Transnational Private Actors Shaping the Policy and Practice of Child Institutionalisation

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We provide an overview of transnational non-state actors and their agency that shape today's out-of-home childcare around the world, specifically institutional residential childcare. Based on existing studies and desktop research, we reveal a broad range of complexly inter-related for-profit and non-profit actors promoting diverse, often conflicting policies and practices – with ambiguous implications for children in care. We focus on secular and faith-based international non-governmental organisations, transnational companies, private regulators, and individuals. Many of them promote family- and community-based care, yet many others support orphanages and other forms of institutional care. The growing number of transnational actors in residential childcare, the emergence of private regulatory frameworks, the advance of market-based, for-profit players, and the involvement of well-resourced religious communities make the future of child institutionalisation uncertain. We discuss how this transnational agency compares with other policy fields and propose directions for future investigations of how transnationalism impacts children in care.

Introduction

Out-of-home childcare, and specifically the issue of child institutionalisation, has turned into a global arena where different public and private actors cross national boundaries to promote their own agendas and childcare norms, compete for power and legitimacy, and contest the right to exercise authority in relation to residential childcare (Ulybina, 2022b, 2023a, 2023b).

Institutional childcare, also referred to as orphanages or children's homes, is a form of residential care where children are separated from their relatives and communities (for more details see European Expert Group on the Transition from Institutional to Community-based Care (EEG), 2012). In the current mainstream policy literature, institutional residential childcare is deemed to be harmful for children and therefore an inferior option compared with family- and community-based forms of care (United Nations General Assembly (UNGA), 2010; van IJzendoorn *et al.*, 2020). Most countries in the world have committed to the policy of childcare deinstitutionalisation and started reforms of their childcare systems with a view to guarantee a family for every child (Milligan *et al.*, 2016; Davidson *et al.*, 2017; Ulybina, 2022b, 2023b). Yet, millions of children worldwide continue to live in orphanages or other forms of institutional care (Desmond *et al.,* 2020). Some regions even see a rise in child abandonment and institutionalisation (Milligan *et al.*, 2016; Chaitkin *et al.*, 2017; Chege and Ucembe, 2020).

Existing studies indicate that a broad range of public, private, and hybrid public-private transnational actors influence the global dynamics of institutional childcare (Ulybina, 2020,

2022a, 2023a). Yet, systematic analysis of their agency and roles in child institutionalisation is missing (Ulybina, 2023a).

In this article, the term *transnational actors* refers to public, private, and hybrid public-private actors which engage in cross-border activities in order to influence public policy design and implementation in different countries (Haang'andu and Béland, 2020; Shriwise, 2020). The focus of this article is on private, i.e. not (inter-)governmental transnational actors – both for-profit and non-profit. These include for example international non-governmental organisations (INGOs) (Downie, 2019; Mitchell *et al.*, 2020); transnational corporations (Folke *et al.*, 2019); private regulatory bodies (Pattberg, 2005); and transnational individuals (Tallberg and Jönsson, 2010; Downie, 2019). The literature on some of these actors is enormous, and we will not be able to do it justice. Let us make a few points that are relevant for the below discussion concerning child institutionalisation.

Researchers note the rise of transnational private agency in policy areas that used to be a prerogative of domestic policy makers and service providers. Transnational actors facilitate the global spread of ideas and policy models, provide resources and technical support for national reforms, and get involved in service provision. Yet, there is often little data to make informed judgements about their significance and impact. Transnational private agency is heterogenous – in terms of ideas and policies actors promote, their resources, proximity to public actors, and leverage (Stone, 2019; Shriwise, 2020). Often, they form transnational networks and coalitions, and even when actors appear independent, they belong to certain policy communities and are influenced by activities of other community members. Therefore, analysis of transnational agency often focuses on the relationships between actors, which can be cooperative or competitive and conflictual (Thiel and Maslanik, 2010; Downie, 2019; Hale, 2020). Transnational agency is often hybrid, whereby private actors (business and civil society) have tight links with states and intergovernmental organisations (IGO), which may seriously affect the outcomes (Stone, 2019; Westerwinter, 2021). Transnational actors may also clash and compete. Relationships among them vary in terms of power and forms of control (Hale, 2020; Martens *et al.*, 2021). States and IGOs seek to control private transnational activity, and at the same time enlist their cooperation – request expertise from them, engage them as stakeholder representatives, compliance watchdogs, and service providers (Tallberg and Jönsson, 2010; Thiel and Maslanik, 2010; Hale, 2020). Therefore, the implications of the proliferating private transnational agency are not obvious.

While there is some discussion of transnational public and hybrid actors in global residential childcare and child (de-)institutionalisation (Ulybina, 2020, 2023a, 2023b), there are no respective studies reviewing the roles of private actors. This article offers an initial survey of such actors and paves the way for more systematic analysis of how transnational private agency impacts the global landscape of institutional childcare. We ask: which private, non-state actors shape the extent and nature of child institutionalisation? What tools do they use? How do they relate to each other? What are the likely implications of their agency and how does this compare with the situation in other policy areas? We use existing publications and our own examples based on desktop research to show the complexity of transnational agency that defines the extent and nature of child institutionalisation around the world. Figure 1 presents several types of identified actors. The lines between boxes link actor types with their sub-types. The list of these sub-types is not exhaustive but rather an attempt to highlight those actors who can already be discerned from available studies and public information.

Below, we discuss a few types of transnational non-state actors which impact child institutionalisation across countries: companies, non-governmental organisations, private regulators, and individuals. We consider potential implications of their agency, how it compares with other policy fields, and propose some directions for future investigations.

Transnational companies

Transnational for-profit companies are widely recognised global actors in human rights and social policy. They promote neoliberal policies, mobilise to prevent the institutionalisation of certain
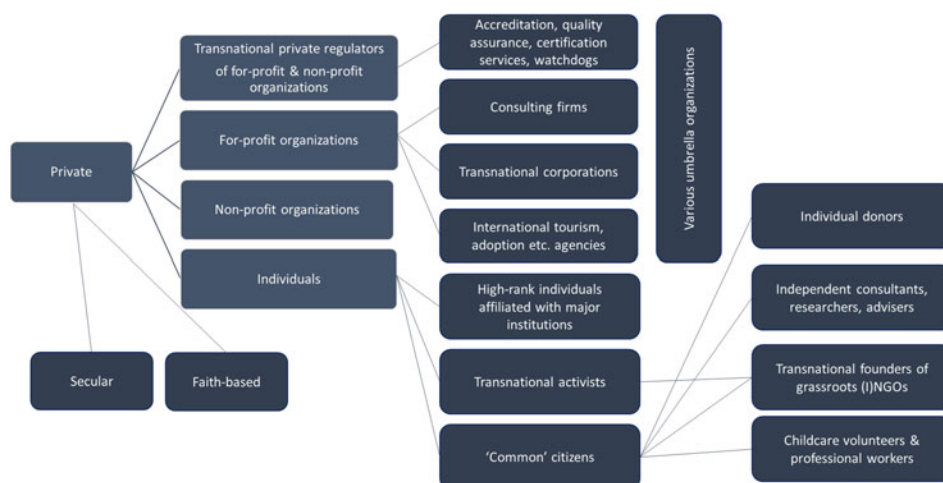
Figure 1. Transnational private actors shaping child institutionalisation.

rules, e.g. relating to environmental protection, labour, health, and safety; create private regulation and promote their own standards in human rights and welfare (Bartley, 2018). Existing studies suggest that private for-profit organisations increasingly shape out-of-home childcare across borders. Researchers pay attention mostly to two types of actors – international tourist agencies and international adoption agencies. Some tourist agencies supply human and financial resources from higher-income countries for orphanages in lower-income countries (Qian, 2014; Guiney, Mostafanezhad, 2015; Van Doore, 2022). Well-off individuals arrive as visitors, make monetary and in-kind donations, and pay to volunteer on a short-term basis helping to run local orphanages, as part of their holiday. By getting these 'good-doing' experiences, they actually contribute to the continued maintenance of orphanages, and ultimately the institutionalisation of children. On some occasions, the opportunity to take advantage of this tourism business leads to active recruitment of non-orphaned children into orphanages (Van Doore, 2022).

