CHILD PROTECTION POLICY AND PRACTICE: A RELATIONSHIP LOST IN TRANSLATION

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Abstract
This article considers the challenges and opportunities facing contemporary child protection practice and contends that a meaningful understanding of child protection can best be gleaned by examining how practice is connected historically and sociologically with the broader discipline of social work. The essence of social work is described as a contradictory mix of surveillance and empowerment. The Victorian genesis of social work is linked to a distinction between the deserving and undeserving, yet also with a theme of redemption and liberation. It is suggested that the positioning of social workers as intermediaries between the comfortable and the threatening classes remains a salient feature in current practice. The relevance of the enduring phenomenon of a constructed underclass for child protection practice is explored. It is contended that anxiety associated with the breakdown of modernist certainties in the last 40 or 50 years has created an impetus to define and measure child protection in a mechanistic and risk-averse manner, and that the dominant instrumental form of social science misapprehends the nature of child protection as “practice”. A paradigm conflict is described, whereby managerial policy frameworks fundamentally fail to accommodate the essence of social work. It is argued that the effective development of child protection practice requires that it be re-conceptualised as complex, creative and interactive as opposed to a two-dimensional process of procedural compliance. It is suggested that child protection practice must be reacquainted with the voice of practice wisdom -- contextualised in the same way that social work is itself a process of engagement with social context. Practitioners, educators and theorists are challenged to actively advocate for an accurate understanding of child protection as ambiguous and situated social practice.

CHILD ABUSE AND SOCIAL WORK

I asked her pardon for the cruel lesson, and to her great surprise, gave her the eighty rubles. She murmured her little “merci” several times and went out. I looked after her and thought: “How easy it is to crush the weak in this world.” (Chekhov 2003:22)

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social workers, contemporary practice is under severe pressure. Arguably, this pressure has been imperceptibly building; ebbing and flowing like an incoming tide over the last 10 or 20 years, perhaps for much longer from a historical perspective. An aura of risk anxiety is, of course, nothing new to child abuse and child protection practice. After all, child abuse involves a crisis for the child, the family, the wider community, and for the agencies charged with intervening (Summit 1983). Consequently, as Morrison (1997:1) so acutely observes, “Anxiety runs like a vein throughout the child protection process”.

It is instructive to adopt a broad “contextual” approach when seeking to understand the challenges facing practice development in this field. Child protection has developed, over time, as a public service delivered principally through the emerging profession of social work. Social work is, in turn, no more separable from its past than social life is separable from social history (Bourdieu 2003:72) Accordingly, this paper sets out to explore some of the tensions that beset the ideological and sociological construction of child protection social work; to look back in order to find a way forward. It is contended that the analysis that emerges could contribute to the development of a policy vision that reconnects child protection practice with social work values and principles. The strength of social work resides in the capacity to link, in theory and in practice, big-picture analysis with the circumstances of individual lives; the political with the personal. By way of analogy, it is argued that child protection cannot be well understood unless it is reconnected with its socio-political dimensions, its complex practice context, and with the value base that informs social work.

SOCIAL WORK AND POST-MODERNITY

Social work is a socially constructed activity in that the parameters of practice are influenced by dominant societal perceptions of what is normative and desirable. What we look for is often what we find, although our visions (and our illusions) change with the times. Societal anxiety has spread and gathered momentum as the clarity and security that characterised the era of industrial modernism has progressively dissolved over the last 40 or 50 years (Parton and O’Byrne 2000:4). This cultural sea-change, often referred to as post-modern times, is associated in the social sciences with an epistemological crisis: critique of the notion of objective professional expertise, of the credibility of the scientific method of truth production as pioneered by the likes of Comte and Durkheim; and a questioning of the validity of the Cartesian dualism that underpins the scientific way of knowing (Sarantakos 1998:35). Ferguson (2004:132) refers to a “melting” of the solid visions of modernity, arguing that such assumptions have always been illusory in the context of child protection practice.

Parton (2000:460--461) has proposed that the recognition of social work as an intrinsically interactive and contingent activity (that “the social” cannot be removed from social practice) may mean that it is a discipline that is uniquely tailored to an uncertain post-modern society. Social work is at best “variably rational” and routinely accommodates ambiguities and dualities (Hutchison 1987:586, Webb 2001:67). It constantly seeks to balance an uneasy dialectical essence in its positioning at the intersection of social care and social control, and in its practice of seeking objective outcomes through a process of subjective interpersonal interaction (Dingwall et al. 1983). Power is understood and experienced as non-linear, contested, and to some degree negotiable in the relationship between social worker and “client”.

