

Report

Understanding the lives of care-experienced young people in Denmark, England and Norway

A cross-national documentary review



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*Understanding the lives of care-experienced young people in Denmark,
England and Norway – A cross-national documentary review*

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Foreword

The project *Against all odds* focuses on care leavers who do well, in order to generate knowledge about this important subgroup of care leavers that can be useful in the further development of timely and efficient services. The project is a mixed-methods cross-national study, conducted in Denmark, England and Norway, funded by the Research Council of Norway, Norwegian Social Research (NOVA) and VIVE – The Danish Center for Social Science Research. The project is led by Elisabeth Backe-Hansen, NOVA. The study sets out to understand what “doing well” means for young adults who have experienced out-of-home placement, against the context of a substantial international literature on risk of disadvantage for young adult care leavers. The research combines three elements: review and analysis of national administrative data; in-depth qualitative longitudinal research with care leavers in each country; and the cross-national documentary review presented here.

The project has four overarching objectives:

- To generate new and more comprehensive knowledge about how young care leavers can succeed against poor odds
- To compare significant indicators for positive outcomes in Denmark, England and Norway
- To highlight existing variation in how the young adults have experienced trajectories and critical turning points, seen in relation to national contextual factors
- To contribute to the development of better and more timely services for a group of young adults who are at risk of marginalization.

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Summary

This working paper has reviewed cross-national datasets for the general population and available national data and other relevant (grey and academic) literature concerned with young people in care and care leavers in the three study countries. The aim is not evaluative; i.e. not to determine which country does “best”. Rather, the paper seeks to provide a situated understanding of the multi-dimensional complexity of transitions out of ‘care’ and of ‘outcomes’ for children and young people with experience of care, and hence to enable a contextualised understanding of the diversity of young people’s lives and experiences. In terms of the study as a whole, the analysis presented here aims to provide a resource that will aid interpretation of the material generated in multi-method qualitative longitudinal interviews with young adults, gaining a perspective on choice and chance by understanding biographical experiences within structural contexts (Thomson and Holland, 2002), and illuminating different layers of context in cross-national comparison (Brannen and Nilsen, 2011). Consequently, the underpinning aim of this working paper has been primarily descriptive, and we have not provided a substantive discussion of cross-country variations. Nonetheless, the material presented raises questions for exploration in further analysis, including the qualitative material generated in our own research.

As noted in the study background, the international literature highlights a heightened risk of disadvantages for care-experienced adults in relation to a range of factors, including physical and mental health, security of housing, and education and employment. However, these risks function (and are mitigated or exacerbated) within wider frameworks of influence, including child welfare systems and the broader state provision, shaping the social, economic and cultural contexts of individual lives. The three countries chosen for this study represent two examples of the Nordic welfare model and one neoliberal welfare regime (cf. Esping-Andersen, e.g. 1990). Unsurprisingly, there are more similarities between Denmark and Norway than with England, though there are of course variations among all three countries. At the risk of oversimplifying complex data sets, we can see from Eurostat data that the Nordic countries do better than England on most indicators of social disadvantage, and that they invest more in social protection for children and families. Participation in tertiary education is also funded to a higher level in both Denmark and Norway, whereas the public loan model in England means that young people graduate from university with considerable financial debts.

Research in all three countries highlights concern about educational attainment for care leavers, relative to the general population, but differences in education systems among the countries raise further questions. In particular, it is striking that both the Norwegian and the Danish system embed more temporal flexibility than the English system – in opportunities to take an extra year of study or to extend studies over a longer period. The Norwegian system has the greatest possibilities for flexibility, including the option of changing study programme. Regardless of overall differences in educational performance relative to the general population, these patterns raise critical questions about the relative (in-)flexibility of educational systems for young people who are in or leaving care. Compared to the two Nordic countries, care leavers in England will meet different obstacles on their way through secondary and post-16 education, with fewer possibilities to get back on track. Thus, distinct questions arise. In Norway (and to a lesser extent Denmark), do young people in and after care have the support and resources that they need to take advantage of flexible possibilities? What support is required to cope with the relative inflexibility in the English system (e.g. if placement moves mean changing exam boards)? In all three countries, educational pathways may well be disrupted by additional challenges associated with other kinds of instabilities in young people’s lives – such as changes in placement, emergent or ongoing health needs and family relationships. Thus,

the (relative) flexibility of systems, and the availability of resources to manage possibilities for flexibility, are likely to be crucial factors in educational trajectories.

The Eurostat data presented in Table 3.1 remind us to recognise the experience of care leavers as young people who are part of a wider society, and thus help to show how risks may accumulate for particularly disadvantaged groups in our society. For example, it is relatively common – especially in England – for young people in their 20s to live in their parental home, and for those who can benefit from familial support this is likely to buffer against risks associated with debt and insecure or precarious employment.

Entitlements to support after leaving care vary across the three countries, and there is no universal entitlement to support for care-experienced young adults beyond their early twenties. Compared to the two Nordic countries, England has a more developed policy framework in relation to support for care leavers, although (as discussed above) the restrictive legal definition of ‘care leaver’ means fewer entitlements to support for those with less stability in their care pathways. Moreover, support for care leavers through entitlement to remain in placement is a relatively new initiative in England and still does not apply to residential care. Both Norway and Denmark have a slightly longer history of enabling young adults to stay on in placement post-18, although this often happens informally; the two Scandinavian countries also appear to have more stability in placements than England (with the caveat that directly comparable data are not available). It seems quite likely that these patterns in part relate to use of long-term foster care rather than domestic adoption as the primary route to permanence for children in care. Accounts from young adults indicate that stability may contribute to informal support from carers or professionals, beyond statutory requirements or the end of a placement (Bakketeig and Backe-Hansen, 2018). These patterns also need to be understood in the context of differences between England and the two Nordic countries in the relative role of targeted support entitlements for care leavers (emphasised in English policy), in comparison with universal entitlements through state (rather than child welfare) systems in Denmark and Norway (see also Jackson and Cameron, 2014).

A growing literature provides documentation that risk of disadvantage for care-experienced adults is complex, involving the intersection of experiences before, during and after placement (e.g. Vinnerljung, 1996; Courtney, Hook and Lee, 2012; Rebbe et al., 2017). Furthermore, a significant body of international research highlights that insufficient resources and assistance are provided for young adults leaving care (e.g. Hjort and Backe-Hansen, 2008; Lerch and Stein, 2010; National Audit Office, 2015). In all three study countries, interagency collaboration is likely to play a critical role in enabling care-experienced young people to access the support they need. For example, young people in all three countries may require referral from child welfare services to gain access to mental health support. It is beyond the scope of this review to evaluate cross-national variation in the resourcing and accessibility of these services, and the work of the Milestone Consortium (2017) indicates common challenges across countries. Nonetheless, it is of note that in Norway (unlike England) Child Welfare Services may cover the costs of mental health support for young people who have been in care, and the differences between England and Denmark in rates of child and adolescent psychiatrists noted in the Milestone survey (Ibid.) are likely to have implications for the availability of specialist support.

The overarching aim of our research is to build understanding of positive outcomes for care-experienced young adults, by learning from the diverse experiences of people who have been in care and who do well in terms of the objective (and normative) indicators of engagement in education, employment and training (see for example, Bakketeig and Backe-Hansen, 2018; Boddy, 2018; Boddy et al., forthcoming). The material discussed in this review provides a context for understanding their

lives. Situating their accounts of their lived experience in relation to the cross-national analysis presented here illuminates the ways in which their experience relates to that of the wider populations of care-experienced young people and similarly aged young people in the general population. Thus, this documentary analysis contributes to understanding the nature and timing of support and other resources that have helped them to achieve in spite of the challenges they may have faced. It also helps to problematise – and theorise – the concept of ‘outcomes’ for children in care and care leavers, attending to diversity in experiences across contexts and over time, and highlighting gaps in data collection within and across countries. What is easily measurable is not always what matters in understanding what it means to “do well” for young people who live through complex multidimensional experiences of transition through their country’s care system.

1 Aims

This working paper sets out to illuminate the ways in which wider contexts, including policy and service frameworks, can support or disrupt care-experienced young people's transitions. The material presented here constitutes part of *Against All Odds?*, a mixed-methods cross-national study, conducted in Denmark, England¹ and Norway, funded by the Research Council of Norway and Norwegian Social Research (NOVA) and led by Elisabeth Backe-Hansen. The study sets out to understand what "doing well" means for young adults who have experienced out-of-home placement, against the context of a substantial international literature on risk of disadvantage for young adult care leavers (e.g. Stein and Munro 2008). The research combines three elements: review and (where possible) analysis of national administrative data in each country; in-depth qualitative longitudinal research with care leavers in each country; and the cross-national documentary review presented here.