International adoption agencies are also believed to drive family and child separation, as well as child institutionalisation, by boosting the transnational 'orphan rescue industry' (Cheney, 2018; Van Doore, 2022). Potential adoptees are in high demand from higher-income countries where a growing number of women experience problems with conception. To meet this demand, in countries like Uganda, foreign-funded private childcare institutions encourage poor parents to place their children in orphanages and relinquish them for adoption, by promising free education, or even resorting to deception, coercion, and fraud (Cheney, 2018: 137).

Provision of out-of-home childcare sees a growing role of business (Lundström et al., 2020) and thus joins the marketisation and corporatisation trend typical for a range of other social services, such as elderly care (Meagher and Szebehely, 2013; Fine and Davidson, 2018). Following ownership changes in the 2010s, about 80 per cent of treatment oriented residential care units (i.e. special facilities providing care for children with behavioural problems or those who experienced maltreatment at home) in Sweden are now run by for-profit private companies, increasingly big business, with just five corporations owning over 20 per cent of the Swedish treatment oriented residential care market for children (Lundström et al., 2020: 44). Relatedly, there is evidence that childcare provision in Sweden made a U-turn, where residential care for children has started shifting 'from small-scale establishments with a family logic, to large-scale establishments with a professional logic' (Lundström et al., 2020: 39). In professional facilities, care staff often change and work in shifts, caregiver-child ratios are low, and children often lack stable attachment relationships with caregivers (Nelson et al., 2014; Zeanah et al., 2019). This corresponds to the evidence from the broader care sector, where the growing presence of

large for-profit companies is associated with changes in the vision and practice of care – the rise of cost-reduction, less personalised and more professionalised care provision (Press and Woodrow, 2005; Sumsion, 2006; Farris and Marchetti, 2017; Aulenbacher et al., 2018). Sweden has been a global leader in social policies, and it is likely that other countries and companies will follow the Swedish dynamics of residential care for children.

Importantly, we note that residential childcare is undergoing not only the process of marketisation and corporatisation but also *transnational* corporatisation. Transnational corporations have bought residential childcare facilities in various countries, widely regarded as trendsetters in social care, such as Australia, Finland, the Netherlands, Sweden, Germany, the UK, and USA. We found some examples of transnational corporate ownership of residential childcare facilities: (1) G Square capital (UK) acquired Mikeva (Finland) in 2012 (GSquare Capital, 2022); (2) Acadia Healthcare (US) bought the Priory Group (UK) in 2016 (The Priory Group, 2017); (3) Attendo (Sweden) acquired Mikeva (Finland) in 2017 (Attendo, 2017); (4) as of late 2022, Key Assets was operating commercially in Finland, Ireland, Sweden, and Norway and as a non-profit in New Zealand, Australia, Japan, and Canada (Key Assets, 2022).

Given the above studies, the spread of transnational corporations may lead to a global shift from the familial logic of care (i.e. an ideal of small-scale, family-like care arrangements, with community-based therapies using everyday environment as treatment) to the professional logic (i.e. large-scale, standardised arrangements, with a focus on evidence-based interventions). In other words, it may bring back those features of institutional childcare, which many countries are now working to eliminate. Deinstitutionalisation of childcare is about moving most children to family-based settings, as well as making the remaining residential childcare more family-like and individualised, where children can develop continuous attachment to few, ideally permanent caregivers (Cantwell et al., 2012).

Given the rise of well-resourced, profit-oriented, and expansion-seeking corporate agency in out-of-home childcare, which increasingly operates across borders, one may soon expect 'efficient' and standardised care practices to become mainstream. Therefore, it is important to investigate the strategies of transnational companies operating in residential childcare: what kind of care logic do they pursue? Do they intend to transfer care models across borders? Do they intend to design their own, private standards of care provision? How do they intend to resolve potential conflicts between market pressures and the demands of children's rights advocates to ensure a family environment?

A related concern is the growing presence of private equity firms, which are often transnational. Driven by the expansion of neoliberal ideology, economic downturn and regulatory changes allowing private capital into social welfare markets, these for-profit actors have moved to invest in many health and social care segments, including out-of-home childcare (e.g. Lundström et al., 2020). Private equity acquisitions have become a matter of public concern because of their potential to prioritise short-term revenues over the interests of people in care. Yet, data remain few and studies inconclusive, leaving open the questions about the impact of private capital on the nature and extent of provided services, workforce, and benefits for service recipients (Gupta et al., 2021; Borsa et al., 2023; Gandhi et al., 2023). As evidenced by developments in other social welfare areas, for-profit ownership is often non-transparent, transactions unreported, and operations poorly monitored – which challenges public authorities to ensure more rigorous regulation and oversight. Scholars call for better controls of the overall care models, specific treatments, service quality, and care outcomes in private equity-owned care facilities (Pålsson et al., 2022; Sallnäs and Shanks, 2023). By using high-level regulation, state licensing, conditional procurement contracts, and other instruments, the state could set minimum benchmarks for staffing levels, permanency of care, child's contacts with their biological family, educational performance, and other aspects of care in private-equity owned facilities.

Another type of private for-profit transnationals are international consulting firms, which work with various public and private stakeholders involved in the design and provision of child

protection and welfare systems. For example, Maestral International LLC, in partnership with the United Nations Children's Fund (UNICEF), produced and promoted *the Global Toolkit to Map and Assess Child Protection Systems*, which aimed to identify country-level child protection problems and help develop better systems in line with United Nations children's rights framework (UNICEF, 2010). Out-of-home childcare and protection of children without adequate family care constitute a separate theme in the Toolkit.

Finally, although many companies are not directly involved in childcare provision, they are nevertheless increasingly part of cross-border agency shaping childcare in many countries, e.g. through their corporate social responsibility (CSR) and philanthropy schemes. Supporting orphanages and other forms of care is a common form of corporate giving in many countries (e.g. Fifka and Pobizhan, 2014; Frazee, 2016). Companies like Walmart, Cox Automotive, and Crescent Bank sponsor NGOs which build orphanages around the world (Hope House Orphanages, 2021). Many companies sponsor placing children in family environments, e.g. Google, Colgate-Palmolive, and UBS (Miracle Foundation, 2022b). The impact of their involvement has not been studied. As shown for other policy areas, transnational agency may be problematic because companies are often not locally accountable, and their social responsibility initiatives may not effectively account for interests of local communities (Macleod and Lewis, 2004; Ruggie *et al.*, 2004).

Transnational non-profit organisations

Public organisations like UNICEF and the United States Agency for International Development (USAID) probably would not have become influential in global out-of-home childcare if it was not for the extensive supporting agency of multiple non-state actors. A growing number of transnationally active NGOs shape national landscapes of child institutionalisation. Some NGOs have emerged only recently and are dedicated specifically to services for children without parental care and vulnerable families in risk of separation, e. g. Hope and Homes for Children and Lumos. Lumos is a non-profit charity, co-founded by the writer J.K. Rowling and Baroness (Emma) Nicholson, Member of the European Parliament (MEP), in order 'to end the systematic institutionalisation of children'(Lumos, 2023). Such NGOs take active interest in national care reforms around the world, evaluate the progress of these reforms, and provide roadmaps for further action. In other words, they view themselves as having a legitimate right and expertise to advise national actors on childcare. To support family-based care, they use a growing range of tools: guidelines, implementation, and assessment manuals (Nhep and Won, 2020); training (Rygaard, 2019); agenda-setting events, conferences, and cross-sectoral fora (The First International Conference . . . , 2009; Udayan Care, 2018; BCN, 2022); advocacy campaigns, e.g. the Worldwide Campaign to End the Institutionalization of Children (DRI, 2023); the Opening Doors for Europe's Children campaign (The Opening Doors for Europe's Children Campaign, 2020); campaigns against orphanage tourism (Think Before Visiting, 2022). In addition, NGOs also leverage new, market-based tools – similar to those used by non-profit actors in environmental governance (Ulybina and Fennell, 2013) – they incorporate out-of-home childcare into the responsible and ethical business agenda (Partnerships with Overseas 'Orphanages': Implications of the Modern Slavery Act 2018, 2020) and develop relevant due diligence assessment tools for organisations (ReThink Orphanages Australia, 2019).

