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**Legislation and practice of current child protection policies in
Turkey and the United Kingdom: a comparative study /
Zakonodaja in praksa aktualnih politik zaščite otroka v Turčiji in
Združenem kraljestvu: primerjalna študija**

Master's Thesis/ Magistrsko delo

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Abstract:

The child protection systems in both countries emerged from a similar need - to protect the children, as the most vulnerable group of the human population, from any kinds of threats and abuses. When the historical backgrounds of the child protection systems in these two countries are compared, it may be claimed that the concept of children, understood as a distinct form of humankind, had started in the UK before it was adopted in Turkey. Accordingly, child protection policies were first developed at in the UK and only later in Turkey. Main child-centered laws and practices that are applied in these two countries may briefly be summarized in two categories: First, the commitment to detect any kind of child abuse within the childcare institutions, within the protective families, and also within the own family of the child. Second, the obligation to take an immediate precaution against these abuses, thus stopping the abuse or the violence and trying to ensure a hundred percent healthy physical, sociological and psychological conditions for the child. The biggest difference between the policies in Turkey and UK may be stated as the perspective of these two countries towards the children. While the UK has adopted a more scientific and systematic perspective towards childhood, as towards an early period in adults' developmental trajectory, Turkey has kept a more traditional perspective towards the childhood period. In that manner, children in Turkey, rather than being accepted as separate individuals, they are usually accepted as a well-integrated component of the family unit that has certain socially determined roles in the family.

Restructuring the existing child protection system in Turkey is proposed, hence establishment of a directorate dedicated to provide child protection and family services is suggested. This directorate will supposedly operate locally, aiming at identifying needs and providing services

for the families in need within its remit. Therefore, needs assessment and services delivery will promptly be ensured and delay will be prevented.

Key words: Child protection, UK, Turkey, policies, approaches, family.

Povzetek:

V obeh primerjanih državah, Združenem kraljestvu in Turčiji, sta se sistema zaščite otroka razvila iz podobne potrebe – zaščititi otroke, najbolj ranljivo skupino človeške populacije, pred vsakršno vrsto grožnje in zlorabe. Če primerjamo zgodovinsko ozadje sistemov zaščite otroka v teh dveh državah, lahko ugotovimo, da so v Združenem kraljestvu prej kot v Turčiji osvojili pojem otroka kot človeške oblike, ki je različna od odraslega. Temu ustrezno so politike zaščite otroka najprej razvili v Združenem kraljestvu in šele kasneje v Turčiji. Glavne zakone in prakse, osredotočene na otroka, ki so v rabi v teh dveh državah, lahko kratko povzamemo v dveh kategorijah. Prva se nanaša na zavezanost k odkrivanju vsake vrste zlorabe otroka znotraj ustanova za varstvo otroka, znotraj družin, namenjenih varstvu otroka, in tudi znotraj otrokove matične družine. Druga se nanaša na obvezo takojšnjega ukrepanja zoper zlorabe, kar vključuje ustavitev zlorabe ali nasilja in prizadevanje otroku zagotoviti stoodstotno zdrave telesne, sociološke in psihološke razmere. Največja razlika med politikami v Turčiji in Združenem kraljestvu je perspektiva, ki jo ti dve državi zavzemata do otrok. Medtem ko so v Združenem kraljestvu privzeli bolj znanstven in sistematičen pogled na otroštvo kot na zgodnje obdobje v krivulji razvoju odraslega človeka, Turčija ohranja bolj tradicionalen pogled do otroštva. Tako so običajno otroci v Turčiji bolj kot ločeni posamezniki razumljeni kot dobro integrirana sestavina družinske enote z določenimi družbeno določenimi vlogami v družini.

V magistrskem delu predlagam preoblikovanje strukture obstoječega sistema zaščite otroka v Turčiji, tako da predlagam vzpostavitev direktorata, namenjenega zagotavljanju storitev zaščite otroka in družine. Tak direktorat bi moral delovati lokalno, z namenom, da v mejah svojih pristojnosti identificira potrebe in priskrbi storitve za družine, ki to potrebujejo. To bi zagotovilo pravočasno oceno potreb in storitve ter onemogočilo časovne zaostanke.

Ključne besede: zaščita otroka, Združeno kraljestvo, Turčija, politike, pristopi, družina.

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Abbreviations

BAE: Best Achieving Evidence

CPC: Criminal Procedure Code

CPL: Child Protection Law

CRC: Convention on the Rights of the Child

MDFTP: Multi-Dimensional Fostering Treatment Program

NCPCP: National Community for the Prevention of Child Persecution

NGO: Non-Governmental Organization

SSMSA: Social Services Maintenance and Supervision Agency

TCL: Turkish Criminal Law

TSSCPI: Turkish Social Service and Children Protection Institution

1. Introduction to the Comparative Study: Problem Description, Purpose, Research Questions, Methodology

The concept of childhood has not been addressed separately from the period of human adulthood. The inadequacy of a sociological distinction of childhood in the life cycle of human beings has caused children to be held responsible for their behavior and actions the same as adults (Aral, 2001). For this reason, no distinction has been made between past punishments for children and adults, and children have been subjected to the most severe punishments in the same way as the adults. In addition to that, that children have been neglected and abused throughout history (Kara, Biçer & Gökalp, 2004). While the ways in which children are being neglected and exploited vary, the results are the same for children: injuries and deaths. It is also necessary to take into account the psycho-social trauma which might increase children's tendency to be violent (Ayan, 2007).

The neglect and abuse of the children is not only true for the children who are away from their homes, who are motherless or fatherless, or who grow up with foster-parents (Aile Araştırma Kurulu, 2000). It is also empirically confirmed that many children are neglected and exploited by their parents and/or siblings or other family members within the family (Akman, 2002).

It would not be wrong to say that historical process of protecting children from neglect and abuse has begun by accepting childhood as a separate process in the life of an individual. As a result of Renaissance and Reformation Movements in Middle Ages and the subsequent philosophy of the Enlightenment, it is stated that the importance of children education was understood and it was concluded that children should be treated as separate individuals from adults. The French Revolution which took place in 1879, paved the way to foundation of secularization and the nationalist movement which provided children protection by the state (Taner & Gökler, 2004). Thus, since the Roman Empire, when the child was subject to the absolute sovereignty of the "father" in a patriarchal society, he/she began to be treated as a separate individual, rather than being treated as a child. Despite these developments, this maltreatment of children continued and the understanding that children must be protected from neglect and abuse has not developed until the 20th century.

As a result of the literature review, I have reached to the conclusion that the children protection policies give priority to children who need protection (children who are in need of

protection), children who are abandoned by their parents, whose parents have died because of wartime or who have no foster care. On the other hand, it is understood that the family, which is seen as responsible for the education and bringing up of children as healthy individuals, could not protect their child over time. For this reason, children who have been neglected or exploited within the family are accepted and treated as children who need protection (Kara, Biçer, & Gökalp, 2004).

The "institutional care" approach has been developed in the United States and Europe in the early 20th century for the protection of children who have been neglected and exploited in the family, particularly for the protection of children who are physically and sexually exploited within family. This approach, based on the care of abused children in state-run institutions, has weakened with the establishment of adoptive family care based on the principle of children protection secured by families who care for these children. Since 1980s in the world, with the support of families and children, an understanding of the protection of children within the family has been adopted (Ayan, 2007).

Child neglect and abuse is quite an extensive concept and there is no common definition or consensus on the subject. These concepts have also been translated into Turkish in different ways. "Bad treatment", "evil treatment", "violence", "exploitation and negligence" are some of the terms used in Turkish literature to stand for neglect and abuse of children (Aral, 2001).

Along with the increase in consciousness regarding the Neglect and Abuse, it is observed that scientific studies have started to increase since the last quarter of the 20th century. Countries are looking for ways to protect children in the most effective way from neglect and abuse. With this respect, the legislations enacted and the plans and programs implemented are being reexamined, and many countries are turning to innovative politics for this issue (Taner & Gökler, 2004). This change, which has started towards the end of the 1980s and continues today, refers to seeking ways to cope more effectively with maltreatment of children, even if the practices change from country to country.

As we speak of this worldwide change, the legal framework for the neglect and exploitation of children in family is still going through transformation (Uçuş, 2013). It should not be forgotten that this is not as well-known as the old social issues such as "custody, tutelage or inheritance", which have a long history.

Policies related to the protection of children, strategies, plans, programs and changes that are discussed in this study are not limited to the examples from the UK and Turkey. Especially in the USA and Canada, where the focus of policy is the protection of children, there has also been a marked change in recent times. For example, it has been suggested that in some states of the United States, studies of neglect and abuse which had previously been taken separately, were now considered as a whole. In other words, while the issue of abuse is a subject that was only related to crime, today the issue of neglect and abuse is treated as a whole, as a part of the multi-institutional practices (Hetherington, 2006: 29). In addition to the countries mentioned, some European countries are carrying out systematic changes to protect children and young people.

Although it is primarily a family's duty to protect the child, it has also been internationally recognized that the state is responsible for the protection of the child in cases when a child can not be protected by the family. According to the Convention on the Rights of the Child (CRC) from 20 November 1989, the responsibility for the protection of children, who are not protected by their own family or guardians, or who have been subjected to negligence or exploitation, belongs to the State. Systematic work has been required to meet the needs of children in need of care because of neglect and exploitation. The family, the international organizations and NGOs (Non-Governmental Organisations) have a very important role in child protection today.

Even though there is a considerable sense of attention, sensitivity and curiosity about the concept of childhood, children throughout the world are still exposed to neglect and exploitation, sacrificed for honor killings and bloodsheds, losing their lives in armed conflicts, and being exploited as sex slaves. Every year, millions of children are deported from their homelands, away from their loved ones and their culture, and they are on their way to become a victim of forced immigration and turning to be a refugee. The United Nations High Commissioner for Refugees states that about 80 percent of the total asylum seeking and refugee population is children and women. The World Resources Institute suggests that refugee children constitute roughly half of the general refugee population (Valencia, 2001: 1; Unicef, 2016: 21).

Recent surveys have shown that 1.5 million children each year are subjected to ill-treatment, neglect, and multifaceted exploitation (Ammerman & Hersen, 1990: ix). Child poverty is increasing every year, and this poverty leads to high levels of anxiety and sorrow.

Today, photographs of children dying of starvation in Africa appear on televisions. Despite the international organizations for the protection of children, multi-governmental

agreements, the regulation of children's protection under their own laws and the role of families in raising their children, neglect and exploitation of children throughout history still continues in various forms, in different dimensions.

The Republic of Turkey, on its way to become a member of The European Union (EU), has taken quite important steps in terms of designing new policies for children who need care and protection. The amendments introduced in Child Protection Law No. 5395 (the Child Protection Law) and subsequent regulations, and the TSSCPI activities and practices, which have been partly restructured in this respect, are some of the examples (Aral, 2001).

