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COMPARISON OF FOSTER FAMILY MODELS IN EUROPE AND THE MODEL IN TÜRKİYE

AVRUPA'DAKİ KORUYUCU AİLE MODELLERİ İLE TÜRKİYE'DEKİ MODELİN KARŞILAŞTIRILMASI

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ABSTRACT

The care and protection of children in need of protection is carried out through institutional care and family care. The foster family model, which undertakes the care and upbringing of the child and provides care in the family environment, is one of the family-based care methods. Foster care means that voluntary families or individuals take care of children under the control of the state. As a result of the European Union's reintegration initiatives, foster care models have become increasingly important. Foster care models have been seen for many years as a cheaper alternative to institutional care. Today, foster care models are considered the best option for caring for children who cannot stay with their biological families. With the establishment of the Ministry of Family and Social Policies in Türkiye in 2011, the sustainability of the foster family, the foster family nuclear family communication, the selection of the appropriate foster family and the high benefit of the models for the child under protection have started to be discussed more. The aim of this study is to evaluate the foster family models applied in Europe and Türkiye and to determine the similarities and differences that arise when compared with our country in this context. In addition, it is aimed to develop the foster family model applied in our country and to explain the aspects that need to be corrected and to encourage the practices that are progressing in a positive direction. Within the framework of these aims and objectives, it has been understood that different protective family service models that set an example in the European Union have been pushed into crime, studies have been carried out on groups with special needs, and that protective families and professional staff have a closer interaction. It can be said that there are different policies in the selection of foster families, that sustainability is important, and that policies are produced to raise the child in touch with democratic values. In Türkiye, despite the quantitative increase in the foster family, it needs to be developed with holistic policies.

Keywords: *Foster Family Model, Europe, Child Care.*

ÖZ

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Korunmaya muhtaç çocukların bakımı ve korunması kurum bakımı ve aile bakımı yoluyla gerçekleştirilmektedir. Çocuğun bakımını ve yetiştirilmesini üstlenen ve aile ortamında bakımını sağlayan koruyucu aile modeli, aile temelli bakım yöntemlerinden biridir. Koruyucu aile uygulaması, gönüllü ailelerin veya kişilerin devletin kontrolü altında olan çocukların bakımını üstlenmesi anlamına gelmektedir. Avrupa Birliği'nin topluma kazandırma girişimlerinin bir sonucu olarak koruyucu aile modelleri giderek daha önemli hale gelmiştir. Koruyucu aile modelleri uzun yıllar boyunca kurumda bakıma göre daha ucuz bir alternatif olarak görülmüştür. Günümüzde ise koruyucu aile modelleri, biyolojik ailelerinin yanında kalamayan çocukların bakımı için en iyi seçenek olarak kabul edilmektedir. Türkiye'de 2011 yılında Aile ve Sosyal Politikalar Bakanlığının kurulmasıyla koruyucu ailenin sürdürülebilirliği, koruyucu aile çekirdek aile iletişimi ,uygun koruyucu ailenin seçimi ve modellerin koruma altındaki çocuk için yüksek yararı daha çok tartışılmaya başlanmıştır.Bu çalışmanın amacı Avrupa'da ve Türkiye'de uygulanan koruyucu aile modellerinin değerlendirilmesi, bu bağlamda ülkemizle karşılaştırıldığında ortaya çıkan benzerliklerin ve farklılıkların tespit edilmesidir. Ayrıca ülkemizde tatbik edilen koruyucu aile modelinin geliştirilmesi ve düzeltilmesi gereken taraflarının açıklanması, olumlu yönde seyreden uygulamaların ise teşvik edilmesi hedeflenmiştir. Söz konusu amaç ve hedefler çerçevesinde, Avrupa Birliği'nde örnek teşkil eden farklı koruyucu aile hizmet modellerinde suça itilmiş ,özel gereksinimli gruplar ile ilgili çalışmalar yapıldığı,yaşlı ve genç yetişkin bireylerin koruyucu aile kapsamına alındığı, koruyucu ailelerle meslek elemanlarının daha sıkı bir etkileşimde olduğu anlaşılmıştır.Koruyucu aile seçiminde farklı politikalar olduğu ,sürdürülebilirliğin önemli olduğu ,çocuğun demokratik değerlerle iç içe yetiştirilmesine yönelik politikalar üretildiği söylenebilir.Türkiye'de ise koruyucu ailenin nicel artışına karşın bütüncül politikalarla geliştirilmesi gerekmektedir.