The above-mentioned NGOs operate in line with United Nations Conventions and guidelines, which promote family-based and family-like care (e.g. UNGA, 2010). However, many non-governmental organisations support orphanages as a necessary and legitimate form of care. For example, the 2020 Impact Report of the Orphanage Support Services Organisation (OSSO) proudly proclaimed its volunteer and financial support to orphanages in Ecuador and Thailand (OSSO, 2023). According to another organisation, active in over forty countries, Zakat Foundation of America, 'an orphanage is a cost-effective method of supporting several orphans at once.

In sponsoring the establishment and/or maintenance of a Zakat Foundation-run orphanage, donors can ensure sustainable and comprehensive care for each of the orphans' (Zakat Foundation of America, 2020). These statements were made after the United Nations General Assembly signed a Resolution on the Promotion and Protection of the Rights of the Child (2019), which specified in its accompanying recommendations that 'no new institutions may be built, nor may old institutions be renovated beyond the most urgent measures necessary to safeguard residents' physical safety. According to the recommendations, institutions should not be extended, and new residents should not enter in place of those that leave' (Coalition on Children without Parental Care, 2019: 4). Such discrepancy between orphanage-supporting strategies of NGOs and international anti-orphanage advocacy is probably not due to simple ignorance. While individual donors to these charities may be unaware of UN resolutions and current international recommendations, it is unlikely to be true for the US-registered NGOs themselves, which collect donations for orphanages abroad. Leaving aside the normative aspect of this issue and the ongoing discussion about the varying quality of care both in family-based and orphanage settings, the pro-orphanage agency of a large number of INGOs deserves close attention of researchers and policy-makers. Irrespective of whether we accept or reject the possibility of a 'good' orphanage, perhaps even refuse to argue in such binary terms, it is highly important to understand the diversity of INGOs, why they behave so differently, and what implications this has for children and families in diverse local contexts.

Many of these pro-orphanage organisations are faith-based. They fund childcare institutions despite extensive evidence of the harm caused by orphanages and at a time when many secular organisations actively promote deinstitutionalisation. This phenomenon is particularly important given that the number of religious organisations has grown among INGOs recently and is part of the larger trend towards 'religious transnationalism', whereby faith-based organisations and communities act transnationally and use religious soft power to promote their own values and interests (Haynes, 2016, 2022). Many religious NGOs have social and political concerns and actively get involved in various social and human rights issues (Weiss, 2020; Haynes, 2022). Religious organisations have a long history of maintaining childcare institutions. There are thousands of childcare institutions run by Islamic and Christian religious organisations around the world, which is partly a legacy of the colonial period and active missionary activities (e.g. O'Kane and Lubis, 2016; Weiss, 2020; Insights into the World of Privatized Faith-Based Residential Care Facilities in Myanmar, 2022). Grey literature estimates that in some countries 90 per cent of orphanage funders are faith-based (Lumos, 2017: 8). A special role is played by US-based transnational faith-based NGOs, which support out-of-home childcare in third, often low-income countries. US-based religious charities are immensely powerful actors – in 2019 alone, they received $128.17 billion in contributions in the USA (Giving USA Foundation, 2020). Orphanage-supporting NGOs belong to different religions and denominations. For example, a Christian missionary NGO Hope House builds orphanages in India, Honduras, Russia, Brazil, and states that their 'goal is to finance and build an orphanage on every livable continent' (Hope House Orphanages, 2023). The US-based Islamic Ummah Relief supports orphanages in Ghana and Nigeria (Islamic Ummah Relief, 2021). The USA is the only country in the world that has not ratified the UN Convention on the Rights of the Child. However, US-based transnational NGOs operate in third countries, which are parties to the United Nations Convention on the Rights of the Child, and are likely to be aware of related international norms.

The situation with faith-based INGOs is, however, not simple. There are splits even within the religious civil society. Some organisations support only institutional childcare, e.g. Children's Mission Network; Children's Vision International Inc.; Child Haven International. Other organisations support both institutional and family-based childcare, such as Pasture Valley Children Missions; Children of Promise International; Children's Hope International. Yet another group of organisations support only family- and community-based care, e.g. Every Child Ministries, Inc.; Children of the Nations; Children's Village of Jerusalem. So, while many

governments and international advocacy groups are celebrating their successes in dissolving orphanages, the global picture is complex, and the future support for out-of-home childcare is uncertain.

Furthermore, strategies and practices of these actors change over time. Some organisations have recently moved away from supporting orphanages to developing family-based care. One example is the now DI-promoting international non-profit Miracle Foundation. This INGO worked for over two decades to help children in more than 300 orphanages in India. In 2020s, the organisation decided to re-direct their support from orphanages to families and other alternatives to orphanage care: improve foster care, support families before separation happens, and reunite families. They now position themselves as an industry leader in family-based care and "part of a global network of nonprofit organisations leading the worldwide movement to end the need for orphanages in our lifetime" (Miracle Foundation, 2022a).

What drives these changes in the conduct of INGOs? They might be attributed to the general ideational change flowing around 'in the air'. They may also be explained through influences of actors with close links to these INGOs. Here, we would like to highlight two types of transnational non-profit actors, which may influence strategic choices of individual INGOs: (a) umbrella non-profit organisations and (b) NGO coalitions, associations, networks, or similar. Umbrella non-profit organisations can be either secular or faith-based (e.g. Wittberg, 2013). An example of a secular umbrella NGO is European Disability Forum (EDF), which claims to 'defend the interests of over 100 million persons with disabilities in Europe' (EDF, 2023) and campaigns for deinstitutionalisation in favour of community-based care alternatives. To give some examples of faith-based umbrella organisations: National Council of the Churches of Christ in the USA, and the World Congress of Muslim Philanthropists. There is no exact count of faith-based umbrella organisations, partly because of the wide range of definitions, however, according to some estimates, at least a fifth of all non-profits in the US are part of an umbrella organisation (Young, 2001: 290).

INGOs often operate as part of a growing number of various ad-hoc or agenda-based networks and coalitions. Secular, faith-based, and hybrid religious-secular coalitions actively guide NGOs to switch from supporting orphanages to supporting care within families, for example the Joining Forces network (Joining Forces, 2019) and the Christian Alliance for Orphans (CAFO, 2019). The coalition Faith to Action Initiative developed the Transitioning to Family Care for Children Tool Kit for Christian churches, religious donors and organisations (Faith to Action, 2022). An example of an ad hoc NGO coalition is the Global Coalition on Deinstitutionalization formed in 2021 by eight disability organisations (which by themselves are also networks) in order to facilitate international consultations with people with disabilities that would inform the Guidelines on Deinstitutionalization 2022 of the United Nations Committee on the Rights of Persons with Disabilities.

Transnational private regulators

Private for-profit and non-profit organisations exert influence over childcare across borders, and yet their own aims, logics, and practices are also shaped by others. Private rule making is particularly well-studied in the fields of environmental, labour, and human rights policies (Donadelli and Matus, 2020; Bartley, 2022; Renckens *et al.*, 2022). Some private regulatory bodies are widely studied, such as the Forest Stewardship Council, Fairtrade, and the Marine Stewardship Council. They develop their own industry-specific and cross-industry standards, metrics, and codes (e.g. forestry, fishery, agriculture, sustainability), which companies voluntarily decide to comply with. By placing their labels on products, companies are advertising the fact that they (are working to) behave responsibly. This way, organisations are gaining a competitive advantage on the market, and at the same time shaping the expectations of their customers and consumers. There also exist umbrella initiatives, such as the International Social and Environmental

Accreditation and Labelling Alliance (ISEAL, 2023). This NGO sets umbrella standards, such as the Codes of good practice in sustainability standard setting, assurance, and impact assessment. By performing the roles of cross-border quality assurance, certification, accreditation and coordination, business and civil society exercise private regulation of corporate activity. Studies suggest that private regulation of global corporate conduct is associated with changes towards more ethical and sustainable business, but also limitations and concerns over decoupling of standards and practices (Auld *et al.,* 2008; Ulybina and Fennell, 2013; Donadelli and Matus, 2020; Bartley, 2022). Scholars also raise concerns that transnational private regulation is imbued with North-South power imbalances: metrics and standards are mostly developed by actors from the global North – potentially as tools to control access of their products to global markets (Renckens and Auld, 2019). Overall, the picture of the global private regulatory landscape remains fragmented, and scholars continue to collect data and investigate the nature of public-private interactions in transnational rule making (e.g. Cashore *et al.,* 2021; Renckens *et al.,* 2022).

