

# Child Protection in Europe: Development of an International Cross-Comparison Model to Inform National Policies and Practices

Trevor Spratt<sup>1,\*</sup>, Jachen Nett<sup>2</sup>, Leah Bromfield<sup>3</sup>,  
Johanna Hietamäki<sup>4</sup>, Heinz Kindler<sup>5</sup>, and Lina Ponnert<sup>6</sup>

---

<sup>1</sup>*Trinity College Dublin, 30 Anglesea Street, Dublin 2, Ireland*

<sup>2</sup>*Berner Fachhochschule/Bern University of Applied Sciences Soziale Arbeit, Hallerstrasse 10, CH-3012 Bern, Switzerland*

<sup>3</sup>*University of South Australia, Centre for Child Protection Hawke Research Institute, Arthur Lemon Ave, Underdale, SA 5032, GPO Box 2471, Adelaide SA 5001, Australia*

<sup>4</sup>*University of Jyväskylä, Department of Social Sciences and Philosophy, PO Box 35, 40014 Jyväskylä, Finland*

<sup>5</sup>*German Youth Institute, Nockherst. 2, D-81541 Munich, Germany*

<sup>6</sup>*Lund University, School of Social Work, Bredgatan 13, 221 00 Lund, Sweden*

\*Correspondence to Professor Trevor Spratt, AIB Professor in Childhood Research, Director of the Children's Research Centre, Trinity College Dublin, 30 Anglesea Street, Dublin 2, Ireland. E-mail: [spratt@tcd.ie](mailto:spratt@tcd.ie)

## Abstract

We report a five-nations project in comparative child protection to provide recommendations on policy and practice to inform the redevelopment of the Swiss child protection system. The Swiss Federal Government and the Optimus and Oak Foundations commissioned the project—collective title: Association Programme National pour la Protection de l'Enfant. We identify the historical developmental trajectories of child protection systems together with common drivers: *the evidential basis for the prevalence and effects of child abuse, the co-joining of social and economic policies and practices to promote early investment in children, the influence of children's rights and comparative international league tables on child well-being*. We describe the cross-national project methodology and analysis of results. Three key indicators for the performance of national child protection systems are indicated: *creating a culturally sensitive child protection governance framework, building a relational heart and using evidence to inform policy and practice*. These encapsulate the recommendations made with respect to the Swiss child protection system. The results provide a prototype model with potential utility in similar

cross-national studies, and add weight to the argument that cross-cultural learning in the context of a globalised society is not only possible, but desirable.

**Keywords:** Child abuse, children and families, child protection, comparative social work, international social work

*Accepted: August 2014*

## Introduction

Child protection has become, arguably, *the* public issue of our time. This is demonstrable in a number of ways, the most immediately apparent being the widespread coverage in the media of untoward childhood events, often involving the death of children at the hands of care-givers. Whilst child deaths may be the leitmotif for any discussion with regard to the protection of children, this concern is superseded by debates concerning the vulnerability of a much greater number of children whose experience of abuse and adverse social circumstances impinge on their developmental trajectories (Spratt, 2009). As a result, we have come to think, in an ecological sense, of the environment surrounding childhood as either toxic to, or of enhancing of, optimal child development.

In this paper, we argue that these all-embracing concerns for the well-being of children, whilst mediated by culture, are not distorted by locality and nationality to the extent that they render international comparison between child protection systems nugatory. On the contrary, we argue that the evolutionary trajectory of child protection systems has created common understandings with regard to what is harmful to, or supportive of, optimal child development. Whilst systems may differ in reflecting, for example, contrasting relationships between the state and the family, other forces are at work to increase pressures toward homogenisation of child protection system goals, as well as means to achieving these (Gilbert *et al.*, 2011). In part, this recently observed convergence has been generated by international league tables making visible to the gaze the performance of nation states in relation to the welfare of their children (Ben-Arieh *et al.*, 2013). The resulting normative standards against which nations are judged are not merely technical, setting key performance indicators for childhood development, but also reflect a wider moral discourse in which the rights of children, as citizens, to protection are enshrined within the United Nations Charter on the Rights of the Child (UNCRC).

In this paper, we report a five-nations project in comparative child protection practices commissioned by the Swiss Federal Government, in partnership with the Optimus and Oak Foundations (under the collective title: the Association Programme National pour la Protection de l'Enfant (Nett and Spratt, 2012)). The project was commissioned to provide recommendations on best practices in policy and practice to inform the renewal and

development of the Swiss child protection system, including child protection legislation. Our starting point was an initial hypothesis that the collation of knowledge gained from five national studies would first make comparisons between the child protection systems represented possible. And that such comparison would enable deduction of learning and transferability of knowledge with respect to informing the development of best policies and practices in Switzerland. The results of our project provide a prototype model with potential utility in similar cross-national studies, and add weight to the argument that cross-cultural learning in the context of a globalised society is not only possible, but desirable (Cameron *et al.*, 2007).