Anahtar Kelimeler: *Koruyucu Aile Modeli, Avrupa, Çocuk Bakımı.*

1. Introduction

With the establishment of the Ministry of Family and Social Services in 2011, the foster family model started to be discussed more in Türkiye. The issues discussed were the compatibility of the foster child and the foster family, the communication of the biological family with the foster family and the sustainability of the family structure. Research on foster families in Türkiye has revealed that the desired efficiency could not be obtained (Karataş, 2007; Karatay, 2017; Dal, 2018; Ertürk, 2020).In addition, although there are researches on the subject in our country, it is obvious that the subject is not sufficiently known by the society.The foster family practice is not accepted in society due to sociocultural structure and economic difficulties.On the other hand, the number of children taken into foster care has increased 17 times in the last 20 years (Büyüktaş, 2022).

In the second article of this convention, it emphasizes that the child's family or guardians have legal responsibilities for the child's upbringing and reintegration into society. In the third article, it ensures that institutions related to the care and protection of children make

commitments in terms of service provision and personnel employment. According to UN resolutions, state institutions should ensure the functioning of the whole for the best interests of the child.

In addition to all these, although progress has been made on legal grounds, the desired situation has not been realized in terms of the continuity of foster families and the duration of consultancy provided by social workers. Since the aim of social work is to ensure social justice in the macro sense, holistic solutions to the issue should be produced.

In this study, in order to approach the concepts from a different perspective, family and child welfare practices of countries at different levels of development in Europe have been examined. Examples of foster family and child welfare practices in Türkiye have been given. In the conclusion and evaluation section, practices that may be useful to be implemented in Türkiye are compiled. European Union reports, related studies of NGOs and research articles have been used in the study.

2. Foster Care In The World

2.1 Foster Care In Türkiye

The roots of foster care have emerged as a result of practices such as orphanage feeding and adoption before modernity. Therefore, the foster family has emerged as a criticism of the old structures. Foster family is a voluntary group selected by the state and undertakes the care and protection of children who cannot be cared for by their families (Karatay, 2017).

This system started in Türkiye in the 1960s and became widespread in the 2000s. In addition to being cheaper than care in traditional institutions, the importance of the child's social and emotional development in a warm family has increased the interest in this family model. Economic reasons, health status, family members being in prison, etc. temporary or long-term foster family models have been formed for reasons.

According to the 1959 Universal Declaration of the Rights of the Child, the child should gain his/her existence with a happy family in accordance with the purpose of life. Not every child is lucky to live in a happy family. It is known that children who stay with their own families have better self-esteem and social skills than their peers who stay in institutions (Özkara, 2005:51).

The Temporary Foster Family Model is the service provided by parents who have received basic foster care training for children who cannot be returned to their birth families in a short period of time. The Specialized Foster Family Model is the service provided by foster families trained by the state above the basic level. Parents are insured, salaried and have paid leave rights when necessary. The Relative or Close Environment

Foster Family Model is when relatives and close neighbors around the child take over the care of the child if the child's own family agrees.

Discussions in the media and NGOs about foster care in Türkiye have only recently begun. In the 1990s, the Child Protection Agency under the Directorate of Social Services was put into operation as an alternative to institutional care. According to 2021 data, child care in foster care is quite low in our country compared to institutional care. According to the 2021 Ministry of Family and Social Services work report, the number of foster families reached 6,978 and the number of children benefiting from foster care services reached 8,459.

Despite this optimistic picture, the number of children in institutional care is 13,902. Although various projects have been carried out to monitor children and socialize children, the inability of children to stay with a family has not brought a solution to their emotional problems. It is the most basic right of every child to have parents who will give them confidence, where they can spend their time and hold on to life together. Children pushed into crime are cared for in such institutions.

In Türkiye, children staying in kindergartens or orphanages show emotional and behavioral problems more frequently than children staying with foster families (Üstüner, et al. 2005). Children staying with foster families should also receive support from their families.

According to the 2022 Annual Report of the Ministry of Family and Social Services, there is a significant increase in the number of foster families in provinces such as Ankara, Istanbul and Izmir, while there are very few or no foster families in the eastern provinces.

