RESEARCH ARTICLE

Comparative Analysis of Child Protection Systems in Sub-Saharan Africa: Review of Four Countries with Implications for the Practice of Social Workers

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Abstract: *Introduction:* Child protection, a persistent and urgent problem in sub-Saharan Africa, is heavily influenced by a colonial history that has shaped the region's social structures and policies, according to recent studies. This literature review compares the child protection systems of Seychelles, Ghana, Kenya, and Sierra Leone with a shared colonial history under Britain to identify similarities and differences and to understand the implications of the operating child protection system on child protection social workers. *Methods:* A computerized search of electronic databases, such as Social Work Abstract and Google Scholar, was undertaken from 2005 to 2024. Published, non-published, peer-reviewed, and non-peer-reviewed articles, policies, and reports were analyzed using the comparative case study method. *Findings:* Results from comparative analysis of policy documents, articles, and reports reveal that all four countries have legal frameworks and principles guiding the child protection system. Additionally, in all four countries, the institutional setup for child protection is a top-down approach. Findings also show one difference and more similarities. There is a difference in child protection issues and children's socioeconomic status, as countries have different Human Development Indexes. However, there are significant similarities in service approach, state control, and legislative frameworks rooted in the Anglo-Saxon child welfare model typical of the United Kingdom. The similarities indicate implications for practice as child protection social workers lack agency, flexibility/and reflexivity. *Discussion:* Given the implications of the child protection systems on child protection social workers, the paper argues for a system that empowers child protection social workers to work with discretion in the child's best interest rather than within a restrictive, controlled system. *Conclusion:* The study underscores the potential for positive change in child protection systems in sub-Saharan Africa, where child protection social workers will be empowered and provided with greater flexibility and innovation that can drive and promote a child-centered approach, potentially making child protection more effective.

Keywords: Child Protection Systems, Social Workers, Sub-Saharan Africa.

Résumé : *Introduction:* La protection de l'enfance, un problème persistant et urgent en Afrique subsaharienne, est fortement influencée par une histoire coloniale qui a façonné les structures sociales et les politiques de la région, selon des études récentes. Cette revue de la littérature compare les systèmes de protection de l'enfance des Seychelles, du Ghana, du Kenya et de la Sierra Leone, qui partagent une histoire coloniale sous la domination britannique, afin d'identifier les similitudes et les différences et de comprendre les implications du système de protection de l'enfance en vigueur sur les travailleurs sociaux chargés de la protection de l'enfance. *Méthodes:* Une recherche informatisée dans des bases de données électroniques, telles que Social Work Abstract et Google Scholar, a été effectuée entre 2005 et 2024. Des articles, des politiques et des rapports publiés, non publiés, évalués par des pairs et non évalués par des pairs ont été analysés à l'aide de la méthode d'étude de cas comparative. *Résultats:* Les résultats de l'analyse comparative des documents politiques, des articles et des rapports révèlent que les quatre pays disposent de cadres juridiques et de principes guidant le système de protection de l'enfance. En outre, dans les quatre pays, la structure institutionnelle de la protection de l'enfance est une approche descendante. Les résultats montrent également une différence et davantage de similitudes. Il existe une différence dans les questions de protection de l'enfance et le statut socio-économique des enfants, car les pays ont des indices de développement humain différents. Cependant, il existe des similitudes significatives dans l'approche des services, le contrôle de l'État et les cadres législatifs, qui trouvent leur origine dans le modèle anglo-saxon de protection de l'enfance typique du Royaume-Uni. Ces similitudes ont des implications pour la pratique, car les travailleurs sociaux chargés de la protection de l'enfance manquent d'autonomie, de flexibilité et de réflexivité. *Discussion:* Compte tenu des implications des systèmes de protection de l'enfance sur les travailleurs sociaux chargés de la protection de l'enfance, l'article plaide en faveur d'un système qui leur permette d'agir avec discrétion dans l'intérêt supérieur de l'enfant plutôt que dans le cadre d'un système restrictif et contrôlé. *Conclusion:* L'étude souligne le potentiel de changement positif dans les systèmes de protection de l'enfance en Afrique subsaharienne, où les travailleurs sociaux chargés de la protection de l'enfance seront autonomisés et bénéficieront d'une plus grande flexibilité et d'une plus grande innovation, ce qui pourra favoriser et promouvoir une approche centrée sur l'enfant et rendre la protection de l'enfance plus efficace.

Mots-clés : Systèmes de protection de l'enfance ; Travailleurs sociaux ; Afrique Subsaharienne.

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Introduction

Although the 1989 UN Declaration on the Rights of the Child set out basic principles for protecting children, its implementation is problematic in sub-Saharan Africa. Sub-Saharan Africa includes the entire African continent except for countries like Egypt, Libya, Morocco, Sudan, Tunisia, and Western Sahara. Colonial legacies have shaped child protection systems (CPS) in countries such as Seychelles, Ghana, Kenya, and Sierra Leone and have also influenced the effectiveness of social work practice and policy. While there is vast research on child protection systems in sub-Saharan Africa (SSA), little is known about the implications of these CPS on child protection social workers (CPSWs). This article uniquely addresses how child protection systems in some countries in the region influence practitioners. The study explores how these CPS, characterized by an Anglo-Saxon child protection orientation, have influenced the work of CPSWs. The following research question guides this study: "How do child protection systems with Anglo-Saxon traditions influence the practice of child protection social workers in countries in sub-Saharan Africa?"