The overarching aim of this documentary review was to provide a focused contextualising framework for comparative analysis, recognising that – regardless of the apparent comparability (or lack thereof) of two countries – "concepts cannot be separated from contexts" Hantrais (2009, p. 72). Even superficially similar or geographically proximate countries will differ in contexts such as population demography, overarching policy objectives and understandings of the role of the state in child and family lives (e.g. Boddy, Smith and Statham, 2011). As Brannen and Nilsen (2011, p. 604) observe, cross-national research has particular value in 'taking different layers of context into consideration', bridging the gap between micro, meso and macrocontexts. Their arguments are particularly relevant for understanding transitions to adulthood for young adults who have been in public care; cross-national comparison sheds light on the lived experience of child welfare systems in each country and the ways in which child welfare systems are situated within the wider social, economic and cultural contexts of individual lives. With this in mind, it is important to recognise that the aim of this working paper was not to provide a comprehensive or systematic scoping analysis of policy, services and literature concerned with looked-after children and leaving care in the three countries. Rather, it was to examine key population contexts and relevant legislation and policy frameworks pertinent to the experience of young people making transitions out of child welfare services. Thus, the documentary review provides a contextualising framework for cross-national qualitative analysis of interviews with young people (e.g. Boddy, Bakketeig and Østergaard, forthcoming), through an approach to case-based research that is concerned with "taking into account at the same time both the contextual features of lives and the stories people tell about themselves" (Brannen and Nilsen 2005, p. 417).

The three countries in our study are (relatively) affluent northern European countries, but – as we shall show in this documentary review – they differ in key respects, and those differences are changing. Denmark, England and Norway differ in after-care legislation and systems, and in wider welfare structures and normative pathways through early adulthood for young people. Looking across countries thus illuminates how care and wider welfare systems function to scaffold young adults through potentially precarious biographical transitions.

¹ Note that, throughout, we refer to England not the UK where possible because the four UK nations have distinct child welfare systems. Where data are presented for the UK as a whole (e.g. in relation to the wider national context for young people in care and care leavers), this is because data for England alone were not available.

2 Background of the study

Across Europe, young people who have experienced out-of-home placement are at increased risk of disadvantage relative to the general population, when it comes to indicators including educational achievement, employment, physical and mental health, homelessness and involvement in crime (e.g. Meltzer et al. 2003; Clausen and Kristofersen, 2008; Stein and Munro 2008; Jackson and Cameron 2014; Stein and Dumaret 2011; Olsen, Egelund and Lausten, 2011; Backe-Hansen et al., 2014). A cross-national body of research has highlighted the mental health needs of looked-after children and care leavers, often relating this to previous experience of trauma, including abuse and neglect (see, for example, Stein and Dumaret 2011). Relative to the general population, young people in care are also more likely to have scores indicating cause for concern on the Strengths and Difficulties Questionnaire, a commonly used screening instrument for emotional and behavioural health (see Lehmann et al., 2013; Jozefiak et al., 2016 for Norway; Egelund and Lausten 2009 for Denmark; and DfE Looked-After Children Statistics for England²).

There is some question, however, about whether comparison with averages for young people in the general population is appropriate to understand wellbeing and outcomes for young people in care, given the extent of social disadvantage that they face. Recent research in England (Sebba et al. 2015) compared national pupil data for children in care and children ‘in need’ (receiving other statutory child welfare services, but not placement) and found that, on average, children in care did better on educational measures. In Norway, Clausen and Kristofersen (2008) found that young adults who had been in foster care completed high school more frequently than those who had received preventive services at home. Also, while it is undoubtedly important to recognise the distinctive challenges and disadvantages faced by care-experienced people, Sinclair et al. (2007) warned against the tendency for policy and research to treat care-experienced people as a homogenous group, with shared needs, risks and experiences. To support this vulnerable group into adulthood, it is not sufficient to focus on risk factors. We need to learn from the experiences and developmental pathways of those who do well as young adults, and *Against All Odds?* was designed to address this critical knowledge gap.

For young people placed away from home, risk of disadvantage is complex, encompassing experiences before, during and after placement (e.g. Vinnerljung, 1996), and a significant body of international research highlights that insufficient resources and assistance are provided for young adults leaving care (e.g. Hjort and Backe-Hansen, 2008; Lerch and Stein, 2010; National Audit Office 2015; Tyrell and Yates, 2018). However, evidence of disadvantage for young people from care does not mean that placement *per se* is the problem – and such a conclusion carries risks in itself. Writing about England, Aldgate remarked that “perhaps the most serious problem [facing the care system] has been the low expectation of success” (1989 p. 32). Her observations remain relevant today and were echoed by an English policy advisor interviewed by Boddy and colleagues (2009, p. 134), who noted the difficulty of disentangling cause and effect in understanding outcomes, observing that “the more we say that anything to do with care is bad, the more you reinforce the notion that it’s a last resort”. Such reflections have been echoed in Scandinavian literature as well, particularly with regard to residential care (Backe-Hansen et al., 2011).

If policy and professional systems and practice are to support young people in their transitions from care to adulthood, an exclusive focus on risk is unhelpful. It is necessary to learn from positive experiences and outcomes, as they evolve in the intersection between contexts, systems and the lived experience of young people’s everyday lives in time. An increasing body of work shows the

² <https://www.gov.uk/government/statistics/children-looked-after-in-england-including-adoption-2017-to-2018>

potential benefits of placement (e.g. Backe-Hansen, Havik and Backe Grønningsæter, 2013; Sebba et al., 2015), as well as the risks associated with returning home or with failing to place children when necessary (e.g. Wade et al., 2011; Ward, 2009). Children in care have diverse needs and characteristics (e.g. Sinclair et al., 2007; Lausten, 2014; Lehmann and Kayed, 2018) and whole population indicators, in comparison to the general population, are not appropriate for understanding individual experiences and life trajectories. To understand how best to support individual outcomes requires close attention to the ways in which child welfare policy and service contexts intersect with individual lives and biographies, and with wider social and economic contexts which additionally shape experiences and possibilities for care-experienced young people.

3 Population contexts

Our study involves three northern European countries, with both commonalities and distinct differences. Here, we discuss some key demographic differences in population and living conditions, including risk of poverty and access to employment, across the three countries. The aim is not to provide a detailed analysis of the causes or consequences of the cross-national patterns described here. Rather, the discussion is designed to establish the wider context for child welfare policy and systems of practice, and for understanding the lives of care-experienced young people in each country. To establish that contextualising overview, Table 1 summarises a selection of Eurostat cross-national data on key population indicators. These data refer to the UK as a whole, and not to England separately, but nonetheless they highlight some key demographic differences between the three countries.

England is the largest country, with a population ten times that of Norway or Denmark. The UK Office for National Statistics (ONS) estimated the population of England in 2015 to be 54.8 million³, compared with 5.7 million in Denmark and 5.2 million in Norway (see Table 3.1). In 2015, 21% (11.7 million) of the population of England were aged 0-17 years, a slightly higher proportion than in Denmark (17%) or Norway (18%).

Almost four times as many young adults in their twenties are living in their parental home in the UK than in Denmark, and more than twice as many as in Norway, a pattern that reflects the importance of familial support for young adults facing insecure labour markets (e.g. Hellevik 2005; Bucx, van Wel, and Knijn, 2012). There is evidence that living with parents has become more common for young adults in the UK over the last 10 years⁴, reflecting an increasingly difficult economic climate. Berrington, Stone and Falkingham (2009, p. 35) note that “more of those with degree level qualifications are living with their parents in their early twenties, even though many are likely to have left home at an earlier age to attend higher education”, and that “At the oldest ages examined here – those in their early thirties – it is the most economically disadvantaged, for example those with no educational qualifications and the unemployed, who are most likely to remain living within the parental home, suggesting that this is the result of external constraints”. In England, therefore, the high proportion of people living with parents when in their early 20s is an important part of the context for debates about aftercare support for care leavers.

The UK also has much higher rates of early parenthood (among 15-19-year-olds) than Denmark and Norway, though this has decreased in recent years, and it is notable that by the time young adults are in their late 20s, fertility rates in the UK are slightly lower than in both the Scandinavian countries. It is beyond the scope of this review to address a significant and complex literature on early parenthood, and its association with (for example) poverty. Rather, for the purposes of our review we simply aim to highlight this as part of the difference in the context of early adulthoods across the three countries.

