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The proportion and utilisation of formal kinship and network care in Norway and Denmark: a comparative study

Omfanget og anvendelsen af formelle slægt- og netværksanbringelser i Norge og Danmark: Et komparativt studie

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ABSTRACT

In the past decades, the implementation of regulations and legislation, which encourage the use of formal kinship and network care, has taken place in many countries. Yet, the proportion seems to vary greatly, also between countries often regarded as similar. Denmark and Norway are examples of this. In 2021, 33% of children in care lived in kinship and network care compared to 13% in Denmark. The aim of this paper is to get a better understanding of these differences. For this paper, we have delved into the historical development of CWS in both countries, with particular attention to the last 20 years. The factors suggested as possible reasons for differences in the proportion and utilisation of kinship and network care in Denmark and Norway, relate mainly to three overlapping levels: policy and values, organisational structures and case management. Possible implications and limitations are discussed.

ABSTRAKT

I de seneste årtier er der i mange lande indført regler og lovgivning, der tilskynder til brug af formelle slægt- og netværksanbringelser. Alligevel synes andelen at variere meget, også mellem lande, der ofte betragtes som ens. Danmark og Norge er eksempler på dette: I 2021 boede 33% af de anbragte børn i slægts- og netværkspleje sammenlignet med 13% i Danmark. Formålet med denne artikel er at få en bedre forståelse af disse forskelle. Vi har undersøgt den historiske udvikling af CWS i begge lande med særlig fokus på de sidste 20 år. De faktorer, der foreslås som mulige årsager til forskelle i andel og brug af slægts- og netværkspleje i Danmark og Norge, relaterer sig hovedsageligt til tre overlappende niveauer: politik og værdier, organisatoriske strukturer og sagsbehandling. Mulige konsekvenser og begrænsninger diskuteres.

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Introduction

In the Nordic countries and most other Western countries, there is a long tradition for children's relatives or network members to care for them when parents cannot. The reasons for such solutions

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have varied in time and space and include parental illness, death, neglect, and poverty. While kinship and network care have deep-rooted traditions as private arrangements, *kinship and network foster care* – as an intervention and category in the child welfare services (CWS), is a relatively new phenomenon which can be dated to about the early 2000. In this article, we direct our attention towards differences regarding the proportion and utilisation of kinship and network care placements in Denmark and Norway.

The official terminology used to refer to foster care arrangements where children grow up with relatives or network members varies between countries. For instance, in Norway, the term ‘foster home within family and close network’ is used by the Norwegian Directorate for Children, Youth and Family Affairs; in Denmark, the term ‘network foster family’ is employed by the Danish Social Service. Despite these different designations, both refer to *formal* foster care placements within kinship and network settings where children reside as part of the public CWS. Informal kinship and network care (arranged by the families) are less common in Norway and Denmark and therefore not included. In this article, we primarily use the term kinship and network care, but distinguish between kinship care and network care when relevant. We use the term *children* (0–17 years) covering both children and youth and we use the term *social workers* covering both the case social worker and the case coordinator/consultant, but distinguish when relevant.

Researchers from several Western countries have previously registered a reluctance among professionals of CWS to accept relatives as viable alternatives for children to grow up with (Berridge & Cleaver, 1987), including the Nordic countries (Moldestad, 1996; Vinnerljung, 1993). Such scepticism has been linked to assumptions of negative social inheritance, where parental neglect is perceived to be inherited from family backgrounds, resulting in inadequate caregiving skills (Skoglund et al., 2022). However, over the last two decades, significant changes have taken place, with laws and principles in Denmark, Norway, and other Nordic countries mandating consideration of kinship and network care as an option before other options. This means that kinship care is the preferred placement option for children who cannot live at home.

The transition from scepticism to prioritisation of kinship and network care has been observed also in other Western countries (Winokur et al., 2014), and has been linked to increased emphasis on biological relationships and cultural identity, shortage of foster homes and/or economic reasons in countries where kinship and network care have been a less costly alternative (for discussion, see Skoglund et al., 2022, pp. 13–38). Research indicating that children raised in kinship and network care often fare as well or better than children in other foster care placements have played a significant role in terms of legitimising kinship and network care as a viable option for children removed from home for maltreatment (Winokur et al., 2014).

