

# 児童福祉制度の国際比較に関する基礎的研究

——日本とフィンランドの児童保護制度を中心に——

A Basic Study on International Comparison of Child Welfare Systems

—Focusing on the Child Protection Systems in Japan and Finland—

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## 要旨

北欧福祉国家として充実した地域子育て支援体制を整備しているフィンランドは、近年日本でも注目を集めている。筆者は1年間の海外特別研究期間に、フィンランド国立タンペレ大学の客員研究員として児童保護制度の国際比較研究で知られているタルヤ・ポソ教授の下、日本とフィンランドの児童保護制度の比較研究を行った。

海外特別研究期間中はタルヤ・ポソ先生から丁寧な個別指導を受けることができた他、児童福祉施設やネウボラ、特別養子縁組を行った里親・里子へのインタビューを実施できた他、英語および日本語での研究報告の機会や、様々な研究会に参加する機会を得ることができた。

児童保護関連法については日本の法律はフィンランドに比べて、支援を提供する側と支援を受ける側の立場と責任について不明確な点が多い。特に、子どもの地位と権利の保障について改善が必要である。また、支援の期限などについても日本の法制度は不明確である。

対児童人口数で比較すると虐待通告はフィンランドが2.5倍、一時保護は1.5倍、被措置児童数は14倍であることが判明した。これは、フィンランドの児童虐待が日本より多いというよりも、ネウボラなどの地域子育て支援施策によって要保護児童の早期発見と早期対応が充実している結果と考えられる。この点を明確化するための質的研究が今後の課題となった。

総人口と児童人口がほぼ同等の首都ヘルシンキと政令指定都市・静岡市を比較すると日本の児童福祉ソーシャルワーカーの配置は日本は25%程度に留まっていることがわかった。さらに、フィンランドでは市単位に児童の措置機能を持った「児童福祉事務所」が設置されている。

日本も市町村の児童福祉対応をさらに充実させ、児童相談所設置市を増やす必要があり、またNPO等との連携可能性も視野に入れる必要があると考えられる。

今後は法制度比較や数量面での実態比較にとどまらず、質的な側面からも日本とフィンランドの比較研究を進めていきたい。また、2019年度中に学んだ国際比較研究の方法を応用し、他の国の児童保護法および制度や実態との比較研究にも取り組んでいきたい。

キーワード：児童保護制度・児童虐待対策・日本・フィンランド・国際比較研究

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## 1 研究の目的・方法

### 1-1 研究の目的

「2017年お母さんにやさしい国ランキング」(セーブ・ザ・チルドレン)において第1位となる等、フィンランドは育児がしやすい国として知られている。また、周産期からスタートするフィンランドの子育て支援施策である「ネウボラ」は日本における地域子育て支援施策のモデルとして取り入れられつつある。さらに2017年1月から2018年12月にかけて、フィンランドでは200名を無作為抽出した「ベーシックインカム」の社会実験が実施されており、新しい社会保障制度の世界的なモデルとなることが期待されている。

このようなフィンランドにおいても社会的養護を必要とする子どもと家族は存在しており、2011年の国連子どもの権利委員会による総括所見では、里親よりも施設養護への措置件数が増加している傾向について懸念が表明されている。

世界に先立って地域子育て支援施策を充実させているフィンランドにおいて、やはり社会的養護、特に施設養護が必要とされる背景には何があるのか、地域子育て支援を充実させても必要とされる児童保護施策はどのようなものか、そして新しい社会保障制度であるベーシックインカムは地域子育て支援や児童保護・社会的養護にどのようなインパクトを与えるのか。これらのテーマについて考察することにより、今後の日本の児童福祉システムを改善するための示唆を得ることが、本研究の目的である。

### 1-2 研究計画・方法

研究計画とその方法は以下の通りであった。

- 1) 首都ヘルシンキ市に次ぐ第2の都市圏であるタンペレ市に在するフィンランド国立タンペレ大学に客員研究員として籍を置いた。そしてタンペレ大学を拠点としながら、フィンランドの児童福祉・社会的養護に関する調査研究を実施した。
- 2) The European Scientific Association on Residential & Family Care for Children and Adolescents (EUSARF)の委員等を歴任しておられるタンペレ大学タルヤ・ポソ (Tarja Pösö) 教授の下で、フィンランドの児童福祉・社会的養護の現状と課題について学んだ。
- 3) 必要に応じて、ヨーロッパの児童福祉施設や研究機関についても調査を行った。

## 2 研究の経過

### 2-1 通年の指導状況

丸1年間にわたり、ほぼ1~2週に1度の割合で指導教授であるタルヤ・ポソ教授に約90分ほどの時間をいただき、個別指導を受けることができた。

筆者は当初の研究目的のひとつとして「フィンランドのベーシックインカム社会実験が地域子育て支援や児童保護・社会的養護に与えるインパクトについて分析する」という課題も挙げていた。しかし、フィンランドでのベーシックインカム社会実験に関しては特に就労の促進という観点に焦点が当

てられており、要保護児童とその家族に対する支援の観点から評価するのは難しいのではないかという助言をタルヤ・ポソ教授から受けることとなった。また、異なる文化背景を持つ2国の国際比較研究を行うことは非常に難しい作業であり、まずは主たるテーマに関する研究に専念したほうが良いという助言を受け、「日本とフィンランドの児童保護制度を中心とした国際比較研究」に専念することとした。

また、タルヤ・ポソ教授の研究チームの構成メンバーであるヨハンナ・コルピネン（Johanna Korpinen）先生およびロシ・エンロース（Rosi Enroos）先生には、新進気鋭の研究者の観点から筆者の研究テーマについて助言をいただき、また意見交換する時間をいただくことができた。

さらに、タルヤ・ポソ教授の研究仲間であり、日本の研究者と共にネウボラの研究を行っているエイヤ・パービライネン（Eija Paavilainen）先生からも、折に触れて指導をいただく機会を設けていただき、フィンランドのネウボラの実情について学ぶ機会を得た。

## 2-2 フィールド調査

事前に倫理審査を受審したり、インタビューガイドを作成した正式なフィールド調査は今後の課題となった。研究期間中に実施したものはフィンランドおよびヨーロッパの児童福祉の現場を理解するためのフィールド調査となったが、フィンランドやヨーロッパの実情を理解する土台となる実りあるものとなった。

### 1) 2019年4月25日（木）／8月16日（月） Touhula Kaleva Daycare Center見学および保育体験

タンペレ大学最寄りのTouhula Kaleva Daycare Centerにて見学および保育体験を行った。2回とも、朝の会の際に手遊び「はじまるよ」のフィンランド語バージョンを作成し子ども達と楽しんだ。また、フィンランド語による簡単な自己紹介と日本文化紹介のスライドを準備し、異文化交流を行った。

希望する子どもには簡易な朝食が提供されている等、今後の日本でも応用可能な様々な発見があった。また、保育内容としてはフィンランドで流行しているアイスホッケーを室内で楽しむ姿や、季節の行事を取り入れた保育がなされている様子を学ぶことができた。

### 2) 2019年5月3日（金） Kuusikon Perhetukikeskus（クーシッコ・ファミリーサポートセンター）訪問

本施設は日本で言う児童養護施設であり、同意のある措置の際に活用される児童福祉施設である。12～18歳の子どもを対象とした施設であり、措置期間は3～4か月と比較的短期間である。7名の子どもが生活しており、6名の社会福祉学の学士号を持つ指導員、2名の看護師、そして管理職と寮舎のSV、調理師と清掃員で運営されており、コンパクトな構成になっていた。

倫理審査等の申請をしていなかったため、寮舎内は見学することができなかったが、家庭的で落ち着いた雰囲気の中で生活できるように工夫がされているとのことであった。

### 3) 2019年5月6日(月) Lielahden Neuvola (リエラハデン・ネウボラ) 訪問

Lielahatikeskus (リエラハティセンター) というショッピングモールを兼ねた多機能施設の中に存在するネウボラを訪問し、ネウボラナースから話を聞くことができた。

ネウボラは、周産期から就学前までの地域子育て支援を担う、小規模の保健所兼地域子育て支援センターである。よほど強い希望がない限りは、ネウボラナース(保健師もしくは助産師)は異動をせず、ケースの家族の担当者であり続けるとのことであった。インタビューに応じてくださったネウボラナースの方は、ひとつの家族を3世代に渡って子育て支援をしてきているケースもお持ちであるとのことであった。

また、「福祉ネウボラ」という制度があり、要保護児童とその家族については措置権限を持つ市の児童福祉事務所等と連携しながら、支援を実施しているとのことであった。この点は日本版のネウボラに関わる関係者にもあまり知られていない事実であると考えられる。日本における地域子育て支援にあたっては、市町村の児童福祉担当部署との有機的な連携をさらに強化する必要があると筆者は感じた。

### 4) 2019年6月24日(月) British Library (大英図書館) およびThe Tavistock and Portman訪問

大英図書館ではタンペレ大学図書館で入手できなかった文献を閲覧した。その後、ジグムント・フロイトが創設したタヴィストック研究所を起源とするThe Tavistock and Portmanを訪問し、またThe Tavistock and Portmanにて心理職としてのスーパーバイズを受けているスクールカウンセラーの御園生直美先生(早稲田大学社会的養育研究所客員次席研究員)にインタビューを行った。