³ Mid-Year Population Estimates, 2015, accessed 8 December 2016: http://web.ons.gov.uk/ons/data/dataset-finder/-/q/dataset-Details/Social/MYEDE?p_auth=8TjPiqIY&p_auth=K1bFhRrL&p_lifecycle=1&_FOFlow1_WAR_FOFlow1portlet_data-set=Back&_FOFlow1_WAR_FOFlow1portlet_diff=&_FOFlow1_WAR_FOFlow1portlet_geoTy-peld=2011STATH&_FOFlow1_WAR_FOFlow1portlet_UUID=9247701

⁴ Source, ONS: <http://www.ons.gov.uk/ons/rel/family-demography/young-adults-living-with-parents/2013/sty-young-adults.html>

Table 3.1 Eurostat cross-national indicators

	UK*	Denmark	Norway
<i>Population and living situation</i>			
Total population (millions)	65.4	5.7	5.2
Population aged 0-14 years, millions	11.5	0.962	0.933
Population aged 15-29 years, millions	12.6	1.08	1.02
Average age of young people leaving the parental household (years)	24.4	21.1	19.3 ⁽¹⁾
Young people aged 16-19 years living with their parents (2013 data)	92.7	86.7	85.6
Young people aged 20-29 years living with their parents (2013 data)	38.3	10.3	17.2
<i>Fertility rates by age (2014 data)</i>			
15-19-year-olds	0.01552	0.00364	0.00502
20-24-year-olds	0.05913	0.03422	0.04484
25-29-year-olds	0.09985	0.10848	0.11020
<i>Young people at risk of poverty or social exclusion</i>			
Children (0-15) at risk of poverty or social exclusion (%) ⁽²⁾	30.4	15.3	13.3
Severe material deprivation rate for young people (15-29) (%) (2013 data)	11.3	6.8	3.6
<i>Education, training and employment</i>			
18-year-olds still in education of any kind (%; 2012 data)	63.3	86.4	88.4
15-29-year-olds not in education, employment or training (%) (2013 data)	11.7	5.6	5.6 ⁽³⁾
Part-time employment as percentage of the total employment for young people (15-29-year-olds)	28.3	52.4	43.8
Involuntary part-time employment as percentage of the total part-time employment (15-29-year-olds)	26.0	10.3	14.9 ⁽⁴⁾
<i>Spending on social protection</i>			
Social protection benefits (all functions) (PPS per inhabitant ⁽⁵⁾)	7809	10654	11797
Social protection benefits targeting families and children (PPS per inhabitant)	810	1196	1463

Note: (1) Latest data from Statistics Norway, 2009.

(2) This is the EU indicator on risk of poverty and social exclusion, and it includes people that are in at least one of three categories: people at risk of poverty, who have an equivalized disposable income below the risk-of-poverty threshold, set at 60% of the national median equivalized disposable income (after social transfers); people who suffer from severe material deprivation and have living conditions severely constrained by a lack of resources (e.g. cannot afford rent or utility bills, cannot afford to heat their home); and people in households with a very low work intensity (see United Nations Economic Commission for Europe, 2013).

(3) 2014 data.

(4) 2012 most recent available Eurostat data for Norway.

(5) PPS, Purchasing Power Standard, is an artificial currency unit. Theoretically, one PPS can buy the same amount of goods and services in each country.

Source: Eurostat data (2015/2016 unless otherwise indicated), and age bands relate to those in published data. Accessed 7 December 2016: <http://ec.europa.eu/eurostat/data/browse-statistics-by-theme>

Such patterning is of course not random. In considering ways in which national contexts may frame the experiences of young people with experience of care in Norway, Denmark or England, we might begin with Esping-Andersen's (1990; 1999) distinction between three broad "ideal-types" of welfare regime. They are: neo-liberal regimes, including the UK, that seek to minimise the role of the state and to promote market solutions; social democratic welfare regimes, characteristic of Scandinavian countries, which are redistributive of wealth and in which the state assumes most of the responsibility for welfare; and conservative regimes, in countries including France, Italy and Germany, which fuse compulsory social insurance with subsidiarity traditions, emphasising social assistance rather than welfare rights. Esping-Andersen's typology has been criticised for neglecting both gender and family (e.g. Lewis, 1997), as well as for its eurocentrism and lack of attention to differences between and

changes in regimes (for example between Scandinavian countries, or between northern and southern European states; e.g. Arts and Gelissen, 2002). Recent analysis by Esping-Andersen (2015, p. 132) reported evidence of commonalities between Denmark and Norway, in comparison to France, Spain and Germany, in the extent to which their welfare regime has been “effective in equalizing the opportunity structure [...] primarily by enhancing the mobility prospects for those with humble social origins.” But these patterns are changing. Norway and Denmark were not equally affected by the global financial crisis of 2008, which had only a “relatively modest impact” on the Norwegian economy (Gryttens and Hunnes, 2010, p. 2), and Denmark – which until recently was one of the most equal countries in the EU – is now the country with the fastest growing income inequality (OECD, 2015).

Nevertheless, Esping-Andersen’s (*op. cit.*) broad typology continues to offer a useful starting point for considering policies and practices cross-nationally. Certainly, the influence of a neoliberal approach is evident in the history of child and family policy in England, which continues to be dominated by a targeted or “residual” approach, with resources focused on those who are defined as being “at risk” (e.g. Cunningham, 2006; Hantrais, 2004; Boddy, Smith and Statham, 2011; Goul Andersen, Schøyen and Hvinden, 2015; Halvorsen, Hvinden and Schøyen, 2015). The UK spends less on social protection benefits, including benefits targeting children and families, than either Denmark or Norway (see Table 3.1). It has the highest levels of income inequality of the three countries, and the inequality continues to widen, with increasing child poverty including in-work poverty for families with dependent children (e.g. Padley and Hirsch, 2013; Tinson et al., 2016). These wider economic contexts are crucial to understanding both the demand and functioning of child welfare systems. In a major UK study, Bywaters et al. (2018, p. 54) documented the sharpened effects of unprecedented cuts to local authority (LA) funding in areas of high deprivation in the UK, “eating into the capacity of both families and LAs to provide for children’s wellbeing”, and corresponding with increased rates of child welfare intervention, including child placement.

Child poverty has increased across the EU since the global financial crisis, but the UK is one of only five EU countries (along with Hungary, Romania, Luxembourg and Malta) where the risk of poverty or social exclusion for children was at least seven percentage points above the national average for the population as a whole (Eurostat, 2015). As Table 3.1 shows, almost a third of children aged 0-15 years in the UK are at risk of poverty or social exclusion, double the rate in Norway and Denmark, which have similar rates of about one in six (15%). Compared to Norway and Denmark, the UK also the rate of 15-29 year olds who are not in education, training or employment is also almost twice as high. Shildrick et al. (2012) and others have highlighted the uneven effects of labour market insecurity on different parts of the population, particularly the young. These effects will inevitably be most sharply felt by young people without cross-generational familial support; families are actively (if not always visibly) engaged in the project of social reproduction.

Patterns of poverty and employment also relate to engagement in education. Moreover, Eurostat data shown in Table 3.1 indicate that part-time employment is also more common in the Scandinavian countries: in Denmark it comprises more than 50% of employment for 15-29-year-olds, and in Norway the corresponding figure is 43%, compared with less than 30% in the UK; Norway and Denmark also have a higher proportion of young people in temporary work. However, the reasons for part-time employment differ across countries. In Denmark, 78% of 15-29-year-olds who work part-time do so because they are in education or training, compared with 43 per cent in the UK. In the UK, 26% of young adults in part-time employment were unable to find a full-time job, compared with 10% in Denmark, and a significant minority of young adults in the UK work part-time because of caring or other personal responsibilities (21.3%, equivalent data not available for the other countries). Eurostat do not publish reasons for part-time employment for Norway, and data published by

Statistics Norway⁵ are not directly comparable, but patterns are similar to those in Denmark, and the majority of young people in part-time employment are also in education. 79% of 15-19-year-olds in part-time employment are studying or attending school, as are 55% of 20-24 year olds. While there are of course limits to what can be understood from these country-level data, in the context of understanding the experiences of young adults who have been in care, it is of particular note that young adults in England are more likely to be working part-time because they cannot find full-time employment, whereas in Denmark and Norway most of those working part-time do so because they are in education or training.

Precarious employment has been highlighted as a particular concern in the UK literature. For example, Berrington, Tammes and Roberts (2014, p. 41) report that “young adults working in (semi)routinised jobs often face multiple dimensions of economic insecurity – being more likely to be in the lowest income quartile, to be more likely to work part time and to be on a temporary contract”. Shildrick et al. (2012) have criticised the tendency of policy and professional discourses to problematise those who face precarious employment, or to emphasise the need for individual change – for example, for training or skills development – neglecting the political and economic structures that produce precarity and the perspectives of those who live through it, churning through a ‘revolving door’ of employment and training opportunities, often time-limited, low-paid or unpaid, and sometimes mandatory. Shildrick and colleagues (2012, p. 141) argued that lack of employee skills or qualifications was not at the root of labour market insecurity in their sample. Rather, they identified:

two prime drivers of the no-pay, low-pay cycle: the relative availability of insecure poor work for individuals in places like those we studied and those same individuals’ resilient commitment to work, whatever the job.