Table 1 Proportion of children raised in state and foster care by year

Years	Under State Protection	In Foster Family	Ratio (%)
2011	14320	1282	8,21
2012	16436	1492	8,3
2013	12681	3351	20,9
2014	12171	4008	24,77
2015	12337	4568	27,02
2016	18323	5004	27,3

Source: <https://www.korev.org.tr/p/21/istatistik-bilgileri> (accessed on 27.11.2022) .

According to Table 1, in the last 6 years until 2016, there has been a 4-fold increase in the number of children in foster care, while the increase in the number of children in state

protection has been less. The ratio of the number of children in foster care compared to the number of children in institutions has increased in the last 6 years. With the increase in the number of children in foster care, more attention has started to be paid to the working and failing aspects of the model.

In the Final Report of the Ministry of Family and Social Services Workshop on Foster Family-Based Child Protection System (2020), some problems related to functioning are mentioned and recommendations are presented:

- Providing foster family training activities since biological families are not sufficiently aware of the foster family system and have the fear of losing their children
- Qualitative and quantitative strengthening of professional staff due to the high number of cases for each professional staff
- Allocating funds to foster families by institutions in proportion to their needs instead of fixed funds
- Providing adequate care for children with disabilities and special education needs
- Adequate cooperation with health and education institutions on foster care
- Amendments to the legislation on volunteering and victims' rights.

The selection of the appropriate child by the institutions is made by the commissions in the provincial directorates and they are matched with those who meet the conditions among the foster families who apply. It is ensured that the foster family spends time with the child on a daily, weekly or bi-weekly basis for a maximum period of 2 months. The interaction between the child and the family is tried to be increased under the guidance of the appointed social worker. Parents who receive Level 1 and Level 2 foster family training by the institution are constantly monitored in terms of the child's development. With the consent of the child, communication with the biological family is also provided to ensure the child's socio-emotional development (Regulation on Foster Family, Article 8).

2.2 Foster Family Policies In European Union Countries

Child care practices in European Union countries were evaluated in terms of finding foster families, preparing foster families, promoting foster care networks, creating structures for professionalized forms of foster care, and children with special needs and behavioural problems.

The EU's opening the window campaign supports the process of child welfare institutionalization in 16 European countries (12 EU Member States). The campaign is

supported by hundreds of scientists and practitioners who signed the 'Stockholm Declaration', in which experts declared that institutional care should only be used as a last resort. "Thirty-two European countries working with the 'Quality4children' initiative have developed quality standards for alternative childcare based on the UN Convention on the Rights of the Child.

These standards have been elaborated with feedback from children and young people. Finally, the European Commission's proposal for a Council recommendation establishing the European Child Guarantee emphasizes that appropriate strategies to tackle child poverty in the EU should include appropriate alternative care services (Reimer , 2021:7).European Union countries take binding decisions binding on member states with the report of UN commissions on child welfare.

In Europe, the widespread tendency in child care is the foster family model.The fact that this model is cheaper and more efficient than traditional models has pushed countries to formulate social policies in this direction.In addition, the new search that started in liberal western countries against the unfavorable conditions of raising children in institutional care in Eastern European countries has made foster family care widespread.Thus, it is envisaged that the state will save on personnel and public expenditures.

In Europe, although it seems logical that all children should be cared for by their families, institutional care has not completely disappeared.When children's special education needs, social emotional characteristics and biopsychosocial characteristics of families do not match, the child is cared for by professionals in institutions.

In these institutions, a physical environment as close to the home environment as possible is prepared.For the healthy care of children in institutions, it is ensured that few children are given to each professional staff.Thus, the child is expected to develop self-esteem by feeling belonging to the institution.As a result, the effect of institutional care on the child is not at the desired level.

Situations in which children's biological families are abused are an important problem in foster care practices.Families may think that they cannot take care of their children due to their own financial inadequacies and psychological problems and may not even want to adopt a child again.For this reason, various programs have been developed in European countries to rehabilitate biological families and to ensure appropriate communication with the foster family and the child (Boddy et al., 2013).In addition, a period in which various religious and ethnic identities have become determinant in foster care has begun.In addition to demographic characteristics in EU countries, immigrant children and their families have also gained a certain place in the system.

Countries in Europe have policies on the use of funds from the European Union in foster and institutional care (openingdoors,2018:19-20).

