

ENHANCEMENT OF PRIVATE FOSTERING NOTIFICATION SYSTEM

Consultation Response

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18 April 2005



ABOUT BAAF

The British Association for Adoption & Fostering (BAAF) is pleased to respond to this consultation.

BAAF is the leading charity and membership organisation in fostering and adoption in the UK. We:

- promote the highest standards of child-centred policies and services
- speak out on behalf of looked-after children
- influence UK-wide policy and legislation
- provide much-needed information and advice
- promote greater public understanding of adoption and fostering
- support our members in their work

BAAF's main activities are the development, promotion and advocacy of best policy and practice; the provision of advice and information to our members and to the general public; training, consultancy and seminars; child placement services including the publication of our flagship monthly newspaper, Be My Parent. We also publish a quarterly professional journal, Adoption and Fostering, books and guides for professionals, academics, parents and carers and research studies. The main users of our services are our members comprising local authorities across England, Scotland and Wales, voluntary adoption agencies, independent fostering agencies and also individual social work, legal and medical professionals and carers. We are currently developing our service to Northern Ireland.

This response has been compiled in consultation with members of the BAAF staff team, the BAAF Private Fostering Special Interest Group and specifically, representatives of local authorities including Dorset, Essex, Gloucestershire, Hartlepool, Lambeth, Middlesbrough, Stockton-on-Tees, Sunderland and Swindon. Other organisations that have been consulted and support this response include the Family Rights Group and the office of the Mayor of London.

Additionally, BAAF endorses the response from the Family Policy Alliance.

INTRODUCTION

The British Association for Adoption & Fostering welcomes the Draft Regulations, National Minimum Standards and Guidance on Private Fostering. The documentation provides an opportunity for a fresh impetus to addressing the needs of privately fostered children.

Sir William Utting's review of safeguards for children living away from home ('People Like Us' 1997), identified that of all the environments in which children lived away from home, private fostering was among the least controlled and most open to abuse. His conclusion was that the current system should no longer be tolerated. The new Private Fostering Regulations, National Minimum Standards and Guidance will require local authorities to take private fostering seriously.

GENERAL COMMENTS

1. Members of the BAAF Private Fostering Special Interest Group share the view that the documentation reinforces the current system, and strengthens the notification requirement. In particular, the emphasis on visiting the child and keeping records is impressive. It is envisaged that the inspection of the local authority's private fostering function against the National Minimum Standards will make a big difference to policy and practice.
2. The Promoting Awareness document is seen as very useful. A national campaign/annual national publicity would also help raise awareness. The DfES should consider producing national information for the public and provide much greater support and impetus for local efforts which could be amended for local use, and perhaps also develop a Children's Guide which could also be amended for local use.
3. It would be helpful if the five outcomes given in "Every Child Matters" are referred to in the private fostering documentation.
4. '*Children in need*': It would be helpful to have some clarification about whether all privately fostered children are to be considered as potentially 'children in need'
5. *Framework for Assessment*: It would be helpful to have clarification about whether the Framework for Assessment will be applied in determining whether a private fostering arrangement is safeguarding the welfare of the child. It is clear that some local authorities are undertaking core assessments on children in private arrangements and having a care plan, and others are not.
6. Who are the privately fostered children? The examples of the common situations in which children are privately fostered, as identified by the BAAF Private Fostering Special Interest Group, should be included in the Appendix to the documents (see attachment at the end of this response). There is still considerable confusion about the types of arrangements which typically arise under the heading of "private fostering". As the Family Policy Alliance have indicated, different factors will apply according to the type of private foster care

arrangement, particularly if the private foster carer is known to the child.

7. *Children in need of services but not accommodation*: it would be helpful to have clarity about the numerous good practice situations that are assisted by social services in the short term with section 17 money, even though the children are not accommodated under the looked after system. Some local authorities do not consider these children to be privately fostered, so there is a real danger of an unregulated care system where no safeguards are in place.
8. *Unaccompanied asylum seeking children and others*: it would be helpful to have clarity about the situation of asylum seekers, overstayers and children who are in the UK with no status. The guidance should include details of how to deal with these children. A glossary of agreed terms should be included in the Appendix section.
9. Further clarification is needed about the responsibilities of other professionals, and the justification implied (paragraph 1.3.19 of the draft guidance) for notification even if this involves a breach of confidence. Clearly it is already well established that where a professional suspects that a child is suffering or at risk of suffering significant harm he or she is not merely justified, but may be obliged, to notify the appropriate statutory agency. Is it intended that the statement in paragraph 1.3.19 “Teachers etc **should notify** the local authority of a private fostering arrangement....” is justified by any existing guidance issued to these professionals, or that this statement is dependent on implementation of other sections of the Children Act 2005? We do believe it is helpful for other professionals to have such a duty, but in order for them not to fall foul of their professional ethics it is essential that this be brought within their relevant professional code of conduct.
10. *Language schools or holiday camps*: it would be helpful to have clarification about the role of language schools and host families in relation to private fostering. In particular, the guidance needs to address the situation where a family has a constant throughput of different host students, but each individual arrangement last for more than 28 days.
11. *The definition*: There are a number of inconsistencies between the definitions used in the private fostering consultation documentations. It would be helpful to have clarification about :
 - the definition of private fostering and kinship care and where arrangements fall into both categories;
 - how local authorities facilitate private fostering arrangements;
 - what is meant by parental responsibility.
12. It would be helpful if user friendly material could be produced for private and prospective private foster carers.