In the field of out-of-home childcare, there are also market-based private governance actors who provide accreditation, quality assurance and certification services to corporations and certifying bodies. For example, the International Society for Quality in Health Care established the ISQua External Evaluation Association (IEEA) (ISQUA, 2022). The IEEA issues accreditations to health and social care external evaluation organisations and standards developing bodies. They operate globally, in over sixty countries, and offer different accreditation options: Accreditation of Health and Social Care Standards, Accreditation of Surveyor Training Programmes, etc. These evaluations and standards are based exclusively on privately developed standards and do not comprise an accreditation by public authorities. Their current award holders include, for example: CHKS Ltd (Assurance and Accreditation) (UK), who accredited the Children's Trust, which provides residential childcare; Designated Audit Agency (DAA) Group Limited (New Zealand), who train auditors and offer different types of Residential Disability Certification to service providers (DAAGroup, 2023).

Private regulation exists not only for multinational companies and global supply chains, but also for the charitable sector – an area significantly less studied. It is based on the idea that non-profits, just like businesses, have social responsibility (Pope *et al.*, 2018). Charities compete in the market for donations, and demonstrating one's social responsibility, professionalism, and accountability can strengthen a charity's position in the market. Private standard-setting and certifying bodies can help NGOs show that they spend donors' money on ethical projects and maintain the best practice in the field, such as best practice in care for vulnerable and orphaned children. Charity watchdog agencies, such as Charity Navigator and the US Better Business Bureau's (BBB) Wise Giving Alliance, issue rating scores and confer a formal seal of approval to some charities, in order to signal to donors which organisations to fund (BBB, 2023; Charity Navigator, 2023).

We have identified a few private regulators active in the field of out-of-home childcare. Mission Excellence (also known as SOE or The Standards of Excellence in Short-term Mission) is 'a membership, accrediting, and resourcing body' for Christian organisations, with the aim 'to make mission trips better'. It offers accreditation based on compliance with their 'Seven standards: A code of best practice for short-term mission practitioners'. Standard N6 is 'Appropriate training', which covers 'best practices in orphan care and short-term missions'. This best practice is presented in an OVC (orphaned and vulnerable children) Guide, which advances the philosophy of family-based care and urges religious organisations 'to make orphanages a thing of the past and keep families together', by 'redirecting support for vulnerable children to strengthening families' (SOE, 2018). The Guide was prepared by a coalition of organisations and networks, such as World Orphans, Adventures in Missions, Open Arms International, Faith to Action Initiative, CAFO Christian Alliance for Orphans, etc. SOE itself is accredited by Evangelical Council for Financial Accountability – one of the major private standard-setting and certifying bodies in the US charitable sector (ECFA, 2022).

Others include the charity watchdog CharityWatch and BBB Wise Giving Alliance with their BBB Standards for Charity Accountability. While such organisations are mostly national, they are likely to exercise influence over transnational NGOs. The existence of private regulatory networks specifically focusing on out-of-home childcare (akin to those in natural environmental management and sustainability) still needs to be established. However, the infrastructure for childcare-specific market-based regulatory coordination and standard setting is already present. For example, Charity Watch aims to evaluate not only the efficiency and accountability of non-profit organisations but also 'to inform the public of wasteful or unethical practices of nonprofits' (Charity Watch, 2023). Given that supporting orphanages is often associated with unethical practices (e.g. Partnerships with Overseas 'Orphanages': Implications of the Modern Slavery Act 2018, 2020), investigating NGO strategies in this regard falls well within the remit of Charity Watch.

Transnational individuals

Individuals are widely recognised as influential transnational actors, although their contributions to policy dynamics are 'rarely open to public scrutiny' (Stone, 2019). Some of them can be regarded as 'transnational policy elites' (Stone, 2019), yet others are 'common' citizens, without relevant prior positions of power. We argue that transnational individuals are important, increasingly visible actors in global out-of-home childcare too.

Researchers of other policy areas identify three broad types of individual transnational actors. First, these are leaders of international organisations (UN agencies, the European Commission, etc.) and national public sector officials, who interact with their counterparts in other countries on some cross-border issues (Andonova and Mitchell, 2010; Downie, 2019; Stone, 2019). They use their institutional positions to advance certain agendas and international action. We find that one can talk about such transnational policy elites in out-of-home childcare. A case in point is the EU rapporteur on Romania, Emma Nicholson, who suggested setting up a high-level group to support childcare reforms in Romania and thereby brought child institutionalisation on the EU's foreign policy agenda (Save the Children Sweden, 2001: 15).

The second type is transnational individual activists, who seek to increase awareness of certain problems and trigger action to resolve these issues – using international arena and cross-national ties to do so. Some of them are individual activists who promote their agenda across borders, join pre-existing or develop new transnational advocacy networks, and may become leaders of transnational social movements (Andonova and Mitchell, 2010). In residential childcare, a case in point is the British social worker Georgette Mulheir, who came to work in Romania in the 1990s, where she designed a 'model of care transformation' to help reduce child institutionalisation. Since then, she promoted and helped implement this model in more than thirty countries, and positions herself as 'a leading global expert on transforming systems of care and protection for children' (Mulheir, 2022).

The third type of transnational individuals are 'common' citizens who are not leaders of major organisations or social movements but nevertheless influence care through their cross-border practices and activities. They do so through cross-border charitable donations, volunteering, or working in childcare. In their daily lives, they face choices and make decisions – to donate (or not) to an overseas orphanage, to work (or not) on a childcare project abroad, etc. They are independent consultants, researchers, childcare professionals, or amateurs, but they are neither activists nor act on behalf of institutions (Andonova and Mitchell, 2010; Ulybina, 2020, 2023a).

One may benefit from distinguishing a particular group of transnational individuals here – the founders of grassroots (I)NGOs. There is a growing number of transnational grassroots initiatives in out-of-home childcare. These are small-scale, independent, and amateur initiatives, often driven by 'ordinary' people with no professional background in childcare. These volunteer leaders may be particularly influential – with their personal interests, relationships, skills, and

preferences – in shaping the nature of the organisations and projects they run (Ulybina, 2020; Schnable, 2021). They do not start from positions of power and work outside established organisational structures. Despite this, they are charismatic and push forward systemic transformations, such as transitioning away from (or towards) institutional childcare. Let us consider three cases of such transnational individual agency.

The first case concerns on-the-ground initiatives set up by foreigners, who arrive from higher-income countries, carrying certain ideas about appropriate childcare. They see children being poorly looked after in children's homes and decide to change the ways childcare is provided. Their activities are based on the ideas and norms they bring from their homeland. One such idea is that child institutionalisation is not an acceptable form of childcare in the modern world of human rights and individualism. In response to their personal experience, they establish charities and NGOs in order to improve care practices on the ground. They pursue advocacy work and gradually become important national players, guiding, and enabling national childcare reforms. For examples of such agency see the history of several NGOs in Georgia (Ulybina, 2020).

In the second case, private individuals in the US and other high-income countries set up, for example, a US-based INGO to raise funds and send them to local organisations and communities in third countries. Together for Africa is a grassroots INGO working with children without parental care. The organisation was founded by a couple who visited Kenya in the 1960s and several decades later decided to pursue development projects there. Now it partners with an orphan centre in Kenya to provide education for orphans (Appe, 2022). In this case, transnationally active individuals shape childcare in third countries by choosing to fund some local grassroots initiatives.

In the third case, a volunteer Christian missionary goes on a short-term trip to another country, during which they 'play with children in orphanages for a week or two at a time', or train caregivers of orphaned children (Miles and Tweheyo, 2022). This is a new type of international religious missionaries, different from their historical predecessors – full-time, 'career missionaries'. These are small-scale, independent 'occasional missionaries who operate without an established infrastructure' provided by a denomination or congregation. The rise of this kind of private, faith-based independent agency in out-of-home childcare needs examination. Some of this mission work is closely tied to grassroots INGOs (Miles and Tweheyo, 2022), including those providing childcare related aid and shaping childcare across borders.