Table 2 Foster Family Activities of European Countries in 2018

Countries	Amount (million euros)	Fund establishment	Activity
Bosnia and Herzegovina	2,5	IPA2	4 organizations are in the process of closure and 98 professionals received foster care training.
Bulgaria	160	ESF, ERDF, European Agricultural Fund for Regional Development(EAFRD)	Supervision training of professional staff, allowances for children and foster families, expenditures for medico-social centers and community centers
Croatia	50	ESF, ERDF	Improving the home environment where adults and children receive care, expanding non-institutional care and allocating funds to services working with families
Estonia	6	ESF	Counseling via internet or phone; individual psychological counseling; mentoring and training for parent resources, counseling for adoptive families
Greece	15	ESF, ERDF	Closure of institutions for children with disabilities, lack of clear policy on foster care, financial support for child care institutions
Hungary	18,7	ESF, ERDF	The project to increase child protection services through the Compass House for children, opening from 600 to 800 new homes. The infrastructure development project in this context is a special house for 20 people, consisting of three residential units for male students with psychological problems.

Poland	-	ESF, ERDF	Opening well-equipped small group homes with a capacity of 14 children for social integration and poverty alleviation, emphasizing social communication rather than the quality of the homes
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Source: www.openingdoors.eu/wp-content/uploads/2020/01/OD-lessons-learned.pdf
(accessed 04.12.2022)

According to Table 2, most of the countries have reduced financial support for institutional care since 2018. In countries such as Bosnia and Herzegovina and Greece, institutions related to child care have started to be closed and family-based care models have started to be supported. What is noteworthy in Poland and Hungary is that a small number of school-age children are being raised in family-based children's homes. According to Openeoors (2018, 5-9), in most countries, cooperation with families on foster care and adoption issues and supervision support for professionals are provided. Undoubtedly, European Union funds have a great impact on the development of social justice.

2.3 Historical Development Of Preventive Care Models In European Union Countries

The first foster families started in France. Paris is a city often mentioned in foster care research because of its origins in the tradition of wet-nursing, which often began there. In the Middle Ages, both abandoned children and children of wealthy parents were placed with wet-nurses. However, terrible transportation and poor living conditions led to a high infant mortality rate. Towards the end of the Middle Ages, the situation of orphaned children worsened, as wars and famine interfered with care work. Against this background, Saint Vincent de Paul developed 'modern' methods of child rearing. Changing perceptions of abandoned children, especially illegitimate children, he founded an organization for orphans in central Paris in 1638. In this way, the health of the children and their social and professional integration into society were ensured. In these organizations, foster families were paid to care for abandoned children up to the age of 6. In order to receive payment, nurses and authorized persons were recommended to the institutions by the priest (Corbillon, 1997 cited in Colton, 1999). The clergy was therefore authorized in matters of care and upbringing.

The structure of civil society, which developed in Europe with the French Revolution and the Industrial Revolution, created awareness in people to reduce inequalities and improve child welfare. During World War I and World War II, different searches emerged for the care of orphaned and impoverished children. Between 1939 and 1945, more than 8,000 children who came to the United States from Europe were placed with foster families by local offices (Child Welfare, 2021).

After the US brought children in need of care from Europe and implemented the foster family model, European countries started to implement similar models in their own countries. In the UK, especially since the 1980s, it is seen that the adaptation of foster families has been evaluated, their health status has been examined, and extensive studies have been carried out on adoption (Dumaret and Rosset, 2005: 4).

2.4 Foster Family Practices In European Union Countries

According to Laklija's (2011:7) research, in Europe, except for a few countries, kinship care is available. In countries such as France, Hungary, Austria, there are foster family models that are suitable for the special needs of children. Another feature in this report is the availability of day, weekend, small home care models. In countries such as Sweden, Finland, France, adults can also stay with foster families. In most European Union countries, except Sweden, professional foster families receive training for vulnerable individuals and constitute important social policies of the state. Professional foster families have salaries, social insurance and paid / unpaid leave rights.

In the research of Laklija (2011:12), there are differences between countries in the selection of foster families. In Sweden, the socio-economic level of foster families is not important for the care of children. In Austria, the physical condition of the families' homes, economic levels, communication skills, reactions to the crisis are some of the criteria in the selection of foster families. In Hungary, there is a requirement to be between the ages of 18-45 in the selection of foster families.

