

Title: Child protection system typologies: An international approach**Abstract**

In recent decades typologies have been developed to better understand the way in which different countries create systems to protect the interests of vulnerable children and their families. A child protection system typology is a classification of a set of characteristics that capture and define different approaches to child protection. Typologies are helpful in enabling comparisons of systems across international contexts, helping also to illuminate the various strengths and weaknesses of child protection systems. Typologies can also guide or redirect the development of a system, as they illustrate the varied ways in which children might be better protected. They explain how a cultural value base underpins approaches to child protection and can suggest alternative ways in which a system might evolve, based on the experiences of other countries. This article builds upon early typology building work and presents an international child protection system typology that has universal application [PUBLISHER – THE PRECEDING UNDERLINED TEXT IS FOR THE MARGIN]. Country examples are used to illustrate the development of systems across two dimensions: whether they are oriented toward an individual or community focus; and whether systems are more, or less, regulated.

Key messages:

- There are a number of different legitimate approaches to developing an effective child protection system, and countries develop their system according to their own circumstances, values and beliefs. No one way is necessarily the right way.
- Typologies of child protection systems can: help us to understand and compare the strengths and weaknesses of systems; guide or redirect the development of systems; and suggest alternative ways of developing systems to those already in existence.
- Typologies can explain how a cultural value base underpins approaches to child protection and can suggest alternative ways in which a system might evolve, based on the experiences of other countries.

Key words:

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Introduction

In recent decades, important work has been undertaken to better understand the differences in approaches to child protection and family welfare across international jurisdictions. Typologies have been developed that attempt to reflect key characteristics of systems across the world (see for example Gilbert *et al.*, 2011; Welbourne and Dixon, 2013; Connolly *et al.*, 2014). Although there is considerable commonality across systems there are also differences in the ways countries have shaped their systems and service responses. There are many ways in which an effective child protection system can develop, and countries invariably work to create systems that protect vulnerable children and support their families and communities, while at the same time align service development within country-specific resources, service structures and cultural value systems.

What is a child protection system?

All countries need to work out ways in which they will protect vulnerable children within their own cultural and societal context [PUBLISHER – THE PRECEDING UNDERLINED TEXT IS FOR THE MARGIN]. The building blocks of a system include the development of a legislative framework and the mobilisation of human and financial resources that can be brought together in a common purpose to protect children. Inevitably, however, because circumstances vary across different countries they often require different responses from the range of actors who may play a part – government; non-government; private sector; and civil society, communities and families. A child protection system therefore 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. It therefore involves a range of actors in various different sectors (see Wulczyn *et al.*, 2010 for a fuller description).

A child protection system typology is a classification of a set of characteristics that capture and define these different approaches to child protection.

Typologies are helpful in enabling comparisons of the basic characteristics of systems across international contexts (see for example, Berrick *et al.*, 2017), helping us to better understand their weaknesses and strengths. A typology can also guide or redirect the development of a system, as they illustrate the varied ways in which children might be better protected. They explain how a cultural value base underpins approaches to child protection and can suggest alternative ways in which a system might evolve, based on the experiences of other countries. There are a number of legitimate approaches to developing an effective child protection system – no one way is necessarily the right way.

Typologies of child protection systems

The development of typologies of child protection systems is evolutionary in nature [PUBLISHER – THE PRECEDING UNDERLINED TEXT IS FOR THE MARGIN].

The early work by Neil Gilbert (1997) provided an important and memorable analysis of child welfare systems, identifying two categories of system based on two identified ‘orientations’: child protection (found mainly in English-speaking countries such as the UK, USA and Australia); and family service (found mainly in Scandinavian countries). The dual orientation that Gilbert conceptualised was pivotal in reinforcing the benefits of comparing systems across different countries and groups of countries over time. The binary conceptualisation was also compelling for practitioners and policy makers as it showed distinct differences in the way countries might understand the role of the state in safeguarding children and providing support for vulnerable families. One of the limitations of the analysis, however, was that it focused on experiences in high-income countries. Both the child protection and the family service orientations identified by Gilbert related primarily to countries that have well established welfare histories with developed systems of child