While relatively small-scale, all these types of initiatives are important because they provide channels for cross-national flow of knowledge, skills, and ideas about childcare. The leaders of these initiatives 'are not aid experts but remain embedded in their American <or other> lives with jobs, family, and religious congregations' (Schnable, 2021). They also channel funds to help socialise local actors to these ideas. Therefore, they influence local and national childcare practices, and build ground for potential state-led reforms and systemic changes.

Future directions

Child institutionalisation has become a matter of concern and cross-border agency of many private transnational actors – transnational corporations, individuals, private regulatory bodies, religious non-profit organisations, transnational grassroots, etc. The rise of private transnational agency is happening in many policy areas, where some of these actors have attracted significant scholarly attention, however their systematic analysis in the context of residential childcare is missing. On the one hand, out-of-home residential childcare is becoming increasingly global as it is increasingly shaped by transnational actors who disseminate ideas and practices across borders. On the other hand, we know surprisingly little about them.

There are several promising directions for further study of private transnational agency in child institutionalisation, and more broadly – out-of-home childcare. First, there is a need to produce empirical knowledge about the nature and interactions of private transnational actors, who

facilitate the spread of (non)institutional care. Do they share discourses, identities, ideas, and logics of care? What makes these actors legitimate rule-makers in what used to be a domestic policy area? In what ways and to what extent is their agency responsive to local contexts? What are their sources of authority? What drives (changes in) their agency? How do they relate to other transnational actors in the field? Do they form distinct transnational communities?

For example, we see that companies vary in what they sponsor (orphanages vs different forms of family placement), yet it is unclear what their sponsorship choices are driven by. The impact of CSR practices on the dynamics of child institutionalisation, has not been consistently analysed. It is unclear how much transnational corporations sponsor – as part of their CSR – different types of out-of-home care in third countries, whether and how they base their CSR strategies on international guidelines about child institutionalisation, who they are accountable to, and how they account for potentially diverse interests of local actors – orphanages, communities, and families.

Another issue is the potential role of private regulators in ensuring compliance of care providers with major international conventions and reducing the extent of avoidable child institutionalisation. There are various issues with private regulation which need investigating, such as: what kind of metrics and standards do private regulators promote in relation to residential childcare? Do these adequately respond to childcare needs in the global South? Given that certification/accreditation is often expensive and affordable for organisations mostly from the global North, to what extent does private regulation guarantee fair access to the global care market? Is there an issue of decoupling between declarations and practices of certified/accredited organisations?

'Independent', non-state actors have become more influential and expansive, e.g. as INGOs employ a growing range of instruments to influence governments, companies, funding, and service providers. At the same time, transnational activities are often hybrid – taking the form of joint religious-secular and private-public initiatives – which raises questions about their motivations and accountability. Arguably, private regulation by organisations like Charity Watch and governance by intergovernmental organisations may be mutually constitutive and reinforcing. The more child institutionalisation is condemned by agencies of the United Nations, the stronger the leverage it gives to private regulators to include investment in orphanages as a criterion of ethical practices used in accreditation. On the other hand, once private regulators start assessing the ethics of the philanthropic or corporate conduct in out-of-home childcare, they are likely to push many companies and INGOs into compliance with 'family for every child' and deinstitutionalisation policies promoted by the United Nations. While seemingly a positive development, the implications of such hybridisation would need to be evaluated, especially given the critical voices pointing out that Northern childcare norms do not always work well in the global South (Wang, 2010; Hoffman, 2021).

The rise of private transnational agency also poses questions about the changing power balance between state and non-state actors. Over the twentieth century, provision of residential childcare in many higher-income countries was a prerogative of public authorities – the situation now radically changing. State provision is reducing in pursuit of efficiency, cost-saving, and choice, while childcare sector increasingly functions as a global market. In contrast, in many lower-income countries, especially those with weaker governments, public authorities never gained such weight in out-of-home childcare, and yet we see important power shifts in those countries too. Care would traditionally be provided by relatives and local communities, as well as local churches and charities, i. e. local non-state actors, often informally. However, these were drastically different from the private organisations, well-funded, transnationally connected, often profit-seeking and possibly with limited understanding of the local context, that we see today. These trends raise questions about the real and desirable distribution of roles among state and non-state actors. How universal or unifying are the trends we observe? Who should be taking responsibility for developing and enforcing care standards? What reforms are necessary in response to these power dynamics? Finally, given the fast cross-border spread of policy innovations in our globalised

world, how can we ensure that the transformations we propose can accommodate local realities, in a way that would ensure child well-being?

Another promising perspective for future research is to consider how (the working of) transnational private agency in out-of-home childcare is different from other policy areas. Is there anything distinctive about the transnationalisation of out-of-home childcare, as well as its consequences and government responses? At least two points seem worth considering here. First, out-of-home childcare involves a very complex, cross-sectoral set of issues, spanning across poverty reduction, disability, healthcare, education, social stigma, child maltreatment, migration, child trafficking, weakening of traditional family ties, etc. Child abandonment and family separation are merely consequences and symptoms of these problems. Transnational actors may bring in significant resources – cross-border donors, volunteers, social entrepreneurs, missionaries, and businesses are prepared to come and invest into vulnerable children. And yet, they are more likely to treat the 'symptoms' and provide 'fast' solutions, such as set up a children's home, find a foster or an adoptive family. Addressing the root causes requires solutions at the system level, as well as a good understanding of reality on the ground – a challenging task beyond the capacity of individual private, especially foreign actors. Therefore, the consequences of expanding transnational agency will depend greatly on the responses of governments to this new reality, and specifically on the government's ability to establish active state guidance, and long-term cooperation with non-state actors.

Second, out-of-home childcare is a highly normative, idea-driven policy area. There is a lot of local normativity and cultural specificity around central concepts, such as childhood, child well-being and best interests of the child. Therefore, it is a challenge to develop international care standards, targets and outcome measures, which would work equally well in different local contexts – in contrast to some other policy areas, where 'universal' indicators seem feasible, e. g. measures of air pollution or polio immunisation coverage. Perhaps more importantly, there is a lot of normativity around internationally promoted care policies, such as the policy of childcare deinstitutionalisation and the promotion of formal foster care, which are largely based on ideas, realities, and experiences from the global North. One could even argue that cross-border intervention in out-of-home childcare is prone to Northern fashion: since the nineteenth century, when orphanages were deemed an appropriate form of childcare in Europe and the US, private actors from the global North would travel to poorer countries in Africa and Asia to set up orphanages – an institution alien to many cultures there. In the twentieth century, Northern childcare and charity norms changed, and transnational actors moved to promote deinstitutionalisation around the world. Given this pendulum of transnational agency in the past, national governments and local actors need to be cautious about any kind of standards and benchmarks imported by transnational actors. Researchers, on the other hand, will benefit greatly from analysing not only the internal complexity of transnational private agency but also how governments respond to it.

Transnational non-state actors seem to pull the sector in different directions, which makes the future of global out-of-home childcare uncertain. On the one hand, pro-family care actors have become more noticeable and relatively successful in promoting childcare deinstitutionalisation worldwide. On the other hand, transnational non-state agency is internally diverse and dynamic – both companies and INGOs seem to pursue conflicting ideas about childcare, their strategies change, too. Transnational pro-deinstitutionalisation actors meet with resistance and opposition – not only domestic but also transnational. In other words, all transnational actors engage in contestation of globally promoted ideas and norms that shape childcare policies and practices across countries. The growing number and diversity of transnational actors in residential childcare, the emergence of private regulatory frameworks, the advance of market-based, for-profit players, and the involvement of well-resourced religious transnational communities make the future of child institutionalisation far from determined. Investigating these issues would allow us to see the many paths of transnationalism – as it engulfs individuals, companies, and NGOs, with varying effects in childcare practices.

References

Andonova, L. B. and Mitchell, R. B. (2010) 'The rescaling of global environmental politics', *Annual Review of Environment and Resources*, **35**, 1, 255–282.