御園生先生からは、日本とヨーロッパの児童福祉制度の違いや、イギリスで学んだことや実践したことを還元するために行っている児童福祉や要保護児童とその家族の心理的支援に関する研究についてご教示いただくことができた。

フロイト博物館は休館日だったために訪問できなかったが、ジグムント・フロイトを経てアンナ・フロイトへと至る精神分析や社会的養護下の子どもの心理的支援の原点のひとつを訪問することができ、良い学びの機会となった。

### 5) 2019年9月21日(土) 国際養子縁組を行った家族へのインタビュー

日本におけるフィンランド社会福祉法制度研究の第一人者である東洋大学国際学部国際地域学科の藪長千乃先生に仲介いただき、タイ人の子どもと特別養子縁組したフィンランド人のご夫婦とタイ人の息子さんにインタビューすることができた。

戦後日本でも積極的に国際養子縁組をしていた児童相談所で児童福祉司をしておられた先輩にインタビューした経験が筆者にはあったが、国際養子縁組後の日本側からのフォローに課題を感じていた。

しかし、この機会にインタビューさせていただいた家族は、非常に愛情深く子どもに接しておられ、子どもは大学進学に備えて受験勉強中である等、国際養子縁組のデメリットをまったく感じない強固な家族的結合の様子を学ぶことができた。

グローバル化が進む中で、改めて日本における国際養子縁組についても学び直す必要性を感じさせられる機会となった。

#### 6) 2019年11月15日(月) タンペレ応用科学大学にてネウボラナースの養成課程を担当する教員にインタビュー

国立タンペレ応用科学大学(Tampereen Korkeakouluysteisö)では、看護師、保健師、助産師の養成を行っている。

エイヤ・パーピライネン先生の計らいで、タンペレ大学の客員研究員としてエイヤ先生の前でネウボラの効果測定研究を実施している京都橘大学の神崎光子先生と共にタンペレ応用科学大学における看護師、保健師、助産師の養成課程、特にネウボラナースの養成に関する工夫などについて伺った。

日本の保健師、助産師養成ではまだ取り入れが十分でない、いわゆる社会福祉援助技術の範疇に入る面接技術や特に生活面でのアセスメント、そして他機関との連携についても学ぶ機会を設けているとのことであった。養成段階からの教育的土台が、しっかりとした地域子育て支援につながっていることを実感することができた。

#### 7) 2019年11月21日(木) サーミ人の生活等に関するインタビュー

フィンランド北部ラップランドの街イナリを訪問してサーミ文化の博物館Siidaを見学した。また、Siidaの敷地内にあるサーミの伝統的なコテージを活用した学童保育を見学させていただき、支援員にインタビューすることができた。さらに、トナカイを飼う昔ながらのサーミ人の生活を受け継ぐ家族のお宅を訪問し、インタビューを行った。

サーミ人はフィンランド、ノルウェー、スウェーデン、ロシアに跨る地域に暮らしており、サーミ語という言語と独自の生活文化を保持している。映画『サーミの血』にも描かれているように、差別の対象になってきた歴史があり、独自の文化を保持しつつ権利を守っていくことが課題となっている。

学校ではフィンランド語とスウェーデン語のみならずサーミ語の講義の時間も設けられているとのこと、新しい世代に伝統文化と民族のアイデンティティを伝えるための工夫がなされている様子を学ぶことができた。

2020年3月にはタンペレ市児童福祉事務所の児童福祉ソーシャルワーカーにインタビューを実施する予定で調整を進めていたが、新型コロナの感染拡大のために、延期となった。

### 2-3 研究会等への参加

#### 1) 2019年4月25日(木) タンペレ大学社会科学部ソーシャルワークコースのスタッフミーティング

ソーシャルワークコースのスタッフミーティングに参加させていただき、1年間お世話になる挨拶と共に、コース会議の様子を学ばせていただいた。教務上の課題について議論もされていたが、コース教員の研究成果を報告する時間も設けられており、研究にも重点が置かれている様子を学ぶことができた。

#### 2) 2019年6月6日(木) 研究会「Consent and objection in child welfare decision-making (児童福祉の意思決定における同意と異議申し立て)」への参加と研究中間発表

指導教授タルヤ・ボソ先生が主宰する研究会「Consent and objection in child welfare decision-

making (児童福祉の意思決定における同意と異議申し立て) 研究会」において、まずは日本の現状について報告する機会を得た。「The Era of Child Abuse in Japan : Focus on the busyness of the Child Guidance Center」というタイトルで、31枚分のスライドを作成し、日本の児童福祉の歴史、児童虐待時代の日本の児童福祉の現状、日本の児童相談所の役割、日本の児童相談所と市町村児童相談部署との関係、日本の児童相談所と社会的養護の今後の課題について英語で報告した。

また、日本の児童相談所の多忙な状況を理解してもらうために、NHKのドキュメンタリー『48時間の約束』(埼玉県中央児童相談所の児童虐待対応チームの様子を追った映像資料)にオリジナルの英訳を付して、上映した。

様々な観点から議論がなされたが、厚生労働省の英語サイトが使用している英訳では海外に日本の児童相談所や社会的養護の実態が伝わりづらいこと、言語の壁があり海外の研究者が日本の児童福祉を対象としづらいために国際比較研究の対象となりづらく、いわゆる「ガラパゴス化」しやすい状況にあること、措置権限を持つ都道府県および政令市レベルの児童相談所と措置権限のない市町村という二重構造システムそのものが事態を混乱させやすいことなどが話し合われ、以後に続く研究課題を意識することに繋がる実りある発表となった。

### 3) 2019年9月11日(木) 研究会「Exploring the intersection between the "Glocal" and social work」

日本から松尾加奈先生(淑徳大学)、大和三重先生(関西学院大学)、和気純子先生(東京都立大学)、Viktor Virag先生(長崎国際大学)がタンペレ大学に来学され、日本における宗教福祉観、外国人の福祉労働者問題、東日本大震災後の被災地支援の状況、今後のグローバルソーシャルワークの望ましい方向性について報告がなされた。また、それを受けてタンペレ大学ソーシャルワークコースの教員とのディスカッションが行われた。

社会福祉に関する幅広い分野の日本人研究者が様々な視点からフィンランドの研究者と議論を交わす様子を学ばせていただき、両国の社会福祉の実情についての認識を深めることができる機会となった。

### 4) 2019年10月11日(金) 研究会「Recent Social Research on Basic Income」

Roosa Eriksson(タンペレ大学)、Veera Jokipalo(タンペレ大学)、Ville-Veikko Pulkka(タンペレ大学)というベーシックインカムに関する気鋭の研究者の報告を聞くことができた。また、フィンランドにおけるベーシックインカム研究の重鎮であるPertti Koistinen先生と対話をし、フィンランドにおけるベーシックインカムの社会実験が受給者の労働意欲促進という観点に偏って評価されるに至る経緯などを学ぶことができた。

日本ではNHKニュースのコンパクトなドキュメンタリーなどにおいて、フィンランドのベーシックインカムの社会実験がひとり親家庭に対する支援の側面でも成果が出ているという報道がなされていた。しかし、研究を行うにあたっては、プライバシーの関係で社会実験における受給者を辿ることなどが困難であることなども知る事ができた。年度当初にタルヤ・ポソ先生からベーシックインカムよりも児童保護の国際比較研究に重点を置くようにと助言された意味を再確認する機会となった。

#### 5) 2019年10月5日(土)～3月15日(日) 在外日本人研究者の会

タンペレ大学はタンペレ応用科学大学との経営統合を2019年1月から開始したとのことで、その混乱の影響もあり、客員研究員に対するサポートは十分とは言えなかった。特に、例年実施されていたという各国からの在外研究員の会合が開催されなかった。

そのような中で、相互にネットワークを伸ばしていき、2019年度には私を含め4名の日本人客員研究員がタンペレ大学にいたことが分かってきた。

その中の中心的存在であった杉本卓先生(青山学院大学・教育学)のお声かけで、神崎光子先生(京都橋大学・看護学)、淡路佳昌(大東文化大学・教育学)、そして筆者が参集し、定期的に情報交換と研究進捗状況報告の会合を行うこととなった。

それぞれ研究の対象やアプローチは異なるものの、関心が共通する面やそれぞれの研究報告の中には参考になる内容も多く、非常に有意義な集まりとなった。

「在外日本人研究者の会」は、10月21日、1月11日、2月20日、3月15日にも実施された。また、2月20日の研究会では筆者の中間報告に上垣内伸子先生(十文字学園女子大学)、向井美穂先生(十文字学園女子大学)に参加いただき、貴重な助言をいただくことができた。

#### 6) 2020年2月10日(月) 研究会「Consent and objection in child welfare decision-making (児童福祉の意思決定における同意と異議申し立て)」にて研究成果報告

指導教授タルヤ・ポソ先生が主宰する研究会において2019年6月6日に続く研究報告をさせていただくこととなった。本研究報告に付したスライドのプロトタイプの研究報告となったが、特に外国人研究者による日本の児童福祉に関する先行研究の報告に時間を多く割く形となってしまう、バランスの良い報告とはならなかった。

