

**Child welfare workers' perceptions of children's participation: a comparative study of  
England, Norway and the United States (California)**

Katrin Križ, PhD, Associate Professor of Sociology, Emmanuel College, Boston, MA 02115,  
[krizka@emmanuel.edu](mailto:krizka@emmanuel.edu)

Dr. Marit Skivenes (corresponding author), Professor, Department of Administration and  
Organization Theory, University of Bergen, Bergen, Norway, [Marit.Skivenes@aorg.uib.no](mailto:Marit.Skivenes@aorg.uib.no)

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### **Abstract**

This paper examines how child welfare workers in England, Norway and the United States (California) perceive children's participation building on 91 qualitative interviews. First, analysing the data using Hart's (1992) ladder of children's participation, we found that all Norwegian workers perceived children's participation as some form of decision-making, whereas 40 percent of English and 35 percent of U.S. workers embraced views of children's participation that can be considered token or non-participation. Second, we coded the data for main themes and found that child welfare workers in all three countries perceived children's participation as *hearing the child's opinion* and *information gathering*. The themes of *age, maturity and ability to form an opinion* also emerged from the data. English workers' reflections about children's participation were more nuanced than their Norwegian and U.S. counterparts; and U.S. workers understood children's participation as children providing valuable information during the investigation of a case more so than workers in England and Norway. We discuss the implications of these findings on future research.

**Key words: child welfare; children's participation; cross-country study; England; Norway; United States**

## **Introduction**

Children's right to participate in matters concerning their lives is an explicit priority for the United Nations, the European Union (Council of Europe, 2014) and many Western nations. Through the Convention on the Rights of the Child (UNCRC 1989) particularly, children are given clear and strong rights to participate. Research evidence has shown that children's participation correlates with positive effects on children's safety and well-being and results in lower levels of out-of-home (foster care) placements, even though the evidence about long term effects is not unequivocal (Vis *et al.* 2011). However, there are difficulties in implementing children's rights, and children's participation is the right that may pose the biggest challenge because it affects the power relations between children and adults.

There are clear signs in many countries of the global north that the social position and status of children are changing and gaining strength (UNICEF 2007, 2010, 2013; Gilbert *et al.* 2011); however, we know little about how public child welfare systems are contributing to this trend. The aim of this article is to examine child welfare workers' understanding of children's participation in the area of child welfare/ child protection. This research question follows in the footsteps of the work of van Bijleveld *et al.* (2013), whose path-breaking study shows that professionals' objections to children's participation is related to their socio-cultural image of children (Healy and Darlington 2009; see also Vis & Fossum 2013b). Our study aims to explore the role of child welfare workers in relation to children's participation in public child welfare agencies in three countries—England, Norway and the United States (California). This is an important topic because public child protection systems seem to have difficulties in achieving children's right to participate: research reports demonstrate that children do not participate as much as legislators aim for (Tregeagle & Mason 2008; Healy & Darlington 2009; Munro 2011; Vis *et al.* 2013a, b); conventions, policies and laws may express goals and ambitions, but the reality of children's participation in the area of child

protection can be found in the interactions between children and the street-level bureaucrats who practice with them (Lipsky 1980; Thomas & Percy-Smith 2012). These interactions could constitute a significant pathway towards children's participation in our societies— an important reason for examining child welfare workers' views on children's participation.

This study rests on the assumption that the way in which individuals conceptualize a phenomenon (in this case child welfare workers' conceptualization of children's participation) is decisive for how they act. For instance, if children's participation is understood as children being allowed to voice their opinion versus children being given the authority to actually decide certain matters themselves, we believe this will result in two very different types of child protection practice: in the former case, child welfare workers may consult with children and inform them about decisions that adults have made; in the latter case, workers will concede decision-making power to children, allowing them to become (co-) decision-makers. There are other researchers who are concerned with ways to establish a culture of participation for children and who have promoted analyses of the frontline practice level (Thomas & Percy-Smith 2012); however, overall, there is a dearth of studies examining children's participation in child protection, even though child welfare is a crucial arena in which the state intervenes in the lives of the most vulnerable children in society. Our study also adds a comparative element to previous research on children's participation in child protection.

Healey and Darlington's (2009) illuminating research on children's participation in the Australian public child welfare system is one of the few studies on child welfare workers' perceptions of children's participation. Healey and Darlington conducted in-depth interviews with 28 child welfare workers who represented five domains of child welfare work. The authors found three themes that workers found important for achieving participation for children: fifty-seven percent of workers mentioned showing respect by creating opportunities

for participation and acknowledging children's knowledge, experience and capacity; seventy-five percent said that workers needed to find the appropriate level of participation that would help children participate (appropriateness); and fifty-three percent mentioned the idea of transparency: workers need to be open and clear about the aims and processes involved in decision making. The study also found variations between workers in terms of their understanding and the implementation of children's participation depending on both the domain of child protection work, and depending on the degree to which workers said that they were interested in primarily promoting children's or parents' participation.

### **Legal platform and conceptual framework**

The concept of children's participation has been subject to a longstanding scholarly debate (Archard 2004), which, generally speaking, revolves around discussions about the content of the concept as it has been outlined in Article 12 of the UNCRC (1989):

#### ***Article 12***

1. States Parties shall assure to the child who is capable of forming his or her own views the right to express those views freely in all matters affecting the child, the views of the child being given due weight in accordance with the age and maturity of the child.

