



Comparative Analyses of Child and Youth Services in Europe

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Introduction

This paper contains a comparative evaluation of the reactions of welfare states to the isomorphic pressures emanating from the European Union based on two case studies taken from the Child and Youth Welfare System. In the European Community different concepts of welfare policy exist. In the unification process every member state has to find answers to the pressure of assimilation invoked by the legislation. The objective of this explorative study is to show that countries can learn from each other in order to improve their own system of social services.

1. The European perspective – a necessary mind-broadening exercise

In the course of the European unification process, the need for both governmental and non-governmental providers of social services to get acquainted with other approaches in member states and to open up to new ideas has become imperative. Hitherto, however, little systematised knowledge has been acquired – at least in Germany – about the existing forms of assistance for children and young people in the European Union and elsewhere (see Bendit/Winzen 2002: 135).

One problem in generating this kind of knowledge lies in the fact that the assistance for children and young people and the professions involved in such tasks (e.g. Kornbeck 2001) have evolved from very different foundations. From a historical point of view, social work in the European context is characterised by two contrasting developments: Very much discernible on the one hand is, first, a trend towards the standardisation of formal educational patterns and working methods. On the other hand, we have to deal with a constant quest for more differentiation and diversity (see Hesse 2001).

The structural framework and associated conditions (and with it, the methods and strategies employed in the practice of providing social assistance services to children, young people and families) differs widely. Therefore, any comparison is extremely difficult.

This report aims to provide a modest contribution to reduce this gap using the application of a particular research approach (see below) in order to test new ways in the conduct of European studies. The European Children's and Youth Welfare Report provide a good basis for comparative case study. It furnishes a framework which provides information on priorities and identifies the directions taken by the respective national youth policy institutions (see IARD 2001). However, as an instrument to enable comparisons between the respective strategies deployed at the level of problem execution, it seems to be quite insufficient. The study under current review represents, to a certain extent, a supplement to the European Youth Report. To date, political institutions have given little consideration or no consideration at all to the differences in support for children and young people in specific problem situations in Europe. Due to advancements in the European unification process, it will become increasingly

important to pay more attention to central assistance structures applied in the member states and to extend our knowledge thereof.

With regard to the discussion on the harmonisation of the support services of the welfare state, and looking at the discussions on questions dealing with services of general interest and their competitive evaluations (e.g. Commission of the European Communities 2003; Schulte 2002), it appears that the attempt to maintain the existing German system (with its respective standards) can no longer be considered self-evident. Throughout Germany and elsewhere there is an increasing questioning of the rationale behind the necessity and even the functionality of a century-old system which demands a close subsidiary interplay between non-profit organisations and state bodies. Perhaps an evaluation which focuses on single case investigations of support services could fruitfully contribute towards a less emotional debate.

The range of assistance for children, for young people and for their respective families differs greatly in the various European countries. We have therefore limited ourselves in this investigation (from a German point of view) to the section dealing with socio-educational provisions for children, youth and families with problems. The structural comparisons of child and youth welfare systems existing till now tend to be made at a relatively high level of abstraction (see van Unen 1995; Walther/Stauber et al. 2002). They are youth-oriented, bear hardly any relationship with the support systems (see Bendit/Gaiser/Marbach 1999), and often limit themselves to specific fields of action (e.g. Höynckh/Soisson/Trede/ Will 2002; Colla/Gabriel/Millham/Müller-Treusler/Winkler 1999). They offer little concrete evidence of practical procedural plans, action strategies and basic orientations of social education.

This report is the outcome of a different approach. Grounded in a description of the prevailing conditions, two case studies were developed. In the first case we described the living situation of an eight year old girl Anna who is growing up in very difficult socio-economic circumstances. There is suspicion of mistreatment and sexual abuse. In the second case, that of a fourteen years old boy (Manuel), is known to be using drugs, is attending the village school sporadically and seldom comes home to stay overnight. After discussions about Manuel's behaviour, his father threw him out of the house and forbade him to return. His mother is very stressed by this development. These two situations could occur in any European country. The reactions of the welfare and support systems in respective countries with respect to the two cases should help us undertake a useful description of the current situation.