Parton (2020) identifies two main approaches to child welfare: the child protection approach (also called the Anglo-Saxon/American tradition) and the family service approach (known as the Northern European tradition of child welfare). Child protection is more legalistic and adversarial with standardized procedures, while family service is flexible to client needs, supportive, and works in partnership with families (Parton, 2020).

Due to colonial influence, some African countries had child welfare models related to the British model (i.e., Anglo-Saxon model-child protection approach) before independence. These have remained, although they have tried to adapt them over the years. The child protection system consists of the full range of activities and processes that are in place in a jurisdiction to prevent abuse and neglect, respond to concerns or allegations regarding the abuse and neglect of children, protect and support children and families where abuse has occurred, and punish perpetrators of abuse.

(Connolly & Katz, 2019). It is important to note that social work processes related to child protection are built around legislative and investigatory concerns (Spratt, 2001), as CPSWs must investigate child abuse cases. Spratt (2001) highlights that these concerns have caused the relationship between social workers, parents, and perpetrators of abuse to be adversarial. In addition, child protection systems include laws, policies, regulations, and procedures to support prevention and response to protection-related risks. This entails some bureaucracy, the need for standard practice, and less discretion during practice. As such, legislative procedures surrounding child protection have other implications for CPSWs.

Background and Literature: Frameworks and Realities of Child Protection in Sub-Saharan Africa

Research identifies that child protection remains a pertinent problem in Africa, specifically sub-Saharan Africa (Abdullah et al., 2022). According to statistics, Africa had the highest rates of child neglect in the world in 2021, with 41.8 percent of girls and 39.1 percent of boys being neglected by their caregivers (Ikusika, 2023). Besides, abuse cases have been reported, particularly in sub-Saharan Africa. For example, sexual violence (sexual abuse) against children with disabilities was identified in two countries in SSA, with two incidents in Senegal and four in Cameroon, respectively (Ikusika, 2023). According to Ikusika (2023), in the case of Nigeria, 66 percent of girls and 58 percent of boys under the age of 18 witness domestic violence in their homes. On the other hand, over half of the adolescent students between the ages of thirteen and fifteen in West and Central Africa are harassed in schools, with one in every four girls below the age of 15 reported to have experienced sexual violence (Ikusika, 2023).

Violence, child abuse, and neglect all have consequences for children and long-term impacts on national development. A study by UNICEF reveals that violence and neglect can physiologically affect the development of a child's brain (UNICEF, 2017). Children affected by violence experience lifelong adverse health, social, and economic consequences, including mental and physical health conditions; increased health and other risk behaviors; exposure to further violence; disability from physical injury; reduced health-related quality of life;

lower educational attainment; and lower levels of adult economic well-being (Ikusika, 2023). Hence, it is imperative to protect children from experiencing such consequences.

The African Charter on the Rights and Welfare of the Child was adopted as early as 11 July 1990 in Addis Ababa, Ethiopia (Barry, 2021). However, implementing these principles has been slow (Ofodile, 2009), limiting the provision of effective and efficient child protection services. Even though existing child protection systems in terms of structures and institutions dealing with child protection issues have been put in place in Africa, as in other continents, research also identifies that their effectiveness is inadequate (Abdullah et al., 2022). Some authors remark that the colonial history of countries in the SSA region has influenced child welfare orientations (Nyamu & Wamahiu, 2022).

The study focuses on uncovering the domesticated Anglo-Saxon child protection orientation in these English-speaking countries in SSA. The countries selected for this study are Seychelles, Ghana, Kenya, and Sierra Leone because of their common colonial history under the British. By examining legislative frameworks and approaches to services in this paper, we seek to uncover implications for social work practice and provide recommendations that will empower practitioners, giving them space for flexibility and reflexivity during practice. In addition, we argue for a system and policies that allow child protection social workers to work at their discretion in the child's best interest in these sub-Saharan African countries.

To comprehensively address this paper's central research question, we explore key features of child protection systems and how they align with the Anglo-Saxon traditions in all four countries, highlighting similarities and differences. Furthermore, we examine how legislative frameworks shape child protection social workers' roles, responsibilities, and actions in all four countries. Finally, we argue for Eileen Munro's (Munro, 2011b) "discretionary spaces" for child protection social workers to improve their flexibility and effectiveness in service delivery.

Methods

This paper uses a comparative case study design to analyze similarities and differences in child protection systems in the selected countries. In comparative case study methods, it is advisable to pick geographically similar cases with similar histories (Diesing, 1971), which is the reasoning that guided the current study. Thus, the commonality of being countries in SSA, having similar colonial history under the British, and operating the Anglo-Saxon child welfare model, which is the child protection approach, allows for the selection of Seychelles, Ghana, Kenya, and Sierra Leone for the comparative case study. The inclusion criteria of countries in SSA are consistent with the research question. Furthermore, in line with Yin (2018), if a proposed pattern is replicated across different cases or countries, as in this paper, it provides a valid explanation for the investigated phenomenon. For example, in our study, if standard features of child protection systems are detected in the countries, this may have a broader resonance in informing the practice of child protection social workers' challenges with the system.