2. For this purpose, the child shall in particular be provided the opportunity to be heard in any judicial and administrative proceedings affecting the child, either directly, or through a representative or an appropriate body, in a manner consistent with the procedural rules of national law.

Concerning participation, Article 12 grants children a very prominent place in all matters that affect them. What is debatable is how to interpret what it means for a child to have the ability to form an opinion, and what it means for a child to be able to express their views freely. It is also a matter of interpretation what giving a child's view due weight implies, and what it means that due weight should be given in accordance with age and maturity. Clearly, these issues are not easy to determine and may result in numerous interpretations and approaches, as previous research has shown (Archard & Skivenes 2009b; Peters 2007; Vis *et al.* 2011, cf.

Healy & Darlington 2009 p. 421). Ultimately, these interpretations show that children's participation is a contested concept—a concept that can be defined in different ways.

The interpretation of children's rights varies in England, Norway and the U.S., and so does the strength of implementation into national legislation: both England and Norway have enacted the UNCRC into national legislation; the U.S. has not ratified the UNCRC but still secures children's rights in many areas. Looking at children's right to participate in the child protection system, and the interactions between the child protection system and children, we see differences between England and Norway on one hand, and the U.S. on the other hand. In Norway, children are granted participation rights in two stages: at seven years of age (or younger if they are able to form an opinion), they must be given the opportunity to express themselves and be heard (law revision of August 1, 2003 no. 86). When they are 15, they are recognized as parties in legal cases and can make decisions about their education, enrolment in activities, membership in organizations and religious practice. Norway recently reduced the age threshold from 12 years to seven years as a direct response to the UNCRC: children shall not only be given a central position in child custody and child protection cases but also become more active participants in Norwegian society at large, in family life, school and local politics (law revision 2003; Author 2011).

The English government has been promoting a child centric framework for the child welfare system for a long time (Parton & Berridge 2011), emphasising the importance of hearing the child's wishes and feelings. Unlike in Norway, legislation does not specify a mandatory age-specific limit for when children should participate. The law's premise is that all children of all ages have a right to be heard. While in practice guardians are appointed for younger children, there seems to be an informal understanding that at the age of 12 years, children can appoint their own lawyer to represent them in court. The current policy seeks to further strengthen the position of children in the English child welfare system (HMG 2013).

The U.S. child welfare system is very heterogeneous and, overall, children do not have strong rights to participate in child protection decision making processes. States and local jurisdictions have discretionary power over how they will include children (Peters 2007). However, there seems to be a trend towards children's inclusion in decision-making processes through Team Decision Making in the form of family conference meetings which include the wider family in decision-making (Berrick 2011).

Historically, the development of the concept of (human) rights has revolved around the idea of authority or sovereignty of an individual over their own life decisions (Archard 2004; Hunt 2007). The idea of the sovereign individual – the individual who has the power to make decisions about their own lives – rests on the Enlightenment assumption that human beings have reason which they can use to deliberate about different courses of action. One of the driving forces behind the invention of the idea of rights was the rise of specific cultural constructions, such as novels and paintings, which allowed individuals to feel empathy towards others who they hitherto considered quite different from themselves, especially in terms of gender, race, social class but also age (Hunt 2007). For this study, we are returning to the historical underpinnings of individual rights to emphasize that the concept of rights is inextricably linked to the concept of power; even though Article 12 does not explicitly mention children's decision-making power, the idea of giving a child's opinion "due weight" is related to the level of a child's authority, sovereignty and, ultimately, power.

Based on the assumption that rights and power (to make decisions) are intertwined concepts, we found Hart's (1992) ladder of children's participation a useful index to examine child welfare workers' perceptions of children's participation. It is no surprise that the basis of Hart's ladder is the ladder of citizenship developed by Arnstein (1969) in an article about civic participation, or the rights of citizens to make decisions about their own lives. Hart's ladder, shown in figure 1, distinguishes between different 'rungs' or levels of participation,

ranging from 1-8. The first rung is called *manipulation*, and then the ladder gradually rises to the final (top) level, which is called *shared decision making*. At the top of the ladder, we find activities that were initiated by children, and decisions about these activities that were shared by children and adults. The bottom of the ladder encompasses activities that were initiated by and decided on by adults; children only follow adults' directions without having a say and without understanding the activity's purpose. Hart distinguishes between "non-participation" (rungs 1-3) and "degrees of participation" (rungs 4-8). Clearly, the main distinction between rungs 1 and 8 of the ladder rests on the level of children's decision-making power.

[Insert Figure 1 here.]

Based on the differences in the legal frameworks of England, Norway and the U.S. and the analytical framework of children's rights as intertwined with the concept of power, we address the following analytical questions in this study: (1) to what extent do workers' perceptions of children's participation include an understanding of children as individuals that should have authority over decisions affecting their lives? To put it differently: in what ways do workers conceive of children's participation as "participation" (by Hart's definition this would involve statements ranging from rungs 4-8) and "non-participation" (statements on rungs 1-3 on Hart's ladder); and (2) In what ways do workers' perceptions differ across countries; and do these differences reflect the legal and policy frameworks we outlined above?