Appe, S. (2022) 'Grassroots INGOs in Africa: Perspectives on what they are (and are not?)', *Nonprofit and Voluntary Sector Quarterly*, **51**, 1, 125–147.

Attendo (2017) 'We are investing in tomorrow's care: annual report 2017'. http://investors.attendo.com/en/reports/attendo-publishes-annual-quality-and-sustainability-report-for-2017-1560897 [accessed 24.02.2024].

Auld, G., Gulbrandsen, L. H. and McDermott, C. L. (2008) 'Certification schemes and the impacts on forests and forestry', *Annual Review of Environment and Resources*, **33**, 1, 187–211.

Aulenbacher, B., Décieux, F. and Riegraf, B. (2018) 'Capitalism goes care: Elder and child care between market, state, profession, and family and questions of justice and inequality', *Equality, Diversity and Inclusion: An International Journal*, **37**, 4, 347–360.

Bartley, T. (2018) 'Transnational corporations and global governance', *Annual Review of Sociology*, **44**, 145–165.

Bartley, T. (2022) 'Power and the practice of transnational private regulation', *New Political Economy*, **27**, 2, 188–202.

BBB (2023) 'Better business bureau', https://web.archive.org/web/20230306054943/https://www.bbb.org/all/charities-donors [accessed 15.01.2024].

BCN (2022) 'Conference on family strengthening and alternative care in Sub-Saharan Francophone Africa, 2012', https://bettercarenetwork.org/about-bcn/what-we-do/key-initiatives/regional-international-conferences/conference-on-family-strengthening [accessed 15.01.2024].

Borsa, A., Bejarano, G., Ellen, M. and Bruch, J. D. (2023) 'Evaluating trends in private equity ownership and impacts on health outcomes, costs, and quality: systematic review', *British Medical Journal*, **382**, e075244. https://doi.org/10.1136/bmj-2023-075244

CAFO (2019) 'Transitioning donors: 5 steps to bring your supporters on the journey to a new model. Christian Alliance for Orphans (CAFO)', https://bettercarenetwork.org/sites/default/files/5%20Steps%20transition%20donors%20to%20give%20to%20a%20new%20model%20and%20inspire%20giving%20%281%29.pdf [accessed 15.01.2024].

Cantwell, N., Davidson, J., Elsley, S., Milligan, I. and Quinn, N. (2012) 'Moving forward: implementing the 'guidelines for the alternative care of children'. UK: Centre for Excellence for Looked After Children in Scotland, https://bettercarenetwork.org/library/social-welfare-systems/child-care-and-protection-policies/moving-forward-implementing-the-guidelines-for-the-alternative-care-of-children [accessed 14.01.2024].

Cashore, B., Knudsen, J. S., Moon, J. and van der Ven, H. (2021) 'Private authority and public policy interactions in global context: Governance spheres for problem solving', *Regulation & Governance*, **15**, 4, 1166–1182.

Chaitkin, S., Cantwell, N., Gale, C., Milligan, I., Flagothier, C., O'Kane, C. and Connelly, G. (2017) 'Towards the right care for children: orientations for reforming alternative care systems' - Africa, Asia, Latin America. Luxembourg: Publications Office of the European Union, https://www.socialserviceworkforce.org/system/files/resource/files/RightCareforChildren.pdf [accessed 14.01.2024].

Charity Navigator (2023) 'How we rate charities', https://web.archive.org/web/20230304000636/https://www.charitynavigator.org/about-us/our-methodology/ratings/ [accessed 14.01.2024].

Charity Watch (2023) 'About CharityWatch', https://web.archive.org/web/20230307084035/https://www.charitywatch.org/about-charitywatch [accessed 14.01.2024].

Chege, N. and Ucembe, S. (2020) 'Kenya's over-reliance on institutionalization as a child care and child protection model: a root-cause approach', *Social Sciences*, **9**, 4, 1–17.

Cheney, K. E. (2018) 'The making of "orphans": How the "orphan rescue" movement is transforming family and jeopardizing child well-being in Uganda' in Maria Rosario T. de Guzman, Jill Brown and Carolyn Pope Edwards (eds.), *Parenting from Afar and the Reconfiguration of Family across Distance*, New York: Oxford University Press, 133–149.

Coalition on Children without Parental Care (2019) 'Key recommendations for the 2019 UNGA resolution on the rights of the child with a focus on children without parental care', https://bettercarenetwork.org/library/social-welfare-systems/child-care-and-protection-policies/key-recommendations-for-the-2019-unga-resolution-on-the-rights-of-the-child-with-a-focus-on-children [accessed 14.01.2024].

DAA Group (2023) 'Residential disability: applicable standards', https://web.archive.org/web/20230118020529/https://www.daagroup.co.nz/disability [accessed 14.01.2024].

Davidson, J. C., Milligan, I., Quinn, N., Cantwell, N. and Elsley, S. (2017) 'Developing family-based care: complexities in implementing the UN Guidelines for the Alternative Care of Children', *European Journal of Social Work*, **20**, 5, 754–769.

Desmond, C., Watt, K., Saha, A., Huang, J. and Lu, C. (2020) 'Prevalence and number of children living in institutional care: global, regional, and country estimates', *The Lancet Child & Adolescent Health*, **4**, 5, 370–377.

Donadelli, F. and Matus, K. (2020) 'Using private regulation for the public good' in H. Sullivan, H. Dickinson and H. Henderson (eds.), *The Palgrave Handbook of the Public Servant*, America: Palgrave Macmillan, 1–15.

Downie, C. (2019) 'Transnational actors: Nongovernmental organizations, civil society and individuals' in P. G. Harris (ed.), *Routledge Handbook of Global Environmental Politics*, London: Routledge, 187–199.

DRI (2023) 'Disability rights international', https://web.archive.org/web/20230308221834/https://www.driadvocacy.org/learn-about-the-worldwide-campaign-to-end-the-institutionalization-of-children/ [accessed 14.01.2024].

ECFA (2022) '9 common questions about ECFA accreditation for nonprofit ministries', https://web.archive.org/web/20221126124425/https://www.ecfa.org/Content/9-Common-Questions [accessed 14.01.2024].

EDF (2023) 'Welcome to EDF', https://web.archive.org/web/20230312045652/https://www.edf-feph.org/ [accessed 14.01.2024].

EEG (2012) 'The Common European Guidelines on the Transition from Institutional to Community-based Care', European Expert Group on the Transition from Institutional to Community-based Care (EEG), https://resourcecentre.savethechildren.net/97bd944/ [accessed 05.02.2024].

Faith to Action (2022) 'Family care toolkit', https://web.archive.org/web/20221014144108/https://www.faithtoaction.org/family-care-tool-kit/ [accessed 14.01.2024].

Farris, S. R. and Marchetti, S. (2017) 'From the commodification to the corporatization of care: European perspectives and debates', *Social Politics*, **24**, 2, 109–131.

Fifka, M. S. and Pobizhan, M. (2014) 'An institutional approach to corporate social responsibility in Russia', *Journal of Cleaner Production*, **82**, 192–201.

Fine, M. and Davidson, B. (2018) 'The marketization of care: Global challenges and national responses in Australia', *Current Sociology*, **66**, 4, 503–516.

Folke, C., Österblom, H., Jouffray, J. B., Lambin, E. F., Adger, W. N., Scheffer, M. and de Zeeuw, A. (2019) 'Transnational corporations and the challenge of biosphere stewardship', *Nature Ecology & Evolution*, **3**, 10, 1396–1403.

Frazee, S. (2016) 'Assessing the Impact of CSR Policy and Practice on Education of Orphans and Vulnerable Children in Indonesia', International Commerce & Policy Theses. 1, Valparaiso University. https://scholar.valpo.edu/icp_mstheses/1 [accessed 24.02.2024].

Gandhi, A., Song, Y. and Upadrashta, P. (2023) 'Private equity, consumers, and competition', (May 16, 2023). http://dx.doi.org/10.2139/ssrn.3626558 [accessed 24.02.2024].

