Article

Comparative Research and Critical Child Protection Studies

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Abstract: This article argues that two interrelated factors have played important roles in the emergence of academic analyses of child protection policies and practices: the evidence of growing strains and crises in child protection systems over the last forty years; and the development of comparative research on different systems. The latter has demonstrated that child protection policies and practices vary between different countries such that the differences could not be explained by differences in the nature of child maltreatment in the different societies—other political, social, and cultural factors were at play. This paper outlines the nature of these key developments and the conceptual frameworks which have emerged to explain the differences. A significant positive outcome is that such conceptual frameworks can be drawn upon for furthering our analyses of different policies, practices and systems and their possible reform and improvement.

Keywords: child protection; comparative research; child maltreatment

1. Introduction

The last twenty-five years has seen the emergence of a new area of academic study which we might characterise as 'child protection studies'. A number of factors have contributed to the development. I will focus on just two which have been key, and they can be seen to be connected. First, the growing strains and crises in the operation of child protection over the last forty years and the continual attempts to improve its operation and impact; and, secondly, the development of comparative research on different child protection 'systems'. The latter has been focused almost exclusively on a few advanced democracies, where it became evident that relatively similar countries had developed quite different child protection policies and practices such that the differences could not simply be explained by differences in the nature of the social problem—child maltreatment—which they were, apparently, attempting to address. One of the positive outcomes of comparative research has been the development of conceptual frameworks, which help explain variations between child protection systems. These can also be drawn upon for the critical analyses of systems, policies and practices in particular countries and their possible positive reform and improvement, as I have done when developing a critical analysis of child protection in England (Parton 2014).

2. The Growing Crises in Child Protection

A major driver for the emergence of the academic study of child protection has been the view, originally in the US, that the systems and services designed to protect children were not carrying out the tasks expected of them and were, in effect, failing (see for example Kamerman and Kahn 1990). By the early 1990s, a range of concerns about the operation of child protection systems were emerging across the English-speaking countries of North America, the UK and Oceania, all of which had adopted, in part, the approach originally developed in the USA in the 1960s in response to the (re)discovery of child abuse in the form of the 'battered child syndrome'.

Henry Kempe et al.'s identification of the 'battered child syndrome' (Kempe et al. 1962) catapulted the issue of child abuse onto professional, public, and political agendas,

initially in the US (Nelson 1984) and subsequently in the UK (Parton 1985) and Australia (Scott and Swain 2002).

There was an immediate impact in the US. In 1963, the Children's Bureau issued a model reporting law, whereby certain health and welfare professionals would be required, or mandated, to report cases of actual and suspected child abuse to designated public authorities, and all 50 US states adopted such a law by 1967 (Hutchison 1993). This was followed by the first national child protection legislation, the Child Abuse and Prevention and Treatment Act (CAPTA) in 1974, which, among other things, required states to have such mandatory reporting laws in place. Most Australian states also introduced mandatory reporting from the late-1970s onwards (Ainsworth 2002).

Having established the new systems to protect children, the next 30 years witnessed a huge increase in the number of children being reported in the USA from 9563 (0.1/100,000 children) in 1984 to 3,126,000 (47.0/100,000 children) in 1996 (Lonne et al. 2009, p. 26). However, while the proportion of reported cases which were 'substantiated' as child abuse was over 60 per cent in the 1970s, the figure had dropped to well below 40 per cent by the early 1990s. Similar trends were evident in Canada (Trocme et al. 1995; Swift 1997). While the way statistics were collated varied between Australian states, the rate of growth of child abuse reports was even greater than in the USA. For example, in the state of Victoria, reports of child abuse and neglect increased more than 5000 per cent between 1977/8 and 1993/4 from 517 to 26,622 (Parton et al. 1997, p. 3).

In England, there were no comparable statistics. The only statistics available which cover the last quarter of the twentieth century relate to the numbers of children on a child protection 'register'. A child's name was placed on a register, where, following an investigation and a multidisciplinary case conference, it was felt that the child continued to be at risk of suffering abuse or neglect and should be subject to a 'child protection plan'. The numbers of children on registers in England quadrupled between 1978 and 1991 from 11,844 to 45,300.

By the mid-1990s, there were several authoritative reports which were arguing that child protection systems in the USA, England and Australia were, at best, out of balance, or, at worst, in crisis and in need of reform. For example, the US Advisory Board on Child Abuse and Neglect (US ABCAN 1990) commented that:

> The most serious shortcomings of the nation's system of intervention on behalf of children is that it depends on reporting and response processes that has punitive connotations and requires massive resources dedicated to the investigation of allegations (US ABCAN 1990, p. 80).