To answer these questions, we first examined the qualitative interview data we gathered in England, Norway and the U.S. between 2008 and 2010 and examined whether, and how, workers' perceptions of children's participation can be mapped according to Hart's rungs. Second, we identified the themes that the participants themselves mentioned as essential to their understanding of participation for children. (We will describe our analysis approach in more detail in the methods section). Based on the differences in legal and policy



frameworks, which we outlined above, we expected to find that child welfare workers would view children's participation differently across countries, with Norwegians leading in terms of participation levels and understanding of participation as power-sharing between children and adults. We also expected that workers in England, who we have shown to be very conscious of the content of legislation in previous research (Authors, 2014), will show an awareness of involving children in decision-making processes. As Team Decision-making is practiced in the Californian child welfare agencies we sampled, we also expected U.S. workers to be conscious of the children's possibility to participate in decisions.

## **Methods**

This study, which was funded by the Norwegian Research Council, is part of a larger research project comparing child welfare systems in England, Norway and the U.S. (California). We selected these three countries because we aimed for a different-case comparison: based on previous research (Gilbert 1997; Gilbert *et al.* 2011), we knew that these countries represented different approaches to child welfare. Practical considerations were important as well, especially accessibility of research sites. This article builds on an analysis of the responses to in-depth, semi-structured interviews with a total of 91 child welfare workers in California (40 responses), England (25 responses) and Norway (26 responses), conducted between January 2008 and June 2010. We primarily present our analytical approach here as a discussion of sample and methods of data collection and analysis are outlined in Authors (2012, 2011) (both sections are attached for reviewers).

Our study is based on workers' responses to this open-ended question: "What is your understanding of participation for children in child protection?" Participants answered this question based on their own interpretations; in most of the interviews they responded without any cues or prompts from us. We analysed the interview transcripts in two stages: first, we identified common themes (Weiss 1994) and counted how many workers fitted into the same

thematic category (or code) in one country; then, we compared themes and their frequencies across countries. The interviews were coded in Atlas.ti. The material was first coded by the authors and then re-coded and reliability-tested by five research assistants, two in the U.S. and three in Norway. Table 1 shows the codes we identified that were mentioned by more than 15 per cent of the study participants in each country. We combined codes 4 and 5 for the analysis as they both concern themes that are considered balancing points in terms of when to speak to children and how to weigh children's opinions.

[Insert table 1 here.]

The most obvious limitation of this study is that the sample, which is based on workers employed in two counties in one state in the U.S., one local authority in England, and two municipalities in Norway, is not representative of each country. This is especially limiting for the United States, as there is significant system variation across U.S. states, even though the federal government sets legal standards for the entire country (Berrick 2011). Another obvious weakness is that we did not ask study participants about a specific age or situation regarding children's participation; thus we do not know what children and types of cases workers had in mind when answering the interview questions. Based on what workers mentioned during the interviews, we did notice that workers had different ages in mind when they answered the question. For the sake of simplicity, we will sometimes use the country term, for instance "Norway," instead of "the sample of workers from Norway," below.

## **Findings**

Workers' responses to the interview question about how they view children's participation varied along several dimensions; for instance, some workers provided very short responses, as this Norwegian worker's response illustrates: "[participation] means to talk with them [children] and involve them; talk with them about what we plan to do; listen to what they

themselves feel about the situation.” (N2). Others provided lengthier answers that included illustrations and reflections about the topic. Workers also spoke about participation in relation to different types of processes within the child welfare system that correspond to different stages of a case (initial assessment or investigation and decisions about a child’s removal from home; decisions about services; decisions about issues concerning foster care, etc.). The workers in California distinguished themselves by including frequent statements about children’s participation in court hearings – an arena that we did not specifically ask about or prompt for.

Table 2 shows that workers in all three countries articulated support for children’s participation, but the degree to which they did so varied by country.

[Insert table 2 here.]

Looking at the top of the ladder, we can see that none of the workers’ responses corresponded to rung 8 (decisions made by children and adults as equal partners), and only one worker’s response, in the U.S., corresponded to rung 7 (decisions made by children with little adult input). At the bottom of the ladder, no responses corresponded to rung 1, and a few responses in England, but several in the U.S., ranked at the level of rung 2— *decoration*; i.e. children have no input in deciding about activities, which are led by adults, but they understand the activity’s purpose. There are also quite a few workers in England and the U.S. who portray participation as rung 3— *tokenism*: tokenism involves adult-led activities in which the child understands the purpose and decision-making process and has a role but does not act as a co-decider. These three lowest rungs, 1-3, cannot be considered actual participation for children, as the designations given to these rungs— *manipulation*, *decoration* and *tokenism*— make clear. While none of the Norwegian workers’ statements fell on the non-participation rungs, more than one third of the workers in England (40%) and U.S. (37%)

expressed an understanding of participation that cannot be considered participation for children according to Hart's ladder.