In line with this development, there has been an increase in the proportion of kinship and network care placements in many Western countries (Hill et al., 2020). While this is a trend also in the Nordic countries, there is a significant difference regarding the proportion and development of kinship and network care placements between the countries. A study comparing the percentage of children in care aged 0–17 in the Nordic countries in 2018, showed that Denmark had the lowest proportion, with 8% of placements in kinship and network care, and Norway had the highest proportion, with 23% of all placements (Rasmussen & Jæger, 2021). The proportion in Sweden was approximately 15%, and Finland approximately 11%. Comparing the development in Denmark and Norway, Denmark has increased from about 5% in 2004 to 8% in 2018, while the proportion in Norway has risen from about 17% to 23% in the same period. The figures for 2021 show an even greater difference, with approximately 8% in Denmark and approximately 26% of all placements (0–17 years) in Norway. If we look at figures for foster care in 2021, the percentage of children in kinship and network care constituted 13% of children in foster care in Denmark and 33% in foster care in Norway (See Table 1 for more details).¹ In both Denmark and Norway ‘kinship and network care’ constitute one common category in official registration, meaning we do not know exactly how many children live in kinship care and how many children live in-network care.

Table 1. Out-of-home care in Denmark and Norway.

	2004		2011		2018		2021	
	DK	NO	DK	NO	DK	NO	DK	NO
Children living in								
<i>OHC</i> Percentage of total population	1.0%	0.64%	1.0%	0.93%	1.0%	1.03%	1.0%	0.90%
<i>Foster care</i> (including kinship and network care). Percentage of OHC in total	48%	76.57%	55.8%	78.17%	65.97%	76.73%	64.1%	79.35%
<i>Kinship and network care</i> percentage of OHC in total	5.0%	17.10%	6.5%	17.38%	8.1%	23.07%	8.2%	26.29%
<i>Kinship and network care</i> – percentage of all foster care placements	10.4%	22.32%	11.7%	22.23%	12.2%	30.19%	12.7%	33.14%

In this article, we focus on the countries in the extremes in a Nordic context, namely Denmark and Norway, and ask: Why is the proportion of kinship and network care significantly different in these two countries?

There are regional differences in both countries. The counties in Norway above the national average of children placed in kinship and network care as a percentage² are Rogaland (46%) and Vestland (43.1%) (south and western part of Norway). Vestfold and Telemark are slightly above the national average (36.6%). The lowest proportion is found in Oslo (26.8%). This is also where the lowest proportion of placements is found in Norway. The other counties are just below the average. In Denmark, the variations based on the proportion of all placements between the five regions are not very large, with most regions around the average of 8.2%, except for Copenhagen with 15.7% and west Jutland at 9.2%, with Funen in the middle of Denmark having the lowest proportion at 5.3%. These average regional figures mask larger differences between the 98 municipalities. Although we cannot directly compare the numbers as the Norwegian ones are based on the proportion of foster care placements and therefore higher, while the Danish ones are based on the proportion of all placements, there is an interesting difference that the capital city Oslo has the lowest amount in Norway and Copenhagen have the highest amount of kinship and network placements in Denmark.

Background

Two contexts: Denmark and Norway

In Norway, there are approximately 5.49 million people, and in Denmark, the population is 5.9 million. Geographically, Norway is considered an elongated country with a land area of 385,178 km² (DK: 42,920 km²), making Norway 8.97 times larger than Denmark. The GDP per capita in Norway (2021): 167, GDP per capita in Denmark: 133. The parallel development of the Nordic countries is often linked to their characteristics as welfare states, with similarities in values, politics, economic redistribution, organisation, and especially equal citizen access to health, education, and social services. It also applies to CWS (Pösö et al., 2014).

When comparing legislation and developments in the field of (CWS), Norway and Denmark have followed each other since the first child welfare laws around 1900 (Pösö et al., 2014). In a recent comparison of the development of CWS in Denmark and Norway conducted by Hestbæk et al. (2023), the researchers conclude that '... these two Nordic welfare states contain quite a few similarities in their legal structure and organisation and how child protection unfolds on a practical level.' (Hestbæk et al., 2023, p. 130).