In parallel to the developments in Turkey, England, known for having well-established child protection system, has also witnessed significant changes in the last twenty-five year. Recent changes in the UK, a country with solid child-focused politics as well as the majority of the European countries, have introduced innovations in the child protection system (Uçuş, 2013).

In the light of the literature review, I have arrived to the conclusion that there exist different systems and strategies in Turkey in comparison to the UK, for the protection of neglected and abused children. In both countries it is believed that there is a need for new studies in order to better understand new concepts and to raise the awareness of the subject in relation to the neglected and abused children (Karataş, 2008; Linsey & McAuliffe, 2006).

Due to the fact that the concepts of neglect and abuse are highly extensive, the focus of the study is limited to the children who are exposed to abuse or children who are under risk for this reason in Turkey and the UK. Moreover, this study is based on state-run social work in two countries. In other words, the activities carried out by the agency in Turkey represent one focal point of the state-run work, and the other focal point is the study of social services departments of local government in England.

Since the services that are "pre-nursing" and "provided under care" for children who are neglected and abused or at risk of suffering are the scope of this study, the services that are provided after the care are not included within the context of my study.

Since the focus of the current thesis are the children who are neglected and exploited, the issues that are considered to be part of the juvenile justice system, such as criminal sanctions for children and delinquents, have not been included either. The term "children in need of

protection" used in this study has been used for children who were neglected and abused (Mayall & Ördem, 2016).

The *general purpose* of this study is to present the general principles of child protection system in England and Turkey from the perspective of children's rights, similarities and differences, to make a comparison. To this end, the following *research questions* are posed (Akyüz, 2012):

1. What are the historical backgrounds of the child protection systems in these two countries (briefly)?
2. Sometimes laws are issued in order to make certain political outcomes possible, rather than providing benefits for certain social groups. Having that in mind, what are the main child-centered laws and practices that are applied in these two countries?
3. In terms of child protection, what is the definition and conceptual framework of neglect and abuse with respect to each of the two compared countries? How did the historical background and socioeconomic conditions in these two countries affect the child protection policies and contribute to the enactment of new legislations?
4. What are the contemporary child protection systems in these two countries?
5. What are the similarities and differences between the general principles of child protection systems and the types of care provided for the children in need of protection when comparing these two countries?
6. What kinds of models may be suggested for the current child protection system in Turkey?

In order to answer the above-mentioned research questions, the *general screening model* will be used as the method. The following primary resources will be collected and examined: the legislation documents of the two respected countries (the laws, regulations, directives, statutes, implementing guidelines and strategic plans), as well as secondary resources, such as relevant scientific works published in the two countries (books, information notes (booklets,

webpage information), articles published in scientific journals) and statistical data. A *comparison* will be made based on the data obtained, with the focus on similarities and differences (Koç et al., 2012).

The comparisons between the two countries will be made based on their respective laws, policies and legislations in different respects, such as the nursing care protection, protection within families, adoption, and protection within child's own family. In addition, in order to understand the perspective and attitude towards child protection in both countries, an archival research will be conducted and the past research on child protection will be reviewed for both countries. *The Systematic Unit Model* will be discussed and a *new model* will be proposed.

This study will be carried out in Turkey and the UK and is expected to contribute to the debate about the concept of children's exploitation and protection. I would like my research to contribute to the field of sciences and professions such as social work, law, psychology and sociology in areas dealing with neglect and abuse. In addition, I wish my work to be beneficial for professionals, academics and students fighting children's neglect and exploitation (in the two countries) while also shedding light on other research on child welfare.

2. Child Protection

2.1. Definition of Child Protection Concept

It will be useful to start with the child's definition to this work that focuses on children. There are many possibilities to come across to many definitions about "child", which is defined as the human fetus in the dictionary. Yörükoğlu (1984: 3) describes the child as a citizen who develops, is immature, and can not be counted as an adult. Akyüz (2000: 1) defines the child as being innocent, sensitive and dependent on adults.

Developmental psychology defines childhood as the period between infancy and adolescence, while the law addresses childhood as the period until adulthood. Although Turkish law does not use a common definition of a child and childhood, it is known that different laws use different kinds of definitions. For example, in Turkish labor law, the definition of a child has not been made, but the provisions on children have been included. Article 80 of the Turkish Labor Law defines the age of 18 as the upper limit of the age group of children (Aytaç, 1994: 179). Again, the Criminal Procedure Code (CPC) indicates that criminals under the age of twelve should not be punished. Juvenile Protection Law, Law No: 5395 and dated March 3,

2005, paragraph 1 of Article 3 of the CCP, defines the child as "a person who has not completed the age of eighteen, even if s/he is younger at an earlier age" (Koç et al., 2012).

According to the CRC, *child* was used as a term covering all individuals under the age of eighteen, except in the case of counting a mature at a younger age than the national legislation. Prior to the CRC, it should be emphasized that no definition of the child has been made in the declarations on children's rights (e.g. the 1924 Declaration of the Rights of the Child). This can be attributed to the fact that *child* is defined differently by each country according to its legal norms.

It is difficult to come across the definition of a child on a literary background knowledge, which has been generally agreed upon. On the other hand, definitions for *children* have some common points: Some of the common characteristics of child-related definitions are that a child has a developing structure, is not mature, is often younger than eighteen, is dependent on adults, and is an innocent human being creature that needs to be protected. Above all, children are considered to be the first constituent of human life. Every child should be included in the priorities of every society in the context of growing in a healthy environment in terms of physical, social, spiritual, economic and moral one, and be protected from neglect and abuse (Akyüz, 2012).

It is very clear that the meaning of being a child and the value given to children are changing from society to society and culture to culture. Inan (1968: 3) also confirms the above thesis, and indicates that the concept of child is a changing concept depending on social structures, cultures, beliefs, and economic systems of societies. For example, the value given to children in industrialized societies will considerably be different when it is compared with societies whose primary means of subsistence is agriculture and animal husbandry. In agricultural societies, it was encouraged to have children in order to increase the number of persons to work in the fields. Likewise, in areas where the gains in society depend on the physical strength of the family, there was a different meaning of having children or protecting children. In many parts of the world it is still thought that children are economic power.

As social change is observed, it is clear that the value of the child can change. Currently there are studies in developed countries which indicate that some people want to have children in order to avoid being alone when they are old, for fear of loneliness and alienation in the society (Rosenthal, 2002: 289). All these points indicate how variable the concepts of childhood and childhood can be in terms of culture, collection and time.

The concept of child protection can be considered as the provision of all aspects of the child's physical, social, emotional, economic, cultural, ethical and political as well as legal security.

A mentality, accepted by almost everyone today, regards children as the safety of our future and is complemented by the belief that healthy generations will create healthy societies. Therefore, the concept of children's rights' protection is generally accepted all over the world in order to raise healthy generations and for the societies to be composed of healthy, spiritual, social and morally healthy individuals in the future. It would not be wrong to say that this understanding affects all processes from the implementation of policies, plans and programs for children and young people to implementation and evaluation stage. Akyuz (2001: 1) considers that the wishes of nations to live a happy and peaceful life in terms of material and spiritual life are possible on one condition, i. e. that the children have a happy and healthy childhood. Inan (2005: 59) also underlines that the future of societies depends on the physical, mental, moral and ideological well-being of children.

Of course, it is a fact that children are the future of a society. On the other hand, the fact that children are regarded as separate individuals and they have inherited rights from being an individual must also be expressed. In other words, as natural law also acknowledges, children's rights and human rights in general are the rights conferred by nature, not human rights. Children's rights should be seen as a part of human rights law and as a result of their developmental needs, should be considered as possessing special human rights (Balo, 2005: 115). The fact that this perspective also dominates children's rights will show that it has a tendency to reflect the rights' perspective of children's rights' advocates.

In this study which focuses on systems for protecting children from neglect and abuse, it is considered as appropriate to give the following details of concepts of neglect and abuse under separate headings.

First, the fact that children have a tendency to attend more to the unpredictable events, which also facilitates their learning shows that children at a certain age have some set of events that they perceive as 'ordinary' or 'non-surprising', and they realize whenever an event that is out of their prediction zone happens. However, it is unknown until when this flexibility continues. It may be discussed about the trade-off between flexibility and specialization, and it may be concluded that some amount of flexibility have to be sacrificed in order to achieve efficiency, automaticity and expertise. This is a highly important issue to also discuss in the

debate on associative learning, since children receive lots of information from multiple sources in the outer environment during the associative and cultural learning processes, and it is highly possible for these different information to conflict. It is worth asking what would happen in these situations.

In addition, what is the role of being an active or passive participant in the associative learning processes in the outer environment and the role of receiving feedback? It is true that the feedback that the child receives affects learning strategies and learning processes of the child, and child may choose not to learn an action which is conducted by a third person and is evaluated negatively by the others in the society. It is also true that both passive and active participation may provide feedback to the child, but active participation and active learning provides more feedback, since in these situations the feedback is given in an explicit and an ostensive way. On the other hand, in the situations where agent is a passive participant in the associative learning environment the feedback is given in a non-ostensive way and the child may not understand the feedback in the most appropriate manner. In some studies it is found out that 3-year olds have a higher tendency to imitate an action which has a positive outcome (pg. 4). However, it is also possible that in the actions which bring positive outcome, the positive emotional responses, body language, and mimics of the adult, and other environmental factors may interfere into the process, and child may have a higher tendency to copy the action not because he/she understood the intentions of the adult or the nature of the action, both just due to the salience of these other factors, which would indicate that child realizes the feedback that comes from the outer environment but becomes unable to interpret the true source of it. (KOL, 2011)

Second, it is worth asking why people emphasize process copying over product copying. Is the underlying motivation behind understanding the actual nature of the action (process copying) during associative learning is related to our intention reading abilities and our desire to understand other minds, or is it just an instrument for us to actualize our 'selves' and become able to survive in the society as socially desirable and acceptable individuals who conform to the social norms. The answer to this question would also help to explain whether socializing and understanding others is instrumental or constitutive for the human-beings. Here, it is highly critical to understand the 'real' motivation behind our tendency to learn through associative learning, and also behind our ability to understand communicative intentions and learn through the communicative intentions in the social context, while discussing on how social learning becomes cultural learning and how human-beings are distinguished from other species in terms of their learning processes.

Third, it is demonstrated that the reliability of the adults predicts the imitation behavior of the child. However, it may be criticized that the ecological validity of this experiment is low, since in real life deciding on whether a third person is reliable or not is not simple and straightforward. Hence, what would happen in the situations where children are not able to decide whether the other person is reliable or not, or in the situations where children receive conflicting input related to the reliability of the other person? Would this ambiguity interfere with the associative learning processes of the child and makes it harder for the child to take the action of imitating or not imitating (or would this prevent child to take any action since the child is not sure about whether to imitate or not), which may refrain the child from learning? Additionally, what would happen if the actions of someone who child relies on (such as the mother or another caregiver) contradict with the actions of a third person who child perceives as reliable due to recent past experience? Would the reliability of the caregiver override the perceived reliability due to recent experience, or would the child still continue to imitate the actions of that third person even if these actions contradict with the actions of the caregiver?