The following are two examples of how U.S. workers expressed views on non-participation. The first worker understood participation as perceiving the child as the key individual during an investigation; the second worker equated participation to a child's reactions during an assessment:

Participation in the sense of they're the key individuals. I mean if we're talking about an investigation or an assessment, basically that's the identified person or the victim. (US\_F16)

So it's equally important for — the child's reaction to something means a huge amount to me. I think that if you have a child who got hit and [...] it happens all the time, that's of interest, but it's also kind of less alarming than a child who is just like terrified and saying, just clearly does not want to go home; he's really, really scared. Those are two different kinds of reactions and you are probably going to make decisions on the case — well I think you should, based on those reactions. (US\_C8)

An example of workers who understood children's participation in accordance with rungs 5 and 6 is provided by Norwegian worker 16:

That the child is heard. So it is important that there are conversations with the child or the young person. And if they are very small [...] we would not have conversations, but at least meet them and make an observation. Participation is all about hearing what they [children] think about their own situation. If they think they need any help. And say something about what we can offer of help. Be really on the supply side in terms of what we can help them with. Be respectful if the child does not want us to get too much information. And do not put the responsibility on the child, but say this very clearly that the responsibility is ours. That it is we who are concerned; it is we who observe these things (that is a concern for the child welfare agency). It is very important to provide lots of information — and over and over again. Participating, that they are allowed to attend meetings if they wish. They should always be heard, and be involved in their own action as far as possible. That we approach them on their terms. For example, meetings at school. It is always a question I have when I call children and young people and say that it is something that I want to talk to them about, if I should come to school, come home to them, or meet here in my office, or if we should meet somewhere else.

The level of support for children's involvement in making decisions differs by country, as table 2 shows: Norwegian workers uniformly supported children's participation to

a higher extent compared to workers in England and the U.S. We placed 96 percent of workers' responses in Norway on rungs 4, 5 and 6, whereas 61 percent of U.S. workers' and 56 percent of English workers' responses were located on these rungs. Compared to the U.S., workers in England were more likely to mention that children should be consulted and informed — workers were more likely to say that they explained procedures and told children how their information would be used. In the U.S., workers were more likely to mention adult-led activities whose purpose and decision-making process children understood.

This analysis demonstrates that the workers in our Norwegian sample tended to be more oriented towards children's participation than their peers in England and the U.S.; however, when we analysed the interview responses for prominent themes, some interesting additional themes emerged across the different samples, as table 3 shows. English workers displayed an in-depth, sophisticated knowledge about children's participation and eloquently discussed how to achieve rapport with children at different ages with the help of different methods (such as drawing images or playing games). Some of them also mentioned that financial concerns and resource issues may overrule children's opinion in later (ongoing) stages of a case (for instance, when children decide about foster placements or when teenagers wish to leave home). Several of them also said that the forms they fill out prompt them about whether children's wishes and feelings were heard; whether the child understands what is happening, and whether the report has been shared with the child. Norwegian workers displayed a nuanced understanding of children's participation but did not mention or elaborate methods or tools. Workers in the U.S. sample displayed an investigative approach in which they valued children's participation as part of the process of gathering information and evidence during the investigation stage of a case. It is also noteworthy that some of the U.S. workers emphasized that children may not be truthful or seek to manipulate adults.

[Insert table 3 here.]

Our findings show that child welfare workers in the three countries under study perceived children's participation as *hearing the child's opinion* combined with *informing* them. Simultaneously, many of the workers identified dimensions as *age, maturity, protective attitude* and *ability to form an opinion* as factors that they considered when and in which ways they should listen to children. In particular, these factors were mentioned in relation to decision-making or choice situations. Finally, one third of the sample mentioned the argument that children needed protection (from possible harmful effects as a consequence of participation), and that children do not always know what is in their best interest.

### ***Hearing the child and gathering information***

When talking about children's participation, a total of 81 percent of the workers mentioned that hearing the child is vital. This code includes statements about involving the child and including the child's perspective in decision-making (actual participation). It also includes more general statements expressing that the child must be heard, spoken to and seen (but without an emphasis on taking the child's opinion into consideration when making decisions). The following responses by an English worker (actual participation) and a Norwegian worker (non-participation) exemplify these different types of responses:

Participation means that a child's views and opinions are taken into consideration and any decisions or factors we look at with regard to them, that they are included in that, as long as we're not putting them under any sort of pressure, and also that they're at an age whereby they're mature enough to understand and make sound decisions about their lives. (E30)

I understand [participation] to be about speaking with children. [I]'ll try to find out how they are. In an investigation, I think that there is no age limit for participation of children. (N5)

Thus, the code "hearing the child" is a broad category; it was therefore surprising to find that not all workers mentioned that hearing the child's view or speaking with children is a vital concern in their work. English workers mentioned this code most frequently, with all but one

worker stating that participation is about hearing the child. Fewer workers in Norway made similar statements (88 percent), and considerably fewer in California (67.5 percent).

*Information gathering* is a closely related theme, which includes all statements expressing that participation for children is important or necessary to collect information and/or gather evidence in a case. About 50 percent of workers in the U.S. mentioned this theme, compared to 40 percent in Norway and 27 percent in England. The following quote by U.S. worker US\_C11 illustrates this theme:

Children really know [...] know their family dynamics. And they can tell you, if you listen to what they're saying, how you should proceed with the case. (US\_C11)

It is probably not a coincidence that there are more workers in the U.S. who focused on information gathering compared to Norway and England as the U.S. system is a 'risk oriented' system with high thresholds for interventions (Authors 2013; Author YY & Author ZZ 2013). In addition, the U.S. sample is comprised of workers from an emergency response unit, whose main task is to gather information about a case to make a determination about risk to the child.

