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A Cross-Country Comparison of Child Welfare Systems and Workers' Responses to Children Appearing to be at Risk or in Need of Help

This paper compares how frontline staff in four national child welfare systems and policy contexts – Finland, Norway, England and the USA (specifically, California) – respond to questions about a scenario of possible harm to children. The countries have different child welfare systems that we anticipated would be reflected in the workers' responses ($n = 1027$). The analysis shows differences and similarities *between* the systems, although often not in line with system expectations. There is also variation *within* the country samples. The study shows the complex interactions of individual and agency characteristics in addition to the role of proceduralised decision-making systems and professional discretion. Copyright © 2017 John Wiley & Sons, Ltd.

KEY PRACTITIONER MESSAGES:

- Professional discretion differs.
- Proceduralised and high threshold systems result in less variation between workers' responses.
- System categories do not seem to capture the nuances of frontline decision-making.

KEY WORDS: child welfare systems; decision-making; eligibility assessment; service provision

Introduction

Child protection systems vary markedly across countries. Even among Western industrialised nations, significant variability exists in the policy, administrative and judicial structures underlying child protection (Gilbert *et al.*, 2011). For frontline workers, political, social, cultural and normative dimensions are important determinants also in how and when it is acceptable to intervene in a family to protect a child. There are many other elements that

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‘Compares how frontline staff in four national child welfare systems and policy contexts... respond to... a scenario of possible harm to children’

‘Child protection systems vary markedly across countries’

‘Study participants were employed in child welfare systems in the welfare states of England, Finland, Norway and the USA [California]’

‘We used an online vignette method’

‘Distinct differences between societies and systems in how children are protected’

influence frontline decision-making, including decision-making models (or lack thereof), and the professional, institutional, organisational and legal frameworks within which staff operate (cf. Berrick *et al.*, 2015; Ferguson, 2003; Rice, 2013). Child welfare workers have to make some of the most difficult decisions required of state employees. Following an assessment of need and risk, child welfare workers have the responsibility to make recommendations about a state's intervention in the lives of children and parents, sometimes (with necessary authorisation) even removing a child from the family home.

In this study, we compare thresholds and interventions, and examine the relationship between systems and frontline practice, in an analysis of how child welfare workers in four different country contexts consider eligibility for services and their agency's likely response to a scenario of possible harm to children. Study participants were employed in child welfare systems in the welfare states of England, Finland, Norway and the USA (represented by a region within California). Because these welfare states have different philosophical and legal platforms on which child welfare work is conducted, we would expect country differences in our findings. We anticipated that workers from Norway and Finland would be relatively similar due to resemblances in the child welfare systems within which they are employed. In contrast, we expected staff in England and California to be different from Norway and Finland, and probably different from each other since their child welfare systems also differ. We expected that workers in the service-oriented systems would express a higher degree of concern regarding child wellbeing than their peers in the risk-oriented systems. On account of the lack of formal decision-making tools in the two Nordic countries, we anticipated more variation between workers there, whereas owing to the greater prevalence of these tools in the Anglo-American systems, we expected less variation between workers. We also expected that worker and workplace characteristics might explain some differences. We used an online vignette method and received responses from 1027 child welfare employees.

We first outline what is known about the wider welfare systems and models within which each country's child welfare system is embedded, followed by a review of what is known on this topic from an international perspective. Next, we present our methods and data materials, followed by the findings, discussion and concluding remarks.