Conversely, the implosion of modernist absolutes has prompted a growing concern in Government, and in social life, with the minimisation of uncertainty: of “risk” identification,
containment and control (Beck 1992). In the case of child protection practice, the greater visibility of child abuse generally, and public scrutiny of the injury or death of children known to social services particularly, has prompted increasingly shrill demands for the design and application of stringent measures to predict and reduce risk (Connolly and Doolan 2007). This article contends that a resultant preoccupation with lineal procedures -- task performance, timeliness, fiscal accountability, and, above all, technocratic measurement -- is ultimately counter-productive, in that a dispassionate and disengaged form of practice is promoted. The art of practice is buried beneath an anxious science of uncertainty. Trebilcock (1995:11--12) credits H.L. Mencken with the astute observation that simple solutions to complex problems are not only comfortably seductive, but also generally wrong. As Connolly and Doolan (2007:3) suggest:

... trying to replace professional judgment with protocols, tools and guidelines ignores the fluidity of child protection practice … Attempting to make complex matters simple by developing tools and checklists is a naïve response and more than likely to fail.

CONTESTED PRACTICE FUTURES

In terms of the future development of social work practice, and of the ownership and control of that development, the stakes may be extremely high. In asserting that it is “no exaggeration to say that the very future of social work itself rests on reaching a deeper understanding of child protection”, Ferguson (2004:7) polemically suggests that no less than the survival of the social work profession is at stake. This claim is germane to the Aotearoa / New Zealand context given the extensive social work resources invested in a field that is subject to constant political and media interrogation. Scott (2006:7) describes a centrifugal, self-reinforcing crisis in child protection practice in Australasia in the following terms:

Most child protection services in countries such as Australia and New Zealand have become demoralised, investigation-driven bureaucracies which trawl through escalating numbers of low income families to find a small number of cases in which statutory intervention is necessary and justifiable, leaving enormous damage in their wake.

The depiction of contemporary child protection as a relentless juggernaut which is oblivious to collateral damage presents social work with an ethical imperative. According to Scott (2006:2):

We need to have the courage to ask ourselves what it is that we are currently so confident about doing in the name of protecting children, without any empirical evidence of its benefit, that in a generation we may be too ashamed to say we have been a part of.

This article will offer a response to Scott’s challenge, arguing that the development of child protection practice is a fundamental issue for the social work profession. It is contended that guidance may be found through consideration of what it is that social work knowledge has to offer child protection. Turning Ferguson’s assertion on its head, it is proposed that the revitalisation of child protection policy and practice rests on reaching a deeper understanding of the nature of social work. It is suggested that social work embodies a dual tradition of state-sanctioned re-socialisation on the one hand, and of empowerment and redemption on the other. An understanding of this ambiguous nexus, and of the knowledge and skills needed for reflexive practice in such a context, has the potential to inform creative practice development. In addition to a legacy of coercive social practice, social work has traditionally advocated for empowerment, seeking to restore its excluded human subjects to the ambit of social citizenship (Parton 2006). In a similar manner, it is suggested here that the vision and
the voice of social work need to be re-enfranchised: brought back in to the politics of policy formation and applied to a practice of child protection that has been compromised by procedural anxiety.

SOME HISTORICAL THREADS

The history of social work, like all social history, is entwined with relations of power; with questions of class and gender, and, in the Aotearoa / New Zealand setting, with the process of colonisation. Its origins can be traced to the social dislocation that accompanied the rise of industrial capitalism in the nineteenth century (Parton 1994). There is a long and undistinguished tradition in social welfare provision, dating back to the infamous English Poor Law of 1834, which separates the deserving from the recalcitrant poor (Morris 1994:51). Distant echoes of current social work practice are found in the “scientific” practice of the English Charity Organization Society (founded in 1869), which was oriented to assisting the deserving, or in later parlance, the “helpable poor” (Himmelfarb 1991:190, 192). Attitudes to the poor in Victorian society were emmeshed with questions of social control, moral turpitude, and the punishment of deviance (Cheyne et al. 1997:18). The delineation of a discrete, morally threatened and/or threatening underclass “other” is a powerful and enduring phenomenon. Dean and Taylor-Gooby (1992:28) contend that:

... the impetus to define a “residuum” or “underclass” has always stemmed from a concern to defend other assumptions concerning the integrity of existing social relations of production and reproduction and, in particular, of labour and the family.