And 3 years later:

> The result of the current design of the child protection system is that investigation often seems to occur for its own sake, without any realistic hope of meaningful treatment to prevent the recurrence of maltreatment or to ameliorate its effects, even if the report of suspected maltreatment is validated (US ABCAN 1993, pp. 10–11).

Increasingly, it seemed that in the USA, Australia and Canada, the child protection systems had developed wide 'nets' in which were caught a whole variety of concerns about children and that certain sections of the population, particularly the poor, single parent households and certain minority ethnic and indigenous groups were at much greater risk of being caught in the nets than others (Thorpe 1994; Waldfogel 1998).

While a similar 'crisis' was developing in England, the process whereby this emerged and the context in which it happened was somewhat different. Like the USA, Canada and Australia, a major driver of policy change was a series of high-profile tragic deaths of children at the hands of their parents or immediate carers and where health and welfare professionals had failed to share information and intervene appropriately. Invariably, subsequent public inquiries into the cases argued that the tragedies had been predictable and preventable and that the professionals, particularly social workers, were culpable.

Between the publication of the public inquiry into the death of Maria Colwell in 1973 (Secretary of State for Social Services 1974) and 1985, there were 30 inquiries into the deaths of children as a result of abuse (Corby et al. 1998).

The intense media and political interest reached a new peak in the mid/late-1980s following a series of public inquiries into the tragic deaths of three children who had been under the care or supervision of the statutory authorities in three London Boroughs (London Borough of Brent 1985; London Borough of Lambeth 1987; London Borough of Greenwich 1987). It seemed that the state was intervening 'too little and too late' and failing to protect children from serious abuse. However, the public inquiry into events in Cleveland, in the North East of England, in the summer of 1988—where 121 children had been removed from home on 'place of safety orders' as a result of apparently dubious allegations of sexual abuse—suggested that the state was also intervening (at the same time) 'too early and too much'.

The passage of the Children Act 1989 was thus centrally concerned with trying to establish a new set of balances between the state and the family in the care and protection of children. It was, perhaps, the first attempt in the Anglophone world to carry out a serious appraisal of the impact of the child protection system(s) which had developed since the mid-1960s. It attempted to keep to a minimum the situations where social workers would rely upon a policing and investigatory approach dominated by a focus upon a narrowly defined forensic concern, and aimed to put in its place an emphasis, wherever possible, of providing help and support with the agreement of parents and children.

The attempt to 'refocus' children's services was reinforced a few years later with the publication of an Audit Commission (1994) and the launch by the Department of Health of Child Protection: Messages from Research (Department of Health 1995). Both documents argued that the 1989 Children Act had not been successful in trying to 'refocus' children's services away from a narrow forensic concern with child protection to an approach which also aimed to provide services to 'children in need' on a voluntary basis and before situations were of crisis proportions (Parton 1997).

In the US, the Harvard Executive Session on Child Protective Services was convened in 1994 to consider ways forward for the USA. It was felt that there were five major problems with the US child protection system—and all could be seen to apply to the other Anglophone systems as well (Waldfogel 1998, 2008). The first problem identified was over-inclusion, whereby some children and families who were at low risk were subjected to an unnecessary adversarial and forensic investigation. At the same time, and second, there was the problem of under-inclusion, where some children and families who should have been included in the child protection system were not. This may have been because they were missed and not reported, or because families asked for voluntary assistance at an earlier stage of difficulty but did not meet the threshold for inclusion. The third problem, which both reflected and arose from the first two, was capacity. The number of reports had increased so dramatically over the previous 30 years that the number of children and families involved far exceeded the capacity of the system to serve them.

The fourth problem was, what Waldfogel called, service delivery, for even if children and families did manage to cross the threshold for inclusion, many did not receive the right sort of service, or, in many cases, any service at all. The fifth problem was to do with service orientation. For, in being so concerned to investigate cases of child abuse, there was a failure to engage with children and families and try to address their particular needs. Such an approach was not only stigmatising and antagonistic to those it confronted, it also acted to discourage others—both families and professionals—from approaching the service when they may need help and support. It seemed that the child protection system was failing on numerous fronts and Waldfogel and her colleagues argued that what was needed was a 'paradigm shift'.

By the late-1990s, therefore, clear evidence was emerging in all the Anglophone countries that there were significant problems with their child protection systems. Public inquiries, authoritative official reports and research were all pointing to significant chal-

lenges which needed to be addressed. It is in this context of increased concerns about child protection systems that researchers and policy makers in the USA, Canada, the UK and Australia began to look elsewhere to see if other countries approached these issues differently and whether they had any more success. The development of attempts to compare systems in different jurisdictions provided a second driver for academic interest in child protection.