But such concerns are not confined to neoliberal welfare states. Majamaa (2011, p. 733) cautioned that the Nordic welfare states are not immune to new social risks, noting evidence of “postponement of labour-force participation because of prolonged studies, labour market instability and high youth unemployment rates in all four countries”. Stoilova et al.’s (2017) cross-national analysis of job insecurity and transitions to adulthood noted that support from NAV (adult welfare services) in Norway did not necessarily help participants to secure stable employment. Nonetheless, they concluded that, compared to other countries in their study, Norway (and Germany) provided better welfare support, in terms of the level and duration of income protection, for unemployed young people. In Denmark, Nielsen, Dyreborg and Lipscomb (2019) discuss the shift to an ‘active labour market policy’, with stricter obligations and rules (e.g. in relation to availability for work and obligations to engage in training), as well as sanctions for those who refuse to take part in activation activities. They conclude that the Nordic welfare model, through education and labour market policies, offers protection from precarious work, but they also draw a crucial distinction, noting that:

For some young employees uncertain and volatile work is a temporary condition in their process of transition from school or apprenticeship to work, while for others there is a high risk of continued uncertain and risky work.

Within and across countries, new flexibilities in the labour market are experienced differently, depending on existing resources and securities. In common with a wider international literature highlighting the importance of intergenerational connections (e.g. Nilsen and Brannen, 2014), Majamaa’s (2011) Finnish research demonstrated that – even in the context of the Nordic welfare state – families must take increasing economic responsibility for young adult children. This new reliance is likely

⁵ Figures for the third quarter of 2016, accessed 19/12/16: <https://www.ssb.no/statistikkbanken/SelectVarVal/saveselections.asp>

to have particularly dire consequences for those, including care-experienced persons, who cannot rely on intergenerational solidarity through transitions to adulthood.

4 Education systems

Eurostat data indicate that, of the three countries, Denmark has the highest expenditure on education as a proportion of GDP (8.8%), followed by the UK (6.1%) and Norway (4.6%)⁶. In Norway and Denmark, education is provided within a single structure model (European Commission/EACEA/Eurydice, 2017), with no transition from primary to lower secondary education, whereas in England, the common core curriculum requires successful completion of primary education (ISCED1) for the students to progress to lower secondary education (ISCED 2).

In the UK, a higher than average proportion of education expenditure comes from private sources due to the existence of fee-paying independent schools, which cater for about 7% of the school population (but account for almost half the intake of the most prestigious UK universities). The majority of children in all three countries attend neighbourhood state⁷ schools, and in all three countries young people are in education until at least the age of 16. Compulsory schooling extends from 6 to 16 years in Norway and Denmark, and has recently been extended from 16 to 18 years in England, starting from age five (see Figure 4.1). Students in Denmark also have the option of an extra year at the end of lower secondary education, so they may go on to upper secondary education after year 9 or year 10. In Norway, young people have the right to secondary education for a further three years, to be completed within five years. In Denmark, students have to qualify to enter upper secondary school, and 80-90% of all students succeed in qualifying (Cederberg and Hartsmar, 2013). In 2016, access to vocational training in Denmark was limited to students who completed compulsory schooling with at least the mark E in Danish and Maths.

Upper secondary education

In all three countries, upper secondary education is available free of charge, although, as with earlier years of schooling, England has a higher proportion of private fee-paying provision than the other countries. Eurostat data for 2012 (Table 3.1) show that Denmark and Norway have a higher proportion of 18-year-olds in education (of any kind) compared to the UK; over 85% in the Scandinavian countries, compared with 63% in the UK. These patterns reflect differences in systems and in the extent to which post-16 education is framed as a right, or is compulsory for young people. In all three countries, post-16 education includes academic and vocational options, but these are structured differently.

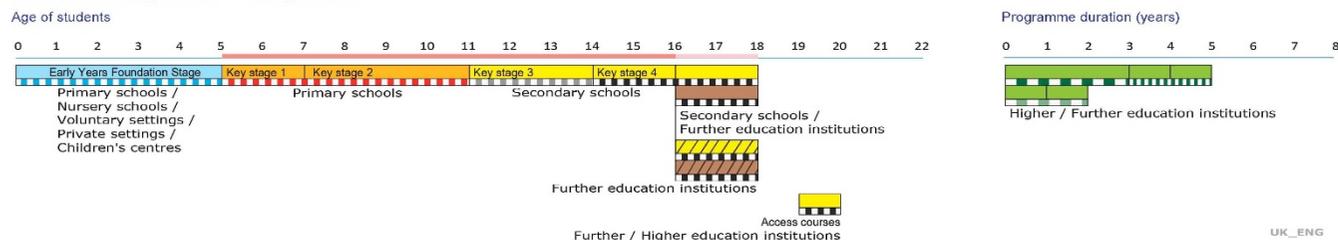
In England, most children take exams at age 16, following a two-year programme of study, and the results of these exams determine their possibilities for post-16 education, which spans two years and may be completed at schools or colleges. There are a variety of different qualifications, including academically oriented (A-Levels or less commonly International Baccalaureate), or vocationally oriented (e.g. BTEC) qualifications. Young people may take a mix of A-Level and BTEC qualifications, and a small number follow apprenticeship routes (5% in 2012/13). In Norway and Denmark, young people can choose to follow either an academic or a vocational track when they are about 16 years of age.

⁶ http://ec.europa.eu/eurostat/statistics-explained/index.php/Educational_expenditure_statistics

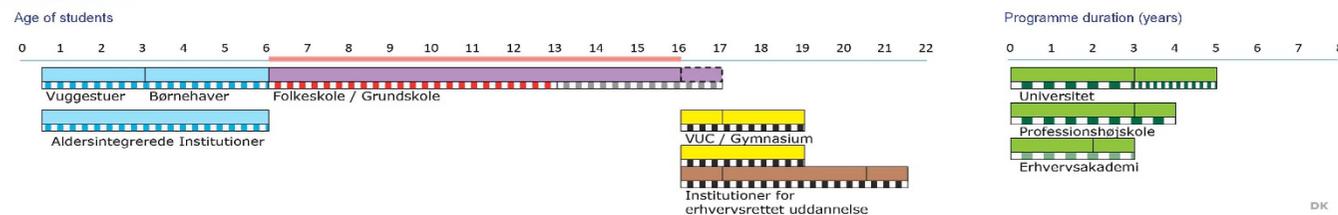
⁷ To avoid confusion, we use the term 'state' schools here to refer to state-funded provision with no fee requirement. In Norway and Denmark, 'public' schools are state funded, non-fee-paying; in England, 'public' schools form part of private, independent, fee-paying provision.

Figure 4.1 The structure of the educational systems in England, Norway and Denmark, Eurydice schematic diagrams

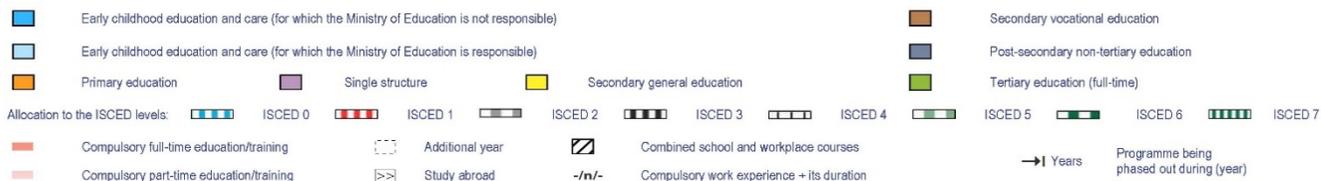
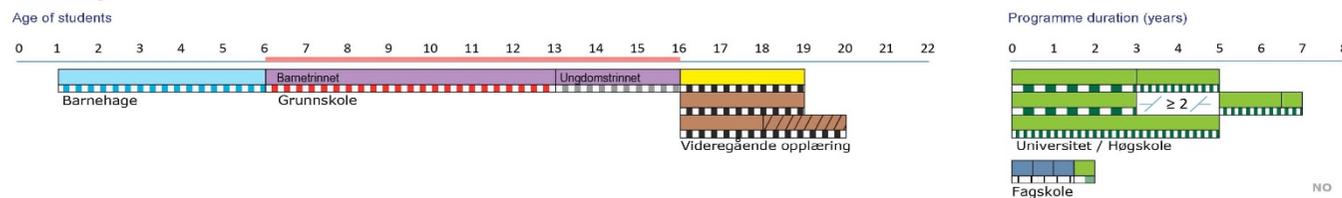
United Kingdom – England



Denmark



Norway



Note: Terminology has not been translated from Danish or Norwegian, as use of English alternatives may be misleading if the provision is not equivalent or if there is no English equivalent. For example, 'grundskole' (Danish) and 'grunnskole' (Norwegian) translate literally as 'ground school', and, as the figure shows, there is no equivalent in England.