Sampling and Data Collection

As mentioned above, the countries selected for this study have a common characteristic of having a common colonial history under the British and have adopted and adjusted to the child protection system, like the Anglo-Saxon tradition. For data collection, we use electronic databases like Google Scholar and Social Work Abstracts to select text for this study. A computerized database search showed several studies on child protection systems in four countries in sub-Saharan Africa. However, given that case studies are in-depth, sampling is necessary (Priya, 2021). Sampling occurs whenever data is gathered from a fraction of a studied population, allowing the researcher to make probable inferences about the larger universe without studying every member (Cargan, 2007). Therefore, we had to delineate our study by focusing on specific articles, legislative documents, and reports addressing our research questions in this study. Scholars like Miles and Huberman (1994, p.27) say, '*You cannot study everyone everywhere doing everything*.' These authors posit that

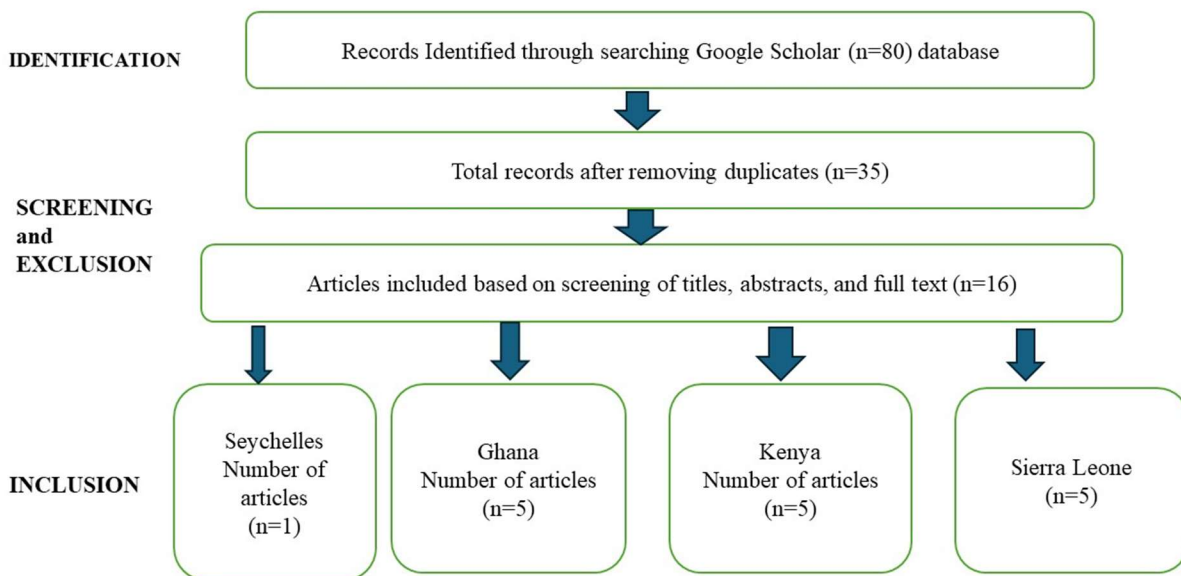the following factors should be considered in a qualitative sample plan:

a) Is the sampling relevant to one's conceptual frame and research questions?
b) Can reliable descriptions or explanations be produced using the sampling plan selected?
c) Is the sampling plan feasible regarding time, money, workforce, and access to people under study?
d) Is the sampling plan effective enough for its findings to be generalizable to the entire universe of the population from which the sample is obtained?

In line with Miles and Huberman (1994), our search had to derive the inclusion and exclusion criteria. Our inclusion criteria entail articles focusing on child protection in all four countries. Another inclusion criterion is that articles could be peer-reviewed or non-peer-reviewed, published or unpublished. Additionally, only articles between 2005 and 2024 were added. The following keywords were used to search in the above databases: "child protection AND welfare AND social workers AND country."

A total of 80 articles, in general, were identified across the case study countries, as shown in Figure 1. After duplicates were removed, we were left with 35 articles. Inspired by Priya (2021), who says sampling is essential in the case study method, 35 articles were screened using the abovementioned inclusion criteria and reduced to five per case study country. It is worth mentioning that this study of child welfare in Seychelles serves as a foundation study in this field, as not much research is found in this regard. Our research questions provided further guidance in reducing the articles from 35 to 16 studies. In closing the gap for the Seychelles case study, observations from the practice of one of the authors were incorporated. This was complemented by consultation with social workers in the Seychelles to gain insights into the country's child protection services. We read the titles, abstracts, and full text, which enabled us to include the selected 16 articles (Ghana n=5, Kenya n=5, Sierra Leone n=5, and Seychelles n=1) as presented in Figure 1.

Figure 1. The procedure used in the identification of relevant articles for the study

IDENTIFICATION
Records Identified through searching Google Scholar (n=80) database

SCREENING and EXCLUSION
Total records after removing duplicates (n=35)

Articles included based on screening of titles, abstracts, and full text (n=16)

INCLUSION
Seychelles Number of articles (n=1)

Ghana Number of articles (n=5)

Kenya Number of articles (n=5)

Sierra Leone (n=5)

Source: Authors' conceptualization

Table 1: Summary of Main Child Protection Documents consulted in four sub-Saharan African countries

Country	Title	Author and year of publication
Seychelles	Enhancing Child Protection in Seychelles by the Child Law Reform Committee (CLRC), Seychelles	Child Reform Law Committee Seychelles, 2021
Ghana	"Child and Family Welfare Policy" was drafted by the government of Ghana, Ministry of Gender, Children and Social Protection, with the support of UNICEF.	Ministry of Gender, Children, and Social Protection, 2015
Kenya	The Framework for the National Child Protection System for Kenya	Waweru & Hussein, 2011
Sierra Leone	Dealing with Child Abuse: A Handbook for Child Welfare Workers in Sierra Leone	Ministry of Social Welfare, Gender, and Children's Affairs, 2009 (Government of Sierra Leone)
	Mapping and Analysis of Child Protection within Sierra Leone	Thompstone & Crispin, 2010