3. Differing Child Protection Orientations

This link between the emerging crisis in child protection in the Anglophone countries and the beginnings of comparative research was made very clear at the beginning of the first book published comparing child protection systems by Andrew Cooper and his colleagues (Cooper et al. 1995), which compared the child protection systems in England and France. The researchers talked with child protection workers in both countries and studied the respective histories and operation of their child protection systems. They became very aware that there were major cultural differences between the two countries and that this could be seen to permeate all areas of law, policy, and practice. While the French system seemed to be infused with both an optimism and trust of both families and social workers' abilities to look after children, this was not the case in England where pessimism and distrust seemed to dominate. As the title of the book suggested, Positive Child Protection: A View from Abroad (Cooper et al. 1995), the main purpose was to encourage a 'positive' approach to child protection in England by looking at how things operated in France.

This overall purpose became even more evident with the publication of a further study by the same research team two years later (Hetherington et al. 1997). Not only were the researchers reporting on a much bigger study—comparing child protection systems in the Belgium Flemish community, the Belgium Francophone community, France, Germany, Italy, Netherlands, England and Scotland—but their political and policy aims were even more explicit. The focus was what they called 'a particular and important moment in the history of child care and protection work in England and Wales' (Hetherington et al. 1997, p. 4). The book was written 'first and foremost' as a contribution to the process of change, particularly in relation to 'the continuing struggle to implement the radical vision of the Children Act 1989' (p. 4) and 'the importance of recovering an ability to think new, creative and even dangerous thoughts in pursuit of change and reinvigoration in child protection work' (pp. 4–5). In examining seven other European child protection systems, Hetherington et al. argued that they were holding up 'seven mirrors to the English system, and each time seen new things reflected back' (p. 111). The aim of the research was twofold: first, to learn about the child protection system in the 'other country' in terms of how it worked for those directly involved in operating it; and second, to elicit the views of social workers in one country about the practice and system of another.

At the same time as Cooper et al. were carrying out their research, another project was being led by Neil Gilbert (1997) in the USA. While the policy and practice concerns driving the research were rather different and the methodology adopted was much more focused on policy analysis, the research very much complimented that by Cooper et al. Combatting Child Abuse: International Perspectives and Trends (Gilbert 1997) was prompted primarily by the rapid increase in reports of child maltreatment in the USA and the growing strains on its child welfare systems between 1980 and 1993. While similar trends could be identified in other countries it seemed that it was in the USA where the trends were the most extreme and conspicuous and it had witnessed a vigorous debate about how best to organise responses and services. Academic researchers were recruited to analyse the child protection systems in Belgium, Canada, Denmark, England, Finland, Germany, the Netherlands, Sweden and the USA. It was thought that a major reason for the upsurge in reports in the USA and the subsequent strains in the system arose from the mandatory reporting system and the vague definitions of child abuse evident. Comparing the USA system with systems elsewhere would provide one way of testing out these assumptions.

However, the key finding proved to be that there were important and more wide-ranging variations between the countries concerning the extent to which systems emphasised a child protection or family service orientation, and these did not depend on whether there was a mandatory reporting system in place. The two orientations were distinguished along four dimensions:

The first, and perhaps the most significant, dimension was the way the problem of child abuse was framed. In some systems abuse was conceived as an act which demanded the protection of children from harm by 'degenerative relatives'; whereas in other systems abuse was conceived as a problem of family conflict or dysfunction which arose from social and psychological difficulties, but which responded to help and support.

Secondly, and depending on how child abuse was framed, the response operated either as a mechanism for investigating deviance in a highly legalistic way, or as a service responding to a family's needs. As a result, thirdly, the child welfare professionals functioned either, in the child protection orientation, in a highly adversarial way, or, in the family service orientation, in a spirit of partnership—particularly with parents. Finally, while there seemed to be a high rate of voluntary arrangements with parents in making out-of-home placements with the family service orientation, in the child protection orientation most out-of-home placements was compelled through the coercive powers of the state, usually in the form of court orders. However, the use of mandatory reporting laws did not appear to be linked to either the child protection or family service orientations.

The countries were grouped into three broad categories:

1. Child Protection United States, Canada, England.
2. Family Service—Mandatory Reporting Denmark, Sweden, Finland.
3. Family Service—Non-Mandatory Reporting Belgium, Netherlands, Germany.

What the research suggested was that there did seem to be important differences in the way Anglo-American child welfare services were organised and the way they responded to concerns about child abuse, when compared to northern European and Nordic countries. The researchers argued that while the details of different programmes and policies were important, the way different systems operated were crucially influenced by the wider overall culture of the system and the social and political contexts in which it operated.