Source: European Commission/EACEA/Eurydice (2017).

In Norway, young people receive grades all through secondary school, and there is a formal assessment at the end of year 10 (the year in which young people turn 16). Performance in lower secondary school influences the routes available in upper secondary school, although some young people may be given the option to start upper secondary school even if they do not have grades from lower secondary school, for instance if they have a child protection background. In both Norway and Denmark, students following the academic pathway study for three years towards baccalaureate exams in a gymnasium. In Norway, the vocational pathway includes two years of study (including work placements) followed by two years of in-work apprenticeship. The vocational track has high rates of drop out (especially for child welfare clients, see Dæhlen, 2014; 2015), perhaps because it combines academic subjects and professional assessments, so that there are many opportunities to fail. In Denmark, there are three possible vocational routes⁸, and vocational pathways take three to four years; students move between the school and the workplace, and are salaried during the workplace apprenticeship (Breen, van de Werfhorst and Jæger, 2014). There is evidence that apprentice systems in Norway and Denmark offer a smoother transition from school to work than school-based vocational education pathways in, for example, Sweden and Finland (Albæk et al., 2015).

Flexible systems?

In Norway, upper secondary education is framed as a right, under the 'youth guarantee'⁹, and this has five key implications for flexibility. Firstly, people have five years within which to finish their studies, and they retain this right until the school year starting when they turn 24 years of age (after which adult education is available for those aged 25 or more). Secondly, students are allowed to make one re-election of their study track, which implies a right to extended time to finish their education. Thirdly, under the youth guarantee students can also apply for up to two extra years to finish their education; this is granted on conditions which can include, for example, difficult or disrupted life experiences – and so is very relevant for young people who have been in child welfare services. Young people in care are usually able to continue in their placement in foster or residential care post-18, if they are in upper secondary education, and this is one reason why someone might spread their upper secondary education over three years (Bakketeig and Backe-Hansen, 2018). Fourthly, there is additional flexibility, in that people who initially follow the vocational route can do a third academic year instead of going into a work placement, and in this way secure a qualification to get into university. Those who have completed their vocational track may take an extra year to take the subjects they need to qualify for university entrance. University entrance requirements are points-based, and students can supplement their points through upper secondary schooling with 'competition points', which relate to activities after the age of 19, such as re-taking exams or doing military service. Finally, there is a new regulation (the '23/5 Rule') which applies to those who have not completed their upper secondary education, who after turning 23 can apply for admission to higher education if they have five years practical experience and/or education, and have taken six mandatory subjects.

The Danish system for upper secondary education is less flexible than the Norwegian, with no extra flexibility for young people who have been involved with child welfare services. However, there is some flexibility in Denmark, not least in the option for children to spend an extra year in lower secondary education, so leaving school after year 9 or year 10. There is a mixed picture of flexibility in the English system. England is unusual compared to other European countries, including Denmark, in that students do not usually have the opportunity to retake years in primary or lower secondary education, and it is very unusual for students in mainstream education not to be entered for GCSEs.

⁸ Accessed 31/10/18: <http://eng.uvm.dk/>

⁹ Accessed 04/12/18: <https://www.vilbli.no/en/en/no/ungdomsrett-lovfestet-rett-for-ungdom/a/027308>

In Norway, students cannot repeat a year in primary or lower secondary education, but they have access to upper secondary with no grade requirements. The Norwegian government are also currently assessing the possibility for students to take an extra year after year 10. Young people in England are also to some extent directed into pathways at a younger age than in Norway or Denmark, as they have to make GCSE choices at age 14 (in year 9). However, the pathways that are then open to them vary considerably across providers (Higham and Yeomans, 2011). Young people in England can retake key exams in Maths and English at the same time as post-16 qualifications, though performance in Maths and English will also delimit post-16 options. As Wolf (2011, p. 55) observed in her review of vocational education in England, another key difference between England and other countries is that:

England's qualification system evolved independently of the state, which is why our qualifications – both academic and vocational – are not awarded by the state and were, until recently, not designed by it either. By contrast, most countries not only have far fewer separate qualifications, but most of them, especially for young people, are developed, run and awarded by governments.

Wolf (2011) noted that there have been attempts by successive governments in England to rationalise the range of qualifications on offer, but it remains the case that assessment is done through one of a number of independent exam boards, and schools/local authorities vary in which exam board they follow. This means that there are some differences between schools in the qualifications on offer, and in the details of what is taught under a subject-specific qualification. This has particular implications for young people who move during their post-14 studies, as moving education provider may also mean moving exam boards (something that is particularly pertinent for young people in care who experience placement moves).

In all three countries, there are some limits to flexibility in entry to tertiary education, depending on what has been studied previously. In Denmark and Norway, it is possible to do intensive study in a particular subject if necessary, in order to meet entry requirements. In England, some universities now offer Foundation Year programmes, enabling access for students who miss course-specific entry requirements, but this gives an additional fourth year of study, which leads to increased student fees (see below).

Tertiary education

In relation to tertiary education, there are, unsurprisingly, more commonalities between the two Nordic countries than with England. According to data published by OECD for 2016, and excluding international and mobile students, in both Denmark and Norway about two-thirds of the population (65%) enter tertiary education at Bachelor level or equivalent, compared to just over half in the UK (55%)¹⁰. While most people in all three countries enter tertiary education when they are below the age of 25, there are differences in rates of engagement in tertiary education for young adults at different ages (see Figure 4.2). Participation in England peaks at 20 years of age. By comparison, in Denmark, and to a slightly lesser extent Norway, peak rates of participation are at the age of 22 – and it is more common for young people in their mid to late 20s to be in tertiary education. These patterns can be understood in relation to the duration of the baccalaureate in Norway and Denmark, and the opportunities for flexibility within the system; as noted above, it is easier for students in the Nordic countries to take a year out or spend an extra year on their studies. In addition, students in

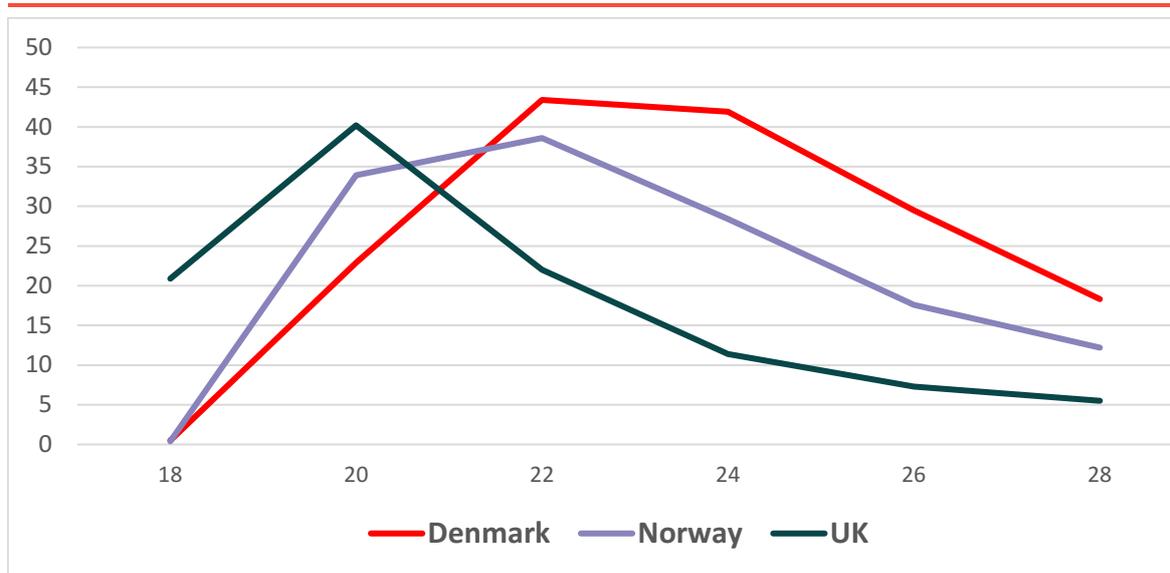
¹⁰ ISCED Level 6, Bachelor's or equivalent; source OECD: https://stats.oecd.org/Index.aspx?datasetcode=EAG_GRAD_ENTR_RATES#

the Nordic countries have the option to retake exams from upper secondary in order to gain access to their preferred tertiary education programme. In Norway, students can take a year off tertiary education, without losing their place on the course. In Denmark, students have had the option of taking fewer courses or time off during their higher education studies, though the government introduced a reform in 2013 (amended in 2015) designed to reduce the number of students taking extra time to complete a degree. In England, it is also possible to withdraw temporarily from a higher education course, but the student fee structure means that this decision can have significant financial implications, as students will be liable to pay all or part of the fee for the year in which they withdraw.

