PRACTICAL WORKING GUIDE / ENGLAND AND WALES

Witness Statement Skeleton - Family Court (England and Wales)

EvidenceCanvas

A fill-in structure for a factual witness statement, with the rules it follows

Jurisdiction: England and Wales

Reviewed: 21 September 2026

> This skeleton gives you the required structure and the rules behind it. It is not legal advice, does not tell you what to include in your case, and does not guarantee a court will accept your statement. Practice Direction 22A and any court order in your case take priority. If your statement is for a different court or jurisdiction, check the rules that apply.

How to use this skeleton

Copy the structure below into your word processor. Replace the [bracketed] text. Keep the paragraph numbering. Every fact gets its own numbered paragraph with its date and source. Write in your own words, in the first person. Keep arguments, opinions and feelings out of the statement - the facts, dated and sourced, do the work.

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1. Heading block (top right-hand corner of the first page)

PD22A paragraph 3.2 requires the following, clearly written at the top right of the first page (and on the backsheet):

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IN THE FAMILY COURT AT [court name]

Case No: [case number, e.g. XX00XXXX]

BETWEEN:

[APPLICANT NAME]                    Applicant

- and -

[RESPONDENT NAME]                   Respondent

STATEMENT OF [FULL NAME]            [e.g. Respondent's 1st statement]

Dated: [DD Month YYYY]
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- Party for whom the statement is made
- Your initials and surname

- The number of the statement (your 1st, 2nd...) in the proceedings
- The identifying initials and number of each exhibit referred to (e.g. AB1)
- The date the statement is made

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2. Opening paragraphs - who you are

PD22A paragraph 4.1: the statement must, if practicable, be in your own words and expressed in the first person. It must indicate which statements are from your own knowledge and which are matters of information and belief, with the source (paragraph 4.3).

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1. I am the [applicant/respondent] in these proceedings. I am [full name] of
[address]. I make this statement in support of [my application / my response
to the application dated DD Month YYYY].

1. The facts stated in paragraphs [X] to [Y] below are stated from my own
knowledge unless otherwise stated. Where a matter is within my knowledge
only from another source, I state the source.
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Rules this follows:

- First person, own words (PD22A 4.1)
- Distinguish own knowledge from information and belief, and give the source (PD22A 4.3)

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3. Body - one fact per numbered paragraph

PD22A paragraph 4.4: it is usually convenient to follow chronological order; each paragraph should be confined to a distinct portion of the subject.

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1. On [DD Month YYYY] at approximately [time], [what happened, in plain factual
language]. This was [my own observation / recorded in - see exhibit AB1,
page N].

1. On [DD Month YYYY], [next event]. [Source if not your own knowledge: "The
school told me this by telephone on DD Month YYYY - I make this paragraph
from that information and belief."]

1. On [DD Month YYYY], [next event]. I refer to the [description of document]
marked exhibit AB2.
```

Rules for the body:

- One event, one paragraph. If a paragraph needs "and also", it is probably two paragraphs
- Facts in date order (PD22A 4.4)
- Every paragraph ends with its source: a document, an exhibit, or "my own knowledge"
- All numbers, including dates, in figures (PD22A 3.3(f))
- Give document references in the margin or in bold in the body (PD22A 3.3(g))
- State facts, not conclusions: "The message said X" is a fact; "She is lying" is an argument. Arguments cost credibility; let the documents show the contradiction
- Do not quote whole conversations when one dated line suffices
- If accounts differ, state the other account as an attributed statement with its source - do not argue with it

Referring to exhibits (PD22A 4.5): when referring to a document, use the wording "there is now shown to me marked "AB1" the (description of exhibit)". Example:

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1. On DD Month YYYY I received the email from [school] dated DD Month YYYY.
There is now shown to me marked "AB1" a printout of that email correspondence.
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4. Exhibits

PD22A paragraphs 9.1-9.4 and 10.1-10.2:

- A document used with your statement is **exhibited** - it remains a separate document, verified by you, identified by a declaration (a certificate) at its front identifying the statement it belongs to
- The **first page of each exhibit** carries the same identification as your statement (party, your initials and surname, statement number, date) **and the exhibit mark** used in the statement (PD22A 9.3)
- If you make more than one statement, exhibit numbers **run consecutively through the case** (AB1, AB2, AB3...), they do not restart (PD22A 9.4)
- Letters are collected into a bundle, arranged **chronologically with the earliest at the top**, with a front page stating whether it is original letters or copies, numbered consecutively (PD22A 10.1-10.2)
- Every page of an exhibit must be clearly legible; where an original is illegible, add a typed copy, paginated with "a" numbers (PD22A, exhibit paragraphs)
- Court documents must not be exhibited (PD22A 11.2)

Exhibit front-sheet skeleton:

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IN THE FAMILY COURT AT [court name]        Case No: [case number]

EXHIBIT AB1

This is the exhibit marked "AB1" referred to in the statement of

[FULL NAME] dated DD Month YYYY.

Signed: .....  Date: DD Month YYYY

[FULL NAME]
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5. Statement of truth and signature

PD22A paragraph 6.4 requires a witness statement to include a statement of truth in these terms:

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I understand that proceedings for contempt of court may be brought
against anyone who makes, or causes to be made, a false statement in
a document verified by a statement of truth without an honest belief
in its truth.
I believe that the facts stated in this witness statement are true.
Signed: .....  Date: DD Month YYYY
[FULL NAME]
```

- The statement must be **signed and dated** by you
- Attention is drawn to **rule 17.6** of the Family Procedure Rules 2010, which sets out the consequences of verifying a statement containing a false statement without an honest belief in its truth (contempt proceedings)
- Do not sign until every fact in the statement is one you honestly believe to be true on the evidence you have cited

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6. Format checklist before you finalise

PD22A paragraph 3.3:

- ☐ Durable A4, 3.5 cm margin
- ☐ Legible, normally typed, one side of the paper only
- ☐ Pages numbered consecutively (as a separate document or within a file)
- ☐ Divided into numbered paragraphs
- ☐ All numbers, including dates, in figures
- ☐ Document references in the margin or bold in the body
- ☐ Heading block complete (party, maker, statement number, exhibit marks, date)
- ☐ Every paragraph: one fact, a date, a source
- ☐ Arguments, insults and speculation removed
- ☐ Statement of truth wording exactly as above, signed and dated
- ☐ You have kept a copy, and the version you file is the version you keep

Common fails to avoid

- Emotional openers ("It is obvious that...", "Everyone knows...") - delete
- Repeating an allegation many times instead of dating and sourcing it once
- Quoting whole message threads when one dated line proves the point
- Paragraphs that bundle several events - split them
- Missing page references to exhibits
- Arguing with the other party's statement inside your facts - map the difference, don't fight it here
- Filing an unproofed draft: spelling of names, dates in figures, exhibit marks all correct

Sources reviewed

- Practice Direction 22A - Written Evidence (supplements FPR Part 22), paragraphs 3.2, 3.3, 4.1, 4.3-4.5, 6.4, 9.1-9.4, 10.1-10.2, 11.2: https://www.justice.gov.uk/courts/procedure-rules/family/practice_directions/pd_part_22a
- Family Procedure Rules 2010, Part 17 (statements of truth; rule 17.6 consequences), Part 18 (rule 18.11), Part 22 (evidence): https://www.justice.gov.uk/courts/procedure-rules/family
- PD27A (family procedure bundles - statements as a bundle section): https://www.justice.gov.uk/courts/procedure-rules/family/practice_directions/pd_part_27a

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