Bringing these various studies together, a clear picture began to emerge about how these two approaches differed and how the different countries studied might be differentiated. This can be summarised in the following Table 1:

Research carried out in the Faculty of Social Work at Wilfrid Laurier University in Canada attempted to build on this work (Freymond and Cameron 2006; Cameron et al. 2007) but rather than just two orientations, it was argued that three generic systems of child and family welfare could be identified in 'developed relatively affluent' countries: child protection, family service, and community caring. While the first two—child protection and family service—were very similar to those found in Gilbert (1997), the third was rather different.

The third system took its inspiration from many Aboriginal communities around the world and was called, by Freymond and Cameron, Community Care Systems. Here:

> Ties to extended family, community, place, history, and spirit are considered integral to healthy individual identities: ideally, community caring relies on consultations with parents, extended family, and the local community about the protection and care of children. Because of the devastating effects on Indigenous Peoples of colonialism, residential care, and child protection systems, a strong connection is made between caring for children and fostering a healing process for whole communities. A strong value is given to keeping children within their families, and communities. Respect for traditional Aboriginal values and procedures is integral to community care processes (Freymond and Cameron 2006, p. 6).

Table 1. Difference between Child Protection (Anglo/American) and Family Service (Northern European) Systems.

Broad Type of System	Child Protection Anglo/American	Family Service Northern European
Countries	Australia, Canada, England, US	Belgium, Sweden, Germany, Finland, Norway, Denmark, Netherlands
Type of welfare state	Tendency to residual and selective provision	Tendency to comprehension and universal provision
Place of child protection services	Separated from family support services	Embedded within and normalised by broad child welfare or public health services
Type of child protection system	Legal, bureaucratic, investigative, adversarial	Voluntary, flexible, solution-focused, collaborative
Orientation to children and families	Emphasis on individual children's rights. Professionals' primary responsibility for child's welfare	Emphasis on family unit. Professionals usually work with the family as a whole
Basis of the service	Investigating risk in order to formulate child safety plan	Supportive or therapeutic responses to meeting needs or resolving problems
Coverage	Resources are concentrated on families where risks of (re)abuse are immediate and high	Resources are available to more families at an earlier stage

Developed from Parton (2017).

One of the few people who have argued consistently against the overall preference of researchers for the family service orientation is Keith Pringle. While critical of the child protection orientation (Harder and Pringle 1997), he has raised a number of major concerns about the ability of the family services to protect children, particularly in relation to child sexual abuse. In a critical overview of different responses to child sexual abuse across different European countries (Pringle 1998), he argued there was evidence that many western and northern European family service-oriented systems responded to child sexual abuse far less effectively than the more forensic child protection-oriented English approach.

Part of his explanation was that there was a strong reliance on family systems thinking in western and northern European countries in a way which was not so evident in England. As a consequence, there was a failure to address the power dynamics related to issues of gender and other social divisions, which he argues underpin sexual abuse and other forms of child abuse (Pringle 2005). He connected this greater adherence to family systems thinking to more general difficulties arising from broader cultural and social patterns. He suggested there was a connection between the family service orientations and the more solidaristic/collectivist discourses and traditions that tended to permeate the social institutions in western and northern European countries—compared to the far more individualistic ethos evident in England, and, by implication, the USA and Canada (Pringle 1998; Pringle and Harder 1999).

He argued that Nordic welfare systems were primarily concerned with addressing problems associated with poverty and work, including those associated with the home, for example day care provision, and parental leave. They were much less concerned with addressing dimensions of marginalisation associated with 'bodily integrity or citizenship' (Pringle 2005, 2010). Included in the latter concept were forms of exclusion associated with, for example, violence to women, violence to children, ageism (in relation to younger as well as older age), racism, heterosexist/homophobia, and disablism. While perhaps dealing poorly with problems related to poverty and the labour market, Pringle therefore argued that when it comes to issues such as racism, disablism, and gendered violence—all of which are key to child sexual abuse and child abuse more generally—that England could be seen to perform better than the Nordic and other western European countries (Pringle 2010).

These arguments clearly provide an important counterweight to what became almost the dominant perspectives and assumptions which have underpinned much comparative child protection research. What the arguments do not do, however, is detract from the analytic frameworks and orientations which have been identified, particularly in terms of the differentiation between the child protection and family service orientations. The argument is much more about what the orientations overlook and, in particular, how (normatively) positive we should be about the orientations in practice and their implications for the children, young people, men and women who are affected by them. It does seem, however, that up until about 2010, there was considerable agreement about the validity and usefulness about using these two orientations as broad frameworks for comparing and analysing different child protection systems.