英語での報告にあたっては、読み上げ原稿のネイティブチェックをはじめ、入念な準備が必要であることを痛感させられる結果となった。

#### 7) 2020年3月11日(水) タンペレ大学社会科学部ソーシャルワークコースのスタッフミーティング

タンペレ大学客員研究員としての1年間を総括する発表をさせていただいた。

基礎レベルの国際比較研究報告に終始したが、今後国際比較研究の成果を海外の学会で発表するための練習や、プレゼン資料を元に論文化するための土台作りを行う機会となった。

## 4 研究の結果

前章「2-3 研究会等への参加」の「7) 2020年3月11日(水) タンペレ大学社会科学部ソーシャルワークコースのスタッフミーティング」で発表したプレゼンテーション資料は次頁以降の通りである。

11.03.2020. Social Work staff meeting



## The basic comparison of child welfare social work and out-of-home placements between Finland and Japan

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Visiting researcher  
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### Purpose of my research

As represented by Neil Gilbert, Nigel Parton, and Marit Skivenes (eds.) "Child Protection Systems: International Trends and Orientations" (2011, Oxford University Press) and Kenneth Burns, Tarja Pösö, Marit Skivenes. (eds.) "Child welfare removals by the state: A cross-country analysis of decision-making systems" (2016, Oxford University Press), the International comparative studies in the field of child welfare and protection have recently been published. These results have been used to strengthen the strongpoints and improve the weaknesses of each country's child welfare and protection measures. However, despite that Japan is a member of the Summit of the Developed Nations "Group of seven", Japanese child welfare and protection measures are rarely taken up in international comparative studies.

One of the reasons is that Japanese researchers have hardly ever communicated the status of child welfare and protection in Japan to overseas researchers and practitioners in English.

Moreover, the difficulty of understanding Japanese child welfare and protection system, which has achieved its own development, and the difficulty of the Japanese language itself, makes it impossible for overseas researchers to place Japanese child welfare and protection as research targets.

Although I am not good at English, I am a Japanese child welfare researcher with experience in child welfare and protection in Japan. Under the guidance of Professor Tarja Pösö who has a extensive knowledge of international comparative studies and qualitative research on child welfare and protection, I conducted this basic comparative research to make the Japanese child welfare and protection system the subject of an international comparative research.

### Previous Research

#### 1. Previous research on Japanese child welfare and protection by overseas researchers

It seemed that Edward J. Flanagan's report (1947), which surveyed the post-war Japanese child welfare facilities and Alice K. Carroll's report (1949-1950), which reported the post-war Japanese child guidance center, are the oldest previous researches on Japanese child welfare and protection by overseas researchers.

However, Roger Goodman's "Children of the Japanese state" (2000, Oxford University Press) is positioned as the first of contemporary research result by overseas researchers. Moreover, Roger Goodman wrote "The State of Japanese Welfare, Welfare and the Japanese State" in Seeleib-Kaiser, M.(ed.) "Welfare state transformations" (2008, Palgrave MacMillan).

Kathryn Goldfarb's "Japan" in John Dixon and Penelope Welbourne (eds.) "Child Protection and Child Welfare: A Global Appraisal of Cultures, Policy and Practice (Child Welfare Outcomes)" (2013, Jessica Kingsley Publishers) is seemed that this article is the first reference to introduce the status of child welfare and protection in Japan as the international comparative studies.

Michael King's "Child guidance centres in Japan: regional variation in policy implementation and the family-bond" (2017, The PHD thesis of the University of Oxford, Economic and Social Research Council) was not written to compare the situation of child welfare in Japan and abroad, but described the results of participant observations on child welfare social work at two child guidance centers in Japan. Therefore, King's PHD thesis is very useful research for this study.

### Previous Research

#### 2. Previous research on Japanese child welfare and protection by a Japanese researcher in English

Although the Japanese Ministry of Health, Labor and Welfare provides policy information in English on the internet, it is not sufficient in quantity and is only directly translated and not easily understood by overseas researchers. Although there are plenty of English studies regarding the situation of children, including those by Japanese researchers and psychologists, there is little research on child welfare and protection policies, and so on.

Mari Saimura's article: "A Study of Social Work in Local Governments Regarding Child Abuse Prevention in Japan, in Japanese journal of social services, No.4, (2006), is only one article written by a Japanese researcher. She tried to explain Japanese child welfare and protection policies and systems in English. However, that is also a direct translation and is not easily understood by overseas researchers.

#### 3. Previous research on Finnish child welfare and protection by Japanese researchers in Japanese

A small number of Japanese researchers have studied Finnish child welfare and protection and have published in Japanese. The following two are representative articles:

•Chino Yabunaga 2017 Finrando ni okeru jidouhogo: fuhensyugitekina fukushiseidoka niokeru yohogonizu heno taiou (Child Protection in a Universal Welfare State: The Case of Finland, Lastensuojelu) in National Institute of population and social security research(eds.) Journal of social security research. Vol.2, No.2・3: pp.216-232.

•Taiko Takahashi 2019 Finrando ni okeru kodomogyakutaino kainyū no seido ni kansuru ichikousatu (The system of intervention to child abuse in Finland : Focused on family service orientation and child centered orientation) in Hokkaido University Collection of Scholarly and Academic Papers: Journal of Education and Social Work, No.23: pp.25-38.



### The difference between the welfare regimes of Finland and Japan

◆ Esping-Andersen described...

・ Finland "Nordic countries were a **social-democratic welfare regime**."

(Esping-Andersen 1990 *The Three Worlds of Welfare Capitalism*)

・ Japan

"Japan's welfare regime is characterized by **familialism**. That is, it is believed that most of the welfare of citizens should come from family connections."

(Esping-Andersen 2000 Preface for the Japanese edition of *Social Foundations of Postindustrial Economies*)

"Japan's current welfare system equally combines **the key elements of both the liberal and conservative regimes, and it is still developing**."

(Esping-Andersen 2001 Preface for the Japanese edition of *The Three Worlds of Welfare Capitalism*)

◆ Public social protection expenditure for children (% of GDP, without health)

Finland 3.2% (2013)

Japan 1.3% (2013)

Data from ILO "World Social Protection Report 2017-19"

<https://www.social-protection.org/gimi/gess/RessourcePDF.action?ressource.ressourceId=54887>

### The difference between the welfare regimes and the child welfare models of Finland and Japan

◆ Hetherington (2000) created a matrix based on Esping-Andersen's theory of the welfare state regime and Niel Gilbert's two models (1997), and stated that there is a split between countries that provide direct family support services by the state and those that provide family support services by the third sector. Finland was described as the state of providing direct family support services.

Child welfare system \ Welfare regime		'Social-democratic'	'Conservative'	'Liberal'
		Holistic system: 'Family service' orientation	state service delivery	Nordic Countries
	subsidiarity		Continental European countries	
Dualistic system: 'Child protection' orientation				English-speaking countries

Rachael Hetherington 2002 Learning From Difference: Comparing Child Welfare Systems, P.29  
<https://pdfs.semanticscholar.org/f83a/a026aa3bfa3cdaebb6882598dccc6b176df3b.pdf>

### The difference of the welfare regimes and the child welfare models between Finland and Japan

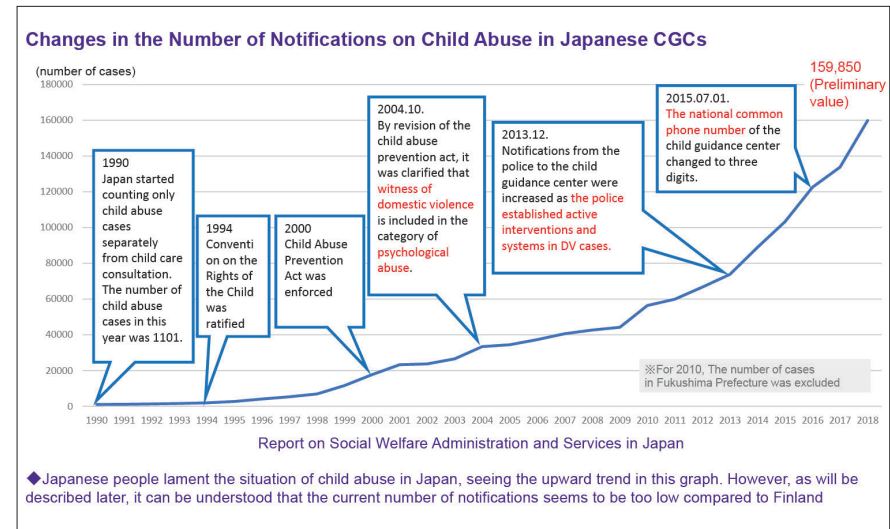
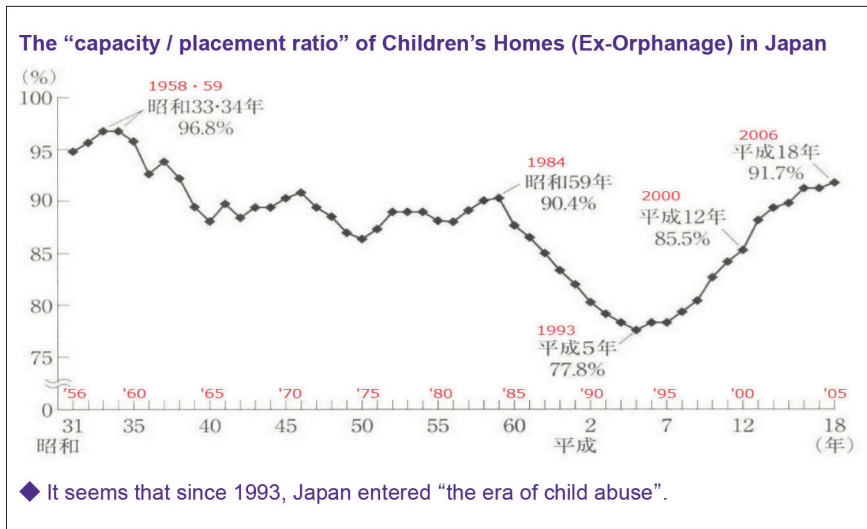
◆ I believe that the Japanese themselves have not found a welfare model that suits them.