Lastly, if we come to how habituation causes children to prefer familiarity over novelty, while high habituation cause children to prefer novelty over familiarity. Can it be possible for the child to prefer to imitate 'non-reliable' figures over imitating 'reliable' figures, if the child is highly habituated to the actions of the reliable figure and if the 'new' actions that are performed by the 'non-reliable' figure are more attention grabbing and interesting for the child? These issues should be elaborated in future studies.

At the point of comparing child protection in different countries, the most important dynamics that might affect the child development is the outer environment and sociocultural conditions in these countries. Here, it would be adequate to argue whether the innate characteristic of children affect their development processes and their reactions to violence and abuse, or whether it is the affect of the outer environment which determines children's developmental pathway and their reactions to violence and abuse. Controversial arguments exist on this issue. However, the majority agrees that even though innate characteristics of children affect their developmental processes and their vulnerability to violence and abuse up to some extent, environmental conditions have a bigger effect in terms of determining children's vulnerability to violence and abuse (Nicolopoulou, A. 2004).

Here, when it is considered that the outer environment is more effective while determining children's reactions and vulnerability to violence and abuse, then bigger differences

might be expected between the perspective towards child development and between the approaches of child development, in the UK and in Turkey. In the UK, as the culture is more individualistic, children have accepted as a separate form of human kind, at an early age. By accepting children as a separate form of human kind, needs of the children have started to be better addressed, and precautions to protect them have started to be taken more quickly. Also, as the UK is a more individualistic country, transparency is higher within the society. As an inevitable part of this, in the UK, children more easily express themselves and ask for help, whenever they are in need for protection. However, as Turkey is a more collectivistic country, here, respect to the elderly family members is a more prevalent norm. As a result, families turn out to be more closed units in Turkey. This means that, in Turkey, it is hard for children to complain about their family members. Similarly, in Turkey, to inform social services personnel about the violence or abuse that is inflicted by their family members is accepted as unethical or disrespectful. As a result, children in Turkey have a lower tendency to express themselves and to react to violence and abuse, which makes them more vulnerable (Allen & Bickard, 2013; Müller, 2009). Here, highlighting these differences is important, as they give clues about what issues to focus on, in the remaining parts of the current study.

While defining the concept of child development, it is important to also consider protection from emotional violence, together with the protection from physical violence. As emotional violence is harder to detect and harder to be realized, even by the one who is exposed to the violence, it is usually harder to protect children from emotional violence. In addition, protection should not only include protection within the boundaries of the house, but its scope should involve every social environment that the child may be a part of, such as school, playground or a friend's house. At this point, it may be claimed that the UK has a broader definition for child protection, when it is compared with the definition of Turkey. For example, according to the definitions of the British Council, the scope of child protection is defined as (NCPCP, 2008);

- To respect, to value and to listen the children
- To prevent hiring child employees
- To inform every employee in every company about child protection and how to approach and behave towards their children
- To develop effective child protection policies

- To train their employees on child protection and how to act towards children who are in need for protection
- To inform children about child protection policies
- To be in cooperation with the related institutions and to act in cooperation with the children, family and the institution while developing new policies
- To manage its personnel affectively to allow smooth processing in child protection
- To dedicate enough resources for child protection
- To continuously improve child protection policies, based on the newly emerging needs of children
- To provide effective education opportunities to children

2.2. The Child Protection System in Turkey

In Turkey the legislation of the 5395 number CPL, which has fairly great importance, can be seen as the beginning of systematic services for abused and neglected children. With the regulations based on related law, the steps to be taken in the child protection system for neglected and abused children have become even more evident. At below, the operation of the child protection system for neglected and abused children in Turkey were discussed on the basis of social work intervention processes (Yolcuoğlu, 2009).

Guidance Phase

The obligation to notify the situation of children who have been neglected or abused or who are at risk of suffering to competent authorities has been discussed in details in TCL dated 26.02.2004. Article 278 refers the obligation to notify the following provision:

"A person who does not report a criminal offense to the authorities is punished to imprisonment up to one year". It is stated in paragraph 3 of the same article that the punishment to be given in case of a criminal offender being a child (because of negligence and abuse) is also increased half more. This provision follows as (Tomanbay, 2011);

"In the case of a child who has not completed the age of fifteen, or who is physically or mentally disabled or who is unable to defend herself due to her pregnancy, the penalty to be imposed according to the preceding paragraphs shall be increased by half."

In Articles 279 and 280 of the Turkish Penalty Code, the obligation of public officials and health personnel to report committed crimes is mentioned. According to Article 7 of the Regulation on the Acceptance and Removal of Prevention Decisions of 28 November 1983, social services institutions, local residents, health institutions and organizations, village headmen, general law enforcement officers and municipal police officers are in charge (Tomanbay, 2011).

"Informing the judicial and administrative authorities, law enforcement officers, village and neighborhood headmen, municipal police officers, health and educational institutions, officials of other public institutions and organizations, NGOs and one who is aware of the need for protection of a child, are in charge of informing to the provincial and district social services . (Koç et al., 2012)"

According to Article 6 (2) of the Regulation on the Implementation of Precautionary and Supportive Measures in accordance with the Child Protection Law, persons, who are responsible for the protection and care of child, may apply to social services institutions in the province and districts for protection of the child. According to the third paragraph of the same regulation, TSSCPI institutions and organizations are obliged to take actions in the media and similar communication media about children in need of protection as denounce and take actions without expecting an official notification (Güner, Güner, & Şahan, 2010).

As anyone can understand from above legal grounds, children suspected for being under neglect and exploitation should be directed to TSSCPI. So ,what will happen next? The answer to this question is mentioned at below (Elmacı & Beyhan):

Determination of Needs Phase

It is the duty of TSSCPI and its affiliated institutions and organizations to investigate the situation of children who are neglected, abused or at risk of suffering and to take necessary measures. According to paragraph 6 of Article 6 of the Regulation on the Implementation of Precautionary and Supportive Measures in accordance with the Child Protection Law, the TSSCPI institution carries out the examination and follow-up processes according to the legislation on children in the process of the identification of children in need of protection. At this point, the Regulation on the Detection, Supervision and Removal of Protective Judgments of 28 November 1983 is used (Karataş, 2007).

Article 7 of the Regulation uses the statement "The purpose of investigating and finding children in need of protection, is the responsibility of the Provincial Directorates and the Social Service Offices". In this context, it is understood that the notifications concerning negligence and abuse will be handled by TSSCPI institutions and organizations and the necessary examinations will be started. Articles 8, 9 and 10 of the related regulation also refer to the responsibility of TSSCPI institutions and organizations for the identification and the necessary examination of children who need protection (Koca, 2015).

As soon as possible for the assessment of the notification from the relevant TSSCPI body or organization, (provincial and district directorates and affiliated organizations) on which the neglect and exploitation has been declared according to article 11 of the above mentioned regulation, charges (Amended: 26.09.2008 R.G.27009 / 1md.) a social worker. In the absence of a social worker at the place where the notification comes, the person to be appointed by the TSSCPI provincial directorate will be able to examine in depth of the issues such as "the child's past, whether or not her parents are siblings, the socio-economic situation of the family and its surroundings, the place s/he lived so far, close kinship and neighborly relations" examination ".

The social worker has the obligation to cooperate with all other related professional staffs and institutions when performing the above studies. Once the needs are determined, the planning of the social service intervention to be made is passed in stages (Tomanbay, 2011).

Planning Phase

After the examination of the social worker, the social work intervention to be done by the family needs to be planned. When it is necessary, the report is also presented as a social review report for the protection of the court. Article 12 of the Regulation for the Detention and Abolition of Prevention Decisions of 28 November 1983 on the Detention and Examination of Children in Need of Protection states that the documents to be submitted to the court on the application for the protection order are as follows (Başpınar, 2007):

- a) If the child has securities and real estate, how it will be managed and maintained,
- b) In conjunction with the Social Examination Report, which includes the question of whether the custody of the guardianship should be removed or not,
- c) Documents received from the Title Deed and Tax Office and the case file of the General Directorate to be determined shall be sent to the competent and competent court. "

At the end of the examination handled by the social worker, s/he can apply to the court to take protective and supportive measures under article number 5395 (Erdal, 2014). This decisions can be done by the branches of the provincial directorates with the social worker's proposal. As mentioned earlier, precautions, related to neglected or abused children, are initially taken to ensure that children are kept in the family at first.

In cases that child has been neglected and exploited ~~and~~ child must be taken immediately after the examination, child may be taken under the supervision and care of the TSSCPI institutions and organizations. According to Article 7 of the Regulation on the Implementation of Precautionary and Supportive Measures in accordance with the Child Protection Law, it can be applied for an urgent protection decision within five days, together with the social surveillance report (Şenocak, 2006). The social surveillance report about the child can be completed before the emergency protection decision for maximum thirty days is over, and the child is provided with the necessary professional interventions.

For a better understanding that how services and implementation plan for neglected and abused children in Turkey, it is necessary to look at the number 5395 CPL Article 5. There is a number of injunctions on children in need of protection as a result of neglect and exploitation. These injunctions are very important at every stage of implementation for children. The following measures have been elaborated (Doğan, 2013):

Counseling custody: The court may require, such measures in order to provide protection for child in family, necessary information to raise the child who is obliged to take care of the child when necessary, in order to ensure that the child is protected within the family. Counseling can also be given to children to solve problems related to care, education and development (Giray, 1999).

Article 12 of the Regulation on the Implementation of Precautionary and Supportive Measures Decided under the Child Protection Act refers to the details of the implementation of the relevant measure. Accordingly, it is aimed to provide services such as providing parent training, parenting benefits, getting children's development from all sides and getting counseling to support them. It is stated that one or more consultants may be appointed for submission of said services (Çiftçi, 2009).

Persons to be appointed as consultants are in a position to certify the training they receive about the field (Işık, 2005). It is also stated that they will be given priority to those documenting their training.

As the above information suggests, the court may decide to take measures to ensure that children and their families benefit from the necessary support and services. This decision is thought to be aimed at preventing issues that may grow even larger in the future, resolving communication problems between parents and children, especially resolving problems with their family of adolescents (Çiftçi & Gönen, 2007). The institutions responsible for the development of the capacities and qualifications of those who will implement the injunction have been held responsible.

Education provision: Another measure that court may give to children in need of protection is the education measure. Details of this decision are given in Article 13 of the Regulation on the Implementation of Protective and Supportive Measure Decisions Granted under the Child Protection Act (Işık, 2005). The child may decide to take an action against an educational institution to attend a vocational or arts-related course for the duration of the day or as a resident, or for the purpose of obtaining a job or occupation. The decision may also decide that a child should be placed next to a professional owner or in public or private sector workplaces.

Shelter measure: This measure may be given by the court for the purpose of establishing a suitable place of residence for pregnant women who are in danger of being living with children or whose decision is not a place of settlement. 15 of the Regulation on the Implementation of Precautionary and Supportive Measures Decided under the Child Protection Law (Işık, 2005).