### ***Protective attitude***

About one third of the sample mentioned that children's participation may not be appropriate because it would harm them, or that children's need to be protected trumps participation rights. About half of the sample of English workers, 38 percent of the Norwegian workers and 20 percent of the U.S. workers mentioned this theme. For example, Norwegian worker N28 stated when putting herself in a child's shoes:

N28: These articles [in the law] about children's rights to be heard and have a spokesperson, sometimes this is cruel to children, I think.

Interviewer: why is that?

N28: Because I think it is a big burden to be seven years old, knowing a case is coming up and someone is coming to ask me [the child to have an opinion, and my dad wants me to have an opinion, and my mum wants me to have an opinion. [...] The pressure that children are exposed to in these situations is wrong, I think. Of course, I

will treat children as the central person in the case, and it is our job to lift up the child in a case.

Or, as the English worker 47 explained it:

I mean, what I do in my practice, sometimes children, we want to know what children feel in a child protection situation but they cannot be a decision maker really. Because children often will cling to a parent even if that parent has been abusive, and I think sometimes as adults we've got to make decisions for them. But share with them why we're doing what we're doing, really. Because I think children cannot choose to stay in an abusive situation, basically.

These workers highlight the importance of balancing children's participatory rights with other important concerns.

### ***Age, maturity and ability to form an opinion***

A total of 71 percent of the workers in this study also stated that children's participation depended on children's age and/or developmental stage; they felt that children could participate once they had reached a certain age and a level of maturity, or an age where they understood what was happening and could form an opinion by themselves. When we combined the codes of age, maturity and ability to form an opinion, our analysis showed that in England, 84 percent of workers raised one or more of these concerns, whereas 65 percent of Norwegian workers and 67.5 percent of U.S. workers did.

The kind of participation workers had in mind varied by age: in England, several workers mentioned that the views, wishes and feelings of children aged three and older needed to be heard. English worker 32 expressed this view like this:

[Children] should always be consulted, even at an age where generally speaking, here, we do it from the age of three, so that we would look at speaking to a child on their own, generally with parents' permission.

In Norway, the age of seven years was often mentioned as the age when children are old enough to participate—workers' views thus paralleled the age mentioned in Norwegian legislation. In the U.S., several workers mentioned 10 years and 12 years as age limits.

Maturity was most often perceived as children's ability to understand the situation. Worker 57



in England noted that when a child reaches 13 years, it does not automatically mean that s/he will understand what is happening; on the other hand, there are children who are younger who are “well aware of what is going on. So I think it depends very much on the child themselves and their level of understanding.” (E57). In the U.S., US\_F 12 felt very strongly that 12 years represented the watershed age between a child’s maturity and immaturity:

A lot of the children, and let’s say that a lot of 12 year olds that I know are really immature, but mainly maturity that they feel like they can say something and people will listen to them. Before they are 12, they are just like little kids. And they had to do whatever their adults are saying. And there’s a lot of fight with that. I see a lot of younger children who are very mature, but unfortunately, they’re never— they’re interviewed and everything, but they’re never asked what do you think about what should happen next? I’ve never seen it around this table.

### **Discussion and conclusion**

When we analysed qualitative interview responses about child welfare workers’ views of children’s participation using Hart’s (1992) ladder of participation, we found that approximately one out of four workers conceptualized children’s participation as *non-participation*: children were not considered decision-makers; rather, these workers’ perceptions corresponded to the themes *manipulation*, *decoration* and *tokenism* as understood by Hart. This type of participation is window dressing and cannot be considered participation as conceptualized in Article 12 of the UNCRC. Interestingly, none of the Norwegian workers understood children’s participation as non-participation, whereas about one out of three U.S. workers and four out of ten English workers did.

When we analysed workers’ responses by thematic category (rather than ranking responses by Hart’s ladder), we found a higher degree of awareness and more nuanced reflections about children’s participation among English workers; they were more conscious about the complex considerations that are involved when participation for children is implemented in daily child welfare practice. They clearly stated that a child should be heard and that her or his opinion is of importance; they also said that participation depends on a

child's age and maturity and needs to be balanced against the child's need for protection from re-traumatization. Quite a few of the English workers also mentioned how resource issues prevented them from putting children's feelings and wishes into reality. Compared to their Norwegian and U.S. peers, a higher proportion of English workers mentioned these themes when they explained what children's participation means. We also found that the Norwegian and U.S. workers responded quite similarly along several dimensions, but there were also clear differences, especially with regard to their statements about hearing the child and the role that children play in information gathering in child abuse and neglect investigations. For Norwegian workers, "hearing the child" typically meant getting children's view on their situation and was less about gathering evidence and information, whereas the opposite was the case for workers in the U.S., many of whom viewed children primarily as valuable sources of information during evidence gathering.