Similarities are also reflected in some key figures related to CWS placements in 2018, where approximately 1% of all children in both countries, between the ages of 0 and 17, were placed outside the home. The total expenditure level for the entire child protection area was 2.4 billion dollars in Norway and 2.5 billion in Denmark in 2018 (Hestbæk et al., 2023). It is considering these similarities that we find it puzzling that the proportion of kinship and network care placements in Norway and Denmark is unequal in the two countries.

Research on kinship and network care

While research into kinship, family life and child placement has a long history, not until the early 1990s did kinship and network care appear as a research topic, initially in the USA. Since then, the volume of research has increased significantly and today many countries are represented in the knowledge production.

In the Nordic context, research into kinship and network care started around 2000, with Bo Vinnerljung's study (1993) in Sweden serving as an exception. Amy Holtan's doctoral thesis on 'Childhood in foster care with relatives' was published in Norway in 2002, followed by research reviews such as 'Placements of Children and Young People outside the Home' in Denmark by Tine Egelund and Anne-Dorthe Hestbæk (2003). These studies laid the foundation for further explorations of kinship and network care (Knudsen & Egelund, 2011; Lindemann & Hestbæk, 2004). Most research contributions have been directed towards placements where children grow up with relatives. Network placements, where children grow up in foster care with friends of the family, teachers, etc. have received less attention.

Studies from several Western countries have shown that kinship foster parents more often have lower income, education and labour market participation than other foster parents (Cuddeback, 2004), making social class and social inequality relevant perspectives. Similar findings have been found also in Norway (Holtan & Thørnblad, 2009) and Denmark (Knudsen, 2009). While both these countries are egalitarian and by a high standard of living, smaller class differences and more comprehensive welfare states than many other countries, it can be argued that kinship (and perhaps also network) care can be viewed as a class phenomenon also here. Despite the material deficient conditions in some kinship and network homes, many children seem to do well. Previous research indicates that children placed in kinship and network care exhibit fewer mental and behavioural problems, higher well-being, more stable placements, and closer connections with their families compared to children placed in other foster care settings (Winokur et al., 2014). Studies that endeavour to explain why these children statistically fare better than those in professional foster care frequently refer to their emotional attachment to kinship caregivers, their reciprocal bonds, the opportunity to maintain contact with family, networks, and local communities and experiencing a more normal living environment than residing with strangers (Egelund et al., 2008; O'Brien, 2012; Skoglund et al., 2022).

When research has directed focus towards professionals' perspectives, it seems that while many view kinship and network care as a positive option, they also emphasise several challenges about such placements. In research from the UK and the US, the challenges have been related to a lack of resources and services available for kinship caregivers and the difficulties professionals express related to intervening in 'private' families (Farmer & Moyers, 2008). Research from Sweden indicates that professionals tend to view kinship and network care as emotional and non-kinship and network care as neutral (Linderot, 2020; Ponnert, 2017). According to Dimmen and Trædal (2013), professionals in Norway seem to alternate between looking at kinship care as a service and/or as family. It is when viewed as a foster care service that the professionals seem to experience more possibilities for involvement in the families.

In a study from the Danish context, professionals often expressed a reluctance to enter the 'emotional space' of kinship and network care families (Rasmussen & Jæger, 2021). The authors relate the reluctance to the view that kinship and network care must live up to the same standards as other foster families. In contrast, the main impression from a newer qualitative study in Norway is a positive view related to placing children in foster care with relatives and in their close network (Tonheim et al., 2021).

Research aim

While research on kinship and network care in the Nordic countries has increased in the two past decades and several Nordic comparisons of CWS exist (Grinde et al., 2004; Hestbæk et al., 2023;

Pösö et al., 2014), very few have attempted to compare kinship and network care between the countries. One exception is a report written by (Sundt, 2012) describing training and follow-up of kinship care in the Nordic countries. We cannot find any other studies comparing developments of kinship and network care between the countries. As emphasised by Esser and Vliegenthart (2017) comparison can enhance understanding of one's society as a fresh light is cast on familiar systems and practices. Like Grinde et al. (2004), we argue that the Nordic countries are 'similar enough' that there is a common basis for comparisons, but at the same time 'different enough' that different assessments and emphases become interesting.