protection and/or family support. The conceptualisation, however, lacked relevance for many parts of the world, particularly low-income countries where there are different challenges in protecting children, and where there are minimal resources to invest in child protection infrastructure. Further, Gilbert's conceptualisation of the child protection system was rather narrow, focusing on the processes of assessment of risk and/or need and intervention to protect children by designated child protection workers. This did not take into account the crucial role of health, education, justice, housing and other sectors in the efforts of states to prevent abuse and neglect and to protect children and safeguard their wellbeing. Acknowledging the limitations of earlier typologies, UNICEF and Save the Children commissioned work to develop a universal typology of child protection systems that is applicable to a wider range of country contexts (Connolly *et al.*, 2014). A values and beliefs-based provisional typology was developed based on four prototypical system dimensions: Authoritarian Individualism, Permissive Individualism, Authoritarian Collectivism, and Permissive Collectivism (Connolly *et al.*, pp. 6-7). The *International Child Protection System Typology*, discussed in the following section is drawn from this earlier typology development work. The original project was a desk-based theoretical exercise to support UNICEF's conceptualisation of child protection systems. This has been supplemented by fieldwork in a further project for UNICEF in four South Asian countries (Nepal, Maldives, Bhutan and Pakistan) (Katz *et al.*, 2018) where the original ideas were further developed. The second project was focused on system change in those countries, but the fieldwork contributed empirical evidence for the development of the typology conceptualisation. Other international comparative work by the authors (e.g., Katz *et al.*, 2011) similarly contributed to this conceptualisation.

The International Child Protection System Typology

Typologies are, in essence, over-simplifications. As Wendt *et al.* (2008, p.71) note, the rationale behind the use of typologies is ‘...not to provide exhaustive comparisons across either time or societies, but rather to identify “ideal-typical” cases...’. Typologies, therefore, capture the essence of a system [PUBLISHER – THE PRECEDING UNDERLINED TEXT IS FOR THE MARGIN, i.e. ‘Typologies... capture *the essence* of a system’]. We argue that there are essentially two dimensions that are useful in explaining child protection system development across international contexts:

- Whether it more oriented toward an **individual or community** focus;
- Whether it is more, or less, regulated (**across a formal–informal continuum**)

These two orientations reflect two fundamental drivers of system orientation; the role of children in societies and the nature of service systems.

Thus child protection systems of different sorts can be located along a continuum in ways that are more or less individual or community oriented; and more or less formal:

Figure 1 about here

Because of the considerable diversity of country contexts and child protection system developmental stages, the typology focuses on a set of values and beliefs that underpin and drive child protection systems [PUBLISHER – THE PRECEDING UNDERLINED TEXT IS FOR THE MARGIN]. A values approach was used as it was important that the dimensions of the typology apply irrespective of the specific structures or functions of the system – processes, regardless of type can be formal or

informal; they can focus on the individual or community. Hence the dimensions provide an underlying logic regardless of how well developed the system may be.

The *individual–community* continuum within the typology draws upon understandings about individual, group, and societal behaviour where two archetypal core values can be identified: individualism and collectivism. This continuum represents deeply held views in societies about the role of children, families and communities (Hofstede *et al.*, 2010; Triandis, 1995; Connolly *et al.*, 2014). Individualism reflects an orientation toward individual autonomy and *self*, where the interests of the individual take precedence over the collective or social group. It prioritises self-reliance and the rights of individuals to choose their own ways of living and rules of behaviour – as long as they do not harm others. Conversely, the core value of collectivism prioritises group interests, reinforces interdependencies in human systems, and supports notions of group coherence. From a child protection perspective, the typology interprets this ‘collective’ value as one that reflects a strong commitment to community and community mobilisation and action. These two constructs, individual and community, are simply representations of these underlying values. At the societal level we suggest that this value archetype influences the structure and functioning of systems with respect to whether solutions to problems such as violence toward children, exploitation and neglect are understood to be located at the individual or community level, based on the core values of individualism and collectivism.