## **'Trade routes' in comparison of child protection systems**

To provide a context for the project, it is important to locate it within one of the prevailing directions of comparative international trade routes as reported in the literature. Three main trade routes in the comparison of child protection policies and practices may be identified. By far the most common of these is between, what are variously termed, Anglophone, Anglo-Saxon or neo-liberal nations (Gilbert, 1997). As the first term suggests, this is influenced by a common language making for ease of communication, although this rationale is becoming increasingly undermined by the proliferation of English as the language of choice in international forums. The migration patterns of the seventeenth, eighteenth and nineteenth centuries served to embed Anglo-Saxon cultural patterns in countries geographically distant from one another, principally North America and Australia. Whilst the resulting cultural hegemony has been eroded by the rather different migratory patterns of the twentieth and twenty-first centuries, it still remains dominant within the powerful echelons of these societies, especially governmental structures and academia. In modern times, neo-liberal economic influences have come to characterise the fiscal and social policies of these nations to varying degrees, eroding somewhat the mediating institutions which 'glue' together society and exposing governments and professionals alike to a public who hold them directly responsible for perceived errors or system malfunctions (Hayes and Spratt, 2009). An example of this has been public intolerance in relation to the deaths of children at the hands of their care-givers where professionals have been involved (Ayre, 2001). Holding professionals responsible has led to the development of defensively orientated bureaucratic child protection systems, with much of the content of comparative studies focusing on the development of forensic techniques to manage risks to children (Zeira *et al.*, 2008). In such a refinement of systems, however, the promotion of good communication (Glad, 2006) may mask a deeper reflex to deflect potential blame by cascading of responsibility through managerial structures and via professional protocols (Hayes and Spratt, 2014).

The second trade route is that between what are sometimes referred to as *developed* or *Westernised* nations and those regarded as *developing*. A particular phenomenon, following the collapse of the former Soviet Union, has seen the emergence of new nations to the east of Europe and the political and social emancipation of old nations to the near east of Europe (Jack and Jordan, 1998). This has resulted in a thriving industry in cross-national European Union projects designed to build social infrastructure. Some countries, such as Romania, whose physical and social capital had been greatly degraded under political dictatorships, required immense structural investment, leading to proliferation of charitable and cross-national organisations providing help in the form of direct services and training (Crawford *et al.*, 2006). Such efforts now form part of strategic initiatives by international organisations such as the United Nations Children's Fund (UNICEF) who provide consultancy and advice in relation to the development of child protection systems as informed by international best practices. There is also a steady stream of reporting in the literature in relation to such projects and accompanying research on methods of intervention (Shardlow and Walliss, 2003).

The third trade route, and the one of particular relevance here, is West European intra-continental comparisons, with particular focus on child protection systems. Despite relative proximity, comparable standards of economic and social development and increasingly integrated social policies as a result of the influence of the European Union, this particular trade remains somewhat underdeveloped. There are a number of reasons for this. The UK and Ireland have tended to follow the fortunes of Anglophone nations with neo-liberal welfare regimes and, as a consequence, display limited interest in their near neighbours in Europe; there are, of course, notable areas of exception, including the recent interest in social pedagogy (Stephens, 2013). Continental European nations, reflecting differing social and economic traditions, such as neo-liberal, social democratic and Mediterranean policy regimes (Esping-Anderson, 1990), have often limited their cross-border trade to privilege those nations with similar traditions (Pösö *et al.*, 2013).

These traditional trade routes, being long established, have proved resistant to change. We can, however, detect some indications that neo-liberal regimes have a developing interest in examining ways of reaching a broader range of children, and look to the states wherein the social contract between the state and the family make possible more agreeable partnerships in addressing core child protection concerns within the context of broader issues concerning the welfare of children (see, e.g. *Protecting Children in Europe*, Harder and Pringle, 1997).

Some have argued that national differences make it difficult to effect and interpret cross-national studies in child protection, with *culture* cited as the monolithic barrier. For example, Andrew Cooper observes, in evidence given to the Scottish Executive (2002), that intra-continental trade has

been hampered by the ‘complex ways in which cultural differences between countries imbue approaches to child welfare and child protection’ (p. 8). And that ‘the complex, unique and holistic character of child protection systems means that simple translation of practices or institutions from one national context to another simply won’t work, because they are systemically related to everything around them’ (pp. 131–2). Cooper proceeds to argue, however, that it is possible to develop *principles* which help create the essential conditions for effective child protection systems. We would argue that this is a good starting point and that shared principles may begat increasing commonality in policies and practices. Such principles derive from and are driven by a number of identifiable common imperatives.

## **Common imperatives driving the development of child protection systems**

The common imperatives may be identified as: epidemiological evidence for prevalence and effects of child abuse, the related need for early investment in children, centrality of children’s rights and international league tables comparing performance in protection arrangements for children.