Context and Research

Most child protection systems are based on a basic set of principles relating to public responsibility for children at risk (Burns *et al.*, 2017), and Gilbert *et al.* (2011) suggest that child welfare systems are becoming more similar. However, there are also distinct differences between societies and systems in how children are protected. Child welfare workers in California, England, Finland and Norway are embedded in different welfare states, child welfare systems and context-specific frameworks for how to perceive risk, how to assess need and how to respond to social problems. In the welfare state literature, the USA is conceptualised as a liberal welfare regime, with little state involvement in family life and few universal services (Aspalter, 2011). Finland and Norway

are widely described as social democratic welfare states, each with a tight welfare safety net offering numerous universal welfare services. The UK was categorised as a liberal welfare regime by Esping-Andersen (1990), but today scholars point out that it is only an approximation of this type (Aspalter, 2011). The latter argument is supported in empirical testing of welfare states, where in four out of five analyses the UK has not been categorised as a liberal welfare state but as a radical or undefined type (Arts and Geliessen, 2002). Nested within their welfare state models, the four countries involved in this study have different child welfare systems (Gilbert *et al.*, 2011): Norway and Finland have a family service and child-focused system (Pösö, 2011; Skivenes, 2011), the USA has a child protection system and England has a hybrid system, starting from a family service perspective but heavily tilted towards child protection (Gilbert *et al.*, 2011; Berrick, 2011; Parton and Berridge, 2011).

These differences are material. In each of these countries, children and their families become eligible to participate in the child welfare service system by different means. In Norway and Finland, a 'best interests of the child' framework prevails where staff are trained to assess for child wellbeing, and child and family need. Who is eligible is, in essence, a question of who is in *need*. Once the child's need is established, the work of the staff is set in a context of a service system that is targeted within universalism, and where efforts to maintain family integrity can be extensive and long lasting. The residual welfare state of the US translates into a framework of *safety*, not need. Children are identified as potentially eligible for services by means of a child maltreatment referral to a public child welfare agency. Staff are then trained to respond to these signals of concern and to assess for *imminent harm* or *risk of harm* to the child. If eligibility is established, targeted services are provided that are typically time bound and unevenly available, depending on the jurisdiction. England has been categorised as a risk-oriented system in terms of actual practice (Berridge, 1997; Lynch and Burns, 2012), even though legislation places a duty on the statutory services to support vulnerable families, and child removal should not normally take place unless prior assistance has been offered (Parton and Berridge, 2011; Stafford *et al.*, 2012; Tunstill *et al.*, 2010).

Eligibility criteria differ in important respects, and each of these countries' child welfare systems utilises different assessment tools and approaches (Berrick *et al.*, 2015). In California, most county workers are guided by the use of structured actuarial models to determine child risk and safety (Berrick, 2011). English staff use a national assessment framework, introduced in 2000 (Department of Health *et al.*, 2000, now in HM Government, 2015). Use of the framework is a government requirement, but it is not a prescriptive tool in which each item has to be scored; rather, the purpose is to give a framework for professional judgement and multiagency work within a highly proceduralised system (Horwath, 2002; Munro, 2011; Parton, 2011). Finnish and Norwegian child welfare workers primarily use a professional discretion model (Pösö, 2011; Skivenes, 2011), so that principles and thresholds are interpreted by the social workers' professional standards. A detailed outline of the formal regulations for these four systems is presented elsewhere (Berrick *et al.*, 2015) and show how the Nordic countries have deregulated systems, whereas the Anglo-American systems are more highly regulated.

'These differences are material'

'Each of these countries' child welfare systems utilises different assessment tools and approaches'

‘We are concerned with thresholds, analysing how workers across four countries assess a possible maltreatment situation’

‘The study includes a sample of 1027 child protection workers’

‘The sample is predominantly female’

Once eligibility has been established, staff in all of these countries have available to them some services – though there may be more or fewer based on the country – which we characterise as *supportive* as they aim to support the family as a unit. Workers in these countries also have the option of recommending removal of the child from the parents' care. This we characterise as an *intrusive* state intervention and one that legal frameworks in each country guard against, barring no other alternative. The system features, and the frames and regulations that are established for how workers within each country should proceed, might lead one to anticipate that workers will be different between countries, but relatively similar within. The literature examining street-level bureaucracy (Lipsky, 1980) points to the role workers play in implementing policy. How child welfare frames shape policy implementation, and where we see inter- and intra-country variability is our subject of interest. We would anticipate greater variability in assessing eligibility for services among workers in Finland and among staff in Norway, where reliance on professional discretion is high, utilisation of assessment frameworks and/or decision-making tools is absent, and where children's needs and best interests should be considered. Conversely, we would anticipate relatively less variability among staff within England where an assessment framework is commonly in use, and we would expect the least variability among staff in California where a decision-making tool is commonly in use and where ‘harm’ or ‘risk of harm’ should be considered.