The *formal–informal* continuum within the typology is drawn from a number of analyses of child protection and other systems, and is similar to two of Fox-Harding's (1991; 1997) four orientations that identify ideological positions in Western child welfare: *laissez faire*, and *state paternalism and child protection*. These two orientations reflect the degree to which the state has a role in child welfare and the protection of children. Fox-Harding's other two perspectives - birth parent's rights and children's rights - do not fall on this continuum as

they could both apply to formal and informal systems. However, all of her perspectives are oriented towards individual children and families and not towards communities as her work focuses almost exclusively on English speaking countries. The *laissez faire* position reflects a core belief that the state's role should be minimal, protecting the privacy of the family and recognising that there should be minimal intrusion in family life. Conversely, the state paternalism and child protection perspective advocate a more highly interventionist role of the state, based on a belief that children should be rescued from situations where they are at risk of being abused, exploited or neglected and that in these circumstances parents can lose their parental rights, and be excluded from their children's lives if necessary. While the *formal–informal* orientations are influenced by these two positions, they recognise that beyond Western experience and conceptualisations there are degrees of formality in societal approaches that regulate and enforce individual and community behaviours toward children. Countries vary with respect to the formality of their child protection systems, and 'formality' can be characterised differently. For example, volunteers in countries such as Bhutan and Nepal undertake many of the tasks that would be seen as formalised professional roles in other countries (Katz *et al.*, 2018). Some systems have highly developed regulatory frameworks and protective interventions that investigate and respond directly to child abuse and neglect, and when necessary use the most extreme powers of the state to remove children from families. We position these systems at the most formal end of the continuum. The other end of the continuum reflects minimally regulated systems and the use of less formal mechanisms to support children's wellbeing.

In the context of professional systems, rather than seeing informal and formal responses as being binary distinctions, either formal or informal, it is more helpful to see them along a continuum: degrees of formality regarding state involvement and interaction (Danish Institute for Human Rights, 2013). Countries will be more or less positioned across this continuum, influenced by time and place.

Figure 2 about here

In response to what has been considered a crisis in English-speaking child protection systems – considered the most formal in the context of the typology – writers have argued for more responsive regulation as an alternative to forensic practices (Lonne *et al.*, 2007) and also the more purposeful mobilising of informal responses that include community engagement (Katz *et al.*, 2018). Indeed, supporting the mobilisation of informal support, Melton (2013, p.1) notes:

‘No matter how well formal programmes are packaged, they often have little logical relations to the needs and hopes of the children and families for whom they are intended.’

The quadrants of the typology represent four distinct orientations but should not be taken as absolute [PUBLISHER – THE PRECEDING UNDERLINED TEXT IS FOR THE MARGIN]. They are simplifications that capture the essence of the approach to the protection of children, reflecting its underpinning value system. Countries may position themselves at points along the individual–community or informal–formal continuums, but the quadrant orientations should nevertheless be in harmony with the core values and beliefs of the broader community within each country. There is no perfect system; each type

has its strengths and weaknesses, which we discuss below. In this view a well-functioning child protection system is one which best fits the cultural, social and economic context of the jurisdiction within which it operates. Of course, these contextual factors are dynamic and ever-changing, and therefore child protection systems are not static either, but change in response to internal and external tensions.

The Individual–formal orientation

The first quadrant of the typology focuses the individual–formal orientation. Here there is an emphasis on identifying and assessing individual children who are suspected to be at risk of abuse, exploitation or neglect. There is, therefore, a strong focus on assessing risk. Systems within this orientation have highly developed regulatory frameworks and are heavily dependent on professionalised systems and solutions [PUBLISHER – THE PRECEDING UNDERLINED TEXT IS FOR THE MARGIN, i.e., ‘Systems within this [individual–formal] orientation have highly developed regulatory frameworks, and are heavily dependent on professionalised systems and solutions’]. In situations of substantiated abuse and/or neglect, children may be removed from harmful family environments into the care of the state and the system has well developed systems of care that may include foster care, group home care, and institutional care. Early intervention efforts are targeted at individual children and families where children are assessed as having been abused, neglected, or are at risk of abuse or neglect. Families are offered resources, but with sanctions for non-compliance. Children's rights are generally seen in individual terms, with a particular emphasis on legal rights.

The clear focus on the most vulnerable children is a strength of this approach along with the legal and policy frameworks that support professional action, including the means through which perpetrators of abuse and violence can be

held to account. Regulation also guarantees that, in theory at least, every child is treated equally by the system. A weakness of the approach is that it can become punitive to parents and families, with little regard to the structural forces that disadvantage families, particularly poor families. This type of system can therefore focus heavily on the *symptoms* rather than the underlying causes of child abuse and neglect. In the face of what may be perceived as a punitive approach, families can become suspicious or fearful of the system, rather than seeing it as a support that will help resolve the difficulties they face. In addition, once children are removed from families they can experience cultural and social dislocation in care arrangements that may not provide them with security and stability.