These findings confirm, and contribute to, the important study by Healy and Darlington (2009), which identified *respect*, *appropriateness* and *transparency* as the main themes emerging from qualitative interviews with a sample of Australian child welfare workers. We believe that our thematic category "hearing the child" includes the theme of "respect," although it is somewhat broader. Similarly, our theme "protection" is similar to "appropriateness;" however, a significantly lower proportion of the workers in our sample mentioned these themes (protection/ appropriateness). Healey and Darlington's theme of "transparency" was partly included by the theme "hearing the child" in this sample, but it was not a direct match. Compared to their peers in England and Norway, the U.S. workers in this sample mentioned the theme "protection" less frequently. (This theme encompassed statements saying that children may be harmed or traumatized if they participate, and that they should be protected from participating.) This may be due to the fact that we interviewed workers in an emergency response unit in the U.S.; these workers are probably more

concerned about children being traumatized by the abusive situation they find themselves in than by participation during the investigation of a case.

From a methodological perspective, we found it useful to apply two different approaches to analysing the interview material because it allowed us to detect differences in how the same material can be interpreted and how it can represent different results depending on the type of analysis we employed. This, to us, indicated the fruitfulness of combining different types of analytical approaches (indices such as Hart's ladder and thematic analyses) in analysing qualitative interview material. Interestingly, our analytical combination revealed a discrepancy between our analysis according to Hart's ladder and our thematic analysis: none of the Norwegian workers perceived children's participation as window dressing; still, Norwegian workers' responses displayed fewer nuances and reflections compared to English workers. We do not have a good explanation for this discrepancy. It is noteworthy, however, that a larger survey-based cross-country study (n=304) that also includes the sample of workers in this study revealed that age is a particularly important factor in children's participation for Norwegian workers. The analysis of this larger sample demonstrated that there is a statistically significant difference between the three countries in workers' responses to a case vignette involving a three year-old boy: only 16 percent of the Norwegian workers stated that they would speak with the child, but 76 percent of the English workers and 62 percent of the U.S. workers stated that they would; however, when the child in the vignette was 15 years old, all Norwegian workers put a lot or quite a lot of weight on the child's opinion; this was statistically significantly different from the U.S. workers, 86 percent of whom said that they would put a lot or quite a lot of weight on the child's opinion, whereas 95 per cent of the English respondents said the same (Author YY, under review). The study indicates that a polarization of perceptions amongst Norwegian workers, either protective and paternalistic as with the 3 year old, or autonomy and self determination as with the 15 years

old. It may also be the case that within the Norwegian socio-cultural conceptualization of children and childhood, in which Norwegian workers operate, children (beyond a certain age) are considered individuals who are reasonable, capable and strong and should be granted the power to participate in decisions concerning their lives. We believe that the nuanced and thoughtful reflections among the English workers in this sample mirror the long-standing governmental focus on child centrism and support for children's participation in the UK. Their responses also showed that there are factors other than legislation and the socio-cultural framework of children and childhood that will influence children's actual participation in child welfare cases, especially financial resources.

At the outset of this study, we departed from the assumption that it is important to understand what child welfare workers think of children's participation. Here, we are arriving at the following conclusion: future research on children's participation will need to be designed to measure the different and often contradictory factors involved in children's actual decision-making power and processes and will need to be able to test the reality of children's decision-making in child protection practice; such a research design might involve workers' responses to a case vignette that includes questions about financial resources and court decisions; it could involve children's own views on participation in their case; or it could involve an analysis of children's participation in court cases—all of which focussing on the ways in which children are actually involved as decision-makers.

### **Acknowledgements**

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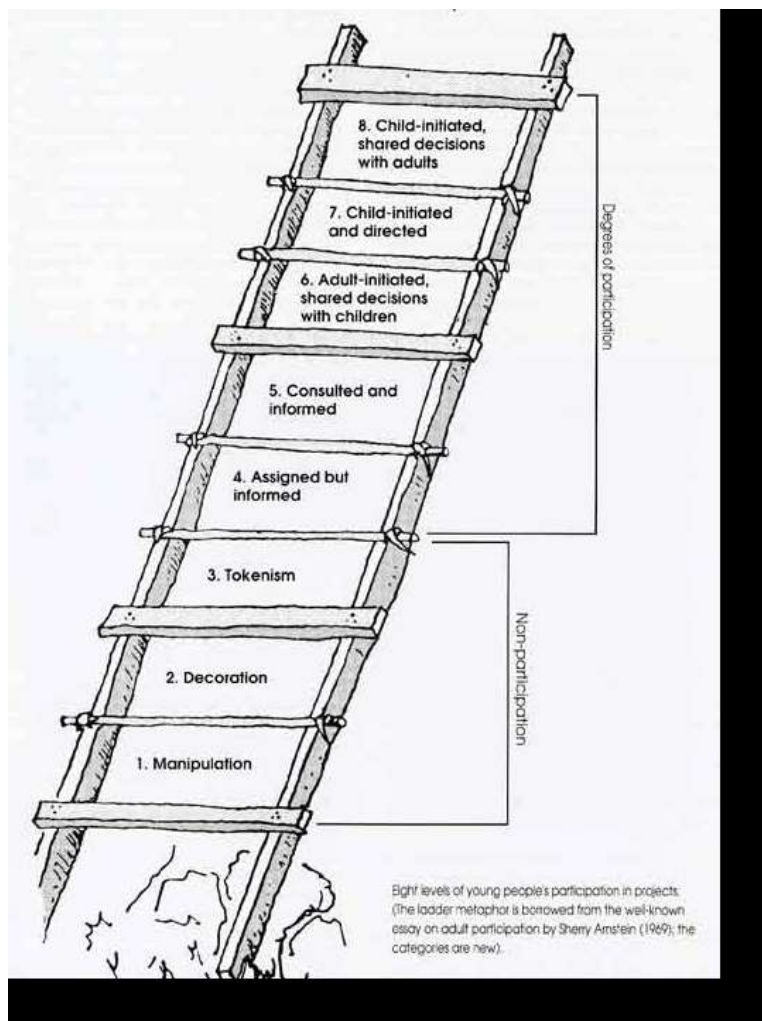
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## Tables and figures