In this study, we are concerned with thresholds, analysing how workers across four countries assess a possible maltreatment situation that might be characterised as *neglect*, and examining whether they believe their workplace would provide supportive and/or intrusive services.

Method and Data Material

This study, which was funded by the Norwegian Research Council, is part of a larger research project on decision-making in child protection in England, Finland, Norway and California. The study includes a sample of 1027 child protection workers who completed an online survey which included (amongst other questions) a vignette about two children who might come under the jurisdiction of a child welfare agency. An in-depth outline of study procedures, the data collection method for the survey and the ethics approvals in each country are described in detail at the following website: <http://www.uib.no/admorg/85747/survey-material#social-worker-survey>. We used sample recruitment approaches customised to the unique context of each country, with an unknown response rate in England and Finland, and a response rate of 38 per cent in California and 30 per cent in Norway. Of the total 1027 informants who responded to the survey, 454 came from Norway, 340 from Finland, 132 from England and 101 from California. Most of the workers (772) had experience making recommendations to court for child removal (what we refer to here as a *care order*). The sample is predominantly female (about 90% female in Finland, Norway and California, and 64% female in England). The level of formal education among respondents varies. Most Californian workers (88%) have a Master's degree, compared to 58 per cent in

Finland, 51 per cent in England and nine per cent in Norway. The workers in the English sample are younger, with a median age of 25–35 years, compared to a median of 36–45 years in the other countries. The English workers also had the shortest work experience in the child welfare system with a median of one to four years, whereas the other workers had a median of five to nine years. The workplace size, measured by the number of welfare workers in full-time positions, differs: in Finland the median size is one to ten workers, in England 11–20 workers, in Norway 21–31 workers and in California 31–40 workers.

The child protection workers were presented with the following case vignette:

Please imagine that a principal at a school contacts your agency for a consultation about the following case:

Jon (11) and Mira (9) are living with their parents. Both mother and father have learning difficulties and mental health problems. The school is very concerned about the situation, and a psychologist has examined the children. She has concluded that Jon and Mira have serious problems with learning and they lack social skills. They are clearly lagging behind their peers, and this is confirmed by their test scores. The psychologist has stated that this is due to lack of stimuli and help from the parents, and the children need a lot of help and support. Further, the psychologist stated that the children lack basic social skills, especially Mira (9). The parents are socially withdrawn and cannot teach and show their children how to behave towards friends and other adults. The psychologist concludes that Mira and Jon are at significant risk of becoming as socially withdrawn as their parents.

Workers were given three statements based upon the limited information provided and asked to rate them on a five-point scale from strongly disagree (1) to strongly agree (5). The statements were:

- ‘It is my professional opinion that it is likely that Mira and Jon are being neglected by their parents.’
- ‘In this situation my workplace would provide services for Jon and Mira.’
- ‘In this situation my workplace would consider preparations for a care order.’ (In the California survey, the wording was: ‘In this situation my workplace would consider preparations for child removal.’)

The online survey was answered from February to June 2014. The survey took approximately eight to 12 minutes to answer. The survey questions were developed in British English by the four researchers making sure that they were relevant in every child welfare system. The questions were translated into Norwegian, Finnish and US terms. The translations into Norwegian and Finnish were also language edited by a person not involved in the research project. The survey was tested by a small group of social workers in each country to ascertain that the questions, and the vignette in particular, were realistic in each country.