Country examples of the individual–formal orientation

Child protection systems in English-speaking jurisdictions, for example, England, Australia and the USA, have relatively long histories of service provision in child and family welfare. Over time, they have developed statutory powers to investigate reported issues of suspected child maltreatment, building structures and systems that enable a strong investigatory response that generally focuses on individual children and their immediate families. Although the individual–formal orientation may be more frequently identified with these Western systems, the typology is not necessarily aligned with any one cultural perspective. To illustrate this, we examine the child protection system in the Maldives, a country that presents a very different cultural milieu but nevertheless provides a good example of the individual–formal orientation in terms of its development of a child protection system.

The Maldives is an archipelago of approximately 1200 small islands in the

Indian Ocean. India and Sri Lanka are the country's most immediate neighbours. Despite being an advanced country in Asia, and being well known for its idyllic island tourism, many Maldivians experience poverty, largely because regional disparities created by the remoteness of the islands and, consequently, poor social service infrastructure support. The signing of the Convention on the Rights of the Child in 1991 stimulated a decade of capacity-building efforts focusing on the protection of children in the Maldives. A devastating tsunami in 2004 further intensified child protection reform efforts as the systems benefited from the increased aid that supported disaster recovery. While resources were generally limited, through the combined efforts of the Maldivian government and the various aid institutions, such as UNICEF, the child protection system strengthened, particularly in Malé. Political change post-2008 resulted in less intense development, however, since 2015 the government has signalled a new rebuilding phase and renewed efforts toward the strengthening of the child protection system have occurred.

In terms of responsibility for child protection, the Maldivian government has overall responsibility, and government workers provide the frontline child protection response in Malé and across the islands. Following the earlier phase of development, the child protection system was well supported and developed in Malé which involved a formalised system of response with caseworkers working across four areas of responsibility: children; gender-based violence; disabilities; and elder care. In Malé the system generally works well with specialist expertise provided by both the government and via non-governmental organisations that provide free counseling services and support training activities across the sector. A service area that reflects both the professionalising of the system in the Maldives and creates concern to both the government and the service sector more generally is the increasing use of children's homes or 'shelters'.

While the level of professional activity in Malé is good, outside the capital in the islands and atolls, professionalised service delivery presents a rather more challenging picture where professional expertise and services are patchy. There have been attempts to develop community-based responses in some of the atolls, but these have been short lived and not very successful.

The Individual–informal orientation

The second quadrant in the typology reflects an individual–informal orientation. What distinguishes this from the individual–formal is the degree to which the child protection system encourages more, or less formalised responses. Inevitably countries have legal frameworks that enable the state to intervene when a child is considered in need of care or protection. So, the degree of formality is not related to whether or not the country has formal systems of response in place. Rather, it is the nature of the *preferred* response. Some countries that reflect the individual–informal orientation may have highly regulated systems of response, but they nevertheless prefer to provide family support rather than intervening with the use of statutory powers [PUBLISHER – THE PRECEDING UNDERLINED TEXT IS FOR THE MARGIN, i.e. ‘Some countries that reflect the individual–informal orientation... prefer to provide family support rather than intervening with the use of statutory powers’]. The focus is on identifying vulnerable children and their families and supporting them in ways that support the child's wellbeing and family cohesion. Rather than imposing mandatory services, families are provided with service supports that intervene early and focus on changing behaviour and encouraging positive change. Countries that reflect this orientation often have a strong focus on the provision of universal services which encourage voluntary engagement rather than reinforcing compliance. But the focus continues to be mainly on individual children and nuclear family support

rather than directing support toward collective responses to vulnerable children. Often there is a strong emphasis on parents' and children's rights, and children's rights are frequently seen primarily in terms of promoting their wellbeing and participation.