The emergence of social science, and its application as “social work”, is historically connected with this perceived threat of social breakdown (Jordan 1996:36). Future security necessitated a repatriation of the morally unfit to the ranks of the respectable working classes. Re-moralisation features as a recurrent theme in state welfare provision throughout the Western world (Lessnoff 1994:106). Ferguson (2004:199), following Baudelaire, asserts that the clients of child protection agencies have traditionally been constructed as human rubbish; as refuse swept aside in the Schumpeterian gales of creative destruction that define the capitalist mode of development. In this analysis, social workers are metaphorically, and literally, positioned as intermediaries operating within established social relations of privilege and relative deprivation. As such, they frequent two worlds: acting as fugitive emissaries between the state and the marginalised, and effectively constructing a bridge between the comfortable and the dangerous classes (Jones 1983).

This description resonates with my personal experience of two decades of statutory child protection practice as a social worker, supervisor and practice manager in South and West Auckland from 1984 to 2004. This analogy can be usefully extended in two ways. First, as a student of mine recently observed, social workers may, as an outcome of this positioning, cease to be fully enfranchised in either world. From my personal observation the phenomenon of burn out for practitioners is often accompanied by an inarticulate state of muddled perceptions. It is as if gravity has failed and left the worker adrift in a no-man’s land -- an indeterminate space where, to recall Habermas, the life world of the other and the demands of the system cannot be adequately reconciled (Sinclair 2005). A second, and related, inference is that social workers are distrusted by both their clients and their masters. The administration of a standardised Risk Estimation System by Child, Youth and Family in the late 1990s was, for example, as much about policing practice compliance as it was about greater accuracy in the prediction of child risk (Smith 2004:23,24, Hyslop 2007:8).
THE CONSTRUCTION OF EXCLUSION: PATTERNS AND CONNECTIONS

Western liberalism has been persistently haunted by the spectre of a dispossessed and morally endangering underclass (Morris 1994). The cardinal sin, and ever-present risk, in the modernist capitalist project is to fail to adapt to continuous change, to fall behind into poverty and beyond participation in, and hence belonging to, market society (Ferguson 2004:134--136). The relevance to child protection lies in the fact that notwithstanding the undisputed assertion that child abuse and family violence occur within all sectors of society, the clients of the contemporary child protection system are most often drawn from the ranks of the poor and marginalised. Practice in child protection social work is as much a class-based, gendered and culturally biased phenomenon as it ever was (Scott 2006). The image of the unfit mother continues to inhabit the consciousness of clients and child protection workers alike. Further, as an outcome of the colonial alienation that defines the social history of Aotearoa / New Zealand, the client group is disproportionately peopled by inter-generationally deprived Māori: ngā mokai Maori (Hibbs 2005, O’Reilly 2008).

In time of war or conflict, and certainly colonisation, human groups habitually objectify, and effectively dehumanise, externalised others. In the first analysis, given the notions of inclusion and empowerment that are routinely inscribed in social work ethics, it may seem perverse to link such practices with contemporary child protection. However, further consideration of the historical legacy suggests that this may not be such a long bow to draw. The Victorian tap-root of social work that demands the moral redemption of individuals and families also includes an associated reflex to purge the profession of the non-compliant and undeserving client (Parton 2006, Morris 1994). In current child protection practice this inheritance is evidenced in the apparent need to justify the more conflicted, arguably punitive, aspects of statutory social work practice by locating failure firmly in an individualised, inadequate other, stripped of reference to historical and cultural location. This phenomenon is consistent with Philp’s (1979) analysis of social work as a normalising intervention contingent on the perceived sociability or deserving character of the social subject.

