.

Cautions against overnight access

It is important to consider the Pruett *et al.* (2004) study in some depth because, as one of the few empirical studies on overnight visitation, it is often cited in support of the practice. In the view of the present author, the study should be viewed with caution as:

- Pruett *et al.* (2004) did not specifically investigate the issue of attachment, the theory of which provides a central model for understanding early relationships.
- A lack of observed insecurity in a child does not necessarily mean that he or she is better equipped to handle lengthy separations from a primary attachment figure. Children may learn that protesting separation is futile, and may operate passively in an environment unyielding to their emotional needs. As noted by Lamb (2002), it is unclear how well overt behaviour problems index the psychological pain experienced by children.
- Children of divorce can display the effects of pent up frustration and emotion years later, as a delayed reaction. The children in the study may not have been “old enough yet to manifest problems” (Pruett *et al.*, 2004, p. 54).

- The study did not investigate the long-term effects of sleepovers for children beyond the age of seven years.
- Most of the parents reported co-parental conflict not to be a large influence on children's adjustment, whereas in contested forensic cases there is often significant, detrimental parental conflict.

A study and follow-up study by Solomon and George (1999a, 1999b) provide less reason for enthusiasm about sleepover access. These researchers found that overnight access had no positive effect on father-infant attachment. Infants in divorced families who had regular overnight visits with their fathers were significantly less likely to be classified as secure and more likely to be classified as disorganized or unclassifiable in their maternal attachment than infants in a married comparison group. Moreover, regular overnights were associated with more anger, resistance and provocation in toddlers toward their mothers.

Opponents of sleepover access find importance in the fact that young children whose parents were married were more securely attached than young children of divorce who slept at fathers' homes. However, the Solomon and George study (1999a, 1999b) is limited and the sample may not generalize to all custody cases. The study did not compare the consequences of overnight contact for children of divorce with the consequences of no overnight contact for children of divorce. In addition, the infants and toddlers, who had not lived with both their parents, may not have established attachments to their fathers before the overnight visits. Some of the infants experienced extended and repeated separations from their fathers, which could have undermined these relationships further.

Kibbutz studies are also used to argue against overnight visitation. Kibbutz children who spent nights away from their parents were more likely to be insecurely attached than children who were away only during the day (Sagi, Van IJzendoorn, Aviezer, Donnell, & Mayseless, 1994). Warshak (2002) acknowledges that kibbutz research (Aviezer, Van IJzendoorn, Sagi, & Schuengel, 1994) has found a lower percentage of secure maternal attachments than is normally found among infants in intact families (but points out that even under conditions far removed from those considered ideal, many children were able to form and sustain secure attachments).

There are no known studies investigating the pros and cons of sleepover access that do not have significant limitations. Most research on separations of children and caregivers has been conducted in contexts such as hospitalisation or residential care for weeks or months in strange environments with unfamiliar caregivers, and in some cases distressing medical procedures (Weinfield, 2002). Researchers who are suspicious of policy recommendations for overnight sleepovers criticise such proposals as based on methodological shortcomings and illogical conclusions.

Much vaunted policy recommendations for overnight visitation, proposed by Michael Lamb (2002), can be criticised on a number of grounds. Lamb (2002) recommends frequent transitions for infants and toddlers despite citing research that infants and toddlers cannot tolerate separations easily. Moreover, Lamb (2002) acknowledges, "The amount of time spent together is not the only factor affecting the development of attachments. Although some threshold level of interaction may be necessary, even brief opportunities for regular interaction appear sufficient" (p. 300). Lamb (2002) presents no research that benefits cannot be derived from activities that are not reliant on removing infants and toddlers from the ready presence of their primary attachment figure. He also provides no research demonstrating the benefits meant to accrue from his recommendations. Fathers may interact with their children in ways other than overnight activities without seeming to impede the formation of attachment relationships (Weinfield, 2002).

According to Weinfield (2002), secondary caregivers may provide children with activities different from that of primary caregivers, such as more cognitive stimulation and socialization interactions. She believes that Lamb's (2002) proposals might deprive children of important, although incompletely understood, relationship experiences, with unintended consequences.

Another contradiction is that proponents of sleepover contact sometimes extend their recom-

recommendations to include a week or so of holiday contact. This is despite opinion by even ardent proponents of sleepover access that most preschool children become stressed and unnecessarily overburdened by separations from either parent that last more than three or four days (Kelly & Lamb, 2000).

Legally contested matters

Most researchers recommend a case-by-case analysis in order to determine the risks and benefits of sleepover arrangements. A system for forensic evaluators to assess contentious sleepover issues is provided by Gould and Stahl (2001), who recommend six dimensions for consideration: (i) the parenting history of the child; (ii) the attachment history between the infant and each parent; (iii) ways to maximize strengths and minimize weaknesses of each parent's skills and parent-child interactions across different daytime and night-time domains; (iv) the temperament of the child; (v) communication between the parents; and (vi) care of the child by a caregiver or caregivers other than the parents.

These dimensions are often difficult to discern in adversarial contexts. Competing parents often make one-sided claims about the emotional security or insecurity of children in their care and during transitions, and observing attachment patterns in situ is complicated and costly. There is anecdotal information of assessors spending so much time observing a young child in a parent's home that they have been considered a nuisance and *harassing*. In some matters, expert witnesses have accompanied parents on holidays to observe children, resulting in questions about patronage and neutrality.