A key strength of this orientation therefore is that vulnerable families become engaged in supported change. The focus on children's wellbeing means that larger numbers of families are provided with supportive services even when they may not meet the threshold for state intervention. Systems that support this orientation create a *preventive focus* – the provision of non-stigmatising family support helps to reduce child maltreatment and build parental capacity to care for their children. A weakness of the approach is that it may not be effective in addressing more severe forms of abuse and violence, and frameworks of accountability may be less well developed (for example, the values of the approach may be inconsistent with the use of coercive interventions that may, in fact, be more effective). In addition, the provision of support does not necessarily result in behaviour change, leaving children at continued risk.

Country examples of the individual–informal orientation

Examples of some of the early intervention and prevention strategies in European and Nordic countries provide good examples of the individual–informal orientation – they tend to focus on the individual child and immediate family, and they encourage informal solutions, for example, support for parenting (see for example, Eurochild, 2012). Writers have also located European countries within this broad family support orientation, for example Sweden (Gilbert *et al.*, 2011; Hessle, 2013), and Finland (Pösö, 2011), although Gilbert and his colleagues note the volatile nature of child protection systems, and that ‘the focus and orientation of these systems might quickly

change, particularly in times of crisis' (Gilbert *et al.*, 2011, p. 256). By way of comparison, Japan provides a culturally different milieu, but nevertheless shares some of the characteristics of the individual–informal orientation. In the area of child protection Japan is not as strongly regulated as many other countries. Goldfarb (2013) illustrates the way in which events of history and cultural tradition in Japan have influenced the value systems that support the care of children, and ultimately the country's approach to the care and protection of children. Perhaps unexpectedly, however, despite the country's non-interventionist preference, many Japanese children are placed in institutional care. Following World War II, there were vast numbers of orphaned children and a critical need to provide care for them. As a consequence, children's homes were built, and these homes continue to provide care for children. While institutional care is used in the contemporary context, children are placed in care by voluntary agreement with the parent(s), something that nevertheless reflects the individual–informal approach. Similarly in the Nordic countries there are relatively large numbers of children in care, but they tend to be placed voluntarily rather than through statutory interventions (Munro and Manful, 2012).

The Community–formal orientation

The third quadrant of the typology reflects a *community–formal* orientation. This characterises systems that have highly developed regulatory frameworks for protecting children, but in these systems there is an emphasis on collective solutions through broader family and community-oriented processes [PUBLISHER – THE PRECEDING UNDERLINED TEXT IS FOR THE MARGIN, i.e. 'In these [community–formal orientation] systems there is an emphasis on collective solutions through broader family and community-oriented processes']. The focus on group interests rather than having an individual

focus is the critical difference, where the community orientation reinforces the importance and significance of human interdependences and group coherence. Law and policy provide the context in which ideas and beliefs about the protection of children are sanctioned and supported in practice. They can also enshrine participatory rights for children and families who engage with child protection systems, and they can influence the resourcing that systems may have to give effect to policy intent.

The Family Group Conference (FGC) is a model of practice that seeks to involve the extended family and community in the decision making relating to child protection, and as such it is a model that brings community-oriented practices into formalised child protection systems. The origins of the FGC rest in Aotearoa New Zealand where the model was enshrined in law in 1989 as a culturally responsive way of diverting children and their families from the court, providing the opportunity for families to take action before the law is involved. Other jurisdictions quickly began to experiment with notions of extended family and community engagement resulting in the internationalising of FGC practice. This sparked many challenging debates about whether such empowerment practices can truly exist within formalised systems of child protection, and whether it is more to do with the state trying to reduce the spiraling costs of providing out-of-home care and a pushing toward kinship care as a cheaper option (Connolly and Morris, 2012). In Aotearoa New Zealand the origin and practice of family group conferencing is set within a rights-based paradigm, reflecting concepts of social justice and cultural responsiveness. It provides a means through which families and communities can come together to resolve issues of child protection in ways that keep the child within the family, avoiding the intrusiveness of the state in the care of children. It nevertheless sits in New Zealand's legal child protection

framework, positioning it within a more formalised child protection system response, and has to compete with more formalised processes of statutory child protection practices.