Due to the varying nature within the structure of the systems providing socio-educational support to assist children, young people and their legal guardians in the various European countries, field access was one of the issues the investigation project had to deal with. Who, for example, can provide internationally relevant comparative information on the various systems? We sent the case descriptions to twelve representatives of the International Social Services in Europe. Prior to postage, the two case descriptions were translated into the respective languages of the countries involved. Access via the International Social Services was chosen in order to assure a professional approach to the subject.

The International Social Service is an independent association (NGO) founded in 1924, which works globally as a non-political, non-religious organisation applying new approaches in the area of social work and legal reforms, providing grass-roots support and single-case assistance. The aim of the individual countries' institutions is to serve as a liaison office between independent agencies engaged in social work, youth welfare and social authorities, guardians' and family courts on a national and international level. This way of collecting data has various

disadvantages, for example, information on procedural methods might be less concrete. However, this is the best way to maximise collaboration in the completing of our questionnaires from people who have a broader view of the social and youth welfare services in the related countries. Another advantage is that the responding agencies operate on the same organisational level.

Here, the individual countries' responses describing the concrete measures applied with regard to the two case constellations were summarised into a single report. All responses obtained from co-operating countries were compared to each other. In cases where, due to drastic regional differences within a particular country, the methods applied differ widely in one or both case constellations, the persons completing the questionnaire were asked to mention this fact, in order to identify the region of the country under reference. By comparing the responses, it was hoped that this would help in generating new ideas for the further development of skilled practical work in Germany. Alongside the case studies, indicative professional orientation and methodological procedures are explicitly provided. The answers given should be considered as ideally typical, but not as the only possible description of practical work in the countries under investigation.

German studies (see van Santen/Mamier/Pluto/Seckinger/Zink 2003; van Santen 2002) with representative outcomes showed that – even within similar legal frameworks – great differences exist in practical procedures due to different interpretations and different philosophies at the decision-making level. In addition, certain case constellations can lead in one Youth Welfare Office to a “X” assistance form, whereby in another Youth Welfare Office the same case constellation can result in a “Y” assistance form.

Who responded?

Out of a total number of twelve questionnaires sent, we received seven responses: from France, Ireland, Italy, The Netherlands, Austria, Portugal and Sweden. In the majority of cases, namely Italy, France, Ireland and Sweden, it was the representative office of the International Social Services which responded. In Sweden, the national representation of the International Social Services is delegated to a private organisation, to ISS Epikur, Consultant Correspondent Sweden. In the three remaining countries, the International Social Services passed our request to other agencies, because they themselves did not feel competent or responsible enough to provide answers.

In the Netherlands, the responses we received were provided by an independent organisation, the *Nederlands Instituut voor Zorg en Welzijn (NIZW)*. The NIZW has set itself the aim of reforming social life by providing information, innovation and support to issues regarding social affairs, including any questions related to child care and youth welfare. In Austria, the responses were compiled by the Austrian Federal Children's and Youth Welfare Advocate, an employee of the Federal Ministry for Social Security and Generations, who only reports to the Federal Minister. Also, in Portugal, the response was provided by a governmental office, the General Directorate for Solidarity and Social Security (*Direcção-Geral da Solidariedade e Segurança Social*). It consists of a department of the Portuguese Ministry of Labour and Social Welfare, which is subdivided into decentralised departments.

We found that we were unable to pursue our original strategy which sought to seek responses from the national representations of the International Social Services in each of the countries. It can, however, be assumed that all agencies which responded possess a good insight into the structures and the methods applied to provide assistance in their respective countries. If we take into account our questionnaire, the responses received comprise many different

approaches in the handling of descriptive details and the orientation methods used. We did not obtain adequate information on every question from all countries. For instance, we received only general answers from France, but no special information on our problem cases. Nevertheless, the answers provided supplied a lot of vital information on the type of assistance provided in the French system.

The answers from the colleagues in Ireland were very detailed. Their responses consisted of detailed descriptions of the reactions to the two case studies, as well as general information on the type of assistance offered and the respective governmental programs. In addition to the information which came from the responses provided on the case histories – as far as available – reference was also made to other sources of information, for example, descriptions of the particular country's child and youth welfare systems.