Health care: The court may decide a measure for the provision of medical treatment for those who use addictive substances for temporary or permanent medical care and rehabilitation for the protection and treatment of the child's physical and mental health (Güner et al., 2010).

Care measure: One of the most important injunctions for children who are neglected and abused is care decision. This decision is taken for children who have not the possibilities of their families, according to Article 14 of the Regulation on the Implementation of Precautionary and Supportive Measures in Accordance with the Child Protection Law. In particular, TSSCPI is responsible for the implementation of this decision on children who are neglected and exploited in their families, who are experiencing adjustment problems due to psychosocial reasons and

who should receive some help and support services so that they can be in a family environment with other children (Tomanbay, 2011).

As a result of the social worker examination, if the decision of protective and supportive measures is not deemed necessary, the social service institution should submit the relevant opinion and the plan for the services to the child and the family applies to child judge. The child's judge gives the decision to return the child to his family. In cases where it is deemed necessary for a protective and supportive decision to be taken as a result of the examination conducted by the institution, the institution shall apply to the child judge.

According to Article 8 of the Regulation on Protection, Care and Rehabilitation Centers no. 27339 and dated 04.09.2009, it is necessary to carry out the necessary examination within five days about the children who are directed to the centers and whose care is provided for them. It is necessary to decide on the most suitable service in "child protection first intervention unit" for children (Altunışık et al., 2007).

Application Phase

Article 18 of the Regulation on the Implementation of Precautionary and Supportive Measures Decisions under the Child Protection Act obliges the TSSCPI to prepare a plan with regard to a child who has been given care for the child within ten days of receipt of the child. In particular, plan includes topics such as what services will be offered to the child, how and by whom and how long these services will be carried out. These plans, if necessary, can be changed by the child's judge. It has been stated that social surveillance reports can be used in making the related plans (Aykanat & Gözen, 2014).

Children who have been made careful about their care benefit from the types of services they need in accordance with the plans submitted to the court. Pursuant to item 1 of the mentioned regulation, the child's placement by the TSSCPI in the official or private care of the child or the use of preventive family services or service models carried out by the institution in this context is pointed out (Çetin, 2010).

Within the scope of the above mentioned services, there are types of services such as institutional care and preventive family care. Also, within this context, the child can stay in social care and rehabilitation centers for a period of time to provide the necessary services (Karataş, 2017). In these centers, implementation plans for children who are neglected and exploited are put into practice. The type of service for which implementation plans are decided

is carried out by a multidisciplinary team. (please see for details: Protection, Care and Rehabilitation Centers Regulation).

Monitoring and Evaluation Phase

According to Article 11 of the Regulation on Protection, Care and Rehabilitation Centers, event evaluation meetings to be held weekly to discuss the implementation plan for each child are mentioned. According to Paragraph 1 of Article 11, a permanent and / or provisional consultant, responsible instructor and, if deemed necessary, a doctor, nurse / health officer participate in the center head or the presidency of this meeting. When it is necessary, other staff members are invited and opinions are taken.

The court is obliged to monitor the situation of the children who have been ordered to take measures on a quarterly basis in a year. A court or a child judge, who has issued an injunction under Article 18 Paragraph 4 of Article 18 of the Implementation of Protective and Supportive Measures Decisions According to the Child Protection Law, has the right to decide whether or not to implement the injunctions and determine whether the anticipated enactment of the injunctions has taken place and the measures taken affect the child's development. And make the necessary examinations for the study officers. According to Article 18 paragraph 4 of the regulation, expert must evaluate the situation by writing a report to the court within ten days. If the report is incomplete, it can be decided whether the review is made or the expert who writes the report listens (Başer, 2013).

At the same time, multilateral meetings may be held when it is deemed necessary in the coordination of the Ministry of Justice (Article 19) for the monitoring and evaluation of decisions. According to Article 19 of the Regulation on the Implementation of Precautionary and Supportive Measures Decided According to the Child Protection Law, the following institutions should participate in this meeting (Başer, 2013):

"Ministry of Internal Affairs, Ministry of National Education, Ministry of Health, Deputy Undersecretary of Ministry of Labor and Social Security, General Director of Social Services and Child Protection Agency, General Director of Criminal Affairs of Ministry of Justice and Head of Education Department".

The institutions that will participate in the meetings will work to resolve the problems and problems that arise during the implementation of the injunctions and to improve the working conditions.

2.3. The Child Protection System in the UK

The key characteristic of the child protection system in the UK is that social workers play a primary role in official institutions and cooperate with other professionals to ensure the protection of the children. Police departments, medical experts and school teachers work with the social workers especially for protecting the child from the risks (preventive intervention); initiate the investigation and make intervention plan. (Kaynak, 2004)

Below is a detailed table of how the protection process for neglected and abused children in the UK Works (Oktay, 1989).

1. Children in need
2. Children who need protection
3. Children under care

It occurs after the application of the social service intervention processes in which classification of children who are neglected and abused should take place. According to the above table, the functional aspects of the developing child protection system can be classified as follows (Başoğlu et al., 2017):

Almost everyone from referrals to social services departments is concerned with children who are neglected, abused or suspected of being at risk for any reason. The obligation to inform the social services departments of local governments of children who need to be protected from neglect and abuse has been given to all citizens (Every Child Matters: 2006: 10). In contrast, the protection of children from neglect and abuse is a duty of all institutions and organizations in society (HM, Government, 2007: 5).

In the UK, public institutions such as schools and hospitals are obliged to have an officer responsible for the protection of children (HM Government: 2006: 10-12). The greatest proportion, on the other hand, is the orientation from the schools and from the hospitals. There is a separate unit that evaluates such referrals to social services departments. This unit consists of social workers and family support officers. The unit, which is called the access and assessment or duty and assessment unit, assigns the initial social worker within twenty-four hours (Department of Health, 2000b: 31) after receiving the incoming notification to make an initial Assessment and determine the requirements. This process is a legal obligation. The assigned social worker also has the obligation to complete the first examination within 7

workdays. This period has been increased to 10 days as of 1 April 2010, with an amendment to the legislation (HM, Government, 2010: 16).

Determination of Needs Phase

In order to determine the needs of children and families who need to be protected, it is the result of two examinations, first and foremost. (The Public Law Outline, 2008: 39) The first review is to reveal whether the referral is correct, and if so, to identify the risks that the child may encounter or face. The initial review also reveals whether a more comprehensive assessment is needed. The initial review, which can be completed within a maximum of ten working days, can be much shorter than the child's needs.

Within the scope of the initial review, the social worker has been given the following items (Department of Health, 2000b: 31):

- Interviewing with the child and his/her family members
- Information on the child and his/her family as required, from other institutions and institutions in the society
- Consultation with the social worker's supervisor/supervisor
- Registration of the first examination
- Decision making
- Notification of the decision to the families and necessary institutions
- Receiving the necessary feedback from family and institutions

As a result of the initial examination, the social worker may arrive at the following three judgments:

1. The case should be closed without any intervention.
2. Support services or social assistance for the family and / or child must be provided and classified into the children in need.
3. If there is a risk to the child, there is a need to initiate a review within the scope of Article 47 of the Children's Law of 1989 and to proceed with the actual review. In this case, the child is placed into the classification of children in need of protection.

In cases which the child has been found to have suffered significant damage from neglect and abuse, it may be considered compulsory to take it from the child's premise at the completion of the examination. In such cases, social services departments and police act together and family tells the situation. If a family member collaborates with local government, it can be taken care of by the local authority without resorting to the court pursuant to Article 20 of the 1989 Children's Law and the intervention of the child's family (Ballar, 1995). This means that child must be looked after by the local government until the results of the required examinations are met, provided that the custody is maintained.

When the family does not cooperate, the police have the authority to take the child from the family. This is called the police protection order. The social services units of the local government must also apply for an emergency protection order before the three-day deadline. The duration of this decision is maximum 7 days. The necessary steps must be taken before the deadline is reached. These steps may include applications for care, supervision or adoption decision, as well as decisions on supporting the family or returning the child to the family. There are documents that the social worker needs to prepare before the court process may start (The Public Law Outline, 2008: 38-40):

- Original assessment (similar to one in Turkey, a comprehensive report) do
- The first court report on the reason for the appeal and evidence
- Child care plan
- Chronology report of all living developments related to children

In the case of non-urgent cases of neglect and abuse, the social worker may decide that a more detailed assessment is necessary to better understand the requirement and determine the requirements as a result of the initial examination (Oktay, 1989). This evaluation is called the actual evaluation.

There is a condition that the professional who carries out the actual examination is a social worker. This review should be completed within 35 days (Suffolks, 2017). This review has been developed to provide comprehensive information on the child's health, education, emotional and behavioral development, social development and belonging characteristics as well as information on parents' parenting capacity, environmental and familial characteristics and family history.

Planning Phase

The planning of the multi-institutional intervention to be carried out after the determination of the requirements is progressing in stages. Planning the services to be provided requires a multidisciplinary approach. Below is a description of the progress of the planning of services (Oktay, 1989).

Strategy Determination Meetings

Under Article 47 of the Children's Law of 1989, each local authority is obliged to manage the social service intervention to be conducted and conducted in the context of a child in a state of emergency protection / police protection within its borders, or in the case of a child who is at risk or at risk of being in danger. This review "47. Section 47 investigation". Strategic discussion / meeting is held with the attendance of the necessary professional members when starting the examination and the minutes of the meeting are reported.

This meeting with the other professionals, especially the police, is very important. At the end of the phone conversation between the social worker and the police, social services department and police together decide on the strategy meeting. If it is deemed necessary for the Strategy Setting Meeting, the nursery or school representative, the family physician, the health officer, etc. people can also participate. In practice, it is generally observed that the strategy to be applied (unless it contains any criminal elements) is set on the phone with the police (Ballar, 1995).

In the strategy setting meeting, it is tried to determine the strategy about what risk is to the child, what to do and how to intervene. If at the end of the meeting it is concluded that it is a risky crime against the child, the police department and the social services department in the local government initiate an investigation and other institutions participate in this review. The police may apply to the court for criminal sanctions if deemed necessary.

The London Child Protection Procedures (2007, 292), which collects and enforces all the processes related to the protection of children in London, draws attention to the fact that the Strategy Setting Meeting should carry the following characteristics:

1. The strategy setting meeting is coordinated by social service units and managed by a senior official.

2. The strategy setting meeting requires the participation of social services and the police. In addition, the relevant professional staff members (teachers, doctors, medical officers, school nurses, supervised release officers, etc.) can attend the meeting.
3. It is necessary for the participants of the meeting to have detailed information about the institutions they represent and to have competence and authority to decide on their behalf.
4. If there is a concern about the health of the child or if there is a possibility of causing the child to be hospitalized, a pediatrician and consultant must also be present at the meeting.
5. Another professional member believed to be able to contribute to the meeting can also be included in the meeting.
6. The role and responsibilities of everyone at the end of this meeting must be clear.