In addition to the literature above, policy documents and reports of the selected countries served as the entry point for this study, which provided access to the primary child protection document, as presented in Table 1 above. These documents guide child protection in the case study countries. These documents were accessed online through the Google Scholar database search. We read through these documents, reviewed them, and analyzed them using some of Helland and Luhamaa's (2020) key features used to study the CPS. Consultations were done with focal persons, like social workers, in the case of Seychelles, where not much is known in this line. The purpose of a case study is to provide an in-depth exploration of a particular phenomenon (Lee et al., 2010); therefore, it was essential to choose the specific policy documents and reports (see Table 1) and relevant studies for each of the case study countries as presented in Figure 1. To analyze and compare the CPS in the SSA countries, focusing on the reports and policy documents, we used some key features (see below in the overview of countries) that Helland and Luhamaa (2020) developed to study CPS. The authors propose five key features they used to study the CPS of six countries (the Czech Republic, Lithuania, Norway, Poland, Romania, and Russia). These key features highlight characteristics, guiding principles,

institutional setup, and interventions of CPS in each country. Helland and Luhamaa's key features provided a guide for an overview of CPSs in each country for analysis and comparison, as seen in the findings below. A thematic analysis of the data was done using key features of CPS of Helland and Luhamaa (2020), which enabled us to identify each country's key functions and child protection systems.

Furthermore, by selecting nations between 67 and 184 on the Human Development Index (HDI), the study reflected the variations and range of socio-economic conditions, which vary considerably across the SSA region (UNDP 2021/2022 Human Development Index) and, by extension, the case study countries (see Table 2 below). The selected countries included two from West Africa (Ghana and Sierra Leone) and two from East Africa (Kenya and Seychelles), with Seychelles also a member state of the Southern African Development Community (SADC).

Ethical approval was guaranteed by the project that supported this study from Masaryk University. This study was part of a greater project covered by the specific research scheme at the Department of Social Policy and Social Work, Masaryk University. The researchers sought

permission from the Director of Social Services at the Ministry of Employment and Social Affairs, Seychelles (as we needed to corroborate the literature), for consultations with focal persons at the child protection unit.

Findings

Overview of Child Protection Systems in Seychelles, Ghana, Kenya, and Sierra Leone

Several authors studying child protection systems have proposed various criteria or essential features to understand the systems in different countries. For example, Helland and Luhamaa (2020) propose five key features they used to study the CPS of six countries (the Czech Republic, Lithuania, Norway, Poland, Romania, and Russia). These key features unveil and provide insights into CPS practices in various countries. The authors' five key features include: a) General country overview; b) General child protection characteristics and principles (Constitutional protection of children's rights, position of the CRC, guiding principles); c) Institutional setup of the CPS; d) CPS interventions – principles and types; e) International criticism of the CPS. Along the same line, to understand the child protection systems in Ghana, Kenya, and Sierra Leone (former British colonies), we use four of Helland and Luhamaa's (2020) key features to provide an overview of CPSs in the four SSA countries, specifically: a) Country Overview; b) General child protection characteristics and principles; c) Institutional setup of the child protection system; and d) Child protection interventions and types.

a.   Country Overview of all Four Countries

All four countries, Seychelles, Ghana, Kenya, and

Sierra Leone, have varying population sizes and Human Development Indexes global rankings (UNDP, 2024). Seychelles has a population of about 132,799 people. Although classified as a country with a very high human development index, with a global ranking of 67, Seychelles faces socio-economic, cultural, and political issues common in the SSA region. On the other hand, Ghana and Kenya are ranked with a medium HDI set at 145 and 146, respectively. Though Ghana and Kenya have varying population sizes, with Kenya's (estimated 56 million people) population higher than Ghana's (35 million people), they also have quite a youthful population (less than 18 years), which is 24 million for Kenya and 12.4 million for Ghana. The fourth country is Sierra Leone. Its population comprises about 9 million people and is one of the youngest populations in Africa (about 7 million of its population is under 18 years old). Sierra Leone has a low human development index and is ranked in the world 184 (UNDP, 2022).

b.   General Child Protection Characteristics, Legal Frameworks and Principles

Seychelles has ratified the United Nations Convention on the Rights of the Child (UNCRC) and the African Charter on the Rights and Welfare of the Child (ACRWC), which are enshrined in its national legal framework for child protection. The Children's Act of 1982 in Seychelles, which has been amended several times, with the latest in 2021, is one of the significant documents that addresses child protection issues in the country. Besides the Children's Act, the Constitution of Seychelles also makes provisions for matters related to child abuse. Seychelles has a child protection policy as a legal guide to keeping children safe.

Table 2: Summary of Country Overview

Country	Population Size	Youthful Population Size	Human Development Index (HDI) Rank of the Country in 2022
Seychelles	131,779	25,228	67
Ghana	35 million	12.4 million	145
Kenya	56 million	24 million	146
Sierra Leone	9 million	7 million	184

The child protection system in Ghana was instituted according to Anglo-Saxon traditions and models (Ministry of Gender, Children and Social Protection, 2015). Ghana has a single central legal framework that systematically guides child protection services (Canavera, 2011), and the government leads the system. A comprehensive legal framework for child protection, guided by the Constitution and the Children's Act 1998 (Act 560), was established to address specific issues related to national child protection plans.