Comparing the proportion and utilisation of kinship and network care in Denmark and Norway over time, this paper seeks to contribute to the development of research on kinship and network care among the Nordic countries. It can also be read as a contribution to international debates about the development of formal kinship care (Hill et al., 2020),

Method

The research question in this paper springs out from the authors' knowledge of kinship and network care, acquired through several years of research on the topic (e.g. Rasmussen et al., 2020; Rasmussen & Jæger, 2021; Skoglund, 2018; Skoglund et al., 2022; Thørnblad & Holtan, 2011). In an interpretive research study, such as ours, it is not uncommon for research to emerge from prior knowledge, without having a clearly defined research agenda (Schwartz-Shea & Yanow, 2013). This was the case for the authors of this paper. Years before we started the work with this paper, we had conversations with policy-makers, social workers and colleagues related to what we understood as a puzzle, namely the different use of kinship and network foster care in Denmark and Norway. For this paper, we continued our work more systematically, delving into the historical development of CWS in both countries, with particular attention to the last 20 years. We have examined policy, legislation, professional guidance, organisational structures, the training, and practices of professionals, as well as statistics for both countries. In line with the interpretivist tradition, our aim has been to get a deeper understanding of differences in frequency and utilisation of kinship care, rather than search for 'mechanical causality' (Yanow, 2014). The analytical process can be described as abductive in the sense that we started with a puzzle and searched for possible explanations 'that would render the surprise less surprising' (Schwartz-Shea & Yanow, 2013, p. 27). In a search for 'sound' interpretations, numerous discussions related to our interpretations have taken place between the three authors and with other researchers and social workers in both countries. The result of this work is presented in the next section.

Results

Kinship and network foster care in Denmark and Norway: similar regulations, different financial compensation for foster parents

In the Nordic countries, professional child welfare dates to the 1900s, marked by the enactment of 'Værgerådsloven' in 1896 by the Norwegian parliament and 'Børneloven' passed in Denmark in 1905. Since then, the Danish and Norwegian states have possessed the authority and responsibility to intervene and to place children out-of-home, when the CWS assess that parents are unable to fulfil their parental duties. Historically, Norway and Denmark have, in parallel, expanded and professionalised the social work concerning out-of-home placements. The shift from children's stay with relatives and networks being 'informal private arrangements' to formal foster care placements reflects an expansion of CWS' area of responsibility and activity. The widening of CWS can be understood as an example of where borders between public and private spheres are changing (Ellingsæter & Leira, 2004).

While this description holds for both countries, the transition and actual status are different. In Norway, kinship and network care have the same status as other foster care placements –

financial compensation, support and control are in principle equal. To be more specific, all foster families in Norway receive a base amount of approximately 100,000 Norwegian kroner, plus expenses for the child's stay. Additionally, there can be reimbursement for lost income. In Denmark, it is different. The Danish Appeals Board issued a decision in 2014 (Ankestyrelsens principafgørelse 32-14, 2014) regarding compensation for kinship and network foster families, ruling that they are not to receive compensation, but instead have their costs associated with housing a child covered. The Danish legislation allows for compensation for lost income, which is used in exceptions. In both countries, foster placements are supervised, and all foster parents must attend an educational programme.

Similar political and legislative developments exercised differently

In Denmark, the Ministry of Social Affairs launched a major project called 'Quality in Children and Youth Out-of-home placement' between 2002 and 2005. The result of the KABU project was that the Social Services Act (Out-of-home placement reform) was passed by the Danish Parliament, where the concept of kinship and network care, and the participation of kin and children's network more broadly, was included in legislation and the new guidelines. Before this kinship and network care had received very little political, legislative, or research attention in Denmark. Egelund and Hestbæk's research review (2003) was probably influential in this regard.