We used SPSS and Stata (www.stata.com) for analysing the quantitative data, applying a pairwise mean comparison two-tailed *t*-test between countries based on the mean values, and undertaking correlation analysis on the relation between demographic variables and the level of agreement on the variables. A detailed overview of the coding of the variables and statistical analysis together with correlation tests with Kendall's Tau B and C are provided in Tables A–E in

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‘The survey was tested by a small group of social workers in each country’

the Appendix which is supplementary material for online hosting available at <http://www.uib.no/admorg/85747/survey-material#appendixes-to-articles> (also available in the online Supporting Information). For the country-difference analysis, we conducted a one-way ANOVA mean comparison that displays significant country differences on all three statements (Table F). Following this, we applied Tamhane's T2 test used for pairwise multiple comparisons of means between countries since the variances across the countries are significantly different (cf. Tables G–I).

In exploring the demographic variables, we can only measure correlations, and we depart from the anticipation that demographic variables are the independent variables. We report statistical significance at one per cent (***) and five per cent (**), with the awareness that five per cent is considered to be at the margin of what is relevant to report as statistically significant. We also report the country results and the overall results in percent in the Findings section, merging the answer categories 'strongly agree and agree' and 'strongly disagree and disagree,' ending up with three response categories (agree, neutral, disagree).

We measured variation of response *within country samples* by categorising as follows:

- 'High variability within country' is when approximately one-third of responses are distributed to each of the three response categories (agree/neither-nor/disagree).
- 'Medium variability within country' is determined when 50–66.5 per cent of the responses are on one of the answer categories.
- 'Low variability within country' is when 66.6 per cent or more of the responses are given to one of the answer categories.

To identify the degree of similarity or differences on responses *between countries*, we used the mean values and examined if there were significant differences between the samples (cf. Tables F–I in the Appendix in the online Supporting Information).

The study, of course, has limitations. Our country samples are uneven and recruitment strategies varied, which makes it difficult to determine the generalisability of our findings. The survey relied on a vignette to tease out workers' assessments and considerations of a hypothetical, but realistic situation. Some authors have raised objections to the use of the vignette method related to realism, complexity and whether the respondents' answers reflect actual practice (cf. Skivenes and Tefre, 2012). The vignette of Jon and Mira was presented without any country-specific references to legislation or child protection protocols and could thus be considered unrealistic or simple from the point of view of street-level practice. However, neither the piloting of the survey nor any remarks in the open-ended comment field in the survey revealed such objections. The general nature of the vignette was needed in order to apply it in all countries. Vignettes have also been used successfully in other cross-country studies of practice and may be considered an appropriate strategy for understanding underlying principles of practice across divergent systems (e.g. Soydan, 1996; Benbenishty *et al.*, 2003; Skivenes and Stenberg, 2013). We cannot determine whether responses reflect actual practice, but they show staff considerations about a given situation.

'Our country samples are uneven and recruitment strategies varied'

Findings

Eligibility: A Situation of Neglect?

We asked workers to consider if they believed it was likely that Jon and Mira were being neglected by their parents. About half of the sample (47%) responded affirmatively (see Table 1). There are significant differences between the four countries in whether they consider the case to be about neglect or not. Based on the mean analysis and comparison, there are significant country differences ($p < 0.01$), with Californian workers least likely to perceive the case as one of neglect (13%), Finnish workers next (35%), then English (47%) and Norwegians most likely (63%) (cf. Table 1 for percentages and Table 5 showing mean values, and Table A in the Appendix in the online Supporting Information displaying significant differences). The variation between workers within each country sample is highest for Finland, followed by England and California, and the least variation is within the Norwegian sample.

Exploring the demographic variables in relation to the neglect theme, respondents with longer experience in the system in England ($p < 0.01$) and in their present job in Norway ($p < 0.05$) were more likely to see the situation as neglect. For the English sample, older staff ($p < 0.01$) and staff with less education ($p < 0.01$) were more likely to regard this situation as neglect. Finally, Californian staff working at larger child welfare agencies were less inclined to regard this case as a neglect case ($p < 0.05$). The findings from the correlation analysis are displayed in the Appendix, Table B (see the online Supporting Information).