There is a draft report to keep records of the strategy setting meeting and all the examinations to be made later on. Although this report differs from local government to local government, it has essentially same content. It may also be decided in the "suggestions" section of this report that the review of article 47 of the Children's Code and the actual examination thereof. In other words, if the child complies with any of the categories of physical, sexual, emotional or extreme neglect, it is recommended that the first child protection meeting be convened and the actual review report will be drawn up that will constitute the report of the first child protection meeting (Altunışık et al., 2007).

The Social Worker who conducts Article 47 of the Juvenile Code shall conduct this examination as part of the original examination. With this examination, the social worker starts to gather information by interviewing the person or the representative of the person who directs (Çiftçi & Gönen, 2011). This can be done in schools, health centers, nursery and day care homes, probation services, mental health centers, community centers, and so on. other sources of information in society.

Achieving Best Evidence Interview

A child is interviewed within the scope of the examination. If the referral has a criminal element, a child is interviewed in presence of the police. This conversation is quite extensive and is recorded on video. This is called negotiating Best Achieving Evidence (BAE). These interviews are carried out by experts because neglect and exploitation are in a mental state where

children can be hurt. The conclusion of this opinion is that the Essential Evaluation contains the most important information to feed.

The London Child Protection Board (2007, 298 - 299) places particular emphasis on the consideration of the following issues in the BAE negotiations:

1. Visually recorded interviews are conducted for children under 17 years of age. These interviews are carried out by specially trained professionals.
2. The social services units and the police jointly organize the negotiations.
3. Where the mother tongue of the child is not English, an interpreter must be present.
4. Negotiations should respect the child's cultural and religious identity.

Information obtained from such discussions may be used in Article 47 reviews and in the original review.

Child Protection Meetings

If social worker working at the social work unit as a result of the assessments and examinations made suggests that the children are at risk from physical, emotional or sexual orientations, or that they are neglected for any reason, they must take initiatives to make the child protection conference (HM Government, 2006 : 122). In order to organize these meetings, sometimes it is not necessary to wait for the examination to finish. In the case of the findings of neglect and exploitation of the child in the course of the examination, an immediate attempt should be made to make such meetings.

After the strategy setting meeting, the first child protection meeting must be held within at most fifteen days. If the notification to the social services departments is related to the welfare of an unborn child, the meeting to be held is called Pre-birth child protection conference (during the 32nd weeks of the pregnancy). In other words, there are also child protection conventions for children who are worried about neglect and exploitation due to various reasons (substance abuse, domestic violence, neglect, abuse types, etc.) when they are born.

(London Child Protection Procedure, 2007: 301-302).

The Children's Law of 1989 (Article 47) underlines that child protection units established in the social services departments of local governments should examine all cases of neglect and

abuse, and that children and their families (Article 17) should be supported in every direction. Child protection units are managed by coordinators who are independent of the social services departments. It is compulsory for the family to attend the meeting, if necessary, children or children, the police and other professional staff (teachers, doctors, nurses, midwives etc.) related to the event (London Child Protection Procedure, 2007: 301-302).

The Child Protection Review Conference is held three months after the first child protection meeting. The child protection evaluation meetings to be held thereafter are held every six months. On the other hand, it may also be decided that evaluation meetings should be held earlier in line with the child's needs. The social worker responsible for the case before each child protection meeting prepares a report called the "child protection conference report" which provides up-to-date information on the general development of children and / or the changes and improvements in their case or the problems experienced. In the preparation of the mentioned report, the "examination framework" used in determining the needs of the children and their families is utilized. The report has to emphasize the child's personal development, parenting capacity and environmental factors. This report provides advice on whether the social worker child should continue to be the subject of a child protection plan. If the meeting president and the other members accept the social worker's proposal, the child or children are subject to a protection plan. All professional staff and the institutions and organizations they are affiliated with are responsible for the implementation of this plan; however, according to the 1989 Juvenile Code, the social services departments of local governments have to assume the management of the case (London Child Protection Procedure, 2007: 301-302).

A multi-agency professional team must work together to implement the child protection plans that are decided at the end of child protection conventions. Below, the phase of the implementation of the plan is discussed under a separate heading (Işık, 2005).

Application Phase

At the implementation stage, the implementation of the plans which are obtained as a result of multi-disciplinary and multi-institutional meetings, especially in child protection meetings, or concluded on the court are applied. All institutions and organizations are responsible for the implementation of such plans (HM Government, 2006: 11).

As a result of the child protection conventions, a child protection plan will be developed by a multidisciplinary team that will cooperate for the protection of the child. The child

protection plan is first prepared for the first three months. If the neglect and abuse situation for the child does not end at the end of three months, the plan will be changed to the six-month plans at a later meeting.

In child protection plan, the duties of each professional working on the case are determined. Core group meetings are held every six weeks, where family members and professionals gather to decide whether it is necessary to regularly monitor the plan, whether it should be implemented or not. According to the nature of the case, family members may change. (Department of Health: 2001: 104), in general, participate in child protection conferences with teachers, family doctors, therapists, psychiatrists, family support workers, health workers, pediatric nurses (pediatric nurses for children under five years old).

The work to meet the child's needs at the core group meetings and the elimination of neglect and abuse towards the child are monitored and, if deemed necessary, changes can be made to the child protection plan. Generally, it is expected that these meetings will be organized by the social worker who conducts case management. The core group may decide after the child protection meeting, by the proposal of the social worker who is actually working, as well as to decide which professional staff will participate in the child protection conferences.

Children who are subject to the child protection plan should be classified according to neglect and abuse or risk of their rights. Thus, in other parts of Great Britain and Great Britain, children are usually subject to a child protection plan with four classifications. These classifications are included in order to start from the most encountered in the UK (NCPCP, 2008: 3)

- Neglect
- Emotional abuse
- Physical abuse
- Sexual abuse

While the above classification is for the UK, there may be a different hierarchical classification for other countries of Great Britain. Children may also be subject to conservation plan with mixed classification. In other words, a few of the above four factors for a child may be anxious about risk. For example, a child may be neglected while experiencing the same

physical and emotional abuse. The 2006-2007 statistical information of the National Community for the Prevention of Child Persecution (NCPCP) confirms this statement:

The fact that children are subject to the protection plan in the UK means that many professionals and thus institutions are involved. A multidisciplinary and interventional child protection plan is prepared according to the principle of ensuring the best benefit of child. This plan is printed at the end of the child protection meetings, after the views of all the other members have been received, by the meeting president and processed in the child's file.

In some cases, a child (or children) may be exposed to risk of neglect and exploitation, even though s/he is (or they are) subject to a child protection plan for more than two years. In these cases, the task of the local government is to initiate legal proceedings after reviewing the situation in detail. The subject can be moved to the court for the settlement of the family court (Çifçi, 2009).

Monitoring and Evaluation Phase

Monitoring and evaluation studies are handled differently according to the following classifications:

Children in Need: The services provided to children referred to as needing children after the original review should be reviewed by a multidisciplinary and multi-agency professional team for 3-6 months. Occupational staff members led by social worker examine whether the needs of their children and their families are met and, if necessary, change the plan of the children in need (Department of Health, 2000b: 31-32).

At the end of the examinations, a period of three months is usually required for the child to be monitored by a professional team after the requirements of the child and his / her family are met. At the end of this period, the case is closed by the social worker.

Children in need of protection: These monitoring and evaluation efforts are carried out by independent child protection coordinators, who preside over child protection meetings. The presiding judge, who decides that the child protection plan has been implemented, may declare a decision for monitoring of the case for three months. In such cases it is decided that children in need of protection should be included in the classification of the children in need and process should be monitored. Assessment meetings for children with conservation plans provide the following benefits (London Safeguarding Children Board (2007: 311):

- Collecting the most up-to-date information about the child's health, development and functioning and parental capacity
- Supervision of the measures taken to protect the child from any kind of ailment
- Make the necessary changes to the child protection plan
- Deciding what actions are necessary for the protection of the child, if there are changes in the child's circumstances or circumstances
- The desired result for the implementation of the child protection plan and the time required for it to be monitored
- Incorporating the child's (changing) feelings and thoughts into the child protection plan
- Achieving more concrete professional decisions about future child and related risks
- Decide whether it is necessary to reassess the actual assessment.

Children under care: Children are categorized as children under the care of a court decision or at the expense of their families and local government. Social services departments are primarily responsible for the monitoring and supervision of services provided to children under care, especially independent reviewing officers.

The status of children undergoing care is assessed within 3-6 months, depending on their needs, until the child reaches 18 years of age. These evaluation meetings are attended by child, child caregiver, and if necessary child's own family and professional staff. These evaluation meetings are called "looked after children review meeting". Plans for children under care are being watched at these meetings. At these meetings, education, health, family relationships, personal care skills, friendships, and similar issues are discussed and a general evaluation is made.

One of the biggest difference between the policies in Turkey and the UK may be stated as the perspective of these two countries towards the children. The UK has a more scientific and systematic perspective towards childhood, which is regarded childhood as an early period in adults' developmental trajectory. There is a more traditional perspective in Turkey towards the childhood period. In that manner, in Turkey, rather than being accepted as separate individuals, children are usually accepted as a well-integrated component of the family unit, which have some certain roles in the family.

3. Child Protection Services

3.1. Nursing Care Protection

When it is not possible for the children to be looked after in family, arrangements are made to allow them to be looked after from outside the family. Alternative services or services that take care of the child can be called substitute care. Kosar (2001: 85) classifies these services as "substitute" services instead, and under this heading, types of care such as adoption or foster care are under consideration because they are neglected and exploited within the family.

The care of a child apart from his or her family includes several separate species. Care types such as institutional care, foster family care and adoption make it possible for child to look after his / her own family (including the extended family). The types of family care, including institutional care, which is older than the guardian family and adoption services, are discussed below comparatively (Çifçi, 2009).

Institutional Care Services

Nowadays, institutional care service which has been subjected to very hard criticism that has a longer history than other types of care. Institutional care refers to a situation in which an individual is looked after by a person who has an occupation in an institution or organization rather than a family environment and who is staying with other people with or without bloodships. Institutional care has a structure that can be the same for children as adults.

Institutional care is not just a type of care that is being used to serve children who are neglected or abused. In the past, day-to-day institutional care has become a kind of care that is being used to provide services to many children, such as children who can not be looked after by their parents for any reason, their parents are abandoned, fathers die in wars, beggars, street or poor children.

Friedlander (1961: 370) states that in the West, the oldest institutional care known is the alms-house with the poor, while poor children were initially viewed together with adults and psychiatric patients on very bad conditions. Friedlander emphasizes that children in need of protection began to be looked at in separate institutions, known as orphanages, in the United States, beginning in the 19th century.

The negative impact of poverty and deprivation of family on children in particular has led to the opening of welfare institutions for children in the third quarter of the 1800's in England. The work that began in London with Thomas Barnardo's first institutionalization in 1870 continued to increase, and thousands of children were tried to guard against the painful face of poverty (Barnardo, 2009). The work that Barnardo has initiated has an enormous amount of prescription because it is now a source of light for many of the work being done in child protection in the UK today.