In 2011, the Danish Parliament passed the Child's Reform and the Danish Directorate produced several guidelines on the topic. Family and network participation was incorporated into the Social Services Act: 'the support (...) must support the child or young person's relations with the family and network' (SEL§ 46(1)). Moreover, §47 states the systematic participation of family and network in social cases and § 71 states the child's right to see parents, siblings, family and network in out-of-home placements (SEL § 47 & 71). Kinship and network placements were regulated according to the rules for family foster care with approval, supervision, and education of the network foster families, yet with two exceptions. The first we have already mentioned involved that they could only be compensated economically for the child's expenses. The second was that kinship and network care foster parents were to be specifically approved for that individual child. The Child's Reform has with minor revisions been used until the new law, the Child's Act. There are no major changes in the new law concerning kinship and network care.

In Norway, before the legislative changes in 2004, there was a preparatory legislative process. An analysis of this process, by Holtan and Thørnblad (2009) revealed that kinship was regarded as an inherent quality, often in reference to the importance of biological relations for children. In line with Denmark, research showing positive outcomes for children (Holtan, 2002) seems to have played an important role regarding the new guidelines implemented in 2004 stating that 'the child welfare service must always consider whether someone in the child's family or close network can be selected as a foster home.' (Child Welfare Act, section § 4–22). It was with the implementation of these guidelines that the formal status of kinship and network foster families in Norway were secured equal to other foster care families, involving economic compensation, supervision, control, etc. In 2018, the guidelines stating that CWS should always search for foster homes in the child's family and network was included in the Child Welfare Act (Section 4-22). Since around 2018, social workers have had to document inconclusive search processes before applying for a non-kinship and network foster home.

The formalisation and prioritisation of kinship and network foster care represents one of the biggest developments in child welfare globally in the twentieth century. A second, and closely related international trend is de-institutionalisation where foster homes are preferred and in demand (Hill et al., 2020). While de-institutionalisation has taken place in Denmark and Norway, there are notable differences. As Table 1 reflects, the use of residential care as out-of-home care placements has decreased rapidly in recent years in Norway and the percentage of foster care has

increased. In contrast, residential care is used to a greater extent in Denmark, meaning that the need for foster homes is perhaps less urgent.

Organisation of the CWS: comparable structures, ethics and values, but the child welfare profession differs in the two countries

Since 2000, out-of-home placements in Denmark have been organised by a department responsible for legislation and finance under the Ministry of Social Affairs and the Directorate of Social Affairs. The Directorate guided the department, the 14 counties, and 271 municipalities. Municipalities had the responsibility for all children at risk and the social casework, while counties had responsibility for the supply of out-of-home placements, operating residential institutions, offering guidance to municipalities, and exercising general supervision of institutions. Municipalities had the responsibility for supervision of foster care and received financial compensation for placement expenses.

In Norway, in 2000, the out-of-home placements were organised by the department under the Ministry of Social Affairs with The Norwegian Directorate for Children, Youth and Family Affairs (Bufdir) having the specialised expertise. There were 356 municipalities and regional child welfare entities. The municipalities held, and still hold, responsibility for children in out-of-home care. Five regional child welfare entities (known as Bufetat) had an obligation towards institutions and advice, guidance, and recruiting of foster families. These regional child welfare entities had simultaneously offered courses and measures, including family group conferencing.

In both Norway and Denmark, it is legally mandated to have an independent judicial board constituted of a judge, child experts and laypersons. The boards take a final decision regarding the out-of-home placements in a court-like process with lawyers representing parents, the children and the CWS. This will be discussed further below.

Norway underwent two municipal reforms in 2017 and 2020, reducing the number of municipalities from 428 to 356 and the number of counties from 18 to 11, with many of the same efficiency arguments as in Denmark. Despite these changes, the organisational structure remains quite similar, but the municipalities have gained more responsibility. Denmark's situation is different due to the agreement on a Structural Reform in 2004–2007. Following extensive debates, the entire municipal landscape and task distribution were altered by 2007. Denmark went from 271 to 98 municipalities and from 14 counties to five regions. As part of this reform, the regions lost their role in CWS, while municipalities became responsible for CWS, including finance. Simultaneously, the tasks of the Social Directorate changed and the strong ties to the regions and municipalities weakened.