Supportive Services: How will the Child Protection System Respond?

We asked workers what they believed their workplace would do in the case of Jon and Mira, and 84 per cent indicated that supportive services would likely be provided (see Table 2). There are country differences, as significantly fewer

Table 1. ‘It is my professional opinion that it is likely that Mira and Jon are being neglected by their parents’, per cent. $N = 1017$

	Norway	Finland	England	California	All
Strongly agree/agree	63.4	35.1	46.9	12.9	47.0
Neither disagree nor agree	31.6	32.7	31.5	30.7	31.9
Strongly disagree/disagree	5.1	32.1	21.5	56.4	21.1
Total	100.1 ($N = 453$)	99.9 ($N = 333$)	99.9 ($N = 130$)	100 ($N = 101$)	100 ($N = 1017$)

Table 2. ‘In this situation my workplace would provide services for Jon and Mira’, per cent. $N = 1012$

	Norway	Finland	England	California	All
Strongly agree/agree	85.3	95.2	54.6	77.0	83.8
Neither disagree nor agree	11.8	2.1	17.7	11.0	9.3
Strongly disagree/disagree	2.9	2.7	27.7	12.0	6.9
Total	100 ($N = 449$)	100 ($N = 333$)	100 ($N = 130$)	100 ($N = 100$)	100 ($N = 1012$)

‘Significant differences between the four countries in whether they consider the case to be about neglect or not’

‘84 per cent indicated that supportive services would likely be provided’

‘There are few variations between workers within each country sample, except for the English sample’

‘Asked if such a case would signal a possible care order or child removal, 29 per cent overall responded affirmatively’

English workers answered affirmatively (55%) though there was variability within this sample, followed by 77 per cent of the Californian workers and 85 per cent of the Norwegian workers. Almost all (95%) of the Finnish staff thought that services would be provided. Differences between the countries are significant ($p < 0.01$). It is worth noting that support might be given to the parents via services for adults with learning difficulties or mental health problems, as well as or instead of child welfare services: but workers were asked to say whether their workplace would provide services as part of child protection. There are few variations between workers within each country sample, except for the English sample.

Exploring the demographic variables in relation to providing services, Norwegian staff with more education were somewhat more likely ($p < 0.05$) to answer that their agency would provide services, and those with greater years of employment in child welfare were less inclined to suggest services ($p < 0.01$). Amongst the English staff, those of older age ($p < 0.01$) and more years of experience in the child welfare system ($p < 0.05$), and working at larger agencies ($p < 0.05$) were more likely to answer that their agency would provide services. English staff with more education were less likely to say that their agency would provide services ($p < 0.01$). The findings from the correlation analysis are displayed in the Appendix, Table B (see the online Supporting Information).

Intrusive Services: Considerations for a Care Order?

Asked if such a case would signal a possible care order or child removal, 29 per cent overall responded affirmatively (see Table 3). Almost none of the Californian (2%) or Finnish (7%) workers indicated that the Jon and Mira case would elicit such considerations. About one-quarter (23%) of English workers indicated that such a case might qualify, and about half (54%) of Norwegian staff might consider a care order, though again, we see variability within the English sample and also between the Norwegian respondents.

Exploring the demographic variables in relation to considering care order proceedings, Finnish and Norwegian staff with longer employment in their present job ($p < 0.05$), or in the system ($p < 0.05$) for Norwegian staff, were more likely to answer that their agency would consider a care order. The same is the case for Norwegian staff of older age ($p < 0.05$), and Norwegian staff with more experience in care order preparations ($p < 0.01$). English staff with higher education were less likely to say that their agency would consider a care order ($p < 0.01$). Californian staff working at larger agencies were less inclined to answer that their agency would consider a care order ($p < 0.01$). An

Table 3. ‘In this situation my workplace would consider preparations for a care order’, per cent. $N = 1014$