### **Prevalence and effects of child abuse**

We now better understand the long reach of childhood abuse, in terms of both prevalence and life-long effects upon individuals. It is estimated that:

4–16% of children are physically abused and one in ten are neglected or psychologically abused. During childhood, between 5% and 10% of girls and up to 5% of boys are exposed to penetrative sexual abuse, . . . however official rates [those children referred to child protection services] indicate less than a tenth of this (Gilbert *et al.*, 2008, p. 70).

Such statistics, however, greatly underestimate the effects of adverse circumstances upon children as they represent a narrow definition of child abuse and do not include the wider range of harms evident in adverse social circumstances (such as poor parental mental health), which have been demonstrated to have particular toxicity when experienced cumulatively with child abuse (Spratt, 2012). This empirically informed reconceptualisation serves to greatly increase numbers of children requiring protection from such harms (Anda *et al.*, 2010).

### **Early investment in children**

In line with the ‘social investment state’ (Giddens, 1994), wherein children are seen as primary investment sites for strategies to improve the global competitiveness of nations, attention has come to be focused on those children predicted to cost much in terms of high levels of service provision and

diminished production of tax returns across the life course (Heckman, 2006). Children who have experienced child abuse and/or adverse social circumstances, particularly in combination, have greatly increased probability of experiencing poor economic outcomes and are therefore of interest to economists and policy makers in relation to early identification and targeted delivery of services to prevent costly life-time trajectories (Spratt, 2012).

## Children's rights

The UNCRC has proved to be a powerful legal and ethical benchmark for the development of national legislation and policies. The Convention contains clear principles on the rights of children to be protected and to be provided with services. Article 19 is of particular importance, stating that children be protected from 'all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse'. Progress reporting requirements leave national governments open to examination, potential embarrassment and moral compromise if compliance is less than fulsome.

## International performance tables

Increasingly, international bodies chart the progress of countries in relation to child well-being, seeking to develop and use comparable data to do so. The UNCRC provides one example of this in the field of child protection; others include the World Health Organisation (WHO) who has published extensively on intercountry comparisons of incidence of and response to child abuse cases (Butchart *et al.*, 2006). UNICEF also publishes indexes of deaths from child abuse (2003) and on the health and safety of children in rich countries (2007). Academics too have expressed a growing concern to chart and provide analysis as to the efficacy of child protection systems (Gilbert *et al.*, 2011). The difficulty here is that incidence measures are a poor proxy for prevalence, and system output measures tell us little about outcomes for children. For example, a study examining data collected by Concerted Action on the Prevention of Child Abuse in Europe (a two-year, nine-country action) from child protection services found data difficult to compare, commenting that 'each country responds (in varying ways) to the prevention of "child abuse" at the conceptual, almost ideological, level with very little evidence of effectiveness' (May-Chahal *et al.*, 2006, p. 15). Despite such difficulties, international league tables make governments sensitive to possible criticism as their policies and practices may be interpreted negatively. In turn, this creates a moral imperative to demonstrably improve child protection policies and practices for children.

The collective weight provided by these common imperatives has fuelled government initiatives to examine their own child protection system

performance against those of comparable countries to provide a basis for establishing best practices to inform improvement and renewal. These key stimuli offer a backdrop to the project in Switzerland.

## Description of the project

The two key aims of the project were: first, to examine the evidence for the effective delivery of child protection services in countries with comparable levels of economic and social development to Switzerland; and, second, to identify how practices in these countries might inform the development of the Swiss child protection. The four objectives were to: (i) design a case study template to ensure each national case study systematically covered prescribed areas to facilitate a cross-national analysis; (ii) recruit national experts and commission five national case studies; (iii) analyse the case studies to identify practices to inform the development of the Swiss child protection system; (iv) subject the recommendations to examination by a panel of Swiss experts to ascertain potential for applicability in the Swiss context. Final recommendations could then be made to the Association Programme National pour la Protection de l'Enfant. The objectives are described in detail below.

### Design of case study template

In designing the case study template, we were cognisant of the need to locate the experiences of each country within the interrelated concepts of history and culture. In a study involving six nations, Heatherington and colleagues comment on the national structures that govern national child protection systems: 'None of these structures exists in a vacuum; a change in one part affects the working of other parts, and all function within the limits imposed by the culture and history which they are embedded' (1998, p. 77). Consequently, as Skehill (2004) has observed, we need to understand present child protection arrangements as being built on past genealogies. On description of such historical foundations, we required structural accounts of the development of child protection systems, specifically: legal and policy frameworks, the role of Non-Governmental Organisations (NGOs), interrelationships between central government and local authorities, national databases for child protection activity, and outcomes and examples of intervention strategies.

### Commission of five national case studies

National experts were recruited to the project to produce national case studies and participate in the cross-national analysis. The countries represented were Finland, the UK, Sweden, Germany and Australia. Whilst the first four nations share a common continental heritage, Australia was also included in the project as the relationship between federal and state governments has

significant points of comparison with Switzerland, where the twenty-six Cantons have a high degree of self-governance which makes implementation of any national policy a complex undertaking.

