

beyond anything in the timorous Canadian legislation. But it is needless also to remark that after all they are only laws, and to point to the unperformed duty of the State towards the children in American cities, notwithstanding the enactment of good legislation. Yet private and municipal enterprises deserve deep study and attention. Here for example is a passage from the last report of the American Park Association: "Both Chicago and New York have purchased a number of small squares in the more densely populated districts of the city for "breathing spaces," which are now conceded to be as necessary to the health and comfort of the inhabitants of crowded districts as any other sanitary measures. In many cities playgrounds have been established, where children of the streets have been gathered and placed under the care of competent teachers who soon win their love and respect. Mothers who have seen better days, and whom circumstances have forced to live in neighbourhoods where their children were surrounded by the worst elements in social life, call down blessings upon the heads of the promoters of this great work. Faces grown prematurely old, soon take on youthful expressions, and the swings and dolls, the games and the sand-heaps are thoroughly enjoyed. The children's playground can be made the kindergarten of outdoor art." In Minneapolis a Ladies' Association runs two such playgrounds.

Recent statutes in England approach in spirit the American law, though the rights of the father to custody are more jealously guarded. The courts used to be bound, in the absence of misconduct on the part of the parent, to invariably order his children to be given up to him, but they may now enquire whether it is for the welfare of the child, and refuse if convinced the interests of the child are in peril; but it is held that mere immorality or a habit of intemperance on the part of the father do not justify the interference of the court. And still we find no State supervision, no State institutions. How this works may be illustrated by one leading case. In a case of conduct showing the father to be a person to whose guardianship it would be very objectionable to entrust children, it was held to be sufficient ground for depriving him of their custody and for providing for their maintenance and education *where such a provision can be effectually secured.* But