13. It would be helpful if guidance could be produced for privately fostered children in specific circumstances – for example, children who attend language schools, teenagers making own arrangements, such as moving in with their boyfriend or girlfriend's family.
14. The private fostering documents need to be linked to the Information Retrieval and Tracking (IRT).
15. *Resource implications:* It would be helpful to have some guidance about the resource implications for local authorities, and how these might be dealt with in terms of the new duties and the national minimum standards. It is suggested that social services will not be able to meet the demands laid out in the private fostering documents because of their heavy workloads.

THE REGULATIONS

1. It is difficult to consult the regulations alone. In order to be fully understood they need to be cross-referenced to the National Minimum Standards. Further, the regulations are written in a way that suggests that parents knowingly and responsibly make private fostering arrangements. The reality is much more complicated and in our experience the arrangements often arise "by default" or almost accidentally with no clear involvement or plan by the parents. The Regulations, Standards and Guidance should reflect this situation, so that a balance may be struck between the intervention of the state and the parent's right to choose for their child.
2. The requirement for CRB checks should be in the regulations. The regulations should impose a duty on local authorities to ensure that the CRB checks for private foster carers are similar to those for local authority foster carers.
3. *Records:* The provisions in the regulations on keeping records on the private foster carer do not correspond with the standards. This needs to be clarified; and separate files must be kept on the child and on the carer. The regulations should include provisions for how long records should be kept.
4. *Regulation 3(3):* It would be helpful if there was some guidance on who might be involved indirectly in arranging a private fostering situation – i.e. the circumstances in which third parties might be involved in making private fostering arrangements should be made more explicit in the guidance.

5. *Regulation 3(4)(a)* should include additional information about whether the child was previously privately fostered and, if so, the details should be ascertained.
6. *Duty to notify and clarification about professionals sharing information:*
It would be helpful to clarify if professionals have an individual duty to notify social services if they are aware of an arrangement and believe social services are unaware of it. Should there be a duty for others, e.g. universities/colleges; the immigration authorities, to notify the local authority when they suspect that there may be a private fostering arrangement. It would be helpful if this function could be clarified.
7. *Regulation 4(2)(b):* It is absolutely crucial that child who is to be privately fostered is seen and interviewed.
8. *Regulation 4(2)(c):* It would be helpful if this regulation is clarified. Sometimes children are placed in a different local authority from the one the parents are residing in. It, therefore, may be difficult for the local authority to interview them. The parent should have to notify the local authority, where they reside, of the private fostering arrangement; that local authority should then be responsible for notifying the local authority in which the child is privately fostered.
9. *Regulation 7:* It should be the duty of both the parent and the carer to inform the local authority where a placement is made in an emergency.
10. *Regulation 8:* It is important that the regulations specify that the parent, or person with parental responsibility, is interviewed where an emergency placement is made.
11. *Regulation 9:* (see comments on the Guidance below, point 6 (iii & iv).
12. *Regulation 10:* It is expected that an initial assessment will be undertaken once a notification of a private arrangement is made. The initial assessment will need to commence from the point of notification. Publicity about notification should explain that parents and carers, when notifying, will need to give their consent to checks being made and an initial assessment being carried out. It should be noted that there is a concern that an initial assessment on its own may not provide all the information required by regulations. (See above points on Guidance: 2.1 and 2.2).
13. *Regulation 11:* – see the comments on Guidance below, point 10.
14. It should be noted that the existence of a common database may help to identify private fostering arrangements.
15. *Regulation 11(3):* This should be worded so that the child is seen on every visit on his own, unless it is inappropriate to do so.

16. *Regulation 16*: It will be important for each local authority to have an identified senior manager as a champion for privately fostered children, and for workers to know there is a named person with relevant knowledge and expertise. This person should not be located in family placement; most notifications will be made to area offices and it will be area social workers who hold the cases. It will also be helpful for Education, Health and Housing to know who the named person is.
17. Notification of a change of circumstances (*Regulation 13*): The Guidance should be more explicit about the co-operation required by the local authorities to notify each other in respect of the moves of the privately fostered child to different areas. These notifications should be monitored.

THE GUIDANCE

1. The guidance outlines the requirements and practice issues. It would be helpful if it could specify who should undertake these functions and how they should be carried out.
2. *Layout of the guidance document*: It would be helpful if the guidance included a 'Table of Contents'.
3. It would be helpful to include the new legislative provisions (as previously given in Volume 8, Part I, p2) in the Introduction to the new Guidance.
4. It would be helpful if the Introduction (Part 1.1, p2), paragraph 1.1.6 could not only refer to the definition of relative, but also quote it. It should also include uncle amongst the other relatives mentioned.
5. *The introduction (1.2.1)*: "They are expected to improve and therefore address the key problems....." It would be helpful to state what these problems are.
6. Action to be taken in respect of children who are proposed to be privately fostered:-
 - (i) parental responsibility(1.2.6). It would be helpful if the guidance could clarify how parental responsibility will be exercised in terms of medical treatment and discipline.
 - (ii) the local authority is not satisfied that the arrangement is suitable - 1.2.8 (Regulation 6). If the local authority is not satisfied with the arrangements, one of the steps might be to take out a prohibition order. It would be helpful if this action is included here.

- (iii) Notifying the local authority within 48 hours (1.2.9 (Regulation 9). It should be noted that this timescale is unrealistic.
- (iv) Visit the child within one week of a notification (1.2.9; Regulation 9). It should be noted that in some cases this timescale might be too long, especially if the privately fostered child might be at risk. Instead, it should be required that a decision should be taken to visit the child earlier, if necessary. The decision should be based on the age of the privately fostered child and whether the local authority has any previous knowledge about the child or the carer.

7. Subsequent visits to privately fostered children:-

- (i) (1.2.14) “that the agreed arrangements for contact between the child and parent(s).... for the local authority to