### Analysis of case studies and first iteration of recommendations

After completion of national case studies, the project team undertook a cross-national comparison. This involved a thematic identification of historical trajectories in the development of child protection policy and practice (described in detail below) and elucidation of emergent shared aspirational goals, as informed by the children's rights agenda and evidential practice discourse. This process informed the first iteration of the recommendations for Switzerland. These recommendations covered three key areas: foundational legislative and governance arrangements for child protection systems, intermediate features including relational issues in the organisation of child protection systems at locality level, and service delivery features to include best practices in securing good outcomes for children.

### The expert panel and second iteration of recommendations

The first iteration of findings was then presented to an expert panel, comprising the key disciplines involved in child protection and senior managers of services representing different Cantons. At this meeting, each recommendation was subjected to a practical interrogation as to applicability in the Swiss situation. As a result of this process, a few recommendations were removed and others adapted. It was evident during this process that some Cantons could see the applicability of some recommendations more easily than others; for example, French-speaking Cantons tended to favour those recommendations that strengthened centralised approaches to governance arrangements, whilst German-speaking Cantons, working from the principle of *subsidiarity* (wherein issues such as child protection are dealt with at the most proximal local levels), found these recommendations to be more culturally challenging. In fact, such tensions are a microcosm of Swiss society wherein policy development at the federal level involves building a consensus across the different cultural norms and perspectives represented by Canton governments. Following this process, the final project report was presented to the Association Programme National pour la Protection de l'Enfant (Nett and Spratt, 2012).

## Developmental trajectories of child protection systems

In our analysis of the five country case studies, we were able to identify three historical stages in the development of child protection systems in Europe; these are classified as *Early*, *Intermediate* and *Modern*, with the last stage featuring six phases. This foundational analysis provided evidence of a



consensus as to the purposes of modern child protection systems and a rationale for knowledge transfer. This is in line with the observation by Hackett and colleagues that a growing European identity has helped in the process of developing common responses to social problems, it being:

... increasingly recognised that far from being a purely local response to social issues with individual nation states, many of the key issues facing individual countries within Europe are shared ... In the context of globalization, we are learning that social problems do not recognise national borders (Hackett *et al.*, 2003, p. 164).

### Early developments in child protection systems

Early developments do not naturally co-occur across nations at once, with timing being a product of a multitude of factors, including industrialisation and urbanisation. These two features were influential in making families more vulnerable to the hazards created by industrial capitalism and in causing children to become more visible to the gaze of others, leading to growing concerns for their moral and physical welfare. Alongside economic and social developments, the nature of European states was also changing, with states becoming much more powerful, able and willing to 'govern' their populations (Maier, 2012).

As is the case in developing nations today, early efforts in relation to protecting children in Europe were focused on those *street children* whose basic needs were not being met, with concerns that some would become *juvenile delinquents*. Early intra-country debates as to whether or not it was best to configure separate services to address *presenting problems* (destitution or criminality) or integrate such services in recognition of the common antecedents of such presenting problems provide an early echo of similar contemporary debates. For example, in Sweden, the Children Act of 1902 was built on the belief that a secure upbringing would prevent youth criminality; as a consequence, contemporary Swedish correctional and social services have joint responsibility for youth involved in criminal activities. It was evident from our national case studies, however, that the state basis for interference in family life at this early stage, as expressed in legislation and policy, was narrowly prescribed, with legislators reflecting concerns to both address the needs of, and protect society from, street children. The most common service response was to establish residential care facilities, often run by churches and charities, whose scale and scope reflected the industrial institutions of the day.

### Intermediate developments in child protection systems

Later developments are characterised by two key features: acknowledgement that children may be at risk in their own homes, and that new types of services were required to enable the state to protect children. Such measures are expressed in the formulation of new laws and policies and represent the

two foundational building blocks upon which modern child protection systems are built. The first of these is a view that some families by virtue of action or inaction represent risks to their children in ways that mandate state interference to secure their immediate protection. The second is recognition that poor social conditions provide common antecedents for detrimental outcomes for families and their children. This leads to the development of social protection arrangements, combining economic and social policies to create *safety nets* for families.

These foundational blocks are sometimes represented in the literature as dualities, with modern systems characterised as being built primarily on one or the other (Gilbert, 1997). Whilst such dualities may serve an important function in identifying national child protection system orientation, it is important to note, as later work by Gilbert and colleagues (2011) on international comparisons of child protection systems acknowledges, that there are also complex intra-national debates taking place. These reflect the tensions evident in developing a child protection philosophy that allows for beliefs that variously accept that change in social conditions provides benefits for most families but that some families may not be able to realise such benefits and may remain a danger to their children. Such debates are increasingly informed by cross-national studies that tend to pull systems toward a normative middle ground, as Hearn and colleagues have observed:

To some extent the systems and practices of the two countries appear to be in a process of change and even moderate convergence, with some apparent movements towards ‘family support’ in the UK and towards ‘legalism’ in Finland (Hearn *et al.*, 2004, p. 38).