According to the same report (Laklija, 2011:12-15), there are different responsibilities depending on the type of foster family applied. In countries such as Sweden and Finland, no extra qualifications are required from families. In Slovenia, foster families sign a contract with the social welfare center about the rights of the child, the duration and end of foster care, cash assistance. In some countries, families working with foster children with drug addiction and special educational needs are given more support and training. The professional roles of social workers working with foster families are also noteworthy in the research. In the Netherlands, the social worker assigned to the foster family reports every 6 weeks, sometimes the foster parents fill in observation forms.

In Hungary, the social worker develops an Individual Care Plan for the foster parent and the child, the foster parent has to submit reports (written and oral) depending on the custody situation. In Slovenia, a child development plan is prepared and initiated with the approval of the foster parents and the social worker. In Sweden and Finland, foster parents do not keep reports and records. The promotion, recruitment, training, licensing and monitoring of foster parents, as well as certain related tasks, are carried out by a number of different institutions and organizations in Europe.

To summarize the results, it can be concluded that all parties involved have a right to be informed and that there is diversity in the types of foster care, both public and civil

society support tailored to the needs of children and the prevention of separation of children from their biological families is important. The results of this research support the thesis of the necessity and importance of improving foster care as a form of child care. The possibilities for improving existing foster care models were observed in the area of undertaking activities to promote the recruitment of foster parents and new foster families and respecting the child's right to express his/her own opinion.

The need to develop and/or improve kinship, specialized and/or professional foster care, assessment process and continuous training to improve the specific knowledge and skills of foster families was also identified. According to the results of the research, there is a need to provide professional support to foster parents and to promote cooperation between different sectors.

3. Discussion And Conclusion

Türkiye has two components in its child protection system. One of them is children in need of protection and the other is children pushed into crime. As a state body, the Ministry of Family and Social Policies is primarily responsible for protecting children, and non-governmental organizations operating in relation to these children support the child protection process by carrying out various projects (Tekindal and Özden, 2016:57).

There are social service theories that support the family, emphasize that the child's life gains meaning within the family and support the solution process. Ecological approach, system theory, attachment theory are effective in the selection, adaptation and high benefit of the foster family.

According to the system theory, the child replaces the old nuclear family by creating a different system with the family he/she settles in. His/her father, mother and environment are subsets of the system and have different limits, difficulties and strengths. It is essential for the system to develop a holistic relationship with other systems and within itself in order to keep the new system in balance (Baykara Acar & Acar, 2002: 31). From this point of view, it will be beneficial for the child if the newly established system can be ensured to function properly and if the relationships with other systems (organization, own family, school, etc.) can be balanced (Tezel et al., 2018).

According to the ecological approach, the perspective of 'the individual in his/her environment' is the most important emphasis of the ecological approach. In other words, it can be said that the physical and social environment positively affects the individual in the process of growing up. In children staying with foster families, peer bullying and acquiring harmful habits are reduced with the positive effect of the environment (Tezel et al., 2018:18). Therefore, the individual increases his/her ability to adapt to his/her environment by applying what he/she has learned from his/her family to his/her environment. This approach is used in the sustainability of the foster family and the harmony between the child and the foster family.

According to attachment theory, healthy relationships between the child and the family are determinant in the healthy development of the child. According to research, the mean attachment scores of children in institutional care are lower than children in foster care (Şahin, 2009: 72-103).

In the transition from institutional care to family-based care, it has been revealed that industrialized countries attach more importance to social policies. Although the transition has been rapid in these countries, fully satisfactory results have not been obtained in child welfare. The cultural and socioeconomic levels of the countries have also played a determining role in foster family attitudes.

When it is considered that social work theories are guiding in family and child welfare, it is understood that although there are various deficiencies in European countries, they have established stable policies on child welfare compared to our country. There are different practices in the care of the elderly and adults with the family in Europe. In addition, supervision training of professional staff and encouragement to graduate school are among the practices that are not available in our country.

In Europe, serious support is given to families for the care of substance abusing children and children with special education needs. In Türkiye, social policies need to be established for the education of families, increasing their self-awareness and adoption. In Türkiye, holistic child protection practices have become compulsory in parallel with the developments in the world. Although the quantitative increase of foster families in Türkiye is positive for social welfare, the development of care practices and strategies is another phenomenon that needs to be discussed for social justice.

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