Removing a child from his or her home is one of child welfare’s most difficult – and impactful -- decisions. The goal of this research is to understand how differences in the process of decision-making regarding removal can impact the services offered to children and families around the world. Researchers in Norway, Finland, England and the US have reviewed the policies and procedures shaping decision-making in order to learn from one another about opportunities for program enhancements.

In each of the four countries included in this study, child welfare workers encounter many similarities in their daily experience of decision making. Child welfare policy in all four countries gives child welfare workers limited authority to intervene in, and to temporarily remove children from their homes. In each nation, children and families engage with a child welfare worker who is responsible for providing assistance to the family and making recommendations for appropriate care. Prevalence rates are similar: about 8/1000 children in all four countries live in out-of-home care in any given year. Each country uses a mix of kinship care and non-kinship care in providing out-of-home care for children.

Differences between the four countries include the degree to which child welfare policy is envisioned as a “child protection” or “family support” system, and the specificity of regulations governing workers’ decision-making. Each country varies in its intervention threshold and in what interventions it offers prior to, or in addition to child removal. And the countries vary in the amount of time workers are allocated to make decisions, and the nature and type of evidence they must present. The inclusion of children and parents in decision-making is one of the most dramatic differences between the four countries. These are the dimensions along which child welfare service systems in each country will be described in the following paragraphs.

UNITED STATES
It is problematic to describe US child welfare as a single system; each state and local jurisdiction may approach practice somewhat differently. Broadly speaking, however, service provision in the United States is based on a “child protection system,” emphasizing the protection of children from clear and present harm. Most children placed in out-of-home care are under the age of six, and of those who reunite with their parents, as many as one third will return to care. The threshold for intervention is high – that is, a child must be at serious risk of harm before the state will intervene. When it does, its hand tends to be heavy. For example, in 2012, for every three children to whom the state offered in-home services, one child was in out-of-home care. Although some workers may involve parents or children in decision-making, this is not required when considering involuntary removal.
Workers are guided by strict timeframes, extensive regulations, and the findings of evidence-based practice. Thus, when invoked, the US child welfare system exercises swift and comprehensive jurisdiction over the lives of its children. The child welfare system in the US is undergoing profound changes, which are modeled after some of the service design characteristics of its European counterparts. Nevertheless, we still see sharp differences between the countries in terms of philosophy and approach.

NORWAY
Most notably, characteristics of the US child welfare system contrast greatly with the Norwegian child welfare system, which employs a holistic interpretation of child welfare rather than solely focusing on child protection. Its goal is to prioritize children’s “best interest” and give each child the same basic opportunities. As a result, the state intervenes at a lower threshold in Norway than in the US. Workers administer services based on both child protection and child advocacy: protection from potential harm (as in child removal), and advocacy toward securing basic resources. Parents and affected children (who tend to be older than their US counterparts) are entitled to participate in decisions affecting them according to their ability. Norway’s child welfare system is fairly decentralized. Workers operate within generous timeframes guiding their investigation and decision-making. The state imposes few directives and research-based models to dictate local agency practices. Instead, decisions are typically made according to the child welfare worker’s best judgment in consultation with parents and children. These practices shape a diffusely structured, holistic support network for children in which they and their parents are extensively involved.

FINLAND
Finland’s conceptualization of its child welfare system extends beyond holistic child welfare to holistic family support. Finnish policy and child welfare workers do not differentiate between concerns like abuse, neglect, or mental illness, but instead identify a “need for child welfare,” which is investigated according to the milieu of the family. In Finland, the “need for child welfare” extends to situations in which either the child’s caregivers or the child’s own behavior pose a threat to his or her development. Children may be eligible for intervention or removal based on either of these criteria. This contrasts with both the Norwegian and US systems, which envision child removal as a result of abuse or neglect. The Finnish threshold for intervention is low, and the welfare system is more deregulated and decentralized than the Norwegian system. Child welfare workers have wide latitude in decision-making, which they do with no restrictions on the timeframe. Children and their parents are extensively involved in the child welfare and child removal
process in Finland. Of the four countries studied, Finland offers the greatest latitude to child welfare workers and has the greatest involvement of children and their parents in their child welfare system.

ENGLAND
Most similar to the child welfare system in the US is the child welfare system in England. The English system contains more central guidance, directives and managerial oversight for child welfare workers than does the US. Like the US, the child welfare system in England may also be conceptualized as a child protection model, though, like Norway and Finland, its ideological focus is on the overall welfare of the child. Many of England’s interventions are incorporated into community prevention programs. In the higher-threshold cases of individual intervention, efforts to include the parents and the perspective of the child are mandatory. Both internal and external oversight are critical to this process. No statutory timeframe is imposed on the agency for the ultimate decision to apply to court for the involuntary removal of a child from his or her home, but recently a tighter time limit has been introduced for the proceedings. England’s system may be seen to contain aspects of the procedurally-oriented US system and the more practitioner-based, intimately focused Nordic systems.

The similarities and differences between countries offer an important opportunity to reflect on intra-country practices and to learn from others. The US and English systems, which rely on agency policy and state regulations in decision-making, might find value in closely examining the ways that parents and children are offered voice in the Nordic systems. The more diffuse Nordic systems, which rely on individual practitioner judgment, may consider the possibilities associated with research-based tools for decision making. Each may move toward more intentional inclusion of children’s voices in their service needs and out-of-home placements. To this end, a survey in the next phase of this study asks child welfare workers in each of the four countries about factors affecting their decision-making, and the decisions they make based on common policies and practices in their respective countries.

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