ESCALATING ANXIETY

In Foucauldian terms, social work is connected with the notion of surveillance; the maintenance of social control by means of the various disciplinary gazes that watch over us all (Foucault 1977). The primary function of social work in this analysis is the diffusion of societal anxiety: cauterising and thereby concealing the ruptures in the social fabric which are endemic to the contradictory nature of capitalism. The societal process of acceleration and destabilisation that is variously described as “late”, “reflexive”, or “post”-modernity has exposed the inherent fallibility of modernist child welfare bureaucracies (Parton and O’Byrne 2000:18--24). Children are vulnerable to abuse, exploitation, and deprivation and are victimised by adults with disturbing frequency. Statutory social services have never been, and never will be, able to prevent this. The revelations that have both challenged and shaped social work in recent decades -- physical abuse / non-accidental injury, child sexual abuse and the deaths of children in the care of the state or otherwise known to social services -- are none of them related to new phenomena. What was previously a well-kept secret has been increasingly opened up to public review. Statutory social workers, once the keepers of such terrible knowledge, are now castigated for the truth that has been laid bare. Connolly and Doolan (2007) express this paradox as follows:
Systems of child welfare went from being protectors of public anxiety to being inadequate protectors of the nation’s children. The notion that social workers could and should protect all children from harm, took hold.

In the first half of the twentieth century neglect was the primary focus of anglophile child-protection systems. The American paediatrician Henry Kempe and his ground-breaking *Battered Child Syndrome*, a 1962 study of the non-accidental injury of children admitted to hospitals, is often associated with the launch of the second wave of the child protection movement. As awareness and anxiety in relation to child protection has continued to expand and intensify, statutory social work has been transformed from the generic provision of social services and social care to a child abuse detection and intervention service. Scott (2006) describes a “vicious feedback loop”: a process of anxiety-driven “net-widening” where forensic investigations designed to detect and process notifications of physical abuse have now become a one-size-fits-all template for child protection social work.

**AN ALTERNATIVE VOICE**

Despite the conflicted history, social work also possesses a powerful and persistent alternative narrative of care and emancipation as opposed to surveillance and control. Turnell (2006:11) identifies an often hidden first voice:

Anne Weick (2000), writing specifically to a social work audience, suggests that the social work profession has two voices, a dominant, professionalized, scientized second voice of assessments and interventions, policy and procedures and a mostly hidden first voice of everyday caring, solution building, and compassionate action.

Social work is heir to the creative humanist tradition of compassion (Parton 2007:3), and because of this it carries the possibility of transformation and redemption; of subversion and liberation from oppression. A penchant for swimming against the tide in terms of making space for creative practice is arguably ingrained in the social work ethos (Ferguson 2004:153, Turnell 2006:4, Walsh 2006:38). Such practice may require social workers to question organisational dictates, acknowledge indeterminacy, and take risks. In my experience, careful and principled child protection practice flourishes when well-organised and rigorously supervised teams of competent practitioners are encouraged to acknowledge anxiety and are resourced to exercise their professional discretion.

Social work is a complex, nuanced and relational activity that contains this dual narrative of control and empowerment at its kernel. Child protection will always be a demanding, stimulating and at times consuming field of practice for the engaged practitioner. Just as policy is ideologically contested (Fox-Harding 1997:99, Packman 1986:5), high-quality practice requires a continual balancing of the need for careful safety-focused assessment and decisive action with reflection and collaborative solution building with client families. The sometimes conflicting demands for child safety and whānau wellbeing are resolved through social action -- in the doing. Child protection social work entails careful, fluid and reflexive praxis -- the doing informs the knowing. It is misleading to reduce this process to a set of actions and procedures, and to then equate compliance with these tasks as a measure of practice reality and practice quality. The often-quoted words of Schön (1983:42) capture something of the dichotomy:

In the varied topography of professional practice, there is a high, hard ground, where practitioners can make effective use of research-based theory and techniques, and there is a swampy lowland where situations are confusing messes incapable of technical
solution. The difficulty is that the problems of the high ground, however great their technical interest, are often relatively unimportant to clients or to the larger society while the problems of the swamp are the problems of the greatest human concern.