Child protection is executed through the legal framework and guiding procedures in Kenya. The 2001 Children's Act and the reformed constitution of 2010 express language mandating the protection of children from abuse and neglect (Goitom, 2019). These frameworks support the country's functional child protection system, which aligns with Kenya's commitment to the UN Convention on the Rights of the Child and the African Charter on the Rights and Welfare of the Child. The 2010 Kenyan Constitution states that "every child has the right... to be protected from abuse, neglect, harmful cultural practices, all forms of violence, inhuman treatment and punishment, and hazardous or exploitative labor" (Kenyan Const. art. IV, pt. 3, § 53). On the other hand, the 2001 Children's Act includes numerous provisions designed to protect children from abuse and neglect. Specifically, it defines the term "child abuse" to include physical, sexual, psychological, and mental injury (Goitom, 2019). Underlying the Children's Act of 2001 is that the child's best interest drives all decisions and actions involving children. All actions in private or public institutions or legislative bodies should be considered in the child's best interest, and issues of child labor and trafficking are all addressed in the Act. Kenya also has an 'Evidence Act,' which was amended in 2006, allowing courts to convict defendants in child sexual offense cases without corroboration if the court is satisfied that the child victim/witness is telling the truth.

The government of Sierra Leone enacted the Child Rights Act of 2007, which provides a legal framework to address the rights and well-being of children (Ministry of Social Welfare, Gender, and Children's Affairs, 2009). The Child Rights Act 2007, which contains most of the rights provided by the Convention on the Rights of the Child

and the African Charter on the Rights and Welfare of the Child, outlines provisions for safeguarding children in the country. In addition, the Child Welfare Policy 2013 was developed by the Ministry of Social Welfare, Gender, and Children's Affairs (Ministry of Social Welfare, Gender, and Children's Affairs, 2013). The policy highlights that issues of child exploitation, violence, neglect, and welfare abuses happen because families are experiencing chronic poverty, and this has caused a significant shift in the child protection approach in Sierra Leone by situating child protection into a broader child welfare system through providing practical support to families and communities. Furthermore, in 2015, the National Draft Framework for Child Protection Case Management for Sierra Leone was set up by the Ministry of Social Welfare and other partnering international organizations to protect and monitor the well-being of children at heightened vulnerability and protection risk during the Ebola response and post-Ebola recovery periods (Thompstone & Crispin, 2010).

b. Institutional Setup of the Child Protection System

In Seychelles, the Child Protection policy or legislation sets forth the principles, values, and beliefs that are adhered to in the fight to keep children safe from all forms of abuse (Social Service Seychelles, 1989). The main elements of the policy include the following: a) raise awareness at all levels on child protection matters; b) provide children with skills to protect themselves and stay safe from abuse; c) support children who have been abused through effective intervention plans; and d) respond effectively to any concern of abuse (Social Services Seychelles, 1989). The policy acknowledges that identifying child abuse might be difficult, so social and medical assessments must be carried out. This policy has been reviewed over the years and serves as the defining parameter for child protection practices on this small island.

In Ghana, the legal framework for child protection guides the role of specialized services, especially the expectations of the Department of Social Welfare and Community Development at the district level to interact with families and communities more closely and help facilitate solutions when problems arise with emphasis on promoting the welfare and restoring the well-being of

the child, the family, and the community. It also gives greater flexibility and discretion to social workers at the local level. The Policy also stresses the importance of implementation, monitoring, evaluation, research, and advocacy. It highlights the need to improve the overall child protection information management system for better data and evidence of the impact of the expected system reform. The formal child and welfare services operate at the district level. In case of child abuse, the district assemblies are expected to establish a child panel to mediate matters on the rights of the child as mandated by the Children's Act. The approach to child and family welfare services is responsive and legalistic, often coming after a violation has occurred, with a focus on the rescue and removal of children. The focus has been on shelter-based rather than family-based solutions, despite efforts by the Care Reform Initiative implemented by the Department of Social Welfare to promote family-based alternative care (Ministry of Gender, Children and Social Protection, 2015). Non-government organizations, civil society organizations, and health and police services also operate under formal support. At local levels (community levels), other formal service providers and structures are teachers, faith-based organizations, health sector workers, assembly members, child panels, family tribunals, district assemblies, and other community structures.

The Kenyan government, through its Ministry of Gender, Children, and Social Development, in collaboration with the National Council for Children's Services, coordinates the execution of child protection services in the country (Waweru & Hussein, 2011). Kenya has both formal and non-formal child protection mechanisms. In the formal approach, the state is the leading actor. In contrast, communities are the main actors in the non-formal approach, and families, children, and schools are also included. International and national NGOs also drive inter-agency mechanisms, and inter-state agencies play a significant role (Waweru & Hussein, 2011). Child protection is carried out through procedures and laws using a top-down approach. Waweru and Hussein highlight that the government is the leading actor in ensuring a protective environment for children and is responsible for allocating resources and ensuring the availability of structures to offer prevention/responsive

child protection services through various government departments, ministries, and authorities. Government agencies are tasked with making sure that laws and policies are implemented as they take the lead in coordinating all work related to children. NGOs and other non-state actors in Kenya are responsible for implementing State action and bringing change. Non-formal actors like the family have the role of ensuring all children are registered at birth, creating homes free of violence or abuse, ensuring immunization against all preventable diseases, and making sure all children of childbearing age attend school. On the other hand, the community plays a crucial role in promoting child protection by creating an environment where all forms of violence against children are taboo and where traditions/customs are respected. In addition, communities use available local resources to set up informal structures to continuously promote the well-being of children, facilitate dialogue, and monitor the situation of children within formal and informal structures.