	Norway	Finland	England	California	All
Strongly agree/agree	53.8	6.9	23.1	2.0	29.4
Neither disagree nor agree	27.7	19.0	26.9	19.0	23.9
Strongly disagree/disagree	18.6	74.1	50.0	79.0	46.7
Total	100.1 ($N = 452$)	100 ($N = 332$)	100 ($N = 130$)	100 ($N = 100$)	100 ($N = 1014$)

Table 4. Within-country variability in responses: High, medium and low

	Norway	Finland	England	California
Neglect?	Medium	High	High	Medium
In-home services?	Low	Low	Medium	Low
Consider a care order?	Medium	Low	Medium	Low

Table 5. Reported means for all countries and totals. *N* = 1018

Statements	Norway	Finland	England	California	Total
My professional opinion [...] They are neglected by their parents	3.69	3.04	3.31	2.51	3.31
My workplace would [...] Provide services for Jon and Mira	4.27	4.53	3.46	3.87	4.21
Consider preparations for a care order	3.50	2.07	2.63	1.88	2.76
<i>N</i> (highest reported)	453	333	131	101	1018

Note: Strongly disagree = 1; disagree = 2; neither agree nor disagree = 3; agree = 4; strongly agree = 5.

overview of the analysis is presented in the Appendix, Table B (see the online Supporting Information).

Similarities within Child Welfare Systems

As to the question of similarities or differences *within* each country sample, we find that in two of the country samples, Finland and California, workers have predominantly similar responses to the questions, as indicated with low variability on two of the choices in Table 4. The Norwegian sample has some variability among staff. The English sample of workers stand out, showing medium or high variation on each of the choices.

Similarities between Child Welfare System Types

Examining whether countries with the same child welfare system have similar perceptions and reactions to the vignette (cf. Table 5), it is clear that there are significant differences between the countries on all of their responses except for one in which Finland and California – two distinct child welfare system types – responded similarly about the unlikely need for an intrusive response (cf. Table I in the Appendix in the online Supporting Information). Finland and England are closer in their assessments on the question of neglect, while in between are Norway (very likely to consider the case as neglect) and California (very unlikely to consider the case as neglect). The only place where we see convergence across systems is on the question of providing services. Norway and Finland are especially likely to recommend services, and England and California are clearly less likely to do so (cf. Table H in the Appendix in the online Supporting Information).

Discussion

The findings show notable differences between the countries in whether staff would assess this possible situation as a case of child *neglect*, and whether their

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‘Notable differences between the countries in whether staff would assess this possible situation as a case of child neglect’

'We asked specifically if it was a likely neglect case, and this may explain some of the differences'

'Few differences between countries about whether supportive services might be offered'

agency would provide *supportive* services and consider undertaking more *intrusive* action.

Thresholds

There are significant differences between the countries regarding the assessment of the children's situation in this scenario. We asked specifically if it was a likely neglect case, and this may explain some of the differences. The reluctance among Finnish staff to categorise Jon and Mira's difficulties as child neglect reflects the country's hesitation to use the term 'neglect' in general, and in particular to frame parents' behaviour as neglectful (Pösö, 2015). The Finnish responses may also reflect the formulation of the question about whether Jon and Mira were neglected by the parents which, when translated into Finnish, highlights the (neglectful) agency of the parents. A question about Jon and Mira being neglected might have received different responses. Categorisation of 'neglect' is not necessary for a child welfare system response; it is thus plausible that the Finns define the central concerns of this family differently, because they still regard the family as being in need of services. The relatively high scores among the English staff may be due to the policy focus in England on raising the profile of neglect cases in recent years (e.g. Brown and Ward, 2012). The Norwegian sample scores the highest on defining the situation for the children as neglect, and this is in accordance with the thresholds in the Norwegian Child Welfare Act 1992 section 4–4 (Act of 17 July 1992 No. 2 relating to Child Welfare Services (The Child Welfare Act), Ministry of Children, Equality and Social Inclusion: Norway) which states 'The child welfare service shall, when the child, due to conditions at home or for other reasons, is in particular need of assistance...'. The focus here is the child's particular needs, and it is not limited to a specific diagnosis or causal condition; 'particular needs' will typically include neglect situations. The relatively low score in California is likely because of the high threshold for intervention, the focus on risk reduction and the definition of maltreatment tied to harm or risk of harm.