In this project, we found that early child welfare state arrangements reflected these twin foundations but did not, as it were, co-locate them systemically. So, whilst we may observe in them the embryonic progenitor of modern child protection systems built on a public health model, they are at this intermediate stage restricted in both ideological and evidential expression.

## Modern developments in child protection systems

Developments within modern child protection systems are identified as key themes. Whilst, in some countries, progression is evident, with one theme building upon and eventually superseding the former, any sense of inevitable progression is inherently problematic. There are rather obvious discontinuities and disparities in such progression, both intra- and internationally. The key themes are therefore *ideal types*, which interact, reoccur and shape the development of a modern system, but not necessarily in progressive stages. Our particular concern is to demonstrate how the problem of child abuse is ideologically identified, acted upon and located within the wider range of services to vulnerable children:

### *Theme 1*

Children require protection because of societal changes, wherein their needs become highly visible and the requirement for services pressing and necessary. Whilst such conditions exist in the early development of systems in the context of urbanisation, they may also reassert themselves in relation to population movements caused, for example, by asylum seeking, and in relation to the trafficking of children. The causes are primarily located in societal or global changes and not generally, within the family.

### *Theme 2*

Children require protection from parents whose pathological features result in the abuse of their children. This relocation of danger to children from the streets to their homes is often attributed to the '(re)discovery' of child physical abuse by Henry Kempe and colleagues in their seminal paper, 'The battered child syndrome' (1962). It is notable that physical abuse, at once the most visible and attributable of all the forms of child abuse, is often the stimuli for development of the procedural infrastructure of child protection systems which have three dominant features: assessment of risk, policing of parenting, and individualistic interventions with victims and perpetrators. This model may act as a default when systems come under pressure to act decisively in the aftermath of child death tragedies. Whilst parental pathology has been much undermined as the cause of physical abuse in light of more recent developmental phases, it retains currency as an explanatory model for child sexual abuse.

### *Theme 3*

Children's families require protection from the effects of structural inequalities. With poverty identified as a factor strongly associated with the occurrence of physical abuse and neglect, policies are developed to ensure adequate provision of resources whilst locality initiatives identify particular neighbourhoods where poverty indicators coalesce, and target these for extra additional services. In this phase, intervention is essentially understood within a welfare state model as addressing cause (reduction of poverty strategies) and effect (amelioration of stressors) and involves a wide range of policies and professional interventions.

### *Theme 4*

The protection of children comes to be conceptualised within an ecological model (Bronfenbrenner, 1986) wherein a wider range of harms and protective factors are located across the concentric and interlocking influences of

family, community and society over time. This theory develops the idea of systemic causation and locates an understanding of child abuse within complex environmental interactions with family functioning. It promotes a nuanced set of protective interventions for children, as risks are located across a wider range of dimensions, not just within the family.

### *Theme 5*

The protection of children becomes understood as a human rights issue, since the implementation of the UNCRC legislation has tended to represent the rights of the child as separate and sometimes different from the rights of their parents. This has led to promotion of the voice of the child, with consideration of their rights sometimes challenging both professional and familial perspectives, especially in relation to decision making involving out-of-home care placements. This has created a shift in perspective from looking at children as primarily *objects* in need of protection to competent *subjects* entitled to such protection.

### *Theme 6*

The protection of children is best effected early, rather than late. Those populations most at risk of suffering child abuse, or indeed having outcomes detrimental to well-being, may be identified on basis of probability for evidence informed interventions at the earliest possible stage. This relocates risk away from the immediate risk of child abuse or its reoccurrence to a wider range of poor outcomes, which may occur both in later childhood and/or adulthood (Anda *et al.*, 2010). Preventive interventions are therefore targeted across a much wider population as indicated by their exposure to multiple risk factors (Spratt, 2012). This later phase is sometimes termed a *public health model*, as it is based on epidemiological research that creates an evidence base for interventions targeted toward populations at most risk.

## **Key issues and recommendations**

For the European nations in our study, and indeed Australia where a comparable welfare state system exists, the phases may represent both a rational development of ideas, built on lived experience and research, but, nevertheless, fail to accurately capture current national child protection landscapes. For example, those readers familiar with the child protection system in the UK may recognise the sequence in terms of the development of ideas, but find the translation into policy and practice more challenging. In a culture wherein the best efforts of researchers, policy makers and service providers to develop an evidence-based early intervention system to serve a wide range of vulnerable children is periodically derailed, or indeed reversed

(Parton, 2011) by public opprobrium poured out on professionals following child death tragedies (Ayre, 2001), translations of policy into practice are often complex and subject to contrary forces (Devaney and Spratt, 2009; Spratt and Devaney, 2009). In our analysis of national case studies, we were able to identify three such key issues confronting child protection services in Europe and Australia, which were to inform our final recommendations.

## Creating a culturally sensitive child protection governance framework

There is evidence for a convergence of aims in the child protection systems we examined. Informed by similar historical forces and propelled by the common imperatives outlined above, the five countries essentially share an ideology predicated on the central idea that early interventions to help children before problems become too acute should be promoted. There is also, however, a requirement for a system to protect children from serious abuse in situations where their parents are unable or unwilling to provide such protection. An optimal child protection system therefore is one which includes both support for families designed to prevent poor outcomes for children at risk alongside legally mandated interventions for those children with immediate need for protection.