Child welfare system \ Welfare regime		'Social-democratic'	'Conservative'	'Liberal'	'Conservative' and 'Liberal' or 'Familialism'
		Holistic system: 'Family service' orientation	state service delivery	Nordic Countries	
	subsidiarity		Continental European countries		
Dualistic system: 'Child protection' orientation				English-speaking countries	
Neither 'Family service' orientation nor 'Child protection' orientation					Japan

### The brief history in child welfare between Finland and Japan

Japan	Finland
Child welfare-related laws were gradually being enacted, including the enforcement of Child Abuse Prevention Act in 1933. However, there was no public out-of-home placement systems in Japan until after WWII.	
1936	<b>Child Welfare Act (52/1936) was enacted.</b>
1945	WWII was over.
1947	Child Welfare Act was enacted.
1950	The Allied Powers sent a child welfare consultant; Alice K. Carroll to Japan and she taught child welfare social work to Child Guidance Center officers.
1981	"Child battering in Finland and Sweden" was published by Maria Korpiolahti.
1983	<b>Child Welfare Act (683/1983) was enacted.</b>
1993	The "capacity / enrollment ratio" of the Children's Homes (Ex-Orphanage) was increased again.
2000	Child Abuse Prevention Act was enforced.
2007	<b>Child Welfare Act (417/2007) was enacted.</b>

◆ Finland has made two drastic changes to the Child Welfare Act after the war. However, although Japan has repeatedly made amendments, it has not made any fundamental changes to the CWA.



### The comparison data of the total population and child population in 2018

Country	Population	Child Population (Percentage of total population, year)	
Finland	5.5million	1.06million (19.3%, 2018)	31.12.2018
Japan	126.4million	18.88million (14.9%, 2018)	01.10.2018

Japanese data <https://www.e-stat.go.jp/>  
 Finnish data <http://pxnet2.stat.fi/>

◆ The Japanese child population is 17.8 times that of Finland.

### The meaning of “Child Guidance Centers” (CGCs) in Japan

Nowadays, the Japanese Ministry of Health, Labor and Welfare has translated *Jidōsōdanjo* (児童相談所) as child guidance centers (CGCs). Japanese CGCs is the child welfare offices placed at prefectural level, which has the authority for the out-of-home placement of children.

In the English version of the Draft of the Japanese child welfare act in 5.8.1947 (used for coordination with the Supreme Commander for the Allied Powers (SCAP) which occupied post-war Japan, the equivalent word for *Jidōsōdanjo* was translated to “child guidance station”.

Alice K. Carroll, who was sent from SCAP to conduct the Consultants and the Surveys on child welfare in Japan from 1949 to 1950, uses the term “child welfare centres” firstly in her report. (Tsunefumi Fujii, 2010, *Kyaroru katudō houkokusyo to Jidōsōdanjo kaikaku* (Carroll's report and the revise of CGCs in Japan), Akashi-Shoten Publishers)

However, Alice K. Carroll wanted to develop *Jidōsōdanjo* into a specialized child guidance clinic. Therefore, it seems that the word “Guidance” was used for *Jidōsōdanjo* after her instruction.

◆ The pursuit of the origin of “the translation of CGC” in Japan remains a further study. However, I hope you understand that Japanese CGC plays a similar role as Finnish CWOs.

### Changes in the role of municipalities in the implementation of child and family welfare support

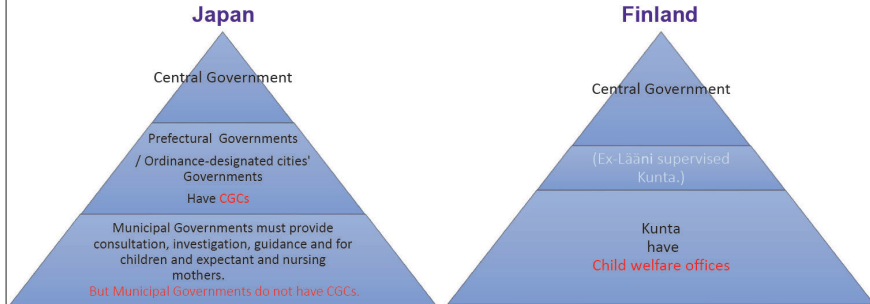
The municipalities were positioned as the primary contact for consultation on child and family welfare by the enforcement of the Revised Child Welfare Act in **April 2005**.

- 1) Obtain and comprehend information on the welfare of children and pregnant women
- 2) Provision of information on the welfare of children and pregnant women
- 3) Consultations, surveys and guidance on the welfare of children and pregnant women
- 4) For those requiring specialized support from 1) to 3), Request the Child Guidance Center for assistance and advice.
- 5) In performing the work in 3), Request the judgment for the Child Guidance Center

◆ Before the enforcement of the revised act in 2005, the response to child and family support was different for each municipality. However, the revised act had made it possible for children and families to be supported at the local level. On the other hand, **municipalities do not have enough social workers specialized in child welfare and do not have the authority of out-of-home placements.**

In order to provide local support for children and families, Japan has set up consultation services in municipalities. However, **a dual structure has been created** between CGCs (prefecture level) that have the authority for out-of-home placements and municipalities that do not have it.

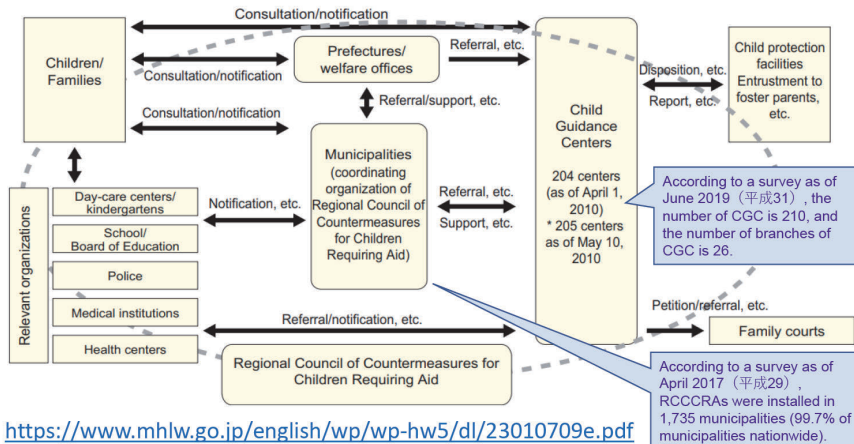
### The difference of the government structure which have the authority for out-of-home placements



Japanese Municipalities are not required to have specialized child welfare social workers such as CGCs. As an alternative, due to the amendment in 2016 of the Child Welfare Law, it is mandatory to make efforts to assign a person who has a child welfare-related qualification as the coordinator of the Regional council of countermeasures for children requiring aid (RCCRA).

According to a survey as of April 2017 (平成29), RCCCRAs were installed in **1,735 municipalities (99.7% of municipalities nationwide)**. In addition, **5,508 of (66.9%) qualified persons** are assigned to RCCCRAs. However, it seems that some qualified persons, such as teacher license holders, do not have a high insight into child welfare specialties.

### The relationship between the CGCs and municipalities regarding child welfare



### The number of CGCs / CWOs and Child welfare social workers

Country	The number of CGCs / CWOs	The number of CGC Branches	The number of Temporary shelters in CGCs	The CGC/ CWO Social workers	Ratio of child population to number of social workers
Finland	No data available	No data available	No data available	No data available	No data available
Japan	210	26	136	3426	0.02%

Japanese data <https://www.mhlw.go.jp/content/11900000/000349860.pdf>

Finnish data Finnish CWOs cooperate with departments other than child welfare and are sometimes commissioned to NGOs. It is also possible to operate across municipalities. For these reasons, the competent authorities do not maintain the above data.