The history of the use of institutional care as an alternative care for children neglected and exploited within the family is much closer. This assumption is undoubtedly assumed to have a direct relevance to the delay in the spread of the thought that neglected and abused children in the family should be protected.

In the past, institutional care, which is at the forefront of the services offered to neglected and abused children, has become the most criticized type of care today. Generally, institutional care, which is the type of care most commonly referred to until the mid-1900s, has become an abandoned care in developed countries in recent years. Surveys show that growing children in institutional care meet more problems.

Scientific studies that first suggested that institutional care had a negative effect on the development of children, was found in Bowlby in the 1960s. As a result of his research on the effects of parental deprivation on children, Bowlby has found important findings about children in institutional care (Koşar, 1992, Akt, Erkan, 1995: 5). Bowlby (1951) revealed that cognitive, behavioral, emotional and social development of children who were taken to institutional care, more than half a century ago in the book "Parental Care and Mental Health", was significantly influenced. For example, a 1999 study found that what is important in family care is that children growing up in institutional care remain dependent on others, their personal skills are not developing sufficiently, and developmentally deprived (Rushtan and Minnis, 2002: 359-372).

The role of institutional care in care of children can depend on many variables. The structure of the institution, the quality of the staff working in the institution, the services provided in the institution, in- causes differentiation of services provided to children in the institution. As described by Karataş et al. (2004: 24), the efficacy and effectiveness of a service based on the ward system with "bar-type" institutional care will undoubtedly be a matter of debate.

It is a proven fact that barrack-type institutional care has negative effects on children's physical, cognitive and emotional development. For example, a study conducted in 2006 comparing the results of 270 scientific studies on two hundred and thirty thousand children and their families revealed that barracks institutional care had a significant impact on the development of children. Examples of these effects include the decline of physical and cognitive development, regression in language development, and development of insecure or irregular emotional ties (Ijzendoorn et al., 2007, Simmonds, 2009: 224-225).

There are researchers who argue that institutional care is necessary for some children and will give positive results. Whitaker et al. (1998, act Bullock, 2009: 212) suggest that institutional care can have positive outcomes in the following situations:

- If a child has difficulty in being taken care of by an adult or if the child can not stay in a family environment,
- When a child behaves in negligence and exploitation of other children,
- When he thinks that a child can not meet the requirements of living in the family
- Where it is not possible for a child to remain emotionally close to a family,
- Institutional care can be considered if a child is placed near many other families and there is no positive result.

In today's contemporary welfare countries, emotional development is hindered, children have difficulty in controlling their behavior, have the potential to be suicidal or have a tendency to turn, or abuse or be able to exploit other children in the family, especially children with therapeutic needs. In such cases it is known that preventive family care does not give very effective results and even other children in the family can be exploited.

Care should be taken to ensure that institutional care is appropriate in the short term if necessary. The child needs to be put in order to be placed with a family at the end of the required work. Another important point depends on the characteristics of the institution the child will be placed in. The organization should be a place where the child's needs can be met.

It is possible to separate two groups according to the purpose and maintenance type of the institution. These are barracks institutions that have been around for many years and have included dozens of children. The second group constitutes contemporary institutions. The

number of children in these institutions is usually below 10, and these children are supported by therapeutic services and educational services.

To sum this section up, I think it is difficult to compare the UK and Turkey in terms of the nursing care protection approaches, as the nursing care protection is a relatively new approach which lacks having a long history. In fact, it might be said that the nursing care protection approach is applied similarly in all the countries which have adopted a social state perspective.

3.2. Protection within Protective Family

Care is based on the principle that children who are unable be cared for within their own family for any reason should be looked at for a short or long term, as well as other families with no blood ties. Gökçe (1971: 150) defines a preventive family care as follows: "a child in need of individual care, separated from his or her father, or a child in need of a certain period for children who are orphaned and who are waiting for adoption, or a family member welfare service ". As can be understood from the definition, family care a type of care that is applied to children growing up in a family environment in which they can not stay with their own family.

The foster family system, based on the idea to provide opportunities for these children to return to their families is seen in the professional sense of the 20th century. It is known that the roots of the protective family, which is a new development that can be regarded as a systematic basis or, in other words, a part of contemporary social service systems, is based on the old (Başoğlu et al., 2017).

In fact, some of the old practices based on philanthropy have similar characteristics to modern contemporary foster family systems. For example, a foundation opened in Sivas (Turkey) at the beginning of the 14th century, provided financial assistance to families who were in need of care and who were interested in their education (Öztürk, 2004; 304-305). It is also known that in these periods there are people who, on the basis of philanthropy, work as children to feed their children and that they have a different intervention from the children of the family. Children viewed by these people can also be assumed to be neglected and exploited. Gökçe (1971: 71-73) underscores that children in our society, often considered orphaned, are being taken as feed by other families and that these children may also be exposed to neglect and exploitation within the family.

Protective family care is undoubtedly a systematic and timely service. Protective families are supervised by professional professionals and are supported both financially and socially so that children can fully meet their needs.

Protective family services can show different appearances from country to country. This view can change according to the socio-cultural characteristics of the country (Tok, 1996; akt. İçağasioğlu, 2001: 157), the level of development and socio-political position. In some countries there are people who choose to be a foster family (many examples are in the US and the UK), while in some countries there are also possibilities to come across people with foster families voluntarily.

In the UK and America in particular legislation and the foster family to foster family care type (not provided by the state) observed, foster family services are offered by only TSSCPI in Turkey. In addition, there are also volunteer foster families in Turkey (Ballar, 1995). There is no doubt that this should not make the illusion that the children in the volunteer families are better looked after or grown more affectionately. Science-based information that would confirm such a judgment was not found in the scan of the literature in the scope of this study.

This form of service is frequently used in the welfare area of developing Western societies. In particular, different forms of protective family care have begun to emerge over time, especially after the devastating effects of institutional care in child development have emerged since the 1950s. The appearance of these different species generally changes according to the level of development of countries and the belief in human rights. Below is a classification of different types of preventive family care (Karataş, 2017)

Types of Protective Family Care

Protective family care has become the largest type of care for the protection, care and rehabilitation of children deprived of their own family with rapidly developing and different species in Europe and America. England is a European country where almost all of the family members can be observed. It is possible to separate the care of the foster family in the light of the theoretical knowledge gained in the UK and on the preparation of this work (Oktay, 1989):

1. Short-term preventive family care
2. Moderate preventive family care
3. Long-term preventive family care

4. Therapeutic protective family care

It is useful to refer to the above-mentioned foster care services in detail. The following types of maintenance were tried to be elaborated:

Short Term Care Family Care

Short-term preventive family care is based on the principle that children who are unable to take advantage of their own family for a short period of time are looked after by temporary families for a temporary period in order to be returned to their families. In this kind of care, children who are neglected and exploited in the family are usually benefited. This care is also included in the term "temporary protective" family care.

For instance, let us assume that some problems are observed in the behaviors of A (girl, 9) and B (boy, 6) at school. Children's clothes are dirty and irregular; children are late to school; it was observed that their hair was not washed and wounded on their faces. A and B's teachers declined that they wanted to talk with their parents first, but they did not reach these people somehow. The children have expressed to their neighbors that they are sick because their parents are sick. The social worker who was assigned to the Local Government Hackney Social Services Department after he made his initial assessment found that his mother, the sole parent, had an increase in his longstanding mental health problems and that he was admitted to the hospital for this reason. At the same assessment, it was reached that the children whom they stated to look after themselves had children that they were obliged to look after and that they did not want to look more at A and B. The initial evaluator stated that a comprehensive social screening should be done and that time will be needed to determine if the mother can not look after her children after they leave the hospital. The expert investigated the possibility that the children could be looked after temporarily by other family members, but did not find anyone to look after the children. For this reason, A and B were placed shortly after the protective family until a comprehensive social survey was made and the state of the mother was clarified (Çetin, 2010).

As can be understood from the above fact, the failure to meet the requirements of A and B has resulted in their negligence. As a result of giving the children to the foster family in the short term, it was ensured that their needs were fulfilled.

Protective families, even for short periods, must be approved by the relevant units of the local authorities or by special protective family institutions and proved that they meet the necessary conditions. Short-term protective families are required to conduct a necessary review

and be approved as a "long-term protective family" if they wish to have a long, continuous or continuous look at a child. This process is known to occur between 3-6 months. The details of the process are mentioned in the Protective Family Regulation. There are short-term protective families as well as medium-term protective families (Çetin, 2010).

Mid Term Protective Family Care

This foster family type contains different species. The preventive care service, which can be called as the middle term, is usually the type of care referred to before the child is returned to his / her family, before being adopted or during the preparation phase for independent living.

Sinclair and Wilson (2009: 121) talked about a classification that could be counted in this line. According to these researchers, preventive family care for treatment purposes should be defined as independent family care before independent living and pre-adoption preventive family care and long-term preventive family care.

Occupational practices also show that in some protective families, children may turn into moderate or long-term protective families, depending on their needs and opportunities. For example, if a child is temporarily placed next to a protective family, if the family is unable to respond immediately to the child's needs, the child will continue to be in temporary family status, and the family can be extended to provide care to the child, not to a temporary, medium or long term.

Long Term Care Family Care

Long-term preventive family care is a type of care in which children who are not usually adopted are placed. Names such as "permanent or permanent protective family practice" may also be given to the long-term preventive family practice in which these children benefit in situations where it is not possible for them to return to their family even after long periods of time. In this study, it is argued that concepts such as permanent preventive family care should also be included in long term protective family type. To clarify this, it would be useful to explain some types of permanent and long-term preventive family care (Karataş, 2017).

A recent survey of 24 local governments in England and Wales (Shcofield, 2009: 140-143) suggests that 40% of local governments treat permanent and long-term preventive family care separately. This means that the permanent protective family type should be treated as a single type of care in which children remain as adults. Permanent preventive family care has

emerged for children who do not have emotional closeness to parent figures and who have problems with secure attachment, especially during the 1980s in the US and the UK.

In particular, it is a very important type of care for children with many different foster family experiences. While this caregiver is quite similar to the adoption care approach, there are also some differences. For example, while adopted families have custody of their children, the local guardianship of the child is in the hands of the permanent guardian family. The adopted child no longer has a legitimate sense of ties to the guardian family, after being adulthood, while continuing his legal ties with the guardian family, after the child reaches 18 years of age in permanent protective family care.

Long-term preventive family care is a recognition that children can return to their families whenever possible, or the end of their care. It is a type of care provided to children who can not stay with their parents for any reason but who can not benefit from adoption services due to their age or developmental needs. Children who are in long-term protective family care continue to have links with their families and often meet on a regular basis.

Protective families should also be recognized as long-term protective family members. Protective families need to be able to prove to the social worker that they are able to meet the developmental needs of their children in a long-term and evaluate themselves about what they can look after. Even this assessment process takes six months (Çetin, 2010).