2. Categories for response systematisation

As already mentioned, the responses provided by the various countries differed in detail. Some questions were not answered and sometimes the answers had no direct relationship to the case histories. In order to allow a general description of the material and on the basis of the reactions received, we developed ten categories of description. The description categories can be subdivided into three thematic aspects:

- Institutional framework,
- Aspects involving the user groups and
- Aspects involving the type of assistance.

The presentation of these dimensions cannot reproduce the situation in its entirety, but is meant to provide a reasonable representation of reality in the respective countries. We can state that, especially with regard to the institutional framework, structural reality (including the legal framework) and financial sources depend on each other.

In our evaluation, focus was not placed on the structures and the basic legal frameworks, since information on these has already been provided (e.g. IARD 2001, van Unen 1995). Rather, emphasis was placed on the effects, creative contributory possibilities and the consequences for the user groups.

It cannot be assumed that successful processes in one country would also yield the same positive results in another country, since such results are determined by their particular context. Cultural and social relationships, political and institutional structures depend on a mutual interplay.

2.1 Basic Institutional Framework

This dimension serves to describe the differences in the organisation of the various types of assistance systems. This topic deals with questions concerning the distribution of responsibilities, the division between government agencies and independent agencies, as well as financing and legal aspects thereof.

Attention shall be focused on the following aspects:

- a) What kind of information is obtained on the competencies in general? What information is obtained on the competencies related to our case histories? Are there any differences between different governmental levels, public and independent or private

agencies? Which is the responsible body for providing services? And, who takes action on-site?

- b) Who bears the costs?
- c) What are the basic legal principles at play?: At which governmental levels are there relevant laws and regulations (national, regional, local)? Which governmental departments are responsible, i.e. will there be a consultation of various laws from various sectors in our concrete case? Are there any political aims documented in the legal framework of child and youth welfare assistance programs, and are there any statements with respect to the infrastructure for children and young people?

2.2 Assistance Target

Due to the existence of very different opinions about the term 'welfare state' in the respective countries, it is also legitimate to ask: "Who is the recipient of help services in the described cases?" Is the assistance directly aimed to support children or young people, shall it be employed for an overall help to the respective families as far as their problem-solving competence is concerned, or is the assistance meant primarily for those parents whose educational competence has to be supported? Depending on the user groups of this assistance, various concepts for the offered aids and interventional measures will be necessary.

The following aspects are examined in detail:

- a) Who is the entitled subject for assistance? To whom is it directed? To what extent is education of importance in families?
- b) Which are the age limits for granting assistance?
- c) In which form and how intensive is the user groups involved (conditions, limitations, differentiation according to case constellation, voluntary or governmental intervention, legal regulations, alternative possibilities)?

2.3 Types of Assistance

The third dimension is meant to record and describe the forms of assistance and aids mentioned in the responses received. An evaluation of properly arranged and related data is only possible if the results of the two preceding dimensions are also taken into consideration. For instance, it became obvious that a high degree of intervention in family life necessarily implies a relatively weak status of the family itself. This fact is reflected in the structural reality of countries (for example Sweden) where ample child day care centres are available.

Hereinafter, again some of the key questions related to this dimension:

- a) What does the range of different assistance types look like? Are there any examples for concrete assistance? Are there any limitations on available or requested assistance programs? How differentiated are the offers made (upbringing, punishment, educational qualification, groups)?
- b) Is there any assistance agreement? What are the reasons for its establishment, what is regulated in it, who is involved? What are the formalisation levels of such an agreement, its prerequisites and contents? Is there any regular review or does the contract even contain information setting an end to the assistance program?
- c) Intervention orientation, eligibility and obligation: when are governmental measures of compulsion justified (suspicion or proof)? Which intervention possibilities do exist? Who is responsible for the taking of decisions? Which forms of intervention are available?

3. Conclusion

With the selected method, it is possible to examine the various types of implementation practices in Europe. The question to be answered in future will be how to deal with this situation in a unified Europe? Even if the responses of the respective countries differed widely, the investigation gives information on how extensive the spectrum of assistance and the award of assistance is and how the various forms of assistance relate to each other. This enables us to get a good impression of the methods applied in the various countries.