Gupta, A., Howell, S. T., Yannelis, C. and Gupta, A. (2021) 'Owner incentives and performance in healthcare: private equity investment in nursing homes', National Bureau of Economic Research Working Paper Series No. 28474. February 2021, revised August 2023. http://www.nber.org/papers/w28474 [accessed 24.02.2024].

Hoffman, D. M. (2021) 'The Haitian orphanage crisis: Exporting neoliberal family ideals in the debate on vulnerable childhoods in Haiti', *Children and Society*, **35**, 577–592.

Giving USA Foundation (2020) 'Giving USA 2020: The Annual Report on Philanthropy for the Year 2019', The Indiana University Lilly Family School of Philanthropy. https://givingusa.org/giving-usa-2020-charitable-giving-showed-solid-growth-climbing-to-449-64-billion-in-2019-one-of-the-highest-years-for-giving-on-record/ [accessed 05.02.2024].

GSquare Capital (2022) 'Why G Square backed them', https://web.archive.org/web/20221209192829/https://www.gsquarecapital.com/mikeva/ [accessed 14.01.2024].

Guiney, T. and Mostafanezhad, M. (2015) 'The political economy of orphanage tourism in Cambodia', *Tourist Studies*, **15**, 2, 132–155.

Haang'andu, P. and Béland, D. (2020) 'Transnational actors and the diffusion of social policies: an ideational approach' in C. Schmitt (ed.), *From Colonialism to International Aid*, Cham: Palgrave Macmillan, 305–332.

Hale, T. (2020) 'Transnational actors and transnational governance in global environmental politics', *Annual Review of Political Science*, **23**, 1, 203–220.

Haynes, J. (2016) *Religious Transnational Actors and Soft Power*, London and New York: Routledge.

Haynes, J. (2022) 'Religious non-governmental organizations', Encyclopedia of Religious Ethics, 1175-1182, https://doi.org/10.1002/9781118499528.ch131 [accessed 14.01.2024].

Hope House Orphanages (2021) 'Giving hope', https://web.archive.org/web/20210613082909/https://givinghopenola.org/ [accessed 14.01.2024].

Hope House Orphanages (2023) 'Hope house orphanages', https://web.archive.org/web/20230130005353/https://givinghopenola.org/hope-house-orphanages [accessed 14.01.2024].

Insights into the World of Privatized Faith-Based Residential Care Facilities in Myanmar (2022) 'Insights into the world of privatized faith-based residential care facilities in Myanmar', Better Care Network, Kinnected, ACC International Relief, https://bettercarenetwork.org/library/the-continuum-of-care/residential-care/insights-into-the-world-of-privatized-faith-based-residential-care-facilities-in-myanmar [accessed 17.03.2023].

ISEAL (2023) 'About ISEAL', https://web.archive.org/web/20230306185711/https://www.isealalliance.org/about-iseal [accessed 17.03.2023].

Islamic Ummah Relief (2021) 'Orphans village project', https://web.archive.org/web/20210118135601/https://islamicummahrelief.org/orphanage/ [accessed 15.01.2024].

ISQUA (2022) 'External Evaluation – IEEA', https://web.archive.org/web/20220628091125/https://isqua.org/external-evaluation. html [accessed 17.03.2023].

Joining Forces (2019) 'A second revolution: thirty years of child rights, and the unfinished agenda', https://joining-forces.org/wp-content/uploads/2019/06/A-Second-Revolution_ENG.pdf [accessed 17.03.2023].

Key Assets (2022) 'Introducing key assets group (Europe)', https://web.archive.org/web/20221129112705/https://www.keyassets.org/ [accessed 17.03.2023].

Lumos (2017) 'Funding Haitian Orphanages at the cost of children's Rights', London, UK, https://bettercarenetwork.org/sites/default/files/EMBLumos%20-%20Funding%20Haitian%20Orphanages%20JUNE17.pdf [accessed 15.01.2024].

Lumos (2023) 'Our history', https://web.archive.org/web/20230314125325/https://www.wearelumos.org/who-we-are/our-history/ [accessed 17.03.2023].

Lundström, T., Sallnäs, M. and Shanks, E. (2020) 'Stability and change in the field of residential care for children. On ownership structure, treatment ideas and institutional logics', *Nordic Social Work Research*, **10**, 1, 39–50.

Macleod, S. and Lewis, D. (2004) 'Transnational corporations: power, influence and responsibility', *Global Social Policy*, **4**, 1, 77–98.

Martens, K., Niemann, D. and Kaasch, A. (2021) *International Organizations in Global Social Governance*, Cham: Springer Nature.

Meagher, G. and Szebehely, M. (eds.) (2013) 'Marketisation in Nordic Eldercare: A Research Report on Legislation, Oversight, Extent and Consequences', Stockholm Studies in Social Work, 30, Stockholm, Sweden: Stockholm University.

Miles, C. A. and Tweheyo, F. M. S. (2022) The changing nature of Christian missions in the twenty-first century, http://empowerinternational.org/wp-content/uploads/Miles-Changing-Nature-of-Missions-in-the-Twenty-first-Century.pdf [accessed 17.03.2023].

Milligan, I., Withington, R., Connelly, G. and Gale, C. (2016) 'Alternative child care and deinstitutionalisation in Sub-Saharan Africa', Glasgow: Celcis, https://strathprints.strath.ac.uk/61137/ [accessed 05.02.2024].

Miracle Foundation (2022a) 'About Miracle Foundation', https://web.archive.org/web/20220812082623/https://www.miraclefoundation.org/about-us/ [accessed 17.03.2023].

Miracle Foundation (2022b) 'Our partners', https://web.archive.org/web/20220812082621/https://www.miraclefoundation.org/our-partners/ [accessed 17.03.2023].

Mitchell, G. E., Schmitz, H. P. and Bruno-van Vijfeijken, T. (2020) *Between Power and Irrelevance: The Future of Transnational NGOs*, USA: Oxford University Press.

Mulheir, G. (2022) 'Georgette Mulheir: About', https://web.archive.org/web/20220927114127/https://www.georgettemulheir.com/about [accessed 17.03.2023].

Nelson, C. A., Fox, N. A. and Zeanah, C. H. (2014) *Romania's Abandoned Children: Deprivation, Brain Development, and the Struggle for Recovery*, Boston: Harvard University Press.

Nhep, R. and Won, H. (2020) 'Transitioning models of care assessment tool', Better Care Network & Kinnected, An Intitiative of ACC International Relief, https://bettercarenetwork.org/library/principles-of-good-care-practices/transforming-institutional-care/transitioning-models-of-care-assessment-tool-pdf-version [accessed 17.03.2023].

O'Kane, C. and Lubis, S. (2016) 'Alternative child care and deinstitutionalisation: a case study of Indonesia', Jakarta: SOS Children Village & European Commission, https://www.celcis.org/application/files/2114/8482/3678/CELCIS_-_Indonesia-_towards-right-care-for-children-alternative-care-and-deinstitutionalisation-2017.pdf [accessed 15.01.2024].

OSSO (2023) 'Orphanage support services organization', https://web.archive.org/web/20230224193622/https://www.orphanagesupport.org/about-orphanage-support [accessed 17.03.2023].

'Partnerships with Overseas 'Orphanages': Implications of the Modern Slavery Act 2018 (2020) 'ReThink Orphanages Australia and the ACFID Child Rights Community of Practice', https://bettercarenetwork.org/bcn-in-action/key-initiatives/rethink-orphanages/resources/partnerships-with-overseas-%E2%80%98orphanages%E2%80%99-implications-of-the-modern-slavery-act-2018 [accessed 15.01.2024].

Pattberg, P. (2005) 'What role for private rule-making in global environmental governance? Analysing the Forest Stewardship Council (FSC)', *International Environmental Agreements*, **5**, 175–189. https://doi.org/10.1007/s10784-005-0951-y

Pålsson, D., Backe-Hansen, E., Kalliomaa-Puha, L., Lausten, M. and Pösö, T. (2022) 'Licence to care – licensing terms for for-profit residential care for children in four Nordic Countries', *Nordisk Välfärdsforskning| Nordic Welfare Research*, **7**, 1, 23–35.