The three countries differ in the extent to which students receive state financial support for participation in tertiary education, as well as in the levels of tuition fees. In Denmark and Norway, as in other Nordic countries, students pay no tuition fees and they also benefit from public support (a mix of grants and loans) for participation in tertiary education. In Norway, part of the loan is converted to a grant if you pass your exams within the set timeframe. Students in England¹¹ pay fees of at least £9,000 per annum for bachelor studies and are not entitled to maintenance grants. There are scholarships and bursaries available for some groups (including care leavers), but these are small relative to the size of fees and living expenses; for example care leavers are entitled to a Leaving Care Grant (£2000, to support them in establishing independent living) and a Higher Education Bursary (also £2000, paid in installments throughout the degree). Some students may also draw on family financial support to some extent, but OECD data for 2016 indicate that 92% of UK students use public loans to cover both living costs and tuition fees, compared to approximately 35% in Denmark and 68% in Norway. There are also differences in the size of the debt that students will incur. The same OECD figures provide estimates in US dollars, reporting an average debt at graduation of just under \$15,000 in Denmark and \$27,000 in Norway, compared to just over \$30,000 in the UK. However, as an average the UK figure is likely to underestimate debt for students in England, given that Scotland does not charge fees to Scottish students. Analysing English data, Crawford and Jin (2014) estimated that the average undergraduate in England will graduate with a debt of £44,035 (at 2014 prices). Loan repayment is income contingent, but there is significant concern in the UK literature about the implications of this fee structure for participation by young people from economically disadvantaged backgrounds, those for whom “‘fear of debt’ is a palpable emotion linked to poverty, want and loss, not an abstract concept” (Burke and Hayton, 2011, p. 14).

¹¹ There are differences among the UK countries.

Figure 4.2 Students in tertiary education by age group (per cent of corresponding age population)



Source: Eurostat data for 2014, accessed 20/12/16: <http://ec.europa.eu/eurostat/web/education-and-training/data/database>

5 Children in care: populations and legal frameworks

In all three countries, placement of children away from the family home is viewed as a last resort, with the aim of being to return children to their birth families as soon as possible. However, there are variations in emphasis between countries in their legislation, and (perhaps correspondingly) variations in patterns of placement for children placed away from home, as shown in Table 5.1.

Table 5.1 Children in care in the three countries

	Denmark (2015)	Norway (2017)	England (2018)
Country population (M)	5.7	5.3	55.6
Children (0-17 years) in placement on census day	10,983	11,389	75,420
Children (0-17 years) in placement during the year	11,546	16,840	104,100
Rate in placement on census day (per 10,000)	99	101	64
Proportion of children in foster care (census day %)	64	75	73
Proportion of children in residential care (census day %)	32	8	13
Number of anonymous domestic adoptions/adoptions from care	2	70	3,820

Note: Most recent available data for each country.
Norwegian data includes all 0-17-year-olds in foster care and residential care, but not in own dwelling.

Sources:

Denmark: To enable cross-national comparability, Danish numbers of looked-after children have been calculated by Lausten using unpublished administrative data for 2015.

Norway: Statistics Norway. Total population on 1 January 2018: <https://www.ssb.no/en/befolkning/nokkeltall/population> Child welfare recipients by type of measure: <https://www.ssb.no/en/barnevern/> Adoptions by type, 'other' adoptions includes foster child adoptions, anonymous adoptions and other adoptions: <https://www.ssb.no/en/statbank/table/06683> Rate of foster and residential placements: <https://www.ssb.no/statbank/table/10661/>

England: Total population based on mid-2017 population estimate, source Office of National Statistics (2018), accessed 26/11/18: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualmid-yearpopulationestimates/mid2017#uk-population-reaches-66-million>. Numbers of looked-after children from DfE SSDA903 Statistical Returns to 31 March 2018, source: <https://www.gov.uk/government/statistics/children-looked-after-in-england-including-adoption-2017-to-2018>

In Norway, the core legislation for child placement is the Child Welfare Act of 1992¹², with a new guiding principle that instructs child protection workers to assess the quality of parent-child attachment, in addition to other indicators. The 1992 Act made provision, for the first time, for placement to be made on a voluntary basis, as a preventive measure. In England, children who are in placement are referred to as “looked after” under the primary legislation of the Children Act 1989; as in the other countries, this makes provision for placement on a voluntary basis (Section 20) in addition to placement by Care Order (Section 31), where parental agreement is not required. In Denmark, the key legislation is the Social Services Act 1998, followed by the Reform on Placements 2006 and the Reform for the Child in 2011 (Hestbæk, 2011). In all three countries, these legal frameworks have the “best interests” of the child as a guiding principle, but the ways in which this is understood are of course rooted in cultural and demographic contexts, with corresponding variations in emphasis on parent and child rights (see Backe-Hansen et al., 2013; Boddy et al., 2013; Skivenes and Thoburn, 2016; Burns, Pösö and Skivenes, 2017).

As Table 5.1 shows, while placement rates differ between the Nordic countries, both Norway and Denmark appear to have much higher rates of children in care than does England. As discussed below, this may in part relate to differences in patterns of placement stability and use of adoption.

¹² The present law has been amended numerous times since 1992, and at present there is an ongoing process to revise the law.

The use of legal measures that partially or permanently revoke parental responsibility varies across countries, as does the use of voluntary arrangements (Skivenes and Thoburn, 2016; Boddy, 2017; Burns, Pösö and Skivenes, 2017). In England, adoption has been given high priority in policy as a route to permanence, and the numbers of children being adopted from care has increased steadily in recent years (e.g. Boddy, 2013). The Adoption and Children Act 2002 authorises the local authority to place a child for adoption (a Placement Order); again, parental consent is not required. The Adoption and Children Act also provides the legal basis for Special Guardianship, which is intended to provide legal permanence for children who are unlikely to be adopted – mainly older children and those settled with relatives (see Wade et al., 2014). In Denmark, the legislation on adoption from care was changed in accordance with the Reform for the Child in 2011, but this has only led to a change from almost none to only a handful of per year on average. Most cases are refused by the Danish National Social Appeals Board on the basis of the cases not being prepared well enough with regard to parents' lack of skills and lack of relationship with the child. Adoptions from care are usually adoption by foster parents. In Norway, adoption is authorized by section 4-20 in the 1992 law. Enforced adoption, particularly of very young children, is not used often in Norway. Although (as Table 5.1 shows) adoption is used more frequently than in Denmark, these are almost exclusively adoptions by foster parents, after they have shown themselves able to care for the child. This is in accordance with section 4-20c of the legislation, which requires that applicants have been foster parents and have shown themselves able to raise the child as their own before adoption can be approved.

Variation in use of adoption has implications for the size of the care population in each country, as well as for cross-national analysis of outcomes of care, because children are no longer counted as part of the care (or leaving care) population once they have been adopted. This means that, year on year, children in Denmark and Norway who would have been adopted if they were in England are likely to remain within the care population (and so continue to be counted in statistical returns), and this could appear to inflate rates of placement in a cross-national comparison.

In considering rates of children placed in out-of-home care, it is also important to take account of overall variations in country populations of children and young people. For example, birth rates in Denmark and Norway have declined by approximately two percentage points in the 11 years from 2006 to 2017, whereas in the UK the decline has been less than one percentage point¹³. Taking such variations into account, in Denmark the proportion of 0-17-year-olds in care has been stable at around 1% every year over the last three to four decades (Lausten, 2014; Lausten, et al., 2015).

The vast majority of placements in Denmark are made with parental agreement and without diminution of parental authority. In England, rates of children in care have increased significantly – from 43 to 64 per 10,000 children in the last 23 years (1994-2017; see Thomas, 2018). Most children in care in England are placed by Care Order (see above), and Thomas's (2018) review notes that applications for these orders have increased significantly; the most recent available data¹⁴ show an increase (in rates per 10,000 children) from 8.0 to 12.2 since 2009. These increases do not follow from legislative change, but have been attributed to a complex mix of factors, including increasing rates of deprivation combined with austerity cuts to public services and reactions to concerns identified in a highly publicised inquiry into the death of a child (see Macleod et al., 2010; Thomas, 2018; Bywaters et al., 2018). In Norway, rates of children (0-17 years) receiving care measures have also increased: from 53 per 10,000 in 2003 to 80 per 10,000 in 2017 (Source: Statistics Norway, as per

¹³ Source: Eurostat <https://ec.europa.eu/eurostat/web/population-demography-migration-projections/births-fertility-data/main-tables>

¹⁴ Source: CAF/CASS Care Applications in England: <https://www.cafcass.gov.uk/about-cafcass/research-and-data/public-law-data/>

Table 5.1). However, in contrast to England, there is some evidence that use of voluntary arrangements in Norway is increasing relative to use of court orders. Backe-Hansen et al. (2013) reported that the number of 0-22-year-olds living in out-of-home care based on a care order increased by 26% over an eight-year period to 2011, while the number of children in voluntary placements increased by 49% in the same period. They cite research by Fauske et al. (2009) which suggests that this growth is seen as pointing to a tendency towards developing a more “friendly” and helpful service in accordance with the intentions of the Act from 1992.