The question of when the threshold is reached in mandating state intervention to protect the child is largely culturally determined and consequently malleable. It was possible to examine shifts within countries over time, reflecting different responses to this central dilemma. Whilst governance structures therefore seek standardisation in decision making, this is inevitably mediated by culture. An example of this is the degree to which systems, reflecting culture, are either centralised or decentralised in relation to responsibilities for the protection of children. Germany operates under the principle of *subsidiarity*; essentially, this entails decisions involving citizens being taken in close proximity to them, with the state devolving responsibility to municipalities wherein NGOs have primary responsibility for service delivery. This has resulted in a paucity of practice guidance reflecting an underdevelopment of agreed standardised approaches. By contrast, a strongly involved and directive state, as is the case in the UK, features the production of a plethora of central regulation and guidance, which may actually inhibit professional practice through over-bureaucratisation (Munro, 2011). Where cultural heterogeneity exists, as is the case in Switzerland, where four language groups are represented across twenty-six Cantons, there is a particular need for the federal government to develop legislation that may be in principle agreeable to all cultural positions, but remain flexible enough to also enable implementation at the cultural level of each Canton. Whilst nations therefore may espouse sets of internationally agreed principles in relation to child protection, these are mediated through different cultures.

The project team took the view that the recommendations did reflect shared systemic goals and ideals, which might be represented within structures of governance to deliver best practices but, nevertheless, were culturally sensitive. In the larger countries with more diverse populations in our study, national frameworks for child protection were necessary to locate state arrangements within federal policies as is the case, for example, in Australia, where the *National Framework for Protecting Australia's Children 2009–2020* (Council of Australian Governments, 2009) also incorporates the work of NGOs in the area of child protection. We recommended the formulation of a similar framework to provide an overarching Federal Government Child Protection Plan to inform the development of law in the Cantons, whose governments would retain responsibility for service provision but exercise this through newly formed Child Welfare Boards, incorporating Canton statutory agencies and local NGOs. A continuum of service provision in line with a public health model would be promoted within this framework. Such arrangements helping to establish norms in relation to the aims of the system, both reflecting national policy and practice coherence whilst at the same time respecting the integrity of Canton governments.

### Building a relational heart

It is evident from the child protection practices across our country studies that, just as the causes of child vulnerability and abuse may be located within breakdown of family life, societal supports and social and economic environments, so likewise are remedies to be found across a range of provision of social supports and benefits. Governance structures may provide coherent organisational rules and protocols but their operationalisation requires good relationships to be established and maintained, with these in turn enabling those supplying supports to families to communicate well with each other in order to establish effective working relationships with families. It also involves focusing on the parent–child relationship and locating parents in their web of relationships, with a need for these to be respected and supported.

We recommended that inter-disciplinary Case Planning Groups should be set up in each Canton, to build relationships with the common purpose of meeting the needs of children and families including, where appropriate, the need for immediate protection. Furthermore, to embed the concept of inter-disciplinary working and build capacity in this regard, we recommended that Swiss universities provide courses for professionals working with children which cut across traditional disciplinary boundaries.

### Using evidence to inform policy and practice

The elucidation of the evidential basis for establishing *best practice* recommendations, which might be implemented effectively in the Swiss context,

proved particularly challenging both in individual country studies and in cross-national analysis. Whilst Axford and colleagues have noted that a 'growing emphasis on evidence-based practice may be seen elsewhere in Europe, particularly in Sweden, Norway, Finland, Denmark and the Netherlands' (2010, p. 524), such evidence may be provided in negative as well as positive forms. Some of our recommendations were informed by country examples of what had not worked, or indeed produced additional risks for children to navigate. Consequently, we recommended that a review of residential care be undertaken in Switzerland, based on findings from a number of our country studies that, without proper staff training and management and robust and transparent inspection systems, institutionalisation was apt to replace a child-centric approach with many associated dangers for children. Alongside this, we recommended the introduction of a national *vetting and barring* system to further ensure that children were not endangered by individuals in child welfare positions who had previously committed offences against children. We also highlighted evidence-based intervention programmes currently used at community, family and individual levels across the five countries and commended these for implementation in the Swiss context.

We were reluctant to interpret state system output statistics as indicative of *success* or indeed *failure* of particular initiatives or policies; the following observation provides some indication as to why we took this approach:

We have explored the relationship between the child protection system and the Nordic welfare state in Denmark, Finland and Norway, and documented that despite an ideological focus on prevention and provision of universal and in-home child protection services for families and children, there is a relatively high number of children in the child protection system (Pösö *et al.*, 2013, p. 12).