SPEAKING IN DIFFERENT TONGUES

Ferguson (2004:136-212) argues that in addition to the rational, structured bureaucracy of management, measurement and accountability, modernist child protection bureaucracy melts in the doing into two other elements. First there is the realm of aesthetic sensibility. Child protection is mediated through sensory perception: the smell of practice, which is also referred to as the smell of poverty. Related to this human encounter there is an expressive dimension that is concerned with emotions, symbolic power, and the psychodynamic aspects of embodied social action. Regardless of the legacy of social control functions, there is room in this engaged relationship for democratic, meaningful, and empowering practice. Parton and O’Byrne (2000:33) suggest that social workers are:

... differentiated from workers in other services mainly by their willingness to forsake the formality of their roles, and to work with ordinary people in their natural settings, using the informality of their methods as a means of negotiating solutions to problems rather than imposing them. Imposed, formal solutions are the last resort in social work, whereas they are the norm in other settings. The further social work moves from this situation the more it loses what is distinctive about it.

A decade ago Morrison (1997:1) illustrated the organisational consequences of ignoring the emotionally loaded nature of child protection practice as follows:

A couple of years ago a middle manager summed up the culture of her social work organization in terms that have resonated with every audience that I have subsequently shared it with. She described herself as being paid for “doing” -- outputs, tasks etc.; as far as “thinking” was concerned she should do that at home; or at the weekend, but as for “feeling” she should not bother to do that at all. In other words her organization, typical of many social care organizations in the 1990’s, was one in which two thirds of the domains of human experience, i.e. thinking and feeling were off organizational limits.

Nevertheless, attempts to force social work generally, and child protection particularly, into a procedural straight-jacket, and to quantify practice accordingly, have gathered increasing momentum over the past 20 years. Managerial efforts to define and measure child protection practice in exclusively instrumental terms, as flow charts with binary decision-making points aided by the application of practice tools tend, like the visible section of an iceberg, to conceal more than they reveal. Effective judgements in relation to child safety are crucial; however, distinctions between abuse, neglect, need, and fault are seldom cut and dried in Schön’s “swampy lowlands” (Ferguson 2004:112). As most practitioners know, despite the functional rationality prescribed by technocrats, accountants and policy analysts, the how of practice matters as much as, if not more than, the what: the script is not the play.

THE CONTEMPORARY POLICY CONTEXT

The commercial production efficiency ethos of Aotearoa / New Zealand in the 1990s saw statutory child protection redefined in terms of fiscal accountability and managerial efficiency: the delivery of measurable, numerically categorised sub-outputs as required by the Public Finance Act 1989 (Hanna 1999). The conceptual flaw in this model lies in the premise that social work can be accurately described as a commodity produced for a commercial market. The consequences of this distorted analogy were at times farcical and also deeply
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damaging to both social workers and their clients (Hyslop 2007). Policy and practice design
that exhibits minimal appreciation of, or respect for, the nature of its subject is hopelessly
flawed by definition: mischievous at best and likely to be damaging.

The Labour-led third way (Duncan 2004:224--254) political configuration of recent years has
achieved much in rehabilitating social policy from the market enemy pariah status visited
upon it by the economic fundamentalism of the 1990s. The Ministry of Social Development
has cast itself in a central planning and co-ordination role and has produced voluminous
policy documents that set out social development aims and means at varying levels of
generality. A complex web of partnership and/or contractual relationships across the social
service sector has developed under this umbrella. Where actual social services to children
and/or families are involved, as in the Family Start initiative, implementation has been
cautious and evaluation driven. In contrast to policy construction, any associated service
development has tended to be fiscally prudent and dominated by the notion of justifying
investment with reference to evidentially measurable outcomes. As far as statutory child
protection is concerned, the legacy of the 1990s neo-liberal output production model
continues to have a pervasive influence, not least in the assumption that timeliness of
response is the primary determinant of practice quality.

There will always be cases of severe harm and risk where the duty of the state to protect its
weakest citizens is the primary determinant of initial action taken. Such assessments must be
made in a careful, dispassionate and balanced way (Skehill 2003:154). For the great majority
of child protection practice, however, the issue is not so much whether state or NGO
practitioners assume responsibility, or even what is done in many cases. Access to resources,
support services, and the willingness of families to re-think questions of power and abuse can
all be critical issues. Nevertheless, in my experience the key to positive outcomes for children
is as often as not a product of how assessment and intervention are managed. The quality of
communication between social worker/s and whānau -- how the smell of practice is mediated
-- is generally the key to good outcomes for children.