More recently, the Gilbert research (Gilbert 1997) has been updated by comparing ten countries—the same countries as before plus Norway. The overall conclusion (Gilbert et al. 2011b) was that while the two original orientations—child protection and family service—were still relevant, they needed to be revised in light of the developments in the various countries during the intervening 15 years up to 2008/9.

The findings suggested that approaches to protecting children had become much more complex. Countries previously identified with the child protection orientation, for example England and the USA, had taken on some of the elements of the family service orientation. At the same time, there was also evidence that those countries which had previously operated according to a family service orientation had made efforts to respond to increasing concerns about harm to children. This seemed to be the case in all the Nordic countries, with the possible exception of Sweden, and all the north European countries studied.

It was also possible to discern the emergence of a new approach—a child-focused orientation (Gilbert et al. 2011a). This orientation concentrated its focus on the child as an individual with an independent relation to the state. It was not restricted to narrow concerns about harm and abuse; rather the object of concern was the child's overall development and well-being. The programs aimed to go beyond protecting children from risk to promoting children's welfare. In this context, concerns about harm and abuse were relevant as just one set of factors that might affect a child's development and well-being. If for any reason there was concern about a child's development, the state sought to intervene to offer support or more authoritative intervention if this was required. With a child-focused orientation, the state takes on a growing role for itself particularly in terms of taking the lead with early intervention and preventive.

While this orientation can be seen to borrow elements from both the child protection and family service orientation, Gilbert et al. (2011a) suggest that it has a rather different character, which is shaped by two major and somewhat contrasting lines of influence. On the one hand, it has been influenced by ideas related to 'the social investment state' and, on the other hand, it has been influenced by a growing priority allotted to the processes of 'individualisation' as these apply to children and emphasises children's rights. However, these two lines of influence do not sit easily together and can lead to tensions, which signifies that the child-focused orientation can take different forms in different jurisdictions.

The idea of 'social investment' emerged in the 1990s as an ideal promoted by the OECD and the EU, among others. According to this view, investment in children takes on a strategic significance for a state keen to equip its citizens to respond and adapt to global economic change in order to enhance individual and national competitiveness. In this respect trying to ensure that all children maximise their developmental opportunities, educational attainment and overall health and well-being becomes a key priority for social and economic policy. This is a future-oriented approach, which considers childhood as a preparation for adulthood, so that investment in children in the present is designed to ensure that they will develop into productive and law-abiding adults. The state takes on this new and pre-emptive role primarily because the challenges are so great that 'the family' is no longer seen as adequate, on its own, for carrying out the tasks expected of it.

In contrast, the rationale for policies and practices which emphasise children's rights perceive children as individuals in the here and now and, while different, equally as valuable as adults. These policies are concerned with the quality of children's childhood, stating that it is a social justice issue to make sure that children are treated with respect and given a loving upbringing. This is the state aiming to promote a happy and caring childhood, securing children the same rights granted to others, and aiming to give children in the child welfare system the same opportunities as other children in society. Children are not seen so much as future workers, but as current citizens.

Overall, the child-focused orientation puts children's rights above parents' rights and emphasises parental obligations and responsibilities as carers. The child welfare systems provide services to promote children's needs and well-being, often with and via the parents and carers, but in return demands change and 'outcomes' for the child.

The three orientations identified by Gilbert et al. (2011a) can be summarised as Table 2:

Table 2. Three Orientations on the Role of the State vis à vis Child Maltreatment.

	Child Focus	**Family Service**	**Child Protection**
Driver for Intervention	The individual child's needs in a present and future perspective/societies need healthy and contributing citizens	The family unit needs assistance	Parents being neglectful towards children (maltreatment)
Role of the State	Paternalistic/defamilialisation—state assumes parent role; but seeks to refamilialise child by foster home/kinship/adoption	Parental support—state seeks to strengthen family relations	Sanctioning—state functions as 'night-watchman' to ensure child's safety
Problem Frame	Child's development and unequal outcomes for children	Social/Psychological (family systems, poverty, inequality)	Individual/Moralistic
Mode of Intervention	Early intervention and regulatory/Needs assessment	Therapeutic/Needs assessment	Legalistic/Investigative
Aim of Intervention	Promote well-being via social investment and/or equal opportunity	Prevention/Social bonding	Protection/Harm reduction
State–Parent Relationship	Substitutive/Partnership	Partnership	Adversarial
Balance of Rights	Children's rights/Parental responsibility	Parents' rights to family life mediated by professional social workers	Children's/Parents' rights enforced with legal means

Developed from Gilbert et al. (2011a).

The orientations can be seen to range along a continuum from a more laissez faire neo-liberal approach which emphasises the night-watchman functions of government to the more social democratic approach which advances policies much more associated with defamiliarisation. The three orientations can be seen to parallel Esping-Andersen's (1990) often-cited classification of liberal (Anglo-American), conservative (Continental) and social democratic (Nordic) welfare state regimes.