Before delving in detail into the areas of future interest for European child and youth services arising out of the descriptions of the methods of action in other European countries, we would like to point out again the discrepancy between laws and their enactment, and the official directives and regulations on the one hand and their implementation on the other.

Even when some of the methods applied in other European countries appear to be worth emulating, looking at it from a professional point of view, it has to be kept in mind that the question still remains to be answered definitively about whether implementation in the respective country, its practicability and its capacity to be transposed to other countries are possible. The aim is to depart from the trodden paths, to question some of the things that are taken for granted in the different child and youth welfare systems and to broaden the horizon.

Looking at it from the German point of view, the responses from the European countries have produced a number of interesting news on the course of action to be taken in the face of certain case constellations. As examples three outcomes are addressed briefly.

User groups of the Assistance

We have observed that in the various countries, aid is directed towards totally different groups of persons. These vary between the two poles - "Family Orientation" and "Children Orientation". At one pole, the emphasis is placed on the special esteem for the family as the nucleus of the state and community, a fact requiring the protection of the private sphere and the family. At the other pole, of vital importance is the shift of emphasis rather to the conception of the state as the protector of the weak and therefore of the under-aged. Seen under this premise, the tendency is to downplay (too often) the private sphere of a family, rather than to hesitate for too long before taking action on behalf of an endangered child. How such differences affect the quantitative utilisation of statutory accommodation, for instance, was not part of the analysis.

Rights of Recipients

The presented material has clearly produced evidence that the position of recipients can be legally regulated in totally different ways. An example which holds promise in the case of child welfare practice in Germany is the right of recipients to fall back on persons they consider trustworthy. In Germany the clients sometimes enjoy this possibility, but it is not codified as in other countries.

In France, decisions on assistance are only taken in the presence of parents. This strengthens the position of the parents. Even if in Germany help is normally not granted without the formal approval of parents, the French practice demands parental participation in the process and goes beyond formal approval. In addition, parents are given the right to terminate any approved assistance prematurely. This rule can lead to increased involvement with the parental perspective, since their position in the assistance process is relatively strong. Another factor

strengthening the position of the parents is the right of parents to have access to the files of children and young people, as well as the regulation that the clients automatically receive a copy of the assistance plan. In Portugal, the legal position of young people in comparison to Germany is much stronger, since assistance to juveniles over 14 only takes place with their mandatory approval. In Germany the age limit for mandatory approval is pegged at 18.

Planning of Assistance

In other countries, the process of planning assistance is done in many different ways than is the case in Germany. There are countries in which the assistance is granted for a maximum period of a year. Also, the continuation modalities for assistance plans in many countries are fixed and are much shorter (e.g. quarterly or initially more frequent and later at longer intervals) than is usually the case in Germany. This touches on the question of directing and controlling the assistance procedures. Even if the danger of “excess control” is real, these examples offer suggestions for the discussion of the question, if a revision of the decisions taken on the type of assistance should not take place at shorter intervals and at more regular intervals than has been the case hitherto in Germany.

The investigation has also supplied evidence that the spectrum of themes and the degree of concretisation of assistance plans could be spelled out more precisely, so that intervention plans could more and more attain the function of a planned process of professional intervention, and not become a document of commonplace generalisations.

In Europe there exists also models which differentiate between an assistance plan and a treatment plan. Whereas in the assistance plan the needs of the clients are fixed and the aims of the approved assistance and the responsibility for its implementation are described, the treatment plan concretely shows how the approved plan should be implemented.

A close analysis of Anna’s case history reveals that, contrary to what has been valid in Germany hitherto, there are regulations in other European countries which protect persons who report suspicions about sexual abuse to the responsible authorities. In some countries, it is explicitly stated that suspicions of sexual abuse permits the abrogation of the legally fixed right to professional secrecy of certain trade groups (professional discretion). Altogether, the responses from the various countries gave the impression that the combat of cases of abuse is taken seriously and has led to the creation of special services.

What we have at hand, is certainly no comprehensive picture of the situation in the various countries: Some questions remain unanswered. Based on the results at hand, it would be a good opportunity to organise expert meetings with the aim of deepening the knowledge accumulated till now, and examining the question of how far certain procedures and regulations can be adapted to other countries.

The results are published in detail under www.dji.de/jhsw .

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