In Sierra Leone, the Ministry of Social Welfare, Gender, and Children's Affairs (MSWGCA) is the lead agency for Child Protection (Ministry of Social Welfare, Gender, and Children's Affairs, 2009). In Sierra Leone, agencies with statutory (legal) mandates and responsibilities to respond to abuse are Local Councils (Social Services Departments), Police, MSWGCA, the Judiciary, child protection service providers, and child welfare institutions. Child Welfare Workers are crucial in strengthening a child protection system at all country levels.

c. Child Protection Intervention and Types

In Seychelles, the government is the lead provider of services (Social Services Seychelles, 1989). Through its Ministry of Social Affairs and the Family, under the Department of Social Services, there exists a child protection unit addressing all child abuse cases in the country. However, the child protection unit collaborates through inter-agency partnering (with the Ministry of Health, Youth and Sports, the Ministry of Education, and all stakeholders, private and public, who work with children) to ensure the safeguarding of children. When a case is reported (by a third party or any agency, like

schools) or referred to the child protection unit, the principal social worker receives it and assigns it to a social worker within the unit. The child protection social worker (CPSW) then accepts the case and contacts the parents or guardians of the child or the person in charge of caring for the child to establish the case in the child's presence. To establish the case, the CPSW meets with the parents and the child to ask for their consent to proceed with the child protection procedure. In case of physical abuse where the abuser is the mother and refuses to consent, the CPSW can ask for the father's consent or, in the last case scenario, contact the AG's office for a general order to proceed if the physical abuse requires immediate attention and parents are not giving consent. After establishing the case through consent, both the parents and the child are informed about the child protection procedures, which include a medical examination to confirm abuse (in case of rape or physical abuse) and a police statement.

For Ghana, according to the working document Child and Family Welfare Policy by Ghana's Ministry of Gender, Children and Social Protection (2015), the government must provide specialized services to children, families, and communities in the case of the failure of community structures. The states' institutions respond to child protection cases referred to them or emergency cases. Distinctions are set between welfare cases and legal cases. So, in intervention, the policy suggests that the child and family welfare system would not depend only on court processes for family engagement but would use courts in criminal and some specific cases. This is so that social welfare officers should have greater flexibility and discretion to work with family and community members when a child protection case comes up. Hence, the prosecution of perpetrators is the responsibility of the Ministry of Justice, the Attorney General, and Law enforcement agencies. Once a case is reported to the police, it is transferred to the Social Welfare and Community Development Department according to the policy, as police cannot determine the removal or placement of children except for immediate safety. Placement or removal is done by the Social Welfare and Community Development Department (Ministry of Gender, Children and Social Protection, 2015). The Department of Social Welfare and Social Welfare and

Community Development Department at the district level are responsible for social welfare service delivery at the regional and district levels. When problems arise that go beyond the competence of a district, for example, emergencies on a large scale or issues affecting more than one district (trafficking of children, for example), then national-level direct service delivery is provided, still involving all relevant social welfare officers and community leaders.

In Sierra Leone, the Children's Rights Act (CRA) of 2007 gives the national Ministry of Social Welfare, Gender, and Children Affairs general responsibility for promoting the rights and welfare of children in collaboration with other ministries (Thompstone, 2010). The Ministry ensures monitoring, supervising, and coordinating the activities of child welfare committees, providing them with training, advice, guidance, and support (administrative and logistical), and issuing rules and regulations on the committees' functions and procedures. Nevertheless, the CRA gives the Ministry responsibility for regulating foster care and approving residential homes for children. At the district level, all devolved district councils are responsible for protecting the welfare of and promoting children's rights within their authority. Each district has a small team of Social Development Workers (SDW) led by the Social Development Officer (SDO). This team is based in the district capital, but the SDW is predominantly in the field. Their role covers all issues relating to children, including those in conflict with the law, orphans, and vulnerable children. They are also responsible for managing the Family Case Work role. At the chiefdom and village levels, significant authority for child protection has been given to Child Welfare Committees. Informal village committees for the welfare and protection of children have long existed in Sierra Leone. However, with the introduction of the Child Rights Act, these committees at both the chiefdom and village have become more formalized structures.

Discussion

Comparison of Child Protection Systems in the Four Countries

One major highlight of the findings is that all four countries have more similarities than differences in their

child protection system approach. We start by presenting the differences in socio-economic issues in different countries, which are based on the Human Development Index of each of the countries.

a) Difference

Child Protection Issues and Socioeconomic Status of Children

By selecting countries between 67 and 184 on the Human Development Index, the case studies reflected the variations and range of socio-economic conditions typical of low, medium, and very high countries in the SSA region (UNDP 2022 Human Development Index). The HDI is a summary measure of average achievement in key dimensions of human development, specifically a long and healthy life, knowledge, and decent living standards (UNDP, 2024), which also impacts child welfare. The differences in HDI limit the availability of resources to implement child protection measures in these countries. Table 3 summarizes the human development index of these countries.

Ghana, Kenya, and Sierra Leone experience problems of poverty, and as such, governments have limited resources and capacities to dedicate to child protection properly, and this hampers the government's ability to deliver services outlined in the legal frameworks. Studies like that of Muchabaiwa (2024) corroborate that child protection in African countries is underfunded and remark that it is affected by the fiscal policies throughout the budget cycle. This is why international or national NGOs are recognized as one of the major child protection partners with the government in these countries.

Besides, issues of refugee children and accompanying minors, who are vulnerable groups, are also a problem in some of these countries, like Kenya. Studies show that protecting these children requires the engagement of traditional and community leaders in refugee camps (Jones et al., 2014; Wessells, 2015), as poverty among this group differs from that of other population groups. The poverty rate in these countries constrains government resources to provide free education, such as at the secondary school level, for children in these countries. Other studies like that of Abdullah and colleagues also remark that the impact of poverty complicates child welfare interventions in issues of physical abuse, especially in developing economies where parent and caregiver poverty is commonplace (Abdullah et al., 2021). Also, healthcare is not easily accessible for children in these countries, as they must pay for it. In Seychelles, with a very high HDI, children are provided free education from primary through secondary to high school. In addition, in Seychelles, financial support is provided in terms of child support to those who meet the criteria, and healthcare is offered free of charge.

b) Similarities

Legal Framework, Role of State, and Service Approach

The overview of the countries above (Seychelles, Kenya, Ghana, and Sierra Leone) identifies similarities Concerning existing legal frameworks, the role of the state, and the service approach used. Table 4 summarizes this information.

Table 3: Human Development Index Classification of each Country as of 2023 (UNDP, 2024)

Country	Human Development Index Value 2022	World Rank	Level of Human Development Index
Seychelles	0.802	67	Very high HD
Ghana	0.602	145	Medium HD
Kenya	0.601	146	Medium HD
Sierra Leone	0.458	184	Low HD

Table 4: Similarities in CPS: Existing Legal Frameworks, Role of State, and Service Approach

Country/ Criteria	Seychelles	Ghana	Kenya	Sierra Leone
Legal Framework	Yes	Yes	Yes	Yes
Role of the State	Lead provider, legalistic, and investigatory	Lead provider, legalistic	Lead provider, legalistic	Lead provider, legalistic
Service Approach	Standard procedures in place	Standard procedures in place	Standard procedures in place	Standard procedures in place

Firstly, all four countries have national legal frameworks that provide child protection, namely Ghana's Children's Act 1998, Kenya's Children's Act 2001, Sierra Leone's Child Rights Act of 2007, and Seychelles' recently updated Child Law 2021. These legal frameworks have incorporated aspects of the UNCRC and the ACRWC international and regional legal frameworks for keeping children safe. In addition, all four countries have ratified the UNCRC and the ACRWC related to child protection (Bockarie et al., 2024; Child Reform Law Committee, Seychelles, 2021; Conteh, 2012; Manful et al., 2020; Thompstone, 2010; Wangamati et al., 2019). While this indicates efforts pulled together to ensure the protection of children, the fact that these sub-Saharan African countries rely heavily on international and regional frameworks to guide the implementation of national law in each country is problematic (Thompstone, 2010). This is because local contexts are different (Frimpong-Manso, 2021).

Furthermore, the government/state plays a central role as the lead provider in child protection, supporting and strengthening parents and families in their role in all four countries. For example, Gatuguta and colleagues (2019) mention that in Kenya, the state is emphasized as planning, providing, coordinating, and supervising protection services (Gatuguta et al., 2019). Despite the generalized conception of the state playing a vital and supportive role in child protection, the threshold for state intervention is still unclear in the national legal frameworks. Furthermore, given that countries like Ghana, Kenya, and Sierra Leone are between a medium

and low, at 145 to 184 in HDI world ranking, coupled with issues of poverty, governments have limited resources and capacities to dedicate to child protection properly, and this hampers the government's abilities to deliver services outlined in the legal frameworks. This is why international or national NGOs are recognized as one of the major child protection partners with the government in these countries. In Kenya, for example, the government has a restrictive allocation of financial resources to child protection and care. Therefore, the national government of Kenya has passively and actively outsourced child protection and care to the third sector (Chege & Ucembe, 2020). In Seychelles, however, despite having a very high HDI of 67 (UNDP, 2022) with indicators of access to education, healthcare, and social benefits, the state's role as the lead provider of services is still questionable. Questions of equality in accessing services arise. However, the state engages more often in legal and investigatory issues.

Regarding service approach, Child protection in Ghana, Kenya, Sierra Leone, and Seychelles has standardized procedures with no room for flexibility, guided by their legal frameworks and policies in each country. The government is the lead provider and collaborates with other agencies, NGOs, and communities in all four countries. The procedures are rigid and work according to the laws provided to guide the system in these nations. This corroborates Nyamu and Wamahiu's (2022) perspectives that these CPSs give limited alternatives for child officers in Kenya. They are obsessed with fulfilling bureaucratic and legal obligations at the expense of

addressing individual children's needs. Therefore, the tendency is that officers serve the state rather than the children's best interest (Nyamu & Wamahiu, 2022). These sub-Saharan countries, through the standard prescribed procedures in the legal framework, provide services by targeting families with children who experience abuse or are at risk of experiencing abuse.

While this study and other studies in similar contexts, like in Lesotho (Bockarie et al, 2024), Ivory Coast, South Africa, and Uganda (Sarumi & Strode, 2018) emphasize the existence of legal frameworks as well as the role of the state in child protection in these areas in SSA, our study further highlights the implications of this CPSs on practitioners. This is what we discuss below.

Anglo-Saxon Child Protection Model in sub-Saharan Africa and its Implications for Child Protection Social Workers' Practice

a) CPSW Lacks Agency

Agency refers to the capacity of an individual to act independently and to make their own free choice (Barker, 2005). Within the child protection system, the rigid adherence to procedures constrains CPSWs from acting on their free will or knowledge acquired during studies. These CPSWs are constrained by the social structure in place (policies and legal frameworks), which guides their performance and practice. This affects practice because it has reduced the system's ability to be innovative and respond flexibly (Munro, 2011b). According to Munro (2011b), by reducing innovation and flexibility, the system becomes less able to account for and react to the individual needs of children whose circumstances did not fit neatly within predefined cohorts. In this light, CPSW works under imposing conditions where they cannot make decisions based on observations during on-site visits. For example, in Seychelles, once an abuse case is identified and the perpetrator is in the home, the CPSW must follow procedures to get permission from the Attorney General's office to remove the child from the home to a safe place. This might take some time due to bureaucracy.

b) Lack of Flexibility and Reflexivity in Practice

The central control exhibited by the child protection orientation allows CPSWs no flexibility or reflexivity in practice. A study in the United Kingdom showed that CPSW's discretion had been constrained because the CPS reduced their ability to be creative and respond flexibly (Munro, 2011b). The lack of flexibility and reflexivity confines CPSWs to routine and procedural practice. In social work practice, reflexivity, professional discretion, and ethics are essential. Hence, allowing room for flexibility and reflexivity empowers the CPSWs during practice. Eileen Munro, in her study of English child protection system, therefore, emphasized the need for change from 'over bureaucratized,' 'over standardized,' and 'defensive' (Munro, 2010) child protection system to one where social workers would be enabled, encouraged, and motivated using their discretion in the best interest of the child.

Limitations of the Study

Cross-country comparative studies entail engaging with various sources of information like legislation, statistics, reports, and academic articles (Helland & Luhamaa, 2020). This study focused on reports, legislations, etc., produced by governments, which is problematic and poses some bias in the reports. However, considering that not so much specific research has been done on child protection systems in some countries like Seychelles, in this study, we relied on a few sources when addressing the inner workings of the CPS. For example, in Seychelles, collaboration with practitioners has enabled us to receive information to secure the validity and reliability of our material. However, to overcome these limitations and ensure the quality of data material in this report, several data sources have been used, and in consultation with practitioners/experts where possible, we have reviewed the information.

Implications for Policy and Practice

The phrase "best interest of the child" is paramount in child protection work. The results stimulate a debate on the need for discretionary spaces for child protection social workers to practice in the child's best interest. This aligns with Eileen Munro's (2010, 2011a, 2011b) argument, where she points out that the space for social

worker discretion had been eroded and curtailed (Munro, 2011b). This means that, because of the bureaucratic structures laid out by legislative frameworks, social workers adhere strictly to policy and work recommendations in the books with no space for reflexivity. Therefore, from a practical standpoint, this study sets the stage for further research to understand child protection social workers' perceptions and experiences within the child protection system in these countries and how policies and legal frameworks can be addressed to promote flexibility in practice, ensuring the innovativeness of practitioners. Hence, we propose some practical recommendations for each country:

1. First, policy adjustments will be beneficial to allow agency CPSWs opportunities for flexibility to act during practice.

2. Secondly, child protection social workers should be trained in adaptive decision-making by offering continuous professional development on ethical judgment, trauma-informed care, and contextual assessments, so they are better prepared to use their discretion effectively.

3. Thirdly, we suggest introducing supportive supervision models where supervisors should enable reflective practice and professional autonomy rather than enforcing bureaucratic compliance. Models like peer mentoring could be good.

4. Finally, advocate for child protection social workers' voices to be engaged in reform initiatives like advisory boards, so they can directly influence child protection reforms.

Conclusion and Way Forward: A Call for Discretionary Space for Child Protection Social Workers

This paper aims to answer the main research question: "*How does the child protection system rooted in Anglo-Saxon traditions influence the practice of child protection social workers in countries in sub-Saharan African Countries?*"

All sub-Saharan African countries selected for this study were former British colonies and have adopted the Anglo-Saxon traditions of the child protection approach.

We provided an overview of child protection systems in four countries: Seychelles, Ghana, Kenya, and Sierra Leone. A comparison between all four countries showed a difference in socioeconomic status. It indicated similarities in the state's role, service approaches, and legislative frameworks rooted in the Anglo-Saxon child welfare model, posing challenges like a lack of agency, flexibility, and reflexivity for CPSWs.

Considering the challenges in the child protection system typical of the Anglo-Saxon traditions and their implications for CPSWs in SSA, operating in Seychelles, Ghana, Kenya, and Sierra Leone, we, therefore, argue for a system that allows child protection social workers to work with discretion in the best interest of the child. According to Eileen Munro, "discretion allows for greater flexibility and innovation, cultivating a system geared towards the needs of each child, making it both more 'child-centered' and effective" (Munro, 2011b, p. 1).

Consequently, to ensure discretionary spaces during practice for child protection social workers, we recommend that policy adjustments be made to allow agency CPSWs opportunities for flexibility to act during practice. Additionally, CPSWs should be trained in adaptive decision making to enhance autonomy, supportive supervision models could be introduced, and CPSWs should be engaged in advisory boards, ensuring their voices influence child protection reforms. Finally, we recommend further study to understand CPSWs' perceptions and experiences within CPSs influenced by Anglo-Saxon models in sub-Saharan Africa.

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