Although the overall structure changed, professionals' work related to out-of-home care seems to have remained the same in both countries. In Denmark, the case social worker has the 'dominant' decision and coordinating role from the start and during the placement with contact with the child, parents, and network families. The family placement consultants have a minor role in approving and guiding the network family compared with Norway. In Norway, the case social worker keeps the 'case management', but hands over the coordination role to the placement consultants.³ The approval of kinship and network family is in Denmark and handled by family placement consultants, resulting in a specific approval for each child. This aligns with the Norwegian approval process. In both countries, slightly more lenient requirements can be considered regarding approval compared to approval for non-kinship and network foster care families.

In a previous comparison of CWS in Finland, Sweden, Denmark and Norway, Blomberg et al. (2010) emphasise one difference which sets Norway apart from the other countries. While Finnish, Swedish and Danish social workers seem to work in a rather integrated manner, they argue that CWS in Norway is organised in a way that facilitates a more specialised way of working. Today, this is reflected mainly in the larger municipalities where CWS is structured into specialised teams. In smaller municipalities, many caseworkers are generalists who are responsible for all tasks in the process. In other words, there is variation in the internal organisation of CWS case work between municipalities in Norway mainly due to their size.

Social workers in both countries adhere to similar overarching professional values and ethics (Hestbæk et al., 2023). Yet, differences regarding knowledge in the two systems (specialist vs generalist), are reflected also in the educational programmes available in the two countries. Denmark has two bachelor generalist programmes: social work and social pedagogue. In Norway, it is the social work bachelor students who are educated through what can be considered more as a generalist programme. Child welfare pedagogues are educated in a more specialised educational programme with particular attention towards child welfare, children and their families. In Norwegian CWS, it is this semi-profession – the child welfare pedagogues – that has dominated the last decades.

Corresponding case management, different emphasis on recruitment

Case management in both countries appears similar, involving notification, assessment, decision-making, planning, intervention, and follow-up. A notable distinction, however, seems to be the process of approval in decisions regarding out-of-home care. It has been estimated that about 70% of Norwegian out-of-home placements where CWS takes over the care of the child have been approved by the judicial board (NOU 2018, p. 18). These are all coercive cases. In Denmark, only 25% of cases pass through a similar judicial board, and those cases also involve coercive measures (Ankestyrelsen, 2020). In other words, the judicial boards may serve as a case review mechanism and may influence the content and quality of documentation and law enforcement.

What also seems to differ is the degree of involvement of family and network before out-of-home decisions. A Danish study (Rasmussen et al., 2020) indicates that if social workers fail to uncover and involve the child's family and network before 'the acute need' for placement, it seems less likely that caseworkers can recruit kinship and network foster parents later in the process. The question is whether Norway involves the child's relatives and network at an earlier stage, making kinship and network care more likely. This remains unexplored. However, we know that Norway and Denmark have different 'acute' measures including institutions for children. We also know that Norway uses Family group conferencing (FGC) to a more systematic extent in the recruitment process than Denmark. The use of FGC in Norway has increased in the past 10 years. A report (Drange et al., 2021) shows that between 2014 and 2018 the use of FGC before the establishment of new foster homes doubled. However, as the authors emphasise this number is still a small proportion of all placements. In 2018, there were approx. 260 children who had FGC before the placement, out of a total of approx. 2000 such placements. The proportion was highest for kinship and network care placements, where around 1/5 had FGC, which is more than a doubling from 2014.

Since around 2015, Norwegian child welfare authorities have worked towards increasing the use of FGC to involve and recruit children's kin and social networks. In 2019, the Directorate reported that 'All Bufetat regions worked with initiatives towards municipalities with a low proportion of placements in kinship and network homes' (Bufdir, 2019). The goal has been to increase the proportion of new kinship and network care homes to two-thirds of all new foster placements. In Denmark, no similar official recruitment process has taken place as far as we know.