We were, however, conscious of the potential for administrative data to be utilised in ways to help better understand child welfare outcomes. In discussing evidence-based approaches to practice, Zeira and colleagues observe that 'International collaboration can be very important here, so as to avoid becoming "stuck in the rut" of doing it in a particular way' (2008, p. 64). We consequently recommended that Switzerland develop an evidence-informed assessment system and link the collated data across services, using an agreed identifier such as a child health number to provide more robust data in the future, capable of inputs with child outcomes. Such emerging evidence should inform future iterations of the Child Protection Plan at national level and enable better comparisons of data at an international level.

## Conclusion

Whilst the central purpose of this paper has been to demonstrate that international comparisons are both possible and desirable in response to pressures to promote knowledge transfer to permit informed development of child

protection systems, a much fuller account of the work upon which this paper is based, including detailed accounts of historical development, current configurations and learning emergent from policy implementation across our five comparator countries, is available online (Nett and Spratt, 2012). The major finding of our work is that the lessons to be learnt from these comparator countries, both positive and negative, are remarkably consistent and coherent. They are drawn from experiences which, while appearing disparate on the surface level, when subject to deeper analysis, reveal common trajectories leading to shared child protection ideals. These findings challenge views wherein cultural difference is reified to the point where comparisons are regarded anthropologically interesting but incapable of generating knowledge transfer. Our structural accounts of child protection systems rather lend weight to the observation by Gilbert and colleagues (2011) that old polarities may be being eroded by common concerns in relation to the well-being of children. We considered at the commencement of this project that there would be difficulty in deducing clear lessons because of problems in creating points of comparability, but rather found consensus without having to seek it. We remain humbled in the knowledge that recommendations for Switzerland represent what any of the project team would wish for our own countries, yet none of our countries bears all these features.

## Acknowledgements

The project was commissioned and funded by the Swiss Federal Government and the Optimus and Oak Foundations—collective title: Association Programme National pour la Protection de l'Enfant.

## References

- Anda, R., Butchart, A., Felitti, V. and Brown, D. (2010) 'Building a framework for global surveillance of the public health implications of aversive childhood experiences', *American Journal of Preventative Medicine*, **39**(1), pp. 93–8.
- Axford, N., Jonas, M., Berry, V., Green, V. and Morpeth, L. (2010) 'Can study tours help promote evidence-based practice in children's services?', *European Journal of Social Work*, **13**(4), pp. 523–43.
- Ayre, P. (2001) 'Child protection and the media: Lessons from the last three decades', *British Journal of Social Work*, **31**(6), pp. 887–901.
- Ben-Arieh, A., Casas, F., Frones, I. and Korbin, J. E. (eds) (2013) *The Handbook of Child Well-Being: Theories, Methods and Policies in Global Perspective*, Dordrecht, Springer.
- Bronfenbrenner, U. (1986) 'Ecology of the family as a context for human development: Research perspectives', *Developmental Psychology*, **22**, pp. 723–42.
- Butchart, A., Kahne, T., Phinney Harvey, A., Mian, M. and Furniss, T. (2006) *Preventing Child Maltreatment: A Guide to Taking Action and Generating Evidence*, Geneva, World Health Organisation and International Society for Prevention of Child Abuse and Neglect.



- Cameron, G., Coady, N. and Adams, G. R. (eds) (2007) *Moving towards Positive Systems of Child and Family Welfare: Current Issues and Future Direction*, Toronto, University of Toronto Press.
- Council of Australian Governments (2009) *Protecting Children is Everyone's Business—National Framework for Protecting Australia's Children 2009–2020*, Canberra, Commonwealth of Australia.
- Crawford, K., Walker, J. and Granescu, M. (2006) 'Perspectives on social care practice in Romania: Supporting the development of professional learning and practice', *British Journal of Social Work*, **36**(3), pp. 485–98.
- Devaney, J. and Spratt, T. (2009) 'Child abuse as a complex and wicked problem: Reflecting on policy developments in the United Kingdom in working with children and families with multiple problems', *Children & Youth Services Review*, **31**(6), pp. 635–41.
- Esping-Anderson, G. (1990) *The Three Worlds of Welfare Capitalism*, Princeton, Princeton University Press.
- Giddens, A. (1994) *Beyond Left and Right: The Future of Radical Politics*, Cambridge, Polity Press.
- Gilbert, N. (ed.) (1997) *Combating Child Abuse: International Perspectives and Trends*, New York, Oxford University Press.
- Gilbert, N., Parton, N. and Skivenes, M. (2011) *Child Protection Systems: International Trends and Orientations*, New York, Oxford University Press.
- Gilbert, R., Spatz Widom, C., Browne, K., Fergusson, D., Webb, E. and Janson, S. (2008) 'Burden and consequences of child maltreatment in high-income countries', *The Lancet*, **373**, pp. 68–81.
- Glad, J. (2006) 'Co-operation in a child welfare case: A comparative cross-national vignette study', *European Journal of Social Work*, **9**(2), pp. 223–40.
- Hackett, S., Kuronen, M., Matthies, A.-L. and Kresal, B. (2003) 'The motivation, professional development and identity of social work students in four European countries', *European Journal of Social Work*, **6**(2), pp. 163–78.
- Harder, M. and Pringle, K. (eds) (1997) *Protecting Children in Europe*, Aalborg, Aalborg University Press.
- Hayes, D. and Spratt, T. (2009) 'Child welfare interventions: Patterns of social work practice', *British Journal of Social Work*, **39**(8), pp. 1575–97.
- Hayes, D. and Spratt, T. (2014) 'Child welfare as child protection then and now: What social workers did and continue to do', *British Journal of Social Work*, **44**(3), pp. 615–35.
- Hearn, J., Pösö, T., Smith, C., White, S. and Korpinen, J. (2004) 'What is child protection? Historical and methodological issues in comparative research on *lastensuojelu*/child protection', *International Journal of Social Welfare*, **13**, pp. 28–41.
- Heatherington, R. (1998) 'Issues in European child protection research', *European Journal of Social Work*, **1**(1), pp. 71–81.
- Heckman, J. (2006) 'Investing in disadvantaged young children is an economically efficient policy', paper presented at the Committee for Economic Development Forum, 'Building the economic case for investments in preschool', New York, 10 January.
- Jack, G. and Jordan, B. (1998) 'Social work training in central and eastern Europe: Experiences in Bulgaria and Slovakia', *European Journal of Social Work*, **1**(2), pp. 165–75.
- Kempe, C. H., Silverman, F. N., Steele, B. F., Droegemueller, W. and Silver, H. K. (1962) 'The battered child syndrome', *Journal of the American Medical Association*, **181**, pp. 17–24.