Differences in care population size between the countries may also be partly ascribed to variations in stability in placement and in rates of movement in and out of care. Published statistics for each country provide a point prevalence census – that is, they count children in care on one particular day. However, as Table 5.1 shows there is more movement in and out of the care system in England than in Denmark and Norway; the number of children in England who were in care at some point during the year is nearly 40% higher than on the census day, whereas there is little difference between census day and in-year figures in both the Nordic countries. Reinforcing this finding, Andersen’s (2010) research in Denmark reported that approximately 60% of looked-after children only experience one placement, and less than 20% experience more than two placements before the age of 18. By comparison, in England 29% of young people aged 18 or over who ceased to be looked after in the year ending on 31 March 2018 had experienced just one placement, whereas 50% had three or more placements. Moreover, 20% had at least two distinct periods in care during childhood (source as Table 5.1). Equivalent data are not published by Statistics Norway, but analyses of the cohorts born in 1990-1992 in Backe-Hansen et al. (2014) demonstrated a complex picture of stability and instability in care careers up to the age of 18. Around three-quarters had fairly stable careers, defined as having experienced up to two moves after the initial move from their family of origin. These young people had generally been in foster care or residential care only. However, almost a quarter (23.5%) experienced three to eight moves between various combinations of foster care and residential care.

Of course, placement may be used for a variety of reasons, from response to a short-term crisis to long-term alternative care, and not all placement endings are bad for children; being in a long-term placement is only a good thing if you are happy there (Sinclair et al., 2005; Backe-Hansen, Christensen and Havik, 2013). However, these variations are important to understand in relation to (a) interpreting differences in the relative size of the countries’ care populations and (b) in understanding the wider context for young people’s experience of placement stability or of movement in and out of care.

There are further differences between countries with regard to where children live. Compared with Norway and England, Denmark has a higher proportion of young people living in residential care (Egelund and Jakobsen, 2009; Lausten, 2014). In all three countries, however, there has been a trend towards increasing the use of foster placements, including placements in kinship care, and residential care has increasingly been used for older children in the system, as well as for young people with more complex support needs, as a “last resort” (Backe-Hansen et al, 2011). There are also important differences in residential care provision (that are not captured in national data), for example with regard to the greater extent of specialisation and differentiation in the Danish system, and the lower levels of qualification of the residential care workforce in England compared to the other two countries (e.g. Petrie et al., 2006; Boddy et al., 2009; Lausten and Frederiksen, 2017).

Professional roles

In all three countries, the key professional with legislated responsibility for children in care is the social worker. The role of social workers and, relatedly, the range and qualifications of other workers involved in delivering social services, varies across countries (see Baltruks, Hussein and Montero, 2017, for a more detailed cross-national discussion of roles and qualifications). Challenges in recruitment and retention of staff also vary cross-nationally (Baltruks, Hussein and Montero, 2017), but child and family social work is widely recognised as being a highly stressful profession, and there is an international literature on stress, resilience and burnout (see McFadden, Campbell and Taylor, 2015, for a systematic review). In England, the Department for Education publishes data on turnover of children's social workers and, in the year 2016-17, recorded a turnover rate¹⁵ of 15%. In Norway, the turnover rate of children's social workers was 12% from 2015 to 2016, which is similar to the overall turnover rate in the municipal sector¹⁶.

In England, local authorities can structure their social care teams in different ways, and the team to which the child's social worker belongs is likely to depend on the age of the child and the nature of their placement. For example, it is common for local authorities to have distinct children looked after and leaving care teams, and the child would normally move to the leaving care team (and hence change social worker) around the time of their 16th birthday. There is policy interest in developing systemic approaches to social work practice in England, and some examples of the development of multi-disciplinary teams (e.g. the Reclaiming Social Work model developed in the London Borough of Hackney), but most local authority social work teams are not multi-professional teams (Cross, Hubbard and Munro, 2010). Nonetheless, it remains unusual for social services teams in England directly to employ psychologists or psychotherapists, for example. Similarly, there is no equivalent qualification to social pedagogy in the UK, and therefore social workers may work alongside other paraprofessionals, such as youth or family support workers, who may have lower levels of formal qualification (see Boddy and Statham, 2009).

In Denmark, in addition to social work and care provision, young people in care are allocated a 'steady contact person'. The Danish National Board of Social Services¹⁷ defines this role as a supportive adult contact, designed to support the young person in establishing (or re-establishing) a supportive professional and/or private network. For example, the steady contact person can help to determine whether there are people in the young person's family or wider network that can act as stable support (and a network that goes beyond the care system) while they are in care. Young people may also be assigned a contact person as an aftercare measure, with a similar function of supporting and building the young person's networks following their transition out of care.

In Norway, according to a new administrative directive concerning casework in child protection services, contact person is a synonym for case worker¹⁸. According to the administrative regulations defining the role of the 'participation and trust person'¹⁹, young people have the right to be accompanied by a person they trust and who will support their rights and perspectives in encounters with the child welfare services. However, the designated person has to be approved by social services, and (for example) cannot be someone who might be judged to harm the child's interests. Young people in England do not have a 'steady contact person' or 'trust person', although there are other professional roles designed to support young people's rights and perspectives. In particular, the

¹⁵ Defined as number of leavers divided by the number of workers in place on 30 September 2017; source:

<https://www.gov.uk/government/statistics/childrens-social-work-workforce-2017>

¹⁶ <http://www.ks.no/fagomrader/Arbeidsqiver/analyse-og-statistikk/lonn-og-sysselsetting/turnover-i-barnevermstjenesten-pa-linje-med-kommunesektoren/>

¹⁷ See (in Danish): <https://vidensportal.dk/temaer/eftervaern/kontaktperson-som-eftervaernstilbud-1>

¹⁸ <https://www.bufdir.no/Barnevern/Fagstotte/saksbehandlingsrundskrivet/>

¹⁹ https://lovdata.no/dokument/SF/forskrift/2014-06-01-697#KAPITTEL_3

Independent Reviewing Officer (IRO) is a professional role designed to monitor how the local authority treats these children and make sure every child gets heard in terms of their views and wishes in decisions and plans about their care. IROs are thus meant to be independent of local authority social services. A study of the work of IROs was published in 2014. This report concluded that the IROs have an important function when they work well, but it did identify issues in some cases, such as their independence from the local authority and the child's social worker (Jelicic et al., 2014).

Another key role in England is the Virtual School Head – a requirement for all local authorities – working across all schools within a local authority where there are looked-after children attending school. The person being the local Virtual School Head is responsible for monitoring the progress of all looked-after children in the local authority, and is also to support school staff and social workers in addressing needs, including help with accessing additional funding for looked-after children.

In Norway, child protection is mainly the responsibility of the municipalities, with the exception of recruitment of foster homes and the responsibility for residential care, which rests with the state. There are just under 400 municipalities in Norway. They vary considerably in size, and this has led to a large number of intermunicipal collaboration arrangements (Andrews, Lindeløv and Gustavsen, 2015). Variation in the size of municipalities, and in the extent of collaboration, means that the number of employees varies enormously. Hence, specialisation is routine practice in the largest organisations, but is almost impossible in the smallest municipalities, where there may only be one or two members of staff to cover all child welfare work. It is common in Norway to have teams organised according to the two main tasks of child welfare provision: investigations and services (placement and preventive measures). It is less common to have dedicated aftercare teams, though several municipalities (or collaborating groups of municipalities) employ one or two social workers who are responsible for the provision of aftercare services.

Mental health and wellbeing

As noted earlier, an international literature has highlighted that children in care and care leavers may be at increased risk of health difficulties. Internationally, there has been particular concern about mental health and wellbeing, as well as recognition of the need to recognise complex pathways of influence. For example, in the ways in which mental health needs may contribute to or result from experiences in care systems, not least given the capacity of placements to meet young people's therapeutic needs (see Whittaker, Del Valle and Holmes, 2015). Mental health may also underpin or be adversely affected by other difficulties that young people experience (such as being out of education and employment, or 'NEET') (Sims-Schouten and Hayden, 2018). Such considerations are highly pertinent to understanding the experience of young adults who are care experienced, as assumptions about transition to 'independence' coincide with the pressures associated with accelerated or compressed transitions to adulthood (e.g. Bakketeig and Backe-Hansen, 2018; Boddy, 2018; Storø, 2018). Hence, within the scope of this review, we focus in particular on mental health, whilst recognising that support for all aspects of health and wellbeing remains a critical and neglected aspect of policy and provision for young people in and after care, as part of the wider landscape of public support after care (e.g. Dixon, 2008).