In most kinship care families two decades ago, it was the relatives themselves who had initiated responsibility for a child in their family, becoming foster parents and they received less help and support from CWS compared to other foster families (Egelund et al., 2010; Holtan, 2002). In contrast, many kinship care foster parents in Norway today are 'searched for' and many start with reinforcing measures (e.g. respite foster care) to be able to say yes to becoming foster parents.

Concluding discussion

At the beginning of this paper, we asked: why is the proportion of kinship and network care different in Denmark and Norway? We now discuss this question in light of the presented differences related to CWS in the two welfare states.

Some reasons why the proportion of kinship and network care is different in Norway and Denmark

In their analysis of how kinship care emerged as a significant form of placement for children in care in Ireland and Scotland, Hill et al. (2020) argue that de-institutionalisation has played a significant role as it created a need for more foster homes. This is the case also among the Nordic countries, but when we compare Denmark and Norway, it is more evident in Norway where foster care has been the prioritised placement in the past decades. In contrast, as we have seen, Denmark still relies more on residential care. This is perhaps one of the most important reasons why kinship and network care are less used in Denmark. Whether a continued use of residential care reflects other reasons for placements in Denmark than Norway we do not know as it has not been the focus of this paper. Yet, there is little evidence that this is the case.

We have also seen differences in the child welfare authority's role in promoting kinship and network care. Norwegian child welfare authorities have taken active steps in increasing the involvement of children's family networks in general, and the goal of increasing the number of kinship and network care placements has been made explicit. We cannot find similar examples of activity from the Danish context. Child welfare authorities' emphasis on kinship and network care in Denmark seems to have been generally low since 2011, after the Child's Reform was passed.

The two countries' CWS organisational structures, for example, related to the recruitment of foster homes, are also different. It seems that Norway has a stronger and more centralised management through less exercise of autonomy in discretion which has implications for CWS in the municipalities and the individual social worker regarding the choice of type of foster home. Moreover, Norwegian social workers might be more thorough in assessing and involving the child's relatives and network as they need judicial board approval for placement transfers. We have also seen that Norway has a more CWS-specialised educational programme for bachelor students where resource-oriented approaches and perspectives where the inclusion of children's families and networks is understood as important.

Resource-oriented approaches towards families in contact with CWS stand in contrast to the assumptions of negative social inheritance. Could it be that such views are still valid among social workers in Denmark? We know little about attitudes towards foster care in kinship and network care in the Nordic countries as no representative surveys have been conducted on this topic. However, as we have shown, Danish and Norwegian qualitative studies do indicate that it is more acceptable to show hesitation towards kinship and network care in Denmark today, compared to Norway (Rasmussen et al., 2020; Tonheim et al., 2021).

While the relatively low amount of kinship and network care placements in Denmark could be an expression of attitudes, we could also ask if it reflects cultural differences in social workers' loyalty – or lack of loyalty – towards child welfare authorities' guidelines. There is little research on this topic, but in Denmark, there are many examples of non-compliance with the intentions of the law; for example, there have only been conversations with children before 55% of decisions in cases involving them (Ankestyrelsen, 2020). We find examples from Norway where social workers, to a greater degree, seem to follow instructions given by child welfare authorities and change practice. One is from the period 2019–2020 when child welfare authorities requested all caseworkers to assess whether the children were responsible for could and should have more contact with their parents.⁴ The following year, 25% of the foster parents who participated in the Foster care survey responded that parental contact for the child in their care had increased since 2019. In 2022, 45% answered yes to this question.

As other researchers have pointed out, there are several variations of kinship and network foster care internationally – from formal, informal and semi-formal (Winokur et al., 2014). As pointed out in the introduction, kinship and network care in Norway and Denmark are predominantly formal arrangements where CWS has custody of the child. Yet, we have also seen differences related to the financial compensation kinship and network foster families receive. In Denmark, kinship and

network foster homes, compared to other foster homes, only have child-related expenses compensated, with no additional payment. In contrast, Norwegian kinship and network foster homes receive the same financial support as other foster homes. As shown, researchers from several countries have found that kinship foster parents often have lower incomes than other foster parents. When financial compensation is to such an extent that low-income families can come in a better financial situation as foster parents, it might be easier to take on the everyday care of a child. It could also be that additional payment makes it easier for social workers to be more ongoing towards the child's relatives and network in the recruitment process.