- Maier, C. (2012) 'Leviathan 2.0: Inventing modern statehood', in A. Iriy, (series ed.), J. Osterhammel, (series ed.) and E. Rosenberg, (volume ed.), *A History of the World. Vol 5: A World Connecting, 1870–1945*, Boston, Harvard University Press.
- May-Chahal, C., Bertotti, T., Di Blasio, P., Cerozo, M. A., Gerard, M., Grevot, A., Lamers, F., McGrath, K., Thorpe, D. H., Thyen, U. and Al-Hamad, A. (2006) 'Child maltreatment in the family: A European perspective', *European Journal of Social Work*, **9**(1), pp. 3–20.
- Munro, E. and Department for Education (2011) *The Munro Review of Child Protection: Final Report: A Child-Centred System*, Norwich, The Stationery Office.
- Nett, J. and Spratt, T. (eds) (2012) *An International Study Comparing Child Protection Systems from Five Countries (Australia, Finland, Germany, Sweden and the United Kingdom) that Provides Scientifically Founded Recommendations for Improving Child Protection in Switzerland*, Programme National pour la Protection de l'Enfant, Bern, Switzerland, available online at <http://kinderschutzfonds.ch/publikationen/>.
- Parton, N. (2011) 'Child protection and safeguarding in England: Changing and competing conceptions of risk and their implications for social work', *British Journal of Social Work*, **41**(5), pp. 854–75.
- Pösö, T., Skivenes, M. and Hestaek, A.-D. (2013) 'Child protection systems within the Danish, Finnish and Norwegian welfare states: Time for a child centric approach?', *European Journal of Social Work*, **17**(4), pp. 475–90.
- Scottish Executive (2002) *It's Everyone's Job to Make Sure I'm Alright: Report of the Child Protection Audit and Review*, Edinburgh, Scottish Executive.
- Shardlow, S. M. and Walliss, J. (2003) 'Mapping comparative empirical studies of European social work', *British Journal of Social Work*, **33**(7), pp. 921–41.
- Skehill, C. (2004) *History of the Present of Child Protection and Welfare Social Work in Ireland*, Lampeter, Edwin Mellen Press.
- Spratt, T. (2009) 'Identifying families with multiple problems: Possible responses from child and family social work to current policy developments', *British Journal of Social Work*, **39**(3), pp. 435–50.
- Spratt, T. (2012) 'Why multiples matter: Reconceptualising the population referred to child and family social workers', *British Journal of Social Work*, **42**(8), pp. 1574–91.
- Spratt, T. and Devaney, J. (2009) 'Identifying families with multiple problems: Perspectives of practitioners and managers in three nations', *British Journal of Social Work*, **39**(3), pp. 418–34.
- Stephens, P. (2013) *Social Pedagogy: Heart and Head*, Bremen, Europäischer Hochschulverlag GmbH & Co.
- UNICEF (2003) *A League Table of Child Maltreatment Deaths in Rich Countries*, Innocenti Report Card 5, Florence, UNICEF Innocenti Research Centre.
- UNICEF (2007) *Child Poverty in Perspective: An Overview of Child Well-Being in Rich Countries*, UNICEF Innocenti Report Card #7, Florence, UNICEF Innocenti Research Centre.
- Zeira, A., Canali, C., Vecchiato, T., Jergeby, U., Thoburn, J. and Neve, E. (2008) 'Evidence-based social work practice with children and families: A cross national perspective', *European Journal of Social Work*, **11**(1), pp. 57–72.