### The data of six representative municipalities in Finland

#### Liite 3 Lastensuojelun tietoja vuonna 2018

#### 3A Lastensuojelun asiakkaat ja vastuusosiaalityöntekijöiden lukumäärä vuonna 2018

LASTENSUOJELUN ASIAKKAAT (lkm)	HELSINKI	ESPOO	VANTAA <sup>1</sup>	TURKU	TAMPERE	OULU	KUUSIKKO
Lastensuojelun asiakkaat yhteensä vuoden aikana (0-17-v.)	5 766	2 835	3 957	1 914	2 000	2 429	18 901
joista avohuollon palveluja saaneet lapset <sup>2</sup>	4 660	2 485	3 823	1 528	1 659	2 170	16 325
joista sijoitettuna olleet lapset	1 819	774	849	666	632	609	5 349
Jälkihuollossa olleet nuoret vuoden aikana (18-20-v.)	921	358	272	257	256	243	2 307
Lastensuojelun asiakkaiden osuus (%) samanikäisestä väestöstä (0-17v.)	5,3	4,4	8,4	6,6	5,3	5,5	5,7

<sup>1</sup> Vantaan avohuollon asiakkaissa on mukana sosiaalihoitolain mukaisia palveluja saaneita lapsia.

HENKILÖSTÖ (lkm)	HELSINKI	ESPOO	VANTAA	TURKU	TAMPERE	OULU	KUUSIKKO
Vastuusosiaalityöntekijät yhteensä	156	67	76	38	40	56	433
joista avohuollossa	100	51	60	24	29	44	308
joista sijaishuollossa	47	12	14	11	11	12	107
joista jälkihuollossa (jos erikseen)	9	4	2	3	0	0	18

[https://www.hel.fi/hel2/tietokeskus/julkaisut/pdf/19\\_06\\_03\\_Kuusikko\\_Lastensuojelu\\_2018.pdf](https://www.hel.fi/hel2/tietokeskus/julkaisut/pdf/19_06_03_Kuusikko_Lastensuojelu_2018.pdf)

### A comparison regarding the number of Child welfare social workers



• Helsinki city: The total population is about 600,000.  
(The child population is about 100,000.)

→ 156 child welfare social workers are working in CWOs.



• Shizuoka City (government-ordinance-designated city; which has the authority for out-of-home placements) in Japan: The total population is about 600,000 (child population of about 100,000) @ 31.12.2019

→ 23 child welfare social workers (including section manager and foster parents support staff) in CGC and 12 social workers in Social Welfare Offices (including persons without child welfare specialties)

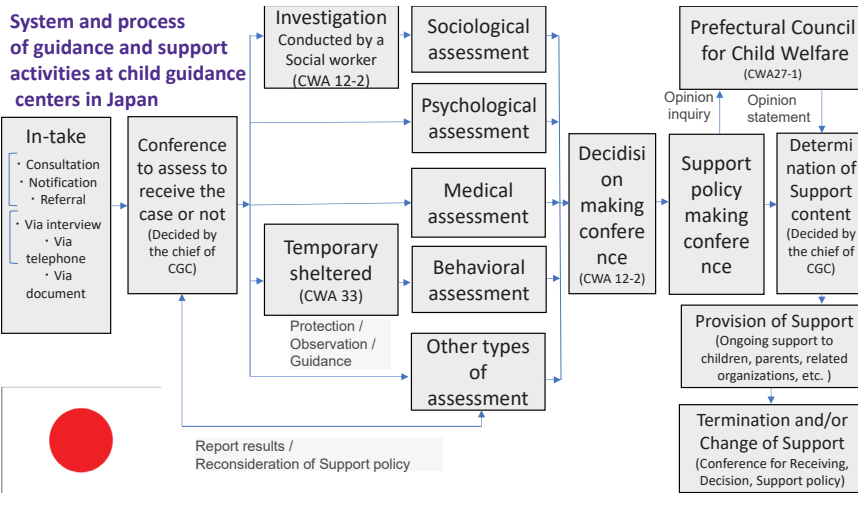
◆ The number of Shizuoka city's child welfare social worker is only 22.4% of Helsinki city's.

<As a reference>

• The Standards of Japan (From "Child Guidance Center Management Guidelines" (revised on September 2016))

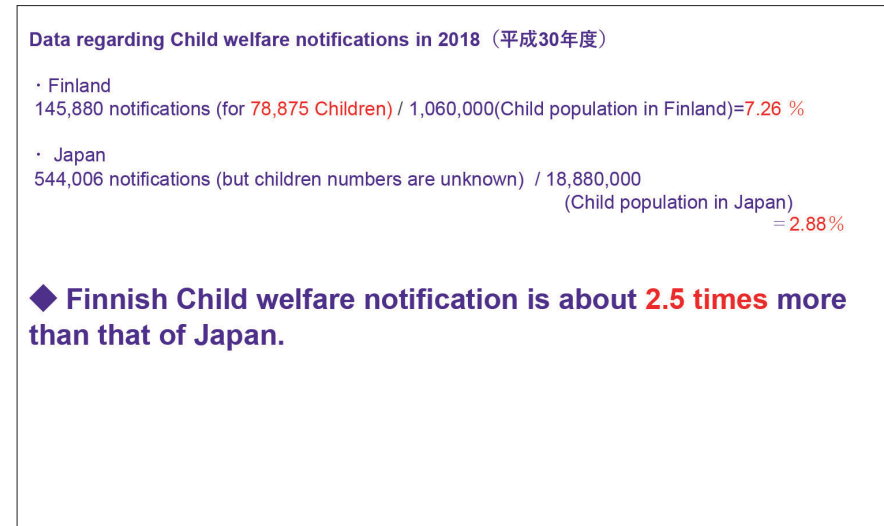
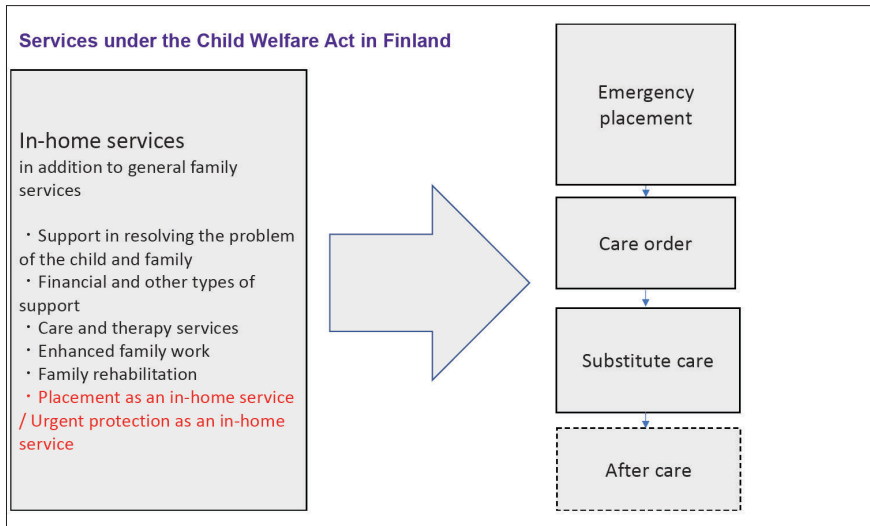
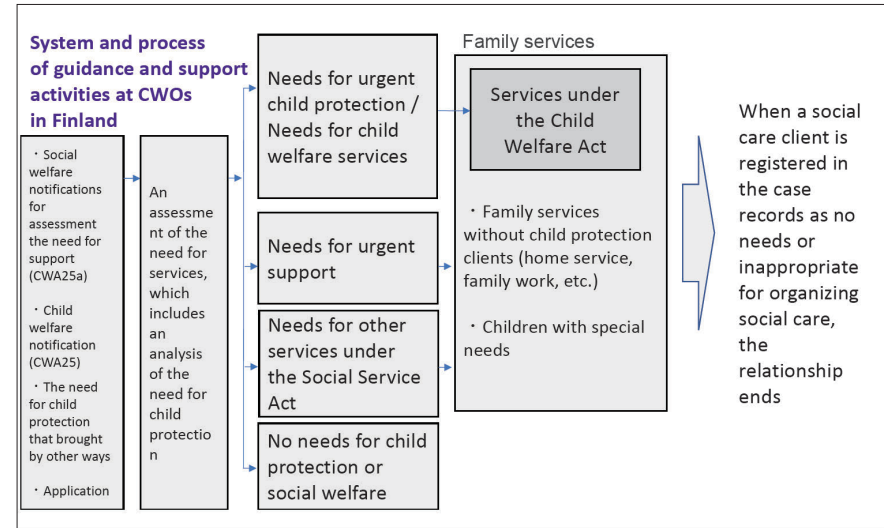
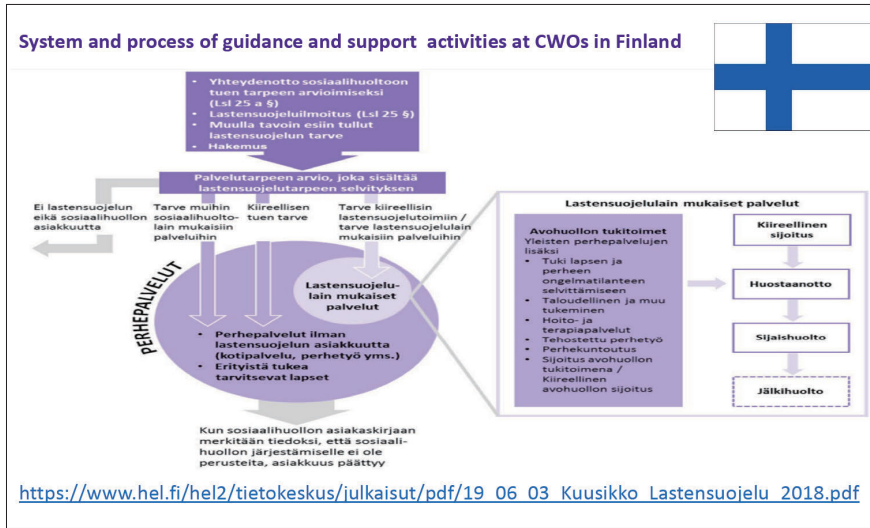
→ Child welfare social workers are assigned to at least one person per 40,000 people. One or more child psychologists are assigned to two child social workers.