One of the very positive outcomes of these various comparative projects has been the development of conceptual frameworks, which are able to help explain variations between child protection systems and critically analyse child protection policies and practices in any particular jurisdiction. In doing so, the importance of different cultural, and political contexts and values is underlined. As Neil Gilbert suggested, the comparative study of how different countries respond to child abuse has advanced over the last two decades, particularly regarding the general characteristics of the systems they develop for these interventions' (Gilbert 2012, p. 532). However, I would go further, for Gilbert suggests that these different systems have been developed in response to the problem of child maltreatment. But as I have argued, such systems have developed their own dynamics so that they seem to operate rather independently of the social problem which it is assumed

they are trying to respond to—such systems do not so much respond to the problem of child maltreatment as construct and constitute it. This is an issue I will return to later.

4. Child Protection Typologies

A particular problem with this research is that it has only been carried out in high-income Western democracies. There is thus a major problem with the relevance of the 'orientations' that have been developed and their applicability to many societies. These problems have been demonstrated in research carried out in several countries including China (Katz et al. 2011; Shang and Katz 2014) and West Africa (Krueger et al. 2014) and, more recently, the Asia-Pacific region (Lonne 2021).

This has prompted attempts to develop new 'typologies' for comparing child protection systems across the globe (UNICEF and UNHCR 2013) and that rather than focusing on the specific structures or components of the systems the analysis might shift to the essential social values, laws and culture which act to inform and provide the focus of the different systems. Such an approach has similarities with some long-standing ideal-type 'models' of child welfare which have been developed over several years. For example, Frost and Stein's (1989) discussion of the politics of child welfare drew on 'child saving', 'child welfare' and 'child liberation' perspectives and Roger Smith (1991) talked in terms of 'protection', 'welfare' and 'rights'. Perhaps the most detailed and sophisticated analysis was provided by Lorraine Fox Harding who outlined different 'value perspectives' evident in debates about child care law in England and Wales in the 1980s. While originally based on her identification of two value positions (Fox 1982), she subsequently developed this into a fourfold classification (Fox Harding 1997): laissez faire and patriarchy; state paternalism and child protection; the modern defence of the birth family and parents' rights; and children's rights and child liberation. Roger Smith (2005) later revised this classification. The Fox Harding/Smith classification can be summarised as follows:

- Laissez Faire and Minimal State Intervention

Here, the essential view is that the family should not be disturbed except in very extreme circumstances, and the role of the state should be a minimal one. While traditionally the 'family' meant the nuclear patriarchal married heterosexual couple with children, the approach is quite capable of recognising the wide variation in contemporary family relations and practices.

- Child Protection and the Authoritative State

Here, extensive state intervention to protect and care for children is seen as legitimate and state intervention may be authoritative and biological family ties not necessarily given pre-eminence. Good-quality substitute care is favoured, particularly adoption, when the care of biological parents is seen to be inadequate.

- Working in Partnership

Here, while state intervention is seen as very legitimate, the intervention should aim to help and support both parents and children and should try and keep heavy-handed state intervention through the courts to a minimum.

- Children's Rights

The perspective advocates the child as a subject whose voice and wishes should be central in decisions made and prioritises the UN Convention on the Rights of the Child.

While these various models and typologies have something of a different basis and focus to the child protection system 'orientations' outlined by Gilbert et al. (2011a), there are clearly many important similarities. Crucially, the focal concern is analyses of different possible relationships between the state and the family.

More recently, Connolly and Katz (2019) have developed a provisional 'values and beliefs' typology for classifying child protection systems based on two value dimensions—Individualism and Collectivism: and Authoritarianism and Permissiveness. From these

two continuums four types of child protection systems emerge: Authoritarian Individualism; Authoritarian Collectivism; Permissive Individualism; and Permissive Collectivism (Figure 1).
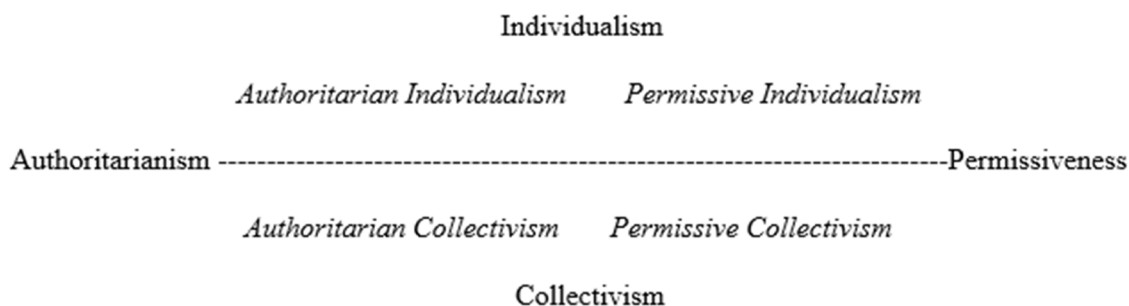
Individualism

Authoritarian Individualism　　　　*Permissive Individualism*

Authoritarianism --Permissiveness

Authoritarian Collectivism　　　*Permissive Collectivism*

Collectivism

Figure 1. Theoretical Typology of Child Protection Systems.