Country examples of the community–formal orientation

In recognition of the issues confronting indigenous people in the context of child welfare, including issues of disproportionality, governments have striven to develop more equitable and culturally responsive approaches that respond to both the needs and interests of disadvantaged communities (Libesman, 2013). These cultural imperatives have influenced the development of child and family welfare, particularly in the context of colonized countries, Canada, the USA, and Aotearoa New Zealand. The overrepresentation of indigenous children in child welfare statistics in these and other colonised countries have challenged practitioners, policy makers and managers to create more responsive services to vulnerable children and families (Katz and Connolly, 2017). Interestingly, these decolonising practices steer child welfare systems toward community-oriented approaches that are embedded typically in more formal systems, thus reflecting the *community–formal* orientation.

Frequently, however, efforts to develop family- and community-oriented solutions are frustrated by decades of risk averse practice that is often characteristic of strongly formalised child protection systems, demanding what writers have called a ‘recalibration’ of the risk culture to better service vulnerable children and families (Morris and Burford, 2017). From an historical perspective, colonised countries share similar histories of disenfranchisement, the neglect of cultural values and the abuse of rights. In Canada, while there have been efforts to create more culturally responsive services for First Nation

people, the question of rights in the context of child welfare has recently come sharply into focus when the Canadian Human Rights Tribunal found that the Canadian government has discriminated against First Nation children and their families engaging with child welfare (First Nations Child and Family Caring Society of Canada, 2016). Although there has been considerable effort to develop community solutions to issues of child protection and welfare across international jurisdictions, there are clearly challenges in adopting a community orientation within strongly formalised child protection systems. Highly professionalised systems can dominate practices where FGCs become hijacked by professional interests rather than reflecting the spirit of family-led decision making.

The Community–informal orientation

The last quadrant in the typology reflects the *community–informal* orientation. Systems reflecting this orientation generally have the formal means through which they can provide legal protections for children, but there is a preference toward informal solutions within the context of community action and engagement [PUBLISHER – THE PRECEDING UNDERLINED TEXT IS FOR THE MARGIN, i.e. ‘[In] systems reflecting this [community–informal] orientation... there is a preference toward informal solutions within the context of community action and engagement’]. Thus, there is an emphasis on the role of communities in improving the wellbeing of children through informal mechanisms. Methods used may involve community development and/or public health approaches, with a wide range of activities such as media campaigns and broad-based health promotion to facilitate cultural change. In some cases, traditional community-based decision-making processes sit alongside formal child protection systems. Unlike the stronger regulatory approach, activities are mobilised informally and include a diversity of

approaches. Hence this orientation supports and relies on informal networks of response within communities. This is analogous to health systems in which the formal system is based on modern western medical approaches and professional staff, but much of the provision on the ground is delivered by traditional healers and informal health workers.

Country examples of the community–informal orientation

Nepal is a good example of a country that relies largely on community-based service provision. Nepal, in fact, has very strong child protection legal and policy frameworks suggesting that as a country, it might be better positioned further toward the formal end of the typology continuum. However, although not a policy objective, the child protection system in Nepal is more focused on prevention and the promotion of children’s rights than on responding to individual cases of child abuse. Non-governmental organisations provide a range of preventative services (usually funded by UN and development partners). These informal responses operate across a wide range of prevention and response services with minimal government oversight. Organisations such as Save the Children are heavily involved in local communities, helping to set up Village Child Protection Committees and supporting community solutions to issues such as child marriage, child trafficking, harmful child labour and harmful cultural practices. However, responding to complex child protection incidents requires workforce expertise, clear protocols and accountability structures which are difficult for many organisations to achieve, and so by necessity Nepal relies on the work of volunteers and untrained workers to advance the interests of vulnerable children. In terms of the formal–informal continuum there is a fluidity of engagement across the child protection system, and in many respects, this is a strength of the system. Families and communities come together to provide for the care needs of children, and across Nepal's villages volunteer District Child Protection Committees and Gender Based Violence and Women's Groups undertake inspiring work to support families.

Bhutan is another country that is characterised by the community-informal orientation, relying heavily on a volunteer workforce to provide for the needs of vulnerable children and families, and looking to the community for solutions. Although at an earlier stage of development in terms of its child protection system, cultural values position Bhutan strongly toward family and community-oriented solutions. The country's policy focus on Gross National Happiness (GNH) is an important cultural response that has been foundational to the way in which the country has advanced its strategic social and economic policy agendas. Indeed, Bhutan's constitution notes, 'The State shall strive to promote those conditions that will enable the pursuit of Gross National Happiness' (Penjore, 2017, p. 29). The policy of GNH is based on an important assertion that responsiveness to non-material needs - spiritual, cultural, environmental - is critical to human wellbeing, and it is likely therefore that this will also influence the development of its child protection system.