### System and process of guidance and support activities at child guidance centers in Japan



### Support contents on Child guidance centers and Related articles

1. In-home services
  - (1) Guidance without welfare placement (Child Welfare Act 12.1)
    - a. Advice and guidance
    - b. Continuing guidance
    - c. Mediation to other organization
  - (2) Guidance with welfare placement
    - a. Guidance by Child welfare social worker (Child Welfare Law 26.1.2, Child Welfare Act 27.1.2)
    - b. Guidance by Child committee (Child Welfare Law 26.1.2, Child Welfare Act 27.1.2)
    - c. Guidance by Children and Families Support Center (Child Welfare Law 26.1.2, Child Welfare Act 27.1.2)
    - d. Guidance by Social worker for Intellectual disabilities, Guidance by social welfare supervisor (Child Welfare Act 27.1.2)
  - (3) Admonition and pledge measures (Child Welfare Act 27.1.1)
2. Placement into child welfare facilities (Child Welfare Act 27.1.3) / Consignment for designated medical institutions (Child Welfare Act 27.2)
3. Placement into Foster family (Child Welfare Act 27.1.3)
4. Support Measures for Child Independence Living (Child Welfare Act 27.7)
5. Consignment and notification for welfare office (Child Welfare Act 26.1.3, 63-4.63-5)
6. Consignment for Family court (Child Welfare Act 27.1.4, 27-3)
7. Petition for Domestic Affairs Trial to family court
  - a. Approval of involuntary care orders (Child Welfare Act 28.1, 28.2)
  - b. Request for declaration of loss of custody (Child Welfare Act 33-6)
  - c. Request for guardian appointment (Child Welfare Act 33-7)
  - d. Request for guardian dismissal (Child Welfare Act 33-8)



**Data regarding Emergency placements in 2018 (平成30年度)**

- ・ Finland  
4,390 Children / 1,060,000(Child population in Finland) = 0.41 %
- ・ Japan  
Emergency placement in CGC's temporary shelters 26,177 Children  
Emergency placement in the child welfare institutions and foster homes 26,276 Children
- Total 52,453 Children / 18,880,000 (Child population in Japan) = 0.27 %

◆ Finnish emergency placement is about **1.5 times** more than that of Japan.

**Numbers of children (0-17 years of age) in care**

Country	Year	Children placed out-of-home and per 1,000 children	Number of children per 1,000 children and the proportion of children in involuntary care of all children in care (%)	Number of children per 1,000 children and the proportion of children in voluntary care of all children in care (%)
Finland	2012	10365 (9.6)	1.8 (19%)	7.8 (81%) <sup>1)</sup>
Japan	<sup>2)</sup> 2017	<sup>3)</sup> 13591 (0.7)	0.41 (4.5%) <sup>4)</sup> The number is 406	8.9 (95.5%) The number is 8871

Note1: The Finnish number includes both voluntary care orders and removals as part of in-home services. In both types the child enters the care based on consent. The voluntary removal by a care order, however, may not be terminated by the parents' or child's decision only.  
 Note2: "2017" is the year of information disclosure by the Ministry of Health, Labor and Welfare in Japan.  
 Note3: The number of "Children placed out-of-home and per 1,000 children" in Japan includes those aged 18 and over.  
 Note4: "Number of children per 1,000 children and the proportion of children in involuntary care of all children in care (%)" in Japan uses as a data source the number of final states of the Family courts in a single year. Under Japanese law, involuntary care is scheduled to be renewed every two years. Therefore, the final numbers for 2017 and 2016 are summed up here.  
 Finnish data is cited from Kenneth Burns, Tarja Pösö, Marit Skivenes, Removals of children by the child welfare system—Variations and differences across countries, in Kenneth Burns, Tarja Pösö, Marit Skivenes, (eds.) "Child welfare removals by the state: A cross-country analysis of decision-making systems" (2016, Oxford University Press), P.227.

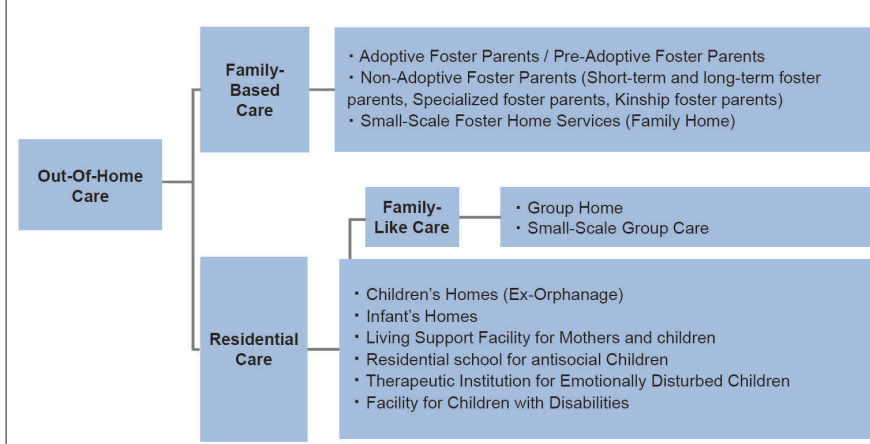
◆ First of all, the ratio of the number of Children placed out-of-home / 1,000 children is about **14 times** higher in Finland. This seems to be the result of lack of intervention in Japan. The actual number of the involuntary care order cannot be simply compared because the data acquisition methods are different. However, the number of involuntary care orders is clearly low.

**Data regarding the number of out-of-home placements in 2018 (平成30年度)**

Country	Total number of out-of-home placement	Foster Care	Professional family home	Residential Care	Other Care	Children aged 0-17 placed outside the home	Children aged 0-17 placed outside the home as a percentage of the population of the same age	<as a reference> Percentage of total number of out-of-home placement divided by population under 18
Finland	18544	7721	1954	7173	1696	15884	1.5	1.7
Japan	44354	5424	1434	37496	unavailable	unavailable	unavailable	0.23

◆ Japan's placement data includes the number of children between the ages from 18 to 20. However, the reference value is divided by the population under the age of 18 to make the denominator uniform. From these reference values, it can be understood that the proportion of children subject to the population of children is extremely low in Japan. Another characteristic of Japan is that more than 80% of children are placed into residential care.

**Out-Of-Home Care System in Japan**



### The Current State of Out-of-home placements in Japan: The number of facilities, foster parents, children in Out-of-home placements

**A childcare system and public responsibility** that takes measures to confirm safety and provide care for a child without guardian or a child for whom the custody of his/her guardian is found inappropriate. About 45,000 children who are in need of Out-of-home placements.

Foster parents	Foster parents entrusted to take care of children at home	1)			Family homes	Taking care of children at foster families' residences (capacity of 5-6 persons)
		Number of foster parents registered (households)	Number of foster parents currently looking after children (households)	Number of placed children (persons)		
		11,730	4,245	5,424		
Classification (foster parents may involve multiple registrations)	Foster parents	9,592	3,328	4,134	Number of homes	347
	Specialized foster parents	702	196	221		
	Adoptive foster parents	3,781	299	299		
	Kinship foster parents	560	543	700		
					Number of placed children	1,434

Facilities	Infant's Homes <sup>2)</sup>	Children's Homes (Ex-Orphanage) <sup>2)</sup>	Therapeutic Institution for Emotionally Disturbed Children <sup>2)</sup>	Residential school for antisocial Children <sup>2)</sup>	Living Support Facility for Mothers and children <sup>2)</sup>	Self-reliant assistance homes <sup>2)</sup>
Subjected children	Infants (including toddlers in the case of particular necessity)	Children with no guardian, abused children, and other children in need of foster care in terms of their environment (infants are also included in the case of particular necessity)	Children with mild emotional disturbance	Children who have already committed or are likely to commit delinquencies and other children in need of daily life guidance, etc. due to their family environment or other environmental reasons	Females without a spouse or females in equivalent circumstances and any children who must be removed from their custody	Children that had completed their compulsory education and left their foster homes, etc.
Number of facilities	140	605	46	58	227	154
Capacity	3,900 persons	32,253 persons	1,892 persons	3,637 persons	4,648 households	1,012 persons
Present number	2,706 persons	25,282 persons	1,280 persons	1,309 persons	3,789 households	573 persons
Total number of working staff	4,921	17,883	1,309	1,838	1,994	687
	Small-scale group care <sup>2)</sup>		1,620 facilities			
	Community-based small-scale foster homes <sup>2)</sup>		391 facilities			