Supportive Services

We see few differences between countries about whether supportive services might be offered. The substantial majority of workers in all countries, except England, indicate they would provide in-home services. This is what would be expected for the two Nordic countries, given their family service-based systems. Findings are more surprising among the California sample. We anticipate that the 'services' indicated by staff are those provided by non-governmental organisations and other local agencies to which families might be referred. Family members would be responsible for seeking out these local resources. In the other three countries, service provision typically would be offered by the child welfare agency. Staff perspectives in England are likely because of the high thresholds required to access a service from a local authority child welfare agency (because of the need to prioritise in the face of high demand and limited resources). Although about half of the workers in England consider Jon and Mira's case as neglect, their responses may suggest that the family would be referred to alternative 'early help' agencies (HM Government, 2015).

Intrusive Action

The large majority of workers, except Norwegians, would not consider separating Jon and Mira from their parents. We can only speculate on the reasons why the Norwegians stand out in this comparative analysis. We know that Norway has approximately the same rate of children placed out-of-home as Finland (and Canada, Switzerland and Denmark), so we would not expect Norwegian child welfare workers to be more inclined to remove children compared to the Finnish workers. The Norwegians may be reflecting 'two-track' thinking in the case of Jon and Mira, indicating that if in-home-services do not help, they are prepared to take the next step. The ages of the children indicate that the children have received services over time, and thus workers may consider if the services are providing sufficient support to the children. Another explanation might be related to Norwegian workers' trust in their child welfare system and the out-of-home placements that they provide. Consequently, this level of intervention is seen as being potentially supportive. Finally, another part of the explanation might be related to a normative dimension and the standards that Norwegians set for children's upbringing and future abilities to make a living for themselves. The sentiment is that children are not supposed to do poorly, and if the child welfare system can do something, it should – even though it brings with it a removal with very uncertain outcomes.

Similarities or Differences within Country Samples

We expected that workers from Finland and Norway would have more variation *within* their samples. Without strict procedures and decision-making models, staff have greater room for professional discretion in decision-making. We anticipated the opposite for the Californian and English workers because of their tighter decision-making models and procedures (possibly with more variability from the workers in England because their assessment framework is not as prescriptive as the Californian system). Confirming our expectations, the Californian sample showed the least variation, indicating the streamlining impact of a tight decision-making model. The other three countries were all in contrast to our expectations. The findings show that overall the Norwegian and the Finnish samples had slightly more variation in their responses than the Californian sample. For the Norwegians, the responses are most clearly split on the issue of preparing a care order, and the Finnish sample was most clearly split on the assessment of neglect. Both countries showed only little variation in providing in-home services, which is the typical child welfare response in these systems. It is also intriguing that workers from England, in a system with such comprehensive procedures, show such a range of views. In fact, the high degree of variation in the English system has long been a regular finding of child welfare research (e.g. Dickens *et al.*, 2007; Packman *et al.*, 1986; Packman and Hall, 1998; Sinclair *et al.*, 2007). It may seem surprising that workers accustomed to a professional discretion model display a higher degree of uniformity in responses compared to staff accustomed to applying assessment models. The current study did not explicitly investigate this, but we wonder whether the strength of the wider value and system features, such as the welfare state arrangement and family values in the countries, can

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'Without strict procedures and decision-making models, staff have greater room for professional discretion in decision-making'

‘Variation... should be minimised based upon the principles of predictability and legality’

‘The findings only partially confirm our expectations’

‘The differences in professional education of child welfare workers and its impact on assessment, among other issues, need further attention’

shed light on this. For example, the general population's confidence in the child protection system is higher in Norway and Finland than in England and the USA (Juhasz and Skivenes 2016), which may reflect different value systems (Warner, 2015) and which may shape practitioners' views (Benbenishty *et al.*, 2015). Of course, effective professional training and good supervision – or co-working as in the Finnish system – are other factors that may influence the degree of variation in assessments and decision-making.