GENERATIVE TENSION

It is little wonder that contemporary child protection policy, and the practice derived from
that policy, fails to take adequate account of social work as social practice. At the core of the
problem lies a clash of paradigms. Social work is innately avoidant of reductionism. It
defines itself in nebulous and slippery terms that do not sit easily with evidence-based
rationalism. Conversely, instrumental rationality inherently recoils from that which refuses to
be de-contextualised, reduced, sanitised, and measured. It is unsurprising that such puckish
insolence tries the patience of policy analysts, motivating them to take their ball and go
home, and to regard the social work ethos as altogether too precious. The resultant policy
prescription typically takes little cognisance of social work knowledge. Mansell’s (2006)
recent erudite exposition concerning optimum outcomes for child protection risk assessment
is a case in point. Effective child protection is described in terms of efficiency: a rational
process of risk assurance that entails negotiating an acceptable, consistent, and transparent
trade-off between the negative consequences of false alarms versus failed alarms, given a
finite pool of resources.

Social work’s refusal to be instrumentally classified is not wholly a matter of wilful or
capricious disobedience. It is more that such resistance is hard-wired into a discipline that is
based on the application of social and moral values in a complex context. If social work is to
be better understood, and if something of its essence is to be applied in the development of child protection practice, it is necessary to move beyond the fact that child protection social work won’t stay in the box that operational policy frameworks conspire to place it in. It is necessary to consider what social work wisdom may have to offer on its own terms. In contrast to the quest for ever greater approximations of predictive certainty in modernist social science, social work is a process that actively engages with uncertainty. Parton (2007), following Philp, suggests that social work is intrinsically concerned with individualising and humanising its subjects, as opposed to categorising, identifying, and generalising. In contrast to evidence-based policy development, which is an exercise in quantifiable probability, social work is a qualitative exercise in possibility.

Social work is fundamentally concerned with communication and with developing an understanding of the social world by engaging with social context. It is a process of inclusion as opposed to the isolation and removal of extraneous influences. Interactive, reflexive and critical engagement with the person in context is arguably the defining principle of social work practice (O’Brien 2001:14). This notion, although altogether too amorphous to satisfy evidential methodology, provides a useful starting point for an interrogation of what it is that effective practice in this complex and contradictory field might require (Lloyd and Taylor 1995:25,108).

**RE-CONTEXTUALISING CHILD PROTECTION SOCIAL WORK**

In my opinion a revaluing of social work knowledge in the realm of child protection practice is needed if significant and sustainable progress is to be made. Child protection practice needs to be re-contextualised. Child protection practice operates within the historical and contemporary context of the capitalist social order. Just as it is overly simplistic to disemboby the behavioural components of client identity from the social context of their lives, it is vitally important to be mindful of the political context of state-sponsored child protection. Similarly, it is important to be fully aware that the procedural map of practice has little real correspondence to the tense, ambiguous and creative territory of interactive communication that lies at the heart of social practice (Lowenberg and Dolgoff 1992:103).

It has been suggested that child protection practice in anglophone jurisdictions may continue to develop a mechanistic vision. Parton (2007) proposes that the information age has heralded previously unimagined possibilities for social surveillance. He explores an increasing adherence to the logic of the database, where human subjects are assembled against a variety of pre-constructed pathology indices. In the face of this colonising paradigm, social work needs to reclaim its first voice in the realm of child protection. The quality of practice is assisted by the accumulation of evidence and adherence to assessment protocols, but is ultimately mediated by the quality of engagement and by the sensitivity of the practitioner.

**CONCLUSION**

This article has argued that social work has a history and a value base that can and should be articulated by child protection social workers and theorists so that systems of practice can be better aligned with the complex social nature of practice reality. I have merely assembled and attempted to synthesise a body of argument that is well canvassed. Extensive statutory practice experience in Aotearoa / New Zealand over 20 years of my working life has left me with a belief that the effective development of child protection social work requires that the voice of social workers and their clients be heard in the policy realm. Practitioners have first
voice stories that need to be told. The institutions that train and educate practitioners need to assume some measure of responsibility by preparing social workers for practice in this zone of abundant contradiction. Action and advocacy are required if child protection is to be reclaimed as a site of creative, innovative, and solution-building practice (Walsh 2006). The social work profession must arise from its apparent torpor and claim ownership of a practice context that has such a wide impact on the nature and quality of human lives. The broader policy vision for child protection must take cognisance of the essential nature of child protection social work as an engaged, interactive, and innovative process of social practice, as opposed to a disembodied science of calculation and compliance.

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