Dysfunctional communication between parents as a reason to deny overnight visitation is also controversial. Most researchers (Kelly & Lamb, 2000; Solomon & George, 1999a) believe it is important for parents to share perceptions and to synchronize contact transitions to accommodate their young children's temperaments. However, there are disagreements whether adequate communication should be a *condition* for sleepover contact. Some practitioners contend that reactive and conflict-ridden parent interactions prevent parents from jointly ascertaining and accommodating their young children's needs, and that the child's superseding interest in developing a healthy, secure attachment to one "good enough" parent should take precedence over night-time contact for the non-resident parent. Others place faith in divorce education, mediation and arbitration interventions to reduce conflict and to promote communication. Kelly and Lamb (2000) recommend that even if parents cannot discuss issues easily because of conflict between them, they should still use a parent book and/or the services of a case manager to discuss important issues such as sleeping and eating routines, illnesses, and soothing techniques.

Kelly and Lamb (2000) believe that communication quality should not be judged on the level of conflict surrounding and encouraged by litigation. Parental conflict usually declines substantially following divorce (King & Heard, 1999). However, 8–20% of parents remain highly conflicted (depending on the study and measures used). Bruch (2006, p. 306) states that given the time it takes to finalize a contested divorce or custody case, it is "is thoroughly unlikely" that inter-parental conflict will have cooled by toddlerhood. She believes it is naive to expect parental conflict to decline when parents are actively litigating following the psychological enormity of a relationship breakdown during pregnancy or shortly after childbirth.

Solomon and George (1999a) found that high parental conflict and poor communication, especially during transitions between parents' homes, were related to insecure, disorganized infant-mother attachments. Behaviours associated with disorganized attachment "suggest the presence of serious threats to healthy psychological development of the child, and serious shortcomings in the parent's ability to provide well-attuned and empathic caretaking and for the child's safety" (Lee, Kaufman, & George, 2009, p. 62). When efforts to achieve a shared-parenting environment fail, conclude Solomon and George (1999a), clinicians and the courts may have to accept at least temporarily that the best interests of the young child are not synonymous with fairness to both parents.

DISCUSSION

Both proponents and antagonists of sleepover contact for young children draw heavily on attachment theory and research, but there is a paucity of controlled studies that explicitly and adequately investigate the risks and benefits of sleepover contact. Available literature suggests that there may be some benefits to sleepover contact when parents cooperate. With cooperation, both parents can nurture a positive attachment with their child across a range of rewarding or soothing night-time and daytime activities. Neither parent has to fear losing ground if he or she needs advice or assistance from the other. The parents may decide that a crying child who cannot be pacified in the middle of the night should be returned to the other parent without negative inferences being drawn for further visits. However, in contested matters, there are considerable risks. Returning a distressed child in the middle of the night (or day) could be access suicide. Despite the child's interests to return to the other parent, a non-resident parent may battle on with an unhappy child rather than face the prospect of allegations of parenting deficits or relationship problems. With both day- and night-time contact, the parent may cling to time with the child to avoid providing the other party with legal ammunition, thereby compromising the distressed child's experience of the primary attachment figure as a ready presence.

There are clearly differences between night and day activities, but a more obvious risk to children is prolonged separations from a caregiver. Proponents of sleepover access do not dispute that in the early years protracted separations from a primary caregiver unduly stress developing attachment relationships and are hazardous to emotional development (Lamb, 2002). While the difference between day and night activities is interesting and possibly significant, the crucial question is, for what length of time can an infant or toddler comfortably tolerate repeated separations from the primary attachment figure? There are no known aggregate research data available based on human infant studies, and different children are likely to have different reactions.

Repeated, desperate protests can be expected when a child's secure base is threatened. When such protests subside, this may indicate either that the child is feeling more secure or that the child is manifesting a form of *learned helplessness* (Seligman, 1975). The latter has serious implications, as psychological problems like clinical depression can result from a perceived absence of control over the outcome of a situation. Assessment of children's best interests should therefore include consideration of attachment styles as characterised by protest and reunification dynamics.

In contested cases, parental agendas are promoted, plausible explanations for a child's functioning are typically twisted to suit one-sided allegations, and the child's interests may be missed. A lack of parental cooperation results in considerable risk for an infant or toddler made to spend extended time away from his or her primary attachment figure. In order to protect the best interests of children, each case should be assessed individually with reference to, amongst other things, processes of separation, reunion and attachment.

Traumatic separation from a primary caregiver can result in arrested right brain development and pernicious emotional consequences (Schore, 2005, Schore & Schore, 2008), and secondary attachment figures may interact with their children in ways other than overnight activities without seeming to impede the formation of attachment relationships (Weinfeld, 2002). Given this, the necessity for overnight contact may be more a case of parental or legal demands than in the best interests of the child. In instances where a very young child's relationship with a secondary attachment figure can be adequately safeguarded through regular, non-prolonged contact, insisting on overnight access that is more protracted than daytime contact may be a case of overkill. Shifts in public policy and practice that promote the easy granting of overnight contact in adversarial contexts should not be accepted uncritically.

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