The main point concerning variation, whether in a proceduralised or professionalised system, is that it should be minimised based upon the principles of predictability and legality, and that the rule of law would argue that similar cases should be treated equally. It may be problematic if or when there is substantial variation between workers in assessments of risk and in determining state action (cf. Bolton and Lennings, 2010; Munro, 1999). Of course this study, reliant on a limited case vignette, does not show actual variability in practice, but clearly suggests an area worthy of further empirical investigation.

Service-Oriented versus Risk-Oriented Systems

On account of the system orientations of the countries under study and previous research, we expected respondents from Norway and Finland to show similarities to one another. We anticipated that workers in these countries would be likely to define Jon and Mira's circumstances as neglectful, and that respondents would be highly likely to indicate that services would be provided, but unlikely to suggest that care order proceedings would be warranted. In contrast, we expected respondents from California and England to reflect their more risk-oriented child protection systems, but with England leaning toward the Nordic systems in terms of service orientation. The findings only partially confirm our expectations. The striking example of lack-of-system similarities is that Finland and California (USA), the two most dissimilar child welfare systems, pair up on the unlikelihood of an intrusive state intervention. However, the reasons for these similar responses are probably quite different. In California, it is likely because of the high threshold for intervention that would define this case as ineligible for a public child welfare service response. In Finland, it is probably quite the opposite, with a low threshold for providing services and the vocabulary of neglect not being necessary for the provision of services for a long period of time. The results from the present study indicate that there are differences between Norway and Finland that merit further examination. There is little comparative research on Finland and Norway, and none on risk assessment and decision-making within these countries. The differences in professional education of child welfare workers and its impact on assessment, among other issues, need further attention.

The exploratory examination of background variables suggests some associations to consider. Seniority in the workplace or in the system was related (in Norway and England), to greater uniformity of agreement among staff. In Norway, we also see higher education correlated with more similarities of views between workers (though not so in England). In the Californian sample, workplace size was correlated, as smaller units reported higher agreement on statements. The relevance of the background variables is not easily explained, but they give us indications of variables to explore in country samples in other studies, and to examine more closely how these interact with proceduralised

or professionalised decision-making models (Benbenishty *et al.*, 2015; Drury-Hudson, 1999).

Conclusion

Overall, the similarities and differences between and within these four countries do not easily fit predetermined categories and do not necessarily align with the child welfare system orientations in which staff are nested. This needs further examination and explanation, and may call for a revision of the traditional categorisations of child welfare system orientations. It is worth exploring whether there are other features that can be used to give more nuance to the established categories of family service orientation and child protection orientation. Perhaps the simple answer is that an overarching categorisation does not (and is not intended to) grasp the details and subtleties within countries. However, the results align more closely in the child protection frame of the USA, where staff have more narrow conceptualisations of child welfare involvement and more tightly defined thresholds for intervention. The decision-making tools in use in most Californian counties may also limit workers' professional discretion, and may also standardise common understandings of maltreatment and neglect – socially constructed phenomena with a wide range of interpretations across culture and context. However, the influence of comprehensive procedures in standardising understandings is not evident in the English sample, which may reflect a system that is also service-oriented and considers the child's wider needs and wellbeing. Determining a nation-specific response that is both uniform *and* considerate of children and families within that country context is the ideal to which we may aspire. In many cases, it would also matter which agency or worker met them. This suggests that differential treatment of children and their families will occur, and that the response they get may depend, ultimately, on the judgement of the individual worker they meet.

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