Therapeutic Family Services

Therapeutic family care has been an emerging practice in the United States for more than two decades, and more recently in the UK. This form of service is based on the principle of looking after a psychological-social development in the family because of neglect and exploitation within the family, so that children who exhibit behavioral disorders are not subjected to the destructive effects of institutional care.

It would be useful to mention here a program that is also found in practice. The Multi-Dimensional Fostering Treatment Program (MDFTP) is one of the programs mentioned. It is stated that these programs using the program, anti-learning theory and systemic approach give positive results (MDFTP, 2009: 1).

In this program, the foster family and the protected child benefit from intensive support for 9-12 months. The program includes professionals such as social workers, clinical

psychologists and teachers. These programs are chosen from those who have experience, knowledge and skill with working families or with children and adolescents who exhibit behavioral disorders as a profession.

The above mentioned programs are also supported in children's educational institutions. It is often seen that the clinical psychologist and social worker are constantly in contact with the school and, if necessary, they also support the school trainer. These programs are run by local governments or private companies and are quite expensive compared to normal foster care (Aykanat & Gözen, 2014).

Such programs designed to achieve the best for children are also explained at the policy level. For example, the document, known as the "Care Matters: Time for Change" and "White Report" published by the government in 2007, calls for serious work on the Multidimensional Protective Family Therapy Program and underlines the need for local governments to support protective families with protected children (Care Matters, 2007: 37). It is understood from this that it is also requested by the government that local governments encourage such programs because it is seen that as children increase their families and children's support, they are less likely to change families or stay in a family.

Such programs are not only for children who are neglected and exploited within the family but also for children who have been disrupted by law.

Research has shown that preventive family programs for treatment have positive consequences for both children and foster families. According to the results of a study by Price et al. (2008: 23-24), children in the 3-18 age group who exhibited behaviors such as social problems, persistent behavior disorder, and suicide tendency to positive behavioral changes in children receiving therapeutic family care services. The program has different forms of services for age groups 3-5, 6-11 and 12-18. Especially, it is stated that these programs using social learning theory and systemic approach give positive results (MDFTP, 2009: 1).

The results of another research that measures the effectiveness of the Multidimensional Protective Family Therapy Program show that the program reduces the stress level of the protective families and that these families deal more effectively and effectively with children with behavioral disorders (Fisher and Stoolmiller, 2008: 1). This program can be used not only in protective families, but also when children are looked after by extended family and relatives.

As the protective family approach is also a relatively new approach, it is applied in a similar way in the UK and Turkey. Here, the biggest difference between the application in these two countries may be stated as the differences in the countries' own conditions and standards. Stated otherwise, the protective family approaches in the UK and in Turkey are determined based on the different sociological, socioeconomical and cultural backgrounds and dynamics of the two countries.

3.3. Adoption

Adoption services are the most prominent example of permanent care for children. Adoption means that all the responsibilities of children who are not a family to look after, or that are not due to their family, and that are not for any reason, are taken care of by other families or individuals until they are adults. The decision to adopt a child is a crucial decision that causes a major change in the life of a child. Adoption, which means that the child is legally removed from the bonds with his parent, presents the child with a new life and the pros and cons of that life. The life of a child placed next to a family completely changes in many ways. For example, with adoption, many questions arise, such as what kind of future the child will share with his new family, what kind of education and health services he will benefit, with whom he will communicate, with whom he will make friends and in what socio-economic structure. Despite the fact that the history of adoption is based on very old ones, it is seen that social change has developed parallel to the present and that it is formed by state-run services in a different way compared to the present day. In the past, more and more unwanted, abandoned babies or illegally arrived children were encountered (Simmonds, 2009: 221). The reason for this situation is that the analysts who cause illegitimate children are exposed to dangers such as social stigmatization, exclusion and even killing. However, even in the recent past, the lack of abortion or prevention methods is thought to have an influence on the number of adopted children.

Nowadays, as the developing medical science facilitates the possession of children, the function of the adoption institution is also weakening the tasting of the child's love for the couple who can not have children. As time has changed, it has been found that children who have children in will and willful social norms are also adopted by their children. In other words, the concept of contemporary adoption has come to the conclusion that children who have been neglected or exploited by their families or who are at risk of suffering, especially those unable to return to the family, are placed beside other families within the framework of the law. With adoption, the children are placed next to the adoptive person and persons, provided that they are

taken from their parents. In other words, establish a legal lineage between the adopted child and those who adopt him. According to the shape of the relation between the child and the parent, the strip is divided into two as real and artificial. According to this situation, while the true polygraph expresses the relation based on the blood bond, the polygraph established by adoption is expressed as artificial polygraph (Oğuzman and Dural, 1994: 195). How should the situation of children adopted in the past be assessed by the authorities who adopt children to other families who have been forcibly harassed by their parents because of the current consequences or illegitimate births? It is not right to judge past arrangements as right or wrong, to make a negative comment without considering the circumstances of time. However, as the reasons for past adoptions have lost their legitimacy within a very short period of time, the question whether adoption decisions are the right decisions has become a matter of great debate.

In the past, children were forcibly taken away from the parents who had children by marriage without a marriage, by way of abandonment or otherwise. This has been seen in Great Britain until the 1980s and even into the 1990s. The children adopted at that time are young adults today and have the right to question why they are adopted. Parents whose children are adopted are also interested in seeing their children again, if possible. For this reason, in the UK in particular, in the 1970s, the legislation regulating the adoption of children of children adopted in the 1970s, allowing access to historical information and meeting with family members was recognized in 2002 by the Law on Adoption and the Juvenile Law (Munro, 2007).

Adoption services seem to be not much preferred in some European countries today, except for international adoption services. It is understood that in these countries priority is given to preventive family care, institutional care and alternative care types instead of adoption services. The UK is a highly developed country in terms of adoption services. There are the USA and Canada that can compete with the UK to use adoption services. This can in fact be perceived as a sign that child adoption services are much more common in countries that focus on children in child welfare services. Conversely, adoption services in European countries (such as France and Germany), which focus on the family, are less common than in England (Simmonds, 2009: 222). An idea of adoption may also be developed that, when all neglected and exploited children and their families are considered, they are sometimes unethical or are controversial from a human rights perspective. It is known that families of adopted children in cases of neglect and abuse usually do not consent to this situation. It can be considered that the adoption of the adoption institution by the court decision completely disables children's self-parents, dramatically damages family ties, ignores the potential for future development and

recovery of parents in many cases other than sexual abuse, and ultimately incompatible with human rights. As a matter of fact, the number of countries that think like this is too big to be underestimated. Simmonds (2009: 222-223), for example, points to the fact that adoption services in European countries are not so much seen, that adoption in these countries is not an ethically accepted type of care. There is no doubt that the quality and quantity of adoption varies according to the values, past and customs of a society. Such a change will undoubtedly lead to dissimilar applications in different regions (Çetin, 2010; Karataş, 2017). Once neglected and referred to the type of care provided to children who had been abused as follows, under a separate section, it focuses on the functioning of the child protection system in England and Turkey.

The aim of child adoption is twofold: To give children to the families who are not able to have children but wanted to have children, and to provide a family environment to the homeless children. Here, in terms of adoption, both the policies in the UK and in Turkey consider the happiness and protection of the child as a priority. However, it may be argued that the individual characteristics of these two countries cause some differences to occur. For instance, as the children ratio is lower in the UK and as less families have children there, the aim of giving children to the families who have no children is more prevalent in the UK. However, in Turkey, as more families have children and as the children ratio in the society is higher, the aim of providing a family to the abandoned children is more prevalent.

3.4. Protection and Care of Children within Their Families

Radically changing the child protection system in Turkey since 2005, it gives high priority to the protection of children alongside their parents. Thus, it is aimed to reduce the institutional care model that has been going on since years for children with protection needs and to increase the family care models. This requirement is one of the most emphasized issues in the related regulations. This is undoubtedly desirable in all countries that have contemporary child protection systems today. On the other hand, in our country, which has a historical understanding of the new use of neglect and abuse concepts and that children can only be preserved in institutions, how clear is the demand for the protection of neglected and exploited children in their families? In other words, it is considered that the necessary infrastructure for protecting neglected and abused children in their families does not occur in our country. Here are the reasons for this situation:

There is a need for a system that supports the family in all matters so that the children can be protected alongside their families. In order to be able to form such a system, it is necessary, firstly, that all institutions and organizations in the society are willing to have knowledge and experience about neglect and abuse. In this way, it can be expected that the institutions in the society act with the consciousness of responsibility, understanding and cooperation about neglect and abuse towards children. In this sense to reach the desired level Turkey is thought that a weak enough to make a serious study of the necessary stages of development. Secondly, there is a need for "improved family support services" for the family to be able to look after their children and to protect particularly the neglected and abused children within the family. The development of service models for the resolution of day-care homes and day-nurseries in a financially accessible state, the provision of parent education, for the problems the parents have (family violence, substance abuse, mental problems, financial problems, etc.), provision of family and child counseling and protection of the child's rights such as the provision of advocacy services for family support services, can be given as examples. Thirdly, in the neglect and necessary for the protection of abused children in the family is also considered to be the quality of services provided to staff working in the field. (Oktay, 1989).

In particular, it will take time for personnel who have worked past day-to-day, institutional care and other types of alternative care to internalize and apply new service models. Even if it is known that studies on increasing the quality of staff working on child neglect and abuse have begun (such as in-service training, active supervision, support for higher education at master's and doctoral levels, etc.), it is thought that this is a long way to go. In Turkey, the need for protection of children and their families about preventive and protective, presentation of concrete social content services that can be considered as the fourth element needed to protect children in the family. These services can be provided by community centers, family counseling centers and local authorities. For example, informative and guiding work can be done about families, neglect and abuse. Children and their families can be made aware of this issue. In contrast, the said protective and preventive work in Turkey is considered too often been encountered.

In addition to the fifth element necessary to protect the families of children who suffer neglect and abuse in Turkey is to increase the effectiveness of NGOs in the field. As mentioned before, the protection of the rights of NGOs by neglecting and exploiting the rights of the family and the child, the mobilization of the institutions that should work with children and families in the society, the coordination and coordination among other institutions and organizations in the

society, many tasks can be undertaken. In Turkey, neglect and family to be protected in families of children who had been abused and the development of an effective and functional cooperation with the child and in this direction it is believed the quality of social service work to be done with the families to be quite important to be increased. In addition, it is necessary to encourage the families of children whose rights are being planned to have access to legal assistance and defend themselves in court. This will also ensure that families are involved in court proceedings in their decisions about their children. At the end of all these reasons, it is thought that the purpose of this rule, which is to protect the children in the family is ideal, but the realization of it does not seem easy today. There is no doubt that the existence of a number of exercises to make arrangements in his blood consistent with today's realities is obvious (Altunışık et al., 2007). Views and recommendations on types of care provided to neglected and abused children are given below.