Sources: 1) Reports on Social Welfare Administration and Services, Statistics and Information Department, Minister's Secretariat, MHLW (as of the end of March 2018).  
2) Equal Employment, Children and Families Bureau, MHLW (as of October 1, 2017).  
(Note) Children's self-reliance support facilities include 2 national facilities

<As a reference>  
Data regarding adoption in 2018 (平成30年度)

• Japan

Number of Special Adoption cases

	2010	2011	2012	2013	2014	2015	2016	2017
	325	374	339	474	513	542	495	616

● Civil law will be revised in April 2020 (related to special adoption)

- Under 6 years old → Under 15 years old
- Parents withdraw their consent before the family court's decision is finalized → Parental consent cannot be withdrawn after 2 weeks
- Adopting couple file petition with family court → In addition to the parent, the director of the Child Guidance Center can also claim

◆ In Japan, there is a special adoption system aimed at improving the welfare of children, but in Finland there is no distinction between special adoption and regular adoption. Japan plans to amend the Civil law to further increase the number of special adoptions. The following are reference values:

**Finland** 273 adoptions / 1,060,000 (Child population in Finland)=0.025%  
**Japan** 616 adoptions / 18,880,000 (Child population in Japan)=0.0032%

### Comparison in Child Welfare Social Work and out-of-home placements between Japan and Finland

	Finland	Japan
Intake and Assessment	• CWOs are providing the assessment of the need for social welfare services, including an analysis of the need for child protection (palvelutarpeen arvio, joka sisältää lastensuojelutarpeen selvityksen) .	• "Child Guidance Center Management Guidelines" states that the status of parents as well as children should be investigated. However, because CGCs and municipalities exist separately, there may be difficulties in utilizing various social resources throughout prefectural and municipal level.
Investigation and making the support plans	• The deadline for conducting a preliminary investigation within seven working days and drafting a support plan within three months has been determined by the act.	• There is a provision only for child abuse notification to identify the child within 48 hours, but there are no other legal regulations regarding deadlines for conducting a preliminary investigation and drafting a support plan.
Making the support relationship	• Based on the service needs assessment, Support Relationship will start if it is determined that the child's rearing environment is deteriorating, health or development is not sufficiently ensured, or that there is a need for child protection support.	• Japanese CGC is independent of other social welfare laws and municipal family support. For this reason, constructing the support relationships and plans by utilizing various social resources is not sufficient in the CGC social work. And there is a tendency for emphasis on child support over family support. As a result, establishing a partnership with a family tends to be difficult.

	Finland	Japan
Reviewing the support plans	• The Support Plan should specify the situation and issues that will affect the child, the need to support the child and family, the services to meet the needs, and the timeframe for achieving the goal. The Support Plan is reviewed at least once a year.	• The timing of the review of the support plan is not clearly defined by the act.
Decision making for removing children No.1	There are three types of removals in Finland, each of which is being implemented in stages. Also, the criteria are different for each. 1) "removal" as a part of in-home services is determined by a social worker based on the consent of a child (12 years or older) and parents, or so on. 2) "emergency placement" is introduced if the child is in urgent need of protection and alternative care. The decision-maker has to be a social worker employed by the local authority either in social welfare or emergency social services. The decision about this is valid for thirty days. However, A social work manager continue the emergency placement for another period of thirty days.	• Clarification of judgment criteria is being promoted in Japan using European and American checklists. However, the criteria varies among CGCs. • "removal" as a part of in-home services is also available in Japan. However it depends on the availability of temporary shelters and facilities. For this reason, it cannot be said that the rights of children and families have been sufficiently guaranteed. • "Temporary protection" in Japan has some aspects in common with Finnish emergency placement, but there are many differences. In Japan, it is often conducted as an assessment of children's living ability before out-of-home placement.

	Finland	Japan
Decision making for removing children No.2	<p>3) Third type of removal is a "care order". A care order decision should be considered only if the in-home services are not relevant or appropriate (condition number one) and if the child's health or development is at risk of being seriously endangered (condition number two). The third condition for the care order and related alternative care is that it should serve the child's best interest (condition number three).</p> <p>The care order is meant to be temporary with the aim of family reunification.</p> <p>The care order implicates shared custodianship between the custodians and the social welfare authorities.</p> <p>In the event that the custodians and a child of twelve years of age or older do not oppose the care order and the placement, the decision is made by the leading authority in child protection.</p> <p>However, if they oppose the care order, the social worker will submit "an application for care order" to the administrative court.</p>	<ul style="list-style-type: none"> <li>• There is little recognition in Japan that out-of-home placement is seen as part of family support. Therefore, we will try to avoid out-of-home placement as much as possible.</li> <li>• On the other hand, once out-of-home placement has been implemented, support for family reunification is insufficient.</li> <li>• Furthermore, as Michael King (2017) points out, children and families often disagree with foster care because of the belief that there is only "one family bond".</li> <li>• By the enforcement of the Revised Child Welfare Act in 2011, there were revisions on the following two points. 1) The custodian must not make unreasonable claims if facility directors take necessary measures for their child's welfare. 2) The director of CGC has been authorized to take necessary measures for the welfare of custody of temporarily protected children. However, there is no idea of sharing custody as in Finland.</li> </ul>

	Finland	Japan
Choosing a place for substitute care	<ul style="list-style-type: none"> <li>• When assessing that of the need for child welfare, a decision concerning a child or young person or the provision of child welfare, must pay special attention to the views and wishes of the child or young person (The section 5 of Finnish child welfare act (417/2007)).</li> <li>• By revising Section 50 of the CWA from 2012, Prioritizing family care in choosing a place for substitute care had been made statute.</li> </ul>	<ul style="list-style-type: none"> <li>• By the amendment of the Child welfare act in 2016, it was clarified in the Child Welfare Law of Japan that guaranteeing welfare is a child's right in accordance with the Convention on the Rights of the Child. However, considering the views and wishes of children when making support plans is not clearly positioned by the act.</li> <li>• By revising Section 3-2 of the CWA from 2016, Prioritizing family care in choosing a place for substitute care had been made statute. In 2017, Japan's Ministry of Health, Labor and Welfare has proposed a drastic improvement plan to break the situation that about 80% of the children who need out-of-home placement was placed into the child welfare facilities. However, there are many issues, such as the need to revise the laws of special adoption and support for increasing the number of foster parents, or so on.</li> </ul>

	Finland	Japan
Providing after-care	<ul style="list-style-type: none"> <li>• In Section 75 of the CWA, providing after-care is positioned to the duty of municipalities. Moreover, it is written that municipalities provide after-care within 5 years after the placed children's out-of-home placement was terminated or until that children become 25 years of age.</li> </ul>	<ul style="list-style-type: none"> <li>• Previously, out-of-home placement measures were extended to the age of 20 for children who placed before the age of 18. In Japan, however, the cost of higher education is high, which poses a serious problem for children, foster parents and the child welfare facilities. Also, from the viewpoint of the social work process, Japanese after-care is regarded as the kind of support before case work termination. For this reason, CGC have no mandatory for after-care after the end of the support nor legal provisions for the length of after-care.</li> </ul>
Involuntary care orders	<ul style="list-style-type: none"> <li>• Finland has implemented involuntary care orders for about 20% of placed children, following the steps of community childcare support from the perinatal period, family support based on the Social Welfare Law, open care, or so on.</li> </ul>	<ul style="list-style-type: none"> <li>• Japanese CGCs tend not to use involuntary care orders. This is because the procedure for appeal from the CGC to the family court is not easy, and if the family court rejects the involuntary care order, it will be difficult to maintain a support relationship with parents.</li> </ul>
Adoptions	<ul style="list-style-type: none"> <li>• There is no adoption system in Finland for the welfare of children.</li> </ul>	<ul style="list-style-type: none"> <li>• Japan has a special adoption system for the welfare of children, but at present it is not fully utilized because the target children are under 6 years old. Therefore, the target child age will be raised to less than 15 years.</li> </ul>

Interim consideration	
<ul style="list-style-type: none"> <li>• It could be evaluated that Japan's CWA has been protecting Japanese children and their families for more than 70 years without changing the foundation of the act. However, in order to respond to "the era of child abuse", drastic revision of CWA is necessary, including the relationship with related acts. The position and responsibilities of the service provider, the service recipient, especially the children, should be clarified, and the necessary support should be specified in the act, including the time limit.</li> <li>• Especially regarding CGCs, the authority of out-of-home placement should be transferred to municipalities, the number of social workers should be increased, and a system that can provide local support should be established. In addition, it is necessary to consider how to cooperate with NGOs.</li> <li>• Regarding the place for substitute care, the Japanese government has been implementing a radical plan to reduce the number of facilities since 2017 with the aim of providing a family care system comparable to English-speaking countries. However, in order to provide the same level of child protection as in Finland, it is necessary to increase the number of both family care and residential care and the number of employees, taking into account regional circumstances.</li> <li>• The current situation of the aftercare system in Japan is also insufficient. Moreover, regarding involuntary care orders, it is necessary to make the system that can properly execute it according to the necessity judgment of the CGC side. In order for this, it will be also important that the opinions of the children be incorporated.</li> </ul>	



## Conclusion

Japan has responded to the child and family problem by mutual support between families and the community without sufficient budget.