The strengths of these systems are found in the creative and diverse methods for maximising children's wellbeing within different cultural contexts. These systems often strongly support the Convention on the Rights of the Child and its focus on children's rights, supporting child-friendly communities, and finding innovative ways of mobilising a broader range of actors such as the media to support children's wellbeing. A weakness of this orientation may be found in its lack of accountability, which can lead to resource wastefulness, and incoherence in terms of the identification of a 'system' to protect children. The focus on community mobilisation can be at the expense of protecting individual children, resulting in a lack of service focus for large numbers of vulnerable children.

Conclusion

Previous attempts at developing typologies have tended to focus on the

contrast between family service and child protection orientations. These studies have focused exclusively on rich countries. By examining a broader range of countries in various stages of development of their child protection systems we show that a more productive framework for a typology of child protection systems involves two dimensions, rather than one. These dimensions reflect the underlying cultural and organisational drivers of the systems in terms of how they conceptualise children and families and the role of the state. In this typology a 'good' child protection system is one which best reflects the culture and professional structures of the jurisdiction in which it is based, and therefore there is no perfect system. Indeed, each one of these orientations (or quadrants) has advantages and disadvantages, and it is up to the policy makers in each jurisdiction to develop the system which best fits their own context [PUBLISHER – THE PRECEDING UNDERLINED TEXT IS FOR THE MARGIN, i.e. 'Each one of these orientations... has advantages and disadvantages, and it is up to the policy makers... to develop the system which best fits their own context']. By focusing on underlying ideologies or drivers of the system the typology leaves open the possibility of different types of organisational structures, and also different levels of resourcing within each of the quadrants. Thus countries like Japan and Finland can be placed in the same quadrant even though they are culturally and administratively quite different. In this article we have illustrated the different orientations with examples from rich and developing countries. The next stage of development of these typologies will be to undertake a more systematic comparison of a range of different countries in order to provide a robust way of categorising child protection systems. It will also be important to examine the nature of system change, and whether and how systems can migrate between quadrants if the context of child protection changes.

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Figure 1: International Child Protection System Typology

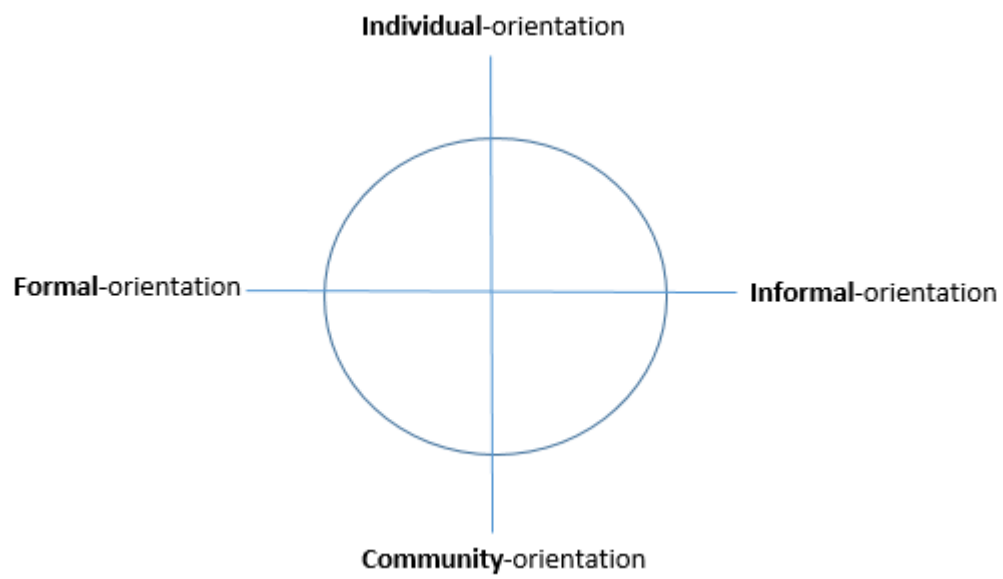


Figure 2: Degree of Formality Continuum (adapted from United Nations Children’s Fund, 2018)