**Figure 1. Hart's ladder of children's participation**



### **Descriptions of rungs used for our analysis, adapted from Fletcher, A. (n.d.):**

#### *Participation:*

Rung 8: children-led activities, in which decision making is shared between children and adults working as equal partners.

Rung 7: children-led activities with little input from adults.

Rung 6: adult-led activities, in which decision-making is shared with children.

Rung 5: adult-led activities, in which children are consulted and informed about how their input will be used and the outcomes of adult decisions.

Rung 4: adult-led activities, in which children understand purpose, decision-making process, and have a role.

#### *Non-participation:*

Rung 3: adult-led activities, in which children may be consulted with minimal opportunities for feedback.

Rung 2: adult-led activities, in which children understand purpose but have no input in how they are planned.

Rung 1: adult-led activities, in which children do as directed without understanding of the purpose of activities.

**Table 1. Codes on data material on children's participation**

<b>Number</b>	<b>Code</b>	<b>Description</b>
1	<i>Hearing the child</i>	Statements about the importance of hearing the child's view or the child's perspective; getting their view on a situation, involving the child; putting weight on the child's opinion
2	<i>Information gathering</i>	Statements saying that participation for children is important or necessary to gather information or evidence in a case
3	<i>Protective attitude</i>	Statements saying that children should be protected from participating or that it may be harmful for children to participate or make a decision.
4	<i>Age</i>	This code includes statements about age as a factor that is relevant for participation.
5	<i>Maturity and ability to form an opinion</i>	This code includes statements about the child's capacity to understand as well as statements that reflect on a child's capacity or ability to have an opinion on an issue. (The codes <i>protective attitude</i> and <i>maturity</i> overlapped to some degree.)



**Table 2. Comparison of rungs according to Hart's (1992) ladder, by country**

<b>Codes</b>	<b>England (%) n (100) 25</b>	<b>Norway (%) n (100) 26</b>	<b>USA (%) n (100) 40</b>	<b>Total (%) n (100) 91</b>
Hearing the child	(96) 24	(88) 23	(67.5) 27	(81) 74
Age	(60) 15	(38) 10	(60) 24	(54) 49
Information-gathering	(40) 10	(27) 7	(50) 20	(40) 37
Protective attitude	(48) 12	(38) 10	(20) 8	(34) 31
Maturity	(36) 9	(11.5) 3	(35) 14	(29) 26
Combined: age, maturity and ability to form an opinion	(84) 21	(65) 17	(67.5) 27	(71) 65

**Table 3. Frequency of codes, by country**

<b>Rungs</b>	<b>England % (n)</b>	<b>Norway % (n)</b>	<b>USA % (n)</b>
Rung 8	0 (0)	0 (0)	0 (0)
Rung 7	0 (0)	0 (0)	2.5 (1)
Rung 6	12 (3)	11 (3)	15 (6)
Rung 5	32 (8)	54 (14)	5 (2)
Rung 4	12 (3)	31 (8)	40 (16)
Rung 3	28 (7)	0 (0)	10 (4)
Rung 2	8 (2)	0 (0)	20 (8)
Rung 1	4 (1)	0 (0)	5 (2)
Unclear	4 (1)	4 (1)	2.5 (1)
Total	100 (25)	100 (26)	100 (40)

## Methods appendix A

This study was funded by the Norwegian Research Council and is part of a larger research project comparing child welfare systems in England, Norway and California in the United States. This article builds on the analysis of the responses to in-depth, semi-structured interviews with a total of 86 child welfare workers in California (39 responses), England (24 responses) and Norway (23 responses), conducted between January 2008 and June 2010. We mainly discuss the study sample here because we discussed methods of data collection and analysis in previous articles (Križ and Skivenes, 2010b, 2011b).

The American Public Human Services Association (2005) distinguishes between five categories of child welfare workers: 1) child protective service (CPS) workers; 2) in-home protective service workers; 3) foster care and adoption workers; 4) multiple program workers; and 5) front-line supervisors. Following this category, in California, our sample consisted mostly of child protective service workers who also provided in-home services, even though several workers mentioned occupying other professional roles in the child welfare system. A few of our interviewees were front-line supervisors. We recruited our Californian sample in ‘emergency response units’. These are the units that undertake risk assessments immediately or within 10 days of the referrals that are screened in. These units can provide services for 30 days (Reed and Karpilow, 2009). In England and Norway, all study participants were involved in front-line child protection work, either through investigating cases and/or providing ongoing services. A few of them self-identified as managers.