4. Searching For a New model

4.1. Systematic Unit Model

The systematic unit model may be defined as the model based on a team – a unit consisted of a Consultant Social Worker who is also in the role of a team manager, a Social Worker, a Child Practitioner, a Unit Coordinator and a Clinician. The family works together with this team during the developmental trajectory of their children. It is called the “systematic unit” model as it offers the establishment of a small unit, in which every member has different, pre-defined responsibilities in child development, and as it offers this unit to work systematically throughout the development of the children (Forrester et al., 2013).

At this point, the systematic unit model may be compared with the individual working project. In systematic unit model, there is a unit that is responsible for the development of the child and this unit applies certain systematic approaches, as it may be understood from the name “systematic unit model”. Meanwhile, in individual working project, child development and protection is handled together with the social service experts and the family (Čačinović Vogrinčić (2016:19-40). The responsibilities in child development are divided concretely and equally between the family members, and these tasks that are agreed upon (or, in case of involuntary social work interactions, assigned to each family member) are reviewed and co-controlled by all the participations/allies. It is called “individual” because in this model approaches are tailored according to the needs of each family and different, individual approaches are developed for and also together with each family. Similarly, it is called

“working” because it encompasses work – e.g. the project participants plan and implement changes at each meeting, and they also plan the next meeting’s agenda at each meeting. If these two models are compared, it may be claimed that the individual working project is more organic, more ecologically valid, and better addresses the needs of the families and children, as the families are also involved in the process and as the policies are personalized according to each family.

In short, the systematic unit model may be defined as a bridge between the social environment that the child lives within, and the social system that aims to protect the child. Each child lives within a family context, each family belongs to a community and each community belongs to the society that we live in. There is a similar hierarchy in the structure of the systematic unit model. Here, in the systematic unit model, each social worker belongs to a team or unit. Each team or unit is managed by a local authority and similarly, each local authority belongs to the society that we live in (Forrester et al., 2013).

Past studies have identified five main features of the systematic unit models, which may be stated as (Forrester et al., 2013);

- Shared responsibilities
- Intensive case discussions
- Distinction of responsibilities and assigning different roles to each worker in the team
- Extensive training for skill development
- Caseloads

The social services and, therefore, neglect and other child abuse related duties are proposed to be given to local authorities in Turkey. These authorities are required to anticipate the possible controversy that might arise from this model. For example, the shortage of staff and resources required of municipalities in Turkey is a serious critical nature of the argument. Perhaps it is not too much exaggeration to imagine that some municipalities are not able to fulfill their basic responsibilities and that they can not overcome such a great burden of carrying out social services. In addition to resource and staff stress, problems that may arise regarding the supervision and evaluation of services are another critical dimension. However, it is expected that criticism such as the politicization of social services and the concern of political staffing in social service institutions are expected to be made if this model is transferred to local governments. Undoubtedly, in this study, it is not considered to be answered in the above-

mentioned criticisms. In contrast, in a number of assessment can be made of the availability and form of social services in Turkey. It is evident that today's services to children and families needing protection can not assume a contemporary, democratic and pluralistic identity that does not reflect the point of view of children's rights. It is also unlikely that the social services administered by central administration today are affected by politics or that strategic plans made at the macro level are carried out outside the control and control of the political elite. The municipalities need to be supported after being articulated with TSSCPI institutions and organizations. It is thought that it can be started by choosing a pilot region. There is a need for time and sufficient resources to fully implement the model (Çetin, 2010). The model has, of course, many aspects that need to be improved and elaborated. It is hoped that this model will at least be able to resume or contribute to the debate on the conduct of social services by local governments.

In fact, there exists one study which investigates the flaws and shortcomings in the functioning of the Social Assistance System in Turkey. According to the study, it is found out that the Social Assistance System in Turkey was based on a very ancient period. It has been seen that there used to be as much social assistance mechanism in the ancient Turkish civilizations. Actually, today's structure is trying to be systematized in accordance with the Social State phenomenon (Akkuş, 2017).

In this study, the social assistance systems in the world are examined, to be able to make a comparison. It has been seen that there are systems or countries that are functioning in parallel to the Social Security System on a national basis. Apart from these systems, the existence of some non-profit organizations that may also be called as international was also observed. These organizations are; The Red Crescent, the Red Cross, and the United Nations. These institutions, which aim to be equidistant from each other, have essentially aimed to provide human service only. However, the political structures in the world have affected these organizations time to time, and sometimes they have served for certain political purposes rather than serving for the humanity. For example, in the former Yugoslavia where the United Nations Peacekeeping Forces are located, people have been massacred and the organizational representatives have not served for religious and regional purposes (Akkuş, 2017). However, it may still be claimed that it will be beneficial for the world to increase the number of these institutions.

At the beginning of the common problems seen in Social Assistance Systems, there comes the concept of the Social State (Akkuş, 2017). Even though this problem is accepted by every country, so far, no priority has been given to the solution of this problem, in state policies.

The main findings of this study may be stated as (Akkuş, 2017):

- Social Assistance System in Turkey is not under the control of a distinct administration.
- There is no comprehensive law on "Social Assistance Act" in Turkey.
- Studies which aims to ensure income justice are not systematically carried out.
- There is a large number of organized organizations for providing social assistance. The work, objectives and expenditures of these organizations are determined only by the institutions and organizations that they are affiliated with (Akkuş, 2017). Therefore, social assistance resources and funds are dedicated to those who do not need it. This leads to the waste of resources.

As there are a large number of problems in this issue, the major problems are reduced to three main headings. These may be stated as (Akkuş, 2017):

1-Corporate Issues

2-Financial Issues

3-Sociological Problems

In this study, the proposed social assistance model also includes the criticism of the model being implemented. So, it will have important consequences such as solution of financial problems, the effective use of resources, and supply of resources. The aim of the proposed social assistance model in this study was twofold: To remove the deficiencies of the existing systems, and to also highlight the strengths of the current systems (Akkuş, 2017). From there, it may be commented that the proposed model in the current study will also overcome the weaknesses of the existing models, by also highlighting the strengths of the existing models, both in short and long term.

4.2. Proposed Child Protection Model

Below, a child protection model has been proposed, for children at risk and for children who are subject to neglect and abuse in Turkey. As it is known, the social services in our country and therefore the studies about the neglected and abused children are presented by the TSSCPI

to the central government. TSSCPI is linked to the Prime Ministry. In addition, services for children and families are carried out by government ministers responsible for these matters. First of all, it is thought that it would be more appropriate to have a directorate responsible for the families and children in our country. Thus, more open family and child policies are considered. It is considered that the transfer of the TSSCPI institutions and organizations to the local governments and the execution of the neglected and exploited children and their families by the local administrations (Başer, 2013).

It is believed that in order to benefit from the experience of TSSCPI, it would be useful to transform the existing child protection system into an independent institution nationwide, with a task defining the national standards of the services to be provided and the legal representatives of children involved in legal proceedings. The new institution to be formed is thought to be named "Social Services Maintenance and Supervision Agency - SSMSA". The SSMSA, which will assume a more macro role by transferring social services to local governments, needs to prepare practical guidelines to be used in neglected and exploited children and their families. The SSMSA, which should provide national practice standards for provision of problem solver-healing services and prevention of neglect and exploitation, should set out the general guidelines for the practices of the social services departments of local governments. As it is known, the notions of neglect and abuse have come to the forefront of contemporary research (Başoğlu et al., 2017; Ballar, 1995). For this reason, professionals working in the field need to take advantage of in-service training and follow-up training to refresh their professional knowledge and skills and follow current social work practices. It is thought that SSMSA's professional staff to work in the field can serve as a supreme institution responsible for in-service training and professional development after university education. In other words, the SSMSA should also undertake the task of supervising the training and the work done by the professional staff who will work in the field on their continuous improvement. It would be appropriate to classify the work carried out by local governments as community services, family and child services, adult services, sociocultural services and elderly care services.

This newly proposed model may be summarized by two steps: First, to establish a new directorate, which is specifically dedicated to children. Second, to detect all the families and the children within these families. By this way, the children would be accepted as separate and distinct entities and all the needs of the children within the problems may immediately be detected and addressed.

5. Conclusion

In sum, the proposed research questions may be answered as follows.

1. *What are the historical backgrounds of the child protection systems in these two countries (briefly)?*

The child protection systems in both countries have emerged from a similar need, i.e. to protect the children as the most vulnerable group of the human population from any kinds of threats and abuses. When the historical backgrounds of the child protection systems in these two countries are compared, it may be claimed that the children are accepted as a distinct form of humankind in the UK in contrast with Turkey where the concept of childhood is still more traditional. Accordingly, child protection policies have been developed in the UK much earlier in time perspective than in Turkey.

2. *Sometimes laws are issued in order to make certain political outcomes possible, rather than providing benefits for certain social groups. Having that in mind, what are the main child-centered laws and practices that are applied in these two countries?*

Main child-centered laws and practices that are applied in these two countries may briefly be summarized in two categories: First, the obligation to detect any kind of child abuse within the childcare institutions, within the protective families, and also within the very family of the child. Second, to take an immediate precaution against these abuses in order to stop the abuse or the violence, a precaution that provides (or should provide) a hundred percent healthy physical, sociological and psychological conditions for the child.

3. *In terms of child protection, what is the definition and conceptual framework of neglect and abuse with respect to each of the two compared countries? How did the historical background and socioeconomic conditions in these two countries affect the child protection policies and contribute to the enactment of new legislations?*

In terms of child protection, similar policies are applied in the UK and in Turkey. However, child protection policies were formulated and put into effect earlier in time in the UK than in Turkey, so it may be claimed that there exists a more established system in the UK, while the policies are still under development in Turkey.

4. *What are the contemporary child protection systems in these two countries?*

The nursing care approach and the protective family approach are two contemporary child protection systems in these two countries. It is difficult to compare the UK and Turkey in terms of the nursing care protection approaches, as the nursing care protection is a relatively new approach which lacks having a long history. In fact, it might be said that the nursing care protection approach is applied similarly in all the countries which have adopted a social state perspective. In terms of the protective family approach, the biggest difference between its use in these two countries may be stated as the differences in the countries' own conditions and standards. Stated otherwise, the protective family approaches in the UK and in Turkey are determined based on the different sociological, socioeconomical and cultural backgrounds and dynamics of the two countries.

5. *What are the similarities and differences between the general principles of child protection systems and the types of care provided for the children in need of protection when comparing these two countries?*

The biggest difference between the policies in Turkey and the UK may be stated as the perspective of these two countries towards the children. While the UK has adopted a more scientific and systematic perspective towards childhood with the concept of childhood as an early period in adults' developmental trajectory, Turkey has kept a more traditional perspective towards the childhood. In that manner, children in Turkey, rather than being accepted as separate individuals, they are usually accepted as a well-integrated component of the family unit with socially determined roles in the family.

6. *What kinds of models may be suggested for the current child protection system in Turkey?*

Restructuring the existing child protection system in Turkey is proposed hence the establishment of a directorate with the purpose of child protection and family services is suggested. This directorate should operate locally, aiming at identifying needs and providing services for the families in need within its remit. Therefore, needs assessment and services delivery would promptly be ensured and delay would be prevented.

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