Pope, S., Bromley, P., Lim, A., and Meyer, J. W. (2018) 'The pyramid of nonprofit responsibility: the institutionalization of organizational responsibility across sectors', *Voluntas*, **29**, 1300–1314.

Press, F. and Woodrow, C. (2005) 'Commodification, corporatisation and children's spaces', *Australian Journal of Education*, **49**, 3, 278–291.

Qian, L. (2014) 'Consuming "the unfortunate": the violence of philanthropy in a contemporary Chinese state-run orphanage', *Dialectical Anthropology*, **38**, 247–279.

Renckens, S. and Auld, G. (2019) 'Structure, path dependence, and adaptation: North-South imbalances in transnational private fisheries governance', *Ecological Economics*, **166**, 106422, https://doi.org/10.1016/j.ecolecon.2019.106422 [accessed 15.01.2024].

Renckens, S., Pue, K. and Janzwood, A. (2022) 'Transnational Private Environmental Rule Makers as Interest Organizations: Evidence from the European Union', *Global Environmental Politics*, **22**, 3, 136–170.

ReThink Orphanages Australia (2019) 'Partnership due diligence assessment tool residential care service providers', ReThink Orphanages Australia, https://rethinkorphanages.org/sites/default/files/2019-09/Rethink-Partnership-due-diligence-final2.pdf [accessed 17.03.2023].

Ruggie, J. G., Kolb, C., O'Rourke, D. and Kuper, A. (2004) *The Impact of Corporations on Global Governance*, New York: Carnegie Council on Ethics and International Affairs.

Rygaard, N. P. (2019) 'Global partnerships with NGOs and governments in caregiver training', *Institutionalised Children Explorations and Beyond*, **6**, 2, 185–195.

Sallnäs, M. and Shanks, E. (2023) 'Therapeutic content in Swedish residential care for children and youth – managers choices and the reasoning behind', *European Journal of Social Work*, **26**, 2, 376–388.

Save the Children Sweden (2001) 'Unfinished Business – EU Enlargement and Child Rights', Stockholm, https://resourcecentre.savethechildren.net/pdf/2409.pdf/ [accessed 15.01.2024].

Schnable, A. (2021) *Amateurs without Borders: The Aspirations and Limits of Global Compassion*, Berkeley: University of California Press.

Shriwise, A. (2020) 'Advancing transnational approaches to social protection in the global south' in C. Schmitt (ed.), *From Colonialism to International Aid*, Cham: Palgrave Macmillan, 19–42.

SOE (2018) 'O.V.C. Guide: A catalyst for excellence in short-term missions. Orphans and vulnerable children. SOE Standards of Excellence', Vancouver, WA, https://missionexcellence.global/free-downloads/ovc-guide/ [accessed 17.03.2023].

Stone, D. (2019) Making Global Policy (Elements in Public Policy), Cambridge: Cambridge University Press. https://doi.org/10.1017/9781108661690

Sumsion, J. (2006) 'The corporatization of Australian childcare. Towards an ethical audit and research agenda', *Journal of Early Childhood Research*, **4**, 2, 99–120.

Tallberg, J. and Jönsson, C. (2010) 'Transnational actor participation in international institutions: where, why, and with what consequences?' in C. Jönsson and J. Tallberg (eds.), *Transnational Actors in Global Governance*, London: Palgrave Macmillan, 1–21.

The First International Conference . . . (2009) 'The First International Conference in Africa on Family-based care for children: Conference Declarations and Recommendations', 28-30 September 2009, Nairobi, https://www.bettercarenetwork.nl/content/17382/download/clnt/23929_Declaration.pdf [accessed 17.03.2023].

The Opening Doors for Europe's Children Campaign (2020) 'Opening Doors: lessons learned and recommendations to strengthen families and end institutionalisation for children in Europe', Eurochild: Brussels, https://eurochild.org/uploads/2021/01/OD_last_report_v5_NT_SCREEN.pdf [accessed 15.01.2024].

The Priory Group (2017) 'About the priory group', https://web.archive.org/web/20170606162336/http://www.priorygroup.com/about-the-priory-group [accessed 17.03.2023].

Thiel, M. and Maslanik, J. (2010) 'Transnational actors', Oxford Research Encyclopedia of International Studies, https://doi.org/10.1093/acrefore/9780190846626.013.105 [accessed 15.01.2024].

Think Before Visiting (2022) 'Children are not tourist attractions', https://web.archive.org/web/20220901054419/https://www.thinkchildsafe.org/thinkbeforevisiting/ [accessed 17.03.2023].

Udayan Care (2018) 'Third Biennial International Conference: Evolving trends in alternative care for children in South Asia', New Delhi, https://bettercarenetwork.org/sites/default/files/3rd%20BICON_Report_2018.pdf [accessed 15.01.2024].

Ulybina, O. (2020) 'Transnational agency and domestic policies: the case of childcare deinstitutionalization in Georgia', *Global Social Policy*, **20**, 3, 333–351. https://doi.org/10.1177/1468018120926888

Ulybina, O. (2022a) 'Explaining the cross-national pattern of policy shift towards childcare deinstitutionalization', *International Journal of Sociology*, **52**, 2, 128–155. https://doi.org/10.1080/00207659.2022.2031488

Ulybina, O. (2022b) 'Policy instrument choice under globalization: Do authoritarian states choose differently?' *World Development*, **151**, 105774. https://doi.org/10.1016/j.worlddev.2021.105774

Ulybina, O. (2023a) 'Advancing global and transnational approaches to the study of out-of-home childcare', *Childhood*, **30**, 3, 253–269. https://doi.org/10.1177/09075682231170151

Ulybina, O. (2023b) 'Global out-of-home childcare and world culture', *International Journal of Comparative Sociology*, **64**, 2, 117–142. https://doi.org/10.1177/00207152221110090

Ulybina, O. and Fennell, S. (2013) 'Forest certification in Russia: Challenges of institutional development', *Ecological Economics*, **95**, 178–187. https://doi.org/10.1016/j.ecolecon.2013.09.004

UNGA (2010) 'Guidelines for the Alternative Care of Children of 2009', United Nations General Assembly, A/Res/64/142, https://digitallibrary.un.org/record/673583?ln = en [accessed 05.02.2024].

UNICEF (2010) 'Child protection systems: Mapping and assessment toolkit: User's guide', https://bettercarenetwork.org/library/social-welfare-systems/data-and-monitoring-tools/child-protection-systems-mapping-and-assessment-toolkit [accessed 16.03.2023].

Van Doore, K. E. (2022) *Orphanage Trafficking in International Law*, Cambridge: Cambridge University Press.

Van Ijzendoorn, M. H., Bakermans-Kranenburg, M. J., Duschinsky, R., Fox, N. A., Goldman, P. S., Gunnar, M. R. and Sonuga-Barke, E. J. (2020) 'Institutionalisation and deinstitutionalisation of children 1: a systematic and integrative review of evidence regarding effects on development', *The Lancet Psychiatry*, **7**, 8, 703–720.

Wang, L. (2010) 'Importing western childhoods into a Chinese state-run orphanage', *Qualitative Sociology*, **33**, 137–159.

Weiss, H. (ed.) (2020) *Muslim Faith-Based Organizations and Social Welfare in Africa*. Cham: Palgrave Macmillan.

Westerwinter, O. (2021) 'Transnational public-private governance initiatives in world politics: Introducing a new dataset', *The Review of International Organizations*, **16**, 137–174.

Wittberg, P. A. (2013) 'Faith-based umbrella organizations: Implications for religious identity', *Nonprofit and Voluntary Sector Quarterly*, **42**, 3, 540–562.

Young, D. R. (2001) 'Organizational identity and the structure of nonprofit umbrella associations', *Nonprofit Management and Leadership*, **11**, 3, 289–304.

Zakat Foundation of America (2020) 'Zakat Foundation of America', https://web.archive.org/web/20200517233655/https://www.zakat.org/en/what-we-do/orphan-care/ [accessed 17.03.2023].

Zeanah, C. H., Wilke, N. G., Shauffer, C., Rochat, T., Howard, A. H. and Dozier, M. (2019) 'Misguided altruism: the risks of orphanage volunteering', *The Lancet Child & Adolescent Health*, **3**, 9, 592–593.