In California, study participants received a compensation of \$150 for their participation in the interview (typically lasting 1–1.5 hours) and for responding to an online survey (lasting for 1–1.5 hours). Our choice to pay study participants an honorarium was based on a research reimbursement model, which proposes reimbursing participants for their time (Grady et al., 2005). We also followed justice considerations – we wanted all participants in the project to receive the same amount, regardless of their country of residence. The honorarium may have motivated more, and a broader set of workers, to participate, but it may also have skewed the sample towards those who were attracted by the honorarium. However, we have checked for other biases, and we know that our sample is representative of their units/ agencies with regard to workers’ age, education, work experience, gender and ethnicity at the time of the interview.

Study participants were experienced child welfare workers. Our Californian sample of 40 workers was unusually experienced with 16 years of work experience on average, with a variance of 28 years, and a median of 15 years. In England, the average years of work experience amounted to 10 years, with a variance of 33 years, and a median of nine years. In Norway, the average work experience amounted to 10 years, with a variance of 33 years, and a median of eight years. In all three countries, study participants were almost all women, and in Norway and England, participants were almost all White. The Californian sample was more ethnically and racially diverse and also more highly educated. All but one study participant had earned a masters degree,

and two participants had obtained a PhD degree. In Norway, all workers held a bachelors degree. In England, fewer than half of the study participants had earned a masters degree, while the remaining participants held a bachelors degree. The variation in education levels across the samples can also be considered a limitation of this study.

However, the most obvious study limitation is that the samples that this study is based on – workers employed in two counties in one state in the USA, one local authority in England, and two municipalities in Norway – are not representative of each country. There is significant system variation across the American states, even though the federal government sets legal standards for the entire country (Berrick, 2011). For our purpose, California is an interesting case because it is ethnically and racially diverse; the state is one of six traditional immigrant destination states (Walters and Trevelyan, 2011).

This article is based on workers' responses to the following question: 'what are the particular challenges, if any, that minority parents face in raising their children in American/Norwegian/English society?' In England and Norway, where we started interviewing, workers spoke about minorities of color hailing from Asia and Africa; hence, in California we stated that the term 'minority families' referred to 'African-American and Hispanic or Latino families, and other families of color'. Primarily, workers then spoke about service users of Hispanic and African American backgrounds. We analyzed the interview transcripts in two stages: first, we identified common themes (Creswell, 2007; Strauss and Corbin, 1990) and counted how many workers fitted into the same thematic category in one country; subsequently, we compared themes and their frequencies across countries.<sup>2</sup> In terms of limitations, this study is based on a small, non-randomized sample and therefore we cannot generalize about the perceptions of child welfare workers overall. However, the depth and richness of the data are particularly useful for our explorative approach, and the data yielded several significant cross-country patterns, which we discuss below.

## Methods appendix B

This study, which was funded by the Norwegian Research Council, is based on in-depth qualitative interviews with 52 child welfare workers in Norway and England conducted between January and March 2008.<sup>1</sup> With the help of the respective city councils, we recruited child welfare workers in two Norwegian municipalities, Sandefjord and Stavanger (14 in each city) and 25 in Sheffield, England. At the request of participants, most interviews took place in conference rooms at the local authorities. Interviews typically lasted for 1.5 hours, were digitally recorded and were transcribed verbatim. This study was reviewed by the Norwegian Privacy Ombudsman for Research, which assesses privacy-related and ethical dimensions of a research project, and by the Research Ethics Committee of the City of Sheffield. The child welfare workers we interviewed were experienced workers. Half of the Norwegian study participants had eight or more years of work experience in the child welfare system. Half of the English study participants had worked for nine or more years. Only one-fifth of all workers had worked in child welfare for less than 5 years. In both Norway and England, our samples were almost all white, and almost all female. Interviewees in Norway reported a lower level of experience working with ethnic minority families, a difference that may affect how child welfare workers perceived minority children. In terms of their work experience, age, sex and education, study participants were representative of the staff population at their child welfare agencies.

This paper is based on all the questions we asked study participants in an in-depth interview section about their experiences working with minority families. These questions yielded information not only about child welfare workers' perceptions of and reflections about working with minority children and parents, but also of their opinions on potential challenges for minority parents raising a child in a dominantly white (English and Norwegian) society and the governmental policies in this area. We allowed study participants to follow their own train of thought and asked for explanations or examples when we needed clarification. It is important to emphasize that we did not explicitly ask workers about their views on children. Our analysis is based on our interpretation of the entire interview section involving ethnic minority children and families.

In terms of data analysis, we approached the interview material with an analytical and conceptual strategy (Coffey & Atkinson 1996, 26ff.) by (i) identifying how participants talked about children when they shared their reflections about minority families, and if children were an important part of their reflections; (ii) identifying examples; (iii) common themes and patterns in each country, and then comparing the themes across countries; and finally, (iv) our theoretical approach of a child-centric framework gave directions for our coding and identifications of the interviews. A few caveats: Even though our findings relate to ethnic minority children, we are aware that some of these viewpoints may well represent how child welfare workers think about children and families in the child welfare system in general. Further, we do not have data to balance our analysis with direct research on minority children and families.

We have assigned participants a letter and a number, with the letter 'E' indicating England and the letter 'N' indicating Norway.