Following Connolly and Katz (2019), the essential characteristics of the four types are:

- Authoritative Individualism

Here, the child protection system focuses upon identifying and assessing individual children who are 'at risk' of abuse, punishing individual perpetrators and removing children from harmful situations. Early intervention is targeted at 'high-risk' vulnerable families who are offered 'interventions' to bring about change with sanctions applied if they do not comply or there is no improvement.

- Permissive Individualism

While the focus is also upon identifying vulnerable children and their families, the emphasis is upon supporting them in order to enhance their overall well-being. Here, early intervention aims to provide unconditional support to children and families who volunteer for services and where little compulsion is used.

- Authoritarian Collectivism

Primarily focuses on intervening in and regulating collective societal behaviour towards children and young people. The main emphasis is upon legal and cultural change through tight regulation of communities and organisations and clear standards of behaviour for organisations and communities to follow. While the rights of the child are likely to be emphasised, the system focuses on community priorities.

- Permissive Collectivism

Emphasises the support of communities to improve the well-being of children and is likely to involve community development and public health approaches. It involves media campaigns and other health promotion-type tools to bring about cultural change. Unlike a more regulatory approach, the system is likely to be concentrated at the community level and encourage a diversity of approaches.

Connolly et al. stress that it is a provisional typology, and that the framework requires further refinement, particularly through its application and development in 'real world' situations. But like the earlier typologies discussed, such an approach helps to make explicit the values and beliefs which both inform and help drive child protections systems in different societies and provides a good basis for comparing them. They also stress that they are 'ideal types' so will not be identified in any pure form in any particular society. All are likely to have some elements of both Authoritarianism and Permissiveness and Individualism and Collectivism. However, not only will the balance be different between different societies, but it is likely to change within societies over time.

However, Connolly and Katz assert that a child protection system:

Consists of the full range of activities and processes which are in place in a jurisdiction to prevent abuse and neglect, respond to concerns or allegations regarding the abuse and neglect of children, protect and support children and families where abuse has occurred and punish perpetrators of abuse (Connolly and Katz 2019, p. 382, my emphasis).

As with so many texts on child protection, it takes for granted that child protection policies, practices and systems operate to prevent and respond to child abuse. While it might be the case that violence against children is a global problem which takes different forms in different places (see for example Bissell 2015; Finkelhor and Lannen 2015; Krueger et al. 2015), child protection policies and practices cannot be understood simply as a response to the phenomena of child abuse. They have dynamics and determinations of their own and can operate independently of the social problem, child maltreatment, which it is assumed they are designed to respond to.

The relationship between child maltreatment and child protection policies and practices is a complex one. Rather than see child protection as operating completely autonomously from the social problem of child maltreatment, it is perhaps more appropriate to see it in terms of a relationship of relative autonomy. We can analyse the processes of child protection policy and practice and their impact without needing to assert these are completely unrelated to views about the prevalence, nature, explanations and experienced threats of child maltreatment. Real or perceived changes in child maltreatment—both historically and comparatively—affect policy and practice to the extent that they generate shifts in public, media and professional opinion and subsequently gain political traction, legal enactment, and practical enforcement.

5. Future Research Priorities

While the development of comparative research has demonstrated there are a range of different ways that child protection can be pursued and, in the process, has helped develop critical approaches to policy and practice, we have also noted how most is have been carried out in relation to advanced Western societies. It is also evident that the focus is very much upon how different societies construct the relationship between the state and the family. However, in some societies, the state is quite undeveloped. Does this mean that such societies have little formal child protection?

Recent research reported by El-Hoss and Brown (2022) in Lebanon demonstrates how Lebanon has multiple, devolved, systems, both statutory and religious, and each contain characteristics which are enshrined in legislation, but it is not appropriate to try and identify a single state lead system. They also argue that the Lebanese example challenges any assumption that progress simply involves moving towards an increasingly state-centred and regulated model. Integrated models that draw upon both formal government and non-government processes enshrined in legislation exist and should be equally recognised. Informal, community driven forms of child protection are important but have received little research attention, particularly how these vary both between and within different societies. In many societies and in history, child protection is carried out by religious institutions and how these vary and relate to the state are important areas for future research.