As Hestbæk and colleagues conclude in their comparative study, the Danish and Norwegian CWS contain many similarities (Hestbæk et al., 2023, p. 130). This is reflected in this paper. However, we also describe significant differences. The factors suggested as possible reasons for differences in the proportion and utilisation of kinship and network care in Denmark and Norway, relate mainly to three overlapping levels: policy and values, organisational structures and case management. The reasons can be summed as follows: (1) The child welfare authority's role in promoting kinship and network care; (2) the use and need of foster care vs institution; (3) the organisational structure of CWS; (4) the financial compensation received by kinship and network foster parents and (5) social workers' education and practice.

Possible implications

There has been an increase in formal kinship and network care in most Western countries in the past 25 years. Australia, New Zealand, Ireland and Spain are at the forefront of the development based on their use of formal kinship care today (between 30 and 50%) (Hill et al., 2020; Ie, 2023; Kiraly & Farmer, 2020). Norway is part of this trend, while Denmark deviates from it. When we compare the Nordic countries on quantity, it is easy to highlight Norway as 'best in class' when it comes to following guidelines prioritising kinship and network care. If Denmark wishes to increase the use of kinship and network care it can learn from Norway regarding the five listed differences. With that said, a high proportion of kinship and network care does not necessarily indicate quality in placement and safeguarding the best interest of the child. We could also view the increased use in Norway from a more critical perspective. The available research, showing positive outcomes of kinship care for children, is primarily built on data regarding children growing up with foster parents who were 'self-recruited' and often knew the child well. In comparison, Norwegian CWS today 'search' in the child's family and network. In this search, potential foster parents expressing doubt about becoming foster parents – are sometimes offered additional services, for example 'weekend reliefs' for the children. This means that the starting point and everyday life for many children in kinship and network care today is different compared to the children placed in kinship care in Norway two decades ago. While there is reason to show caution towards some aspects related to the use of kinship and network care in Norway today, there is also reason to examine what the low amount of kinship and network care in Denmark is an expression of more closely.

Limitations

One limitation is that we have very little knowledge about informal kinship and network care homes in Norway and Denmark compared to other countries. It might be that Denmark has more children living with relatives or others in their network without the involvement of CWS compared to Norway. Moreover, we have not examined geographical differences related to kinship and network care placement. Considering that the lowest percentage of kinship and network care in Norway is found in Oslo, while the highest percentage in Denmark is found in Copenhagen, this could be an interesting lead to follow. Geographical differences in placements and informal kinship and network care are surely topics deserving more attention.

Another weakness is that most differences relate to developments in CWS in the past 20 years. Our discussion does not explain why kinship and network care placements were more prevalent in Norway compared to Denmark also 25 years ago – before the law and guidelines prioritising kinship and foster care were implemented. This points to questions related to potential cultural differences between the two countries, for instance, related to the populations' acceptance of public involvement in the private sphere, and/or emphasis on biological relatedness. Future research comparing Danish and Norwegian CWS could benefit from integrating a cultural perspective, to better understand the differences.

Notes

1. Comparing statistics across countries is difficult due to differences in registration and categorisation. We have chosen to construct the table with as few relevant and comparable categories as possible based on available data from Denmark Statistics (DS) and Statistics Norway (SSB): the total number of children aged 0–17, the number placed in care, the number in family care, and the number in kinship and network placements, as of December 31st in the two countries. There are minor differences between our calculations of percentage and the official publications of each country, but they are small and do not alter the overall picture.
2. According to Child welfare monitor (<https://www.bufdir.no/statistikk-og-analyse/monitor/barnevern>).
3. Norway has many small municipalities with few social workers and they often integrate all the tasks, which more or less gives the same result, that one person coordinates with all the involved family members.
4. This request can be understood in light of The European Court of Human Rights rulings related to limitations of parents right to contact with their children who had been taken into public care. A study analysing care orders issued in 2018 and 2019 in Norway also played a major part as it revealed that contact regulation does not appear to be clearly justified (Gerds-Andresen, 2020).

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