There is concern across all three countries in our study about access to mental health services. A cross-national survey conducted by Balkruts et al. (2017) suggested that social services in Nordic countries are more likely to involve family therapists than those in Western Europe. Children in care in England do not routinely have access to psychological therapies, and psychologists do not routinely work in social services teams, so access to mental health services relies on referral to Children

and Adolescent Mental Health Services (called CAMHS in England). In 2016, the government's Education Select Committee recommended that all children coming into care should have a mental health assessment. The recommendation was rejected by the ministries responsible (Department of Health and Department for Education)²⁰, but it highlights a growing concern about access to mental health services for looked-after children. In Norway too, mental health services are separated from child welfare services, and young people who need mental health or school psychology support require a referral into those services, who will then decide whether the young person is eligible for support. Since 2000, there has been more emphasis on cross-sectoral collaboration, but challenges remain that are familiar to the international literature on interprofessional and interagency working (DIFI, 2014). A recent 28-country survey²¹ (Milestone Consortium, 2017; Signorini et al., 2018) showed extensive variation across countries in levels of child and adolescent mental health (CAMHS) provision. Of particular relevance to our focus, and to the accessibility of CAMHS support for young people, these authors reported a more than twice as high proportion of child and adolescent psychiatrists in Denmark relative to the UK (10.3 per 100,000 young people, compared to 4.5 in the UK²²). Signorini et al. (2018) note that Denmark and the UK were the only countries in the survey that had written national or regional policies or guidelines for the management of individual service user transition from child and adolescent to adult mental health services. However, survey respondents in both countries (in common with most of the sample) highlighted concern over the lack of connection between child and adult services. In the UK, respondents also mentioned difficulties with mismatch in eligibility criteria for child and adult services, and – in comparison with other countries in the sample – both Denmark and the UK offered very little in terms of specialised support programmes for young people following discharge from child and adolescent mental health services.

²⁰ See: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/552688/Mental_health_response_accessible.pdf

²¹ Norway was not part of the survey.

²² Denmark also had a rate of 22.4 child and adolescent psychologists per 100,000 young people; no equivalent data were provided for the UK. Data from Milestone Consortium (2017).

6 Legislation and provision for care leavers

In all three countries, the formal age of leaving care is 18 years, and while all the countries have entitlements to support beyond 18 the systems vary, as does the nature and accessibility of support. Recently published US longitudinal research shows a clear link between extended foster care and benefits, including increased participation in post-16 education and employment, increased access to professional support and reduced risk of economic hardship, involvement in crime and homelessness (Courtney, Okpych and Park, 2018). However, cross-nationally, there is evidence that not all young people have equal support for care leaving (e.g. Bakketeig and Mathisen, 2008; Stein, 2012; Bakketeig and Backe-Hansen, 2018; Frederiksen and Lausten, 2018).

In Norway, the primary legislation of the 1992 Child Welfare Act made provision for services to be given to young people between 18 and 22, in order to support them in the transition to independence: However, it did not legislate for a state duty to provide this support, and hence practice has been variable (Fransson and Storø, 2011). Revisions to the legislation in 2009 introduced a requirement for child welfare services to provide a written statement if they refuse to offer aftercare services to a young person, as well as the possibility for young people to file complaints about child welfare decisions. According to data published by Statistics Norway, there were 4,731 18-22-year-olds in receipt of child welfare assistance measures on the census date of 31 December 2017; of these young adults, 40% were 18, and 27% were 19 years old. Access to aftercare support declines with age: about 17% were 20 years old, while 10% were 21, and just under 6% were 22 years old (Backe-Hansen, 2018). On average, these young adults were in receipt of two forms of provision. The most common aftercare provisions are help with somewhere to live, financial assistance and continued stay in foster care (Oterholm and Paulsen, 2018), comprising two-thirds of the aftercare services provided at the census date of 31 December 2017. Other forms of support, such as help with education and work, and help with treatment from other services, accounted for less than 3% of aftercare provision, while services connected with family relationships and network building (e.g. counselling, support for collaboration between services and the family and children) accounted for just 8%. Almost 20% of aftercare provision involves other forms of provision, including 'support persons', weekend accommodation and leisure activities (Backe-Hansen, 2018).

Although child welfare services in Norway are responsible for aftercare, they do not provide all the services care leavers might need. As noted above, for example, mental health services are delivered separately, although child welfare services may cover the costs. The same applies to financial assistance for those who are neither studying nor working, who have to seek support from the Norwegian Welfare and Labour Administration (NAV). Similarly, provision of extra interventions related to educational support has to be arranged in collaboration with the school authorities. More generally, young adults (18 or older) who do not receive aftercare services are entitled – like any other member of the population – to seek support from NAV, which acts as a hub for adult welfare service provision (including housing support).

In Denmark, legislation stipulates that young people aged 18-22 who have been in care are entitled to aftercare services, if it is believed that aftercare will contribute to a good transition into independent living for the person as an adult. Aftercare usually involves continuation of the placement and/or having a 'steady contact person' (a distinct support role in the Danish system). Statbank Denmark data indicate that just over 2,100 young people aged 18-22 years were in placements in 2017; al-

most 1,000 were in foster care, with slightly fewer in residential settings, and just over 300 in independent living²³. In addition, about 3,000 young people in this age group have a 'steady contact person'²⁴. These two groups of young people are most likely overlapping. As in Norway, young adults who do not receive aftercare can seek support from adult welfare services. Analyses show that young people are less likely to receive aftercare if they age out of residential care, as opposed to foster care, and that young people with shorter and more unstable placements are more likely to receive aftercare (Frederiksen and Lausten, 2018).

Of the three countries, England has had the strongest policy emphasis on support for young people leaving care, and initiatives such as Right2BCared4 (Munro et al., 2011) have highlighted the potential of this policy emphasis to generate a culture that increases emphasis on young people's entitlement to stay in care for longer. A key role in England is the Personal Adviser (PA), which has some commonalities with the function of the 'steady contact' person through the leaving care process in Denmark. The commonalities are that the personal adviser is independent of the leaving care social worker, and is to help to make sure that the care leaving plan (called the 'pathway plan') is working and to help the young person find training or education or with housing or financial matters. In Norway, the Child Welfare Service caseworker will have this function (see the discussion of professional roles above).

Young people in England are entitled to support, if they meet the legal definition of a 'care leaver', which means that they must have been looked after for at least 13 weeks since the age of 14 and either still be looked after or have left care. A 16- or 17-year-old who has lived with a parent (or other person with parental responsibility) for a continuous period of six months is not defined as a 'relevant child' according to the legislation (even if they meet the other criteria) and hence is not entitled to support as a care leaver. People who do meet the definition of care leaver are entitled to support under legislation, usually up to the age of 21, although this can potentially be extended to 25 years of age for young people in education. Until recently, this support did not include the option of remaining in placement. In 2015, the National Audit Office published data indicating that a third of young people aged 16 or over that left care in 2013-14 did so before their 18th birthday, a finding that has important implications for leaving care entitlements. The English literature on leaving care has highlighted concern about the implications of a restrictive definition of 'care leaver' (e.g. Ward, 2011; Stein, 2012), in that young people who have experienced more disruption and discontinuity may have less entitlement to support. In Ward's (2011) study, just 19 of the 49 young people she interviewed came under the aegis of the Children (Leaving Care) Act 2000 (England and Wales); the other 30 young people in her sample did not meet the legislated definition of care leavers.

The Children and Families Act 2014 now allows young people in foster care to stay with their foster carers until they are 21 (under an initiative called *Staying Put*), and government data trends show an increased proportion of young people staying in placements post-16, although this remains a small minority of those leaving care. There is no equivalent initiative for young people in residential care, but the government is currently piloting a trial scheme (*Staying Close*). In the year up to 31 March 2018, data were published for 28,510 care leavers aged 19-21 years in England, of whom the largest proportion (35%) were in independent living; just over 2000 (7.6%) were living with former foster carers, while 12% were living with parents or other relatives. Almost 2000 (6.5%) 19-21-year-olds were living in accommodation defined as unsuitable²⁵.

²³ Statbank Denmark Table ANBAAR3: Children and young persons placed outside their own home per 31 December 2017 by age, measure, place of accommodation and time. Accessed 04/11/18: <http://www.statbank.dk/statbank5a/default.asp?w=1600>

²⁴ Statbank Denmark Table BU01A: Children and young persons with preventive measures per 31 December 2017 by time, measure and age. Accessed 04/11/18: <http://www.statbank.dk/statbank5a/default.asp?w=1600>

²⁵ 'Unsuitable' accommodation is defined as: emergency accommodation used in a crisis; bed and breakfast establishments; being homeless and temporarily staying with friends as an emergency measure; or custody.

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