In addition, it is important to recognise that communities play a key role. 'Child protection' in this context refers not to state-imposed measures but to civil society's routines of socialisation, norm-setting, monitoring, and informal sanctioning—routines that channel individuals in positive child-rearing directions, establish peaceable social relations, and create safe public places. However, it is also important to recognise that such routine social control is enabled or inhibited by socio-economic structures, the supply of public resources and the wider political economy. Communities do not operate in isolation, and the way formal and informal systems of child protection are crucially influenced by the social, political and economic contexts in which they operate (Firmin 2020).

An area which has received increased research attention in recent years is in relation to the impacts, both intended and unintended, of state child protection policies and practices on different parts of the community—in particular, the quite different impacts of such policies upon the most deprived children and families, and the racialised nature of such interventions. The work of Paul Bywaters and his research team associated with the Child Welfare Inequalities Project in the UK (Bywaters and the Child Welfare Inequalities Team 2020) has been particularly influential in this regard. They have gathered considerable evidence demonstrating the very strong correlation between local authority deprivation scores and the rates of children in out-of-home care in England (Bywaters et al. 2016) and that this closely mirrors the relationship between deprivation and inequalities in life expectancy at birth. Patterns of service supply are also affected by inequality. Analysis of service expenditure shows that the more deprived local authorities faced larger expenditure cuts than the less deprived local authorities in the period of financial austerity from 2010/11 to 2015/16, and that the cuts in budgets had meant that by 2015/16, a smaller proportion of expenditure was funding family support and a larger proportion was spent on children in out-of-home care and those subject to child protection plans (Webb and Bywaters 2018); there is a very weak and worsening correspondence between funding and needs, especially for preventive services in England (Webb 2022).

In the US, state child protection has been characterised as being akin to 'poverty governance', whereby child protection is primarily concerned with state surveillance and 'getting eyes in the home' (Fong 2020). It is not only concerned with 'saving children', but crucially 'controlling families' (Edwards 2016). For many years, it has been demonstrated that the US child protection system is racialised, where Black and Brown children are removed from home on a disproportionate rate compared to their percentage in the wider population (Roberts 2002; Greene et al. 2011; Barth et al. 2020). It is now being argued that the system is so broken it needs to be abolished for racism is seen to be so rooted in the systems history, policies, and practices that they are not easily reformed. Rather the system needs to be ended to ensure racial equity (Dettlaff et al. 2020).

It is important to try and bring these threads of critical analysis together so that we can begin to assess not only how state child protection policies, practices and systems vary between different societies but also how other non-state approaches to child protection impact and whether there are different outcomes and impacts for children, families and communities, particularly in terms of key social divisions such as race, social class, gender, and ability.

6. Conclusions

Child protection is the dominant means in advanced liberal societies through which the state attempts to control the behaviour of parents and ensure the welfare of children. More recently, the focus of attention has broadened to include any situation where adults encounter children including schools, day care, the church, sport and the wider community (see for example Firmin 2020). A whole range of sociological, political, cultural, and economic factors can influence the development child protection and the way it operates in any particular society. In the process, the study of child protection policies, practices and systems advance our understanding of the societies which generate them.

In this article, I have concentrated on trying to demonstrate how the development of comparative studies has acted to further our understanding and analyses of child protection, policies, practices, and systems. One of the aims of using comparison is to advance our 'learning from difference' to identify possible improvements. Some years ago, Rachel Hetherington argued that there were three key elements in the process of learning from difference in comparative research: description; comparison; and reflection (Hetherington 2006). While she argued that the description of a system may start with an account of the formal structures, it also needs to try and describe how it works on a day-to-day basis. She felt that the overall culture in which the system operates and the way it is experienced by the children, young people, and adults—including parents and professionals—is key.

A challenge with making comparisons is the difficulty of establishing whether two things that might appear the same are really the same, and whether two things that appear different are really different. This is something Hetherington says we must always be sensitive to and connects with the third element she sees as being key in the process of learning from comparative work—reflection. She argues that such learning develops from self-questioning and requires the ability to be both reflective and critical. It is important to question and interrogate material in order to make our assumptions transparent so that they can be subject to change. Richard Freeman (Freeman 2006) goes further, and argues that comparison not only requires us to make explicit what previously might have been taken for granted, it also needs to be described in quite new ways so that it can be compared with something else. Comparison can be difficult and highly disorientating but also highly creative. In the process, it is not only reflective but also generative of new ideas, policies, and practices (Freeman 2008). It is for this reason that the development of comparative research has played an important role in the development of child protection studies.

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