However, recent changes in family relationships have made it difficult to respond with 'Familialism'. In response to "the era of child abuse", Japan has focused on adopting English-speaking countries that are easy for Japanese to understand and that researchers can easily refer to. On the contrary, at present, the adoption of Neubola is progressing rapidly.

I think that the child welfare system preferred by the ordinary Japanese is 'Family service' orientation. Therefore, it is very favorable for the introduction of Neubola. However, it is necessary to develop a more fulfilling system by referring to Finnish child welfare and protection systems that have been developed in conjunction with it, rather than adopting Neubola alone.

## Future Research

Japan's CGC, which has been established at the prefectural level since WWII, has not been equipped to respond to "the era of child abuse" since the 1990s. By comparing family support and child protection implemented at the municipal level in Finland, it was possible to understand the current child welfare and child protection in Japan have not been able to provide sufficient support.

Thus, My future research subjects are;

- Analyzing the strength and weakness of giving the municipalities authority of child placements, the budget and staffing in Japan and Finland.
- Quality assurance of NGOs which are collaborated with municipalities in child and family welfare and child protection social work in Japan and Finland.
- Cooperation between CWOs and CGCs and courts regarding involuntary care orders in Japan and Finland.

In addition, I will be an advisor for the newly established CGCs in Kita ward and Arakawa ward of Tokyo. Implementing new child welfare measures and the operation of a CGC based on Finnish measures in these two special wards of Tokyo, which have a compact regional scale, are my future practical tasks.

## Acknowledgments

I would like to thank all of you for giving me the opportunity to study in a social work course in Tampere university. I was not confident in my English, especially in topics other than child welfare. Even though I had been called for a coffee meeting on Wednesday morning, I couldn't have the courage to attend the meeting. However, as my English skills are gradually improving, I hope to communicate you by e-mail or Skype after returning Japan.

Special thanks to Professor Tarja Pösö. She make the teaching time almost every week. It is not easy to reward this grace, but I promise you to pay forward it by improving child welfare in Japan and the world.

I also appreciate Johanna Korpinen, Rosi Enroos and Eija Paavilainen spending plenty of the times for me in order to give me different insights than Professor Pösö.

In particular, Johanna Korpinen arranged visits to her son's kindergarten.

If any of you ever have the opportunity to come to Japan, please let me know. I will guide you to sightseeing and restaurants in Japan.

## 5 研究の今後の課題

現在、本報告資料を元に、日本語と英語での研究論文を執筆中である。関心のある方は、そちらの出版をお待ちいただきたい。

要点のみをまとめると、まず児童保護関連法に関しては、フィンランドの児童保護法では支援を提供する側と支援を受ける側の立場と責任が法的に明確化されていた。日本法では、この点に加えて、特に子どもの地位と権利の保障をさらに進めるための改善が必要であることが理解できた。また、支援の期限などについても日本の法制度は明確化が必要な点が少ないことがわかった。

対児童人口数で比較すると虐待通告はフィンランドが2.5倍、一時保護は1.5倍、被措置児童数は14倍であることが判明した。これは、フィンランドの児童虐待が日本より多いというよりも、ネウボラなどの地域子育て支援施策によって要保護児童の早期発見と早期対応が充実している結果ではないかと筆者は考えている。この点を明確化するための質的研究が今後の課題となった。

総人口と児童人口がほぼ同等の首都ヘルシンキと政令指定都市・静岡市を比較すると日本の児童福祉ソーシャルワーカーの配置は日本はフィンランドの25%程度であることがわかった。さらに、フィンランドでは市単位に児童の措置機能を持った「児童福祉事務所」が設置されている。

したがって、日本も市町村の児童福祉対応をさらに充実させ、児童相談所設置市を増やす必要があることが分かった。またNPO等との連携可能性も視野に入れる必要があると考えられる。

今後は法制度比較や数量面での実態比較にとどまらず、質的な側面からも日本とフィンランドの比較研究を進めていきたい。また、2019年度中に学んだ国際比較研究の方法を応用し、他の国の児童保護法制度や実態との比較研究にも取り組んでいきたい。

## 6 謝辞

まずは、1年間、貴重な時間を割いて英語コミュニケーション力も十分とは言えない筆者を忍耐強く指導して下さったタンペレ大学社会科学部タルヤ・ポソ先生、そしてヨハンナ・コルピネン先生、ロシ・エンロース先生、エイヤ・パービライネン先生に感謝の意を表したい。

また、タンペレ大学セルフアクセスセンターのダルヤ・クレメンティエバ先生、ディアンファイ・フー先生には、研究に関する英語面のサポートで継続的にお世話になった。

タンペレ大学日本人客員研究員として知り合った杉本卓先生、神崎光子先生、淡路佳昌先生からは、初めての長期海外生活に戸惑う筆者に様々な助言を与えていただいた。

タンペレ大学の日本人大学院生である工藤沙季さん、津田桃子さん、山本みゆ紀さんには、タンペレ大学で研究を進めるにあたっての助言や日本人としてフィンランドで生活する実感などを教えていただいた。

タンペレ大学に隣接するムーミン美術館館員の常世田美喜子先生には、渡航直後にお声かけいただき、フィンランドでの生活をスタートさせるうえでの様々な助言をいただくことができた。

タンペレ大学社会科学部にて客員研究員を経験された大阪商業大学の佐々木尚之先生、タンペレ大学大学院にて博士号を取得された新名正弥先生には、渡航前から渡航中に至るまで様々な助言をいた

だくことができた。特に、新名正弥先生はタルヤ・ボソ先生と同窓生でもあったとのことで、新名先生との関係はタンペレ大学の先生がたにポジティブな影響を与えてくれた。

東洋大学国際学部国際地域学科の藪長千乃先生からは研究面での助言のみならず、様々なご配慮をいただくことができた。

タンペレ市在住でフィンランドにおける子育て経験を著作として出版しておられる藤井ニエメラみどり先生、ペトリ・ニエメラ先生には渡航前、渡航後に相談に乗っていただくことができた。

徳永祥子先生（立命館大学衣笠総合研究機構）、マット・フラー先生（東洋大学イングリッシュ・サポート・サービス）は、英語で研究を進めるうえでの伴走者として、英語力が不十分な筆者をサポートし続けてくれた。

最後に1年間の海外特別研究期間を認め、温かく送り出してくださった東洋大学ライフデザイン学部の先生がた、そして何よりも子ども支援学専攻の先生がたに記して感謝を表したい。

筆者の人生の中でかけがえのない学びができた貴重な1年となりました。

A Basic Study on the International Comparison of Child Welfare Systems  
—Focusing on the Child Protection Systems of Japan and Finland—

SUZUKI Takayuki

**Abstract**

Finland is known as one of the Nordic welfare states and has been attracting attention in Japan over the recent years for its well-developed community childcare support systems. As a visiting researcher to the University of Tampere in Finland, I conducted a comparative study of the child protection systems in Japan and Finland under the supervision of Professor Tarja Pösö, who is known for her international comparative studies of child protection systems.

During the overseas research period, I was able to receive thorough individual guidance from Professor Tarja Pösö and conducted interviews with child welfare facilities including, Neuvola, and foster parents and foster children who had been adopted. Furthermore, I had the opportunity to present my research in English and Japanese and participated in various research meetings.

The main findings of my research were as follows ; first of all, compared with the Finnish legislation, the Japanese child protection legislation is unclear in many respects regarding the positions and responsibilities of those who provide support and those who receive support.

In particular, the status of children and the guarantee of their rights needs to be improved in Japan. In addition, Japan's legal system must clearly stipulate the time frame required for providing child support.

In terms of the number of children in relation to the population, Finland has 2.5 times more child abuse case reports, 1.5 times more children in temporary protection, and 14 times more children in out-of-home placements than that of Japan.

This is thought to be the result of an enhanced early detection system and an early response to children in need of protection through community childcare support measures such as Neuvola ; rather than more child abuse cases in Finland compared to Japan.

Qualitative research to clarify this point is an issue that will be researched in the future

Comparing Helsinki city, the capital city of Finland, where the total population and the child population are almost equal to Shizuoka city, an ordinance-designated city in Japan, it was found that the number of Shizuoka city's child welfare social workers is only 22.4% of Helsinki city's.

Furthermore, in Finland, Child Welfare Offices at the city level have the authority to implement out-of-home placements for children.

In Japan, it is necessary to further improve the child welfare services provided by municipalities and to increase the number of cities with Child Guidance Centers (Child Welfare Offices) , in addition, it is also necessary to consider the possibility of cooperating with NPOs.

In the future, I would like to promote comparative research between Japan and Finland, not only in terms of the comparison of both legal systems and quantitative studies of child welfare conditions, but also in terms of the qualitative aspects.

**Keywords** : child protection system, child abuse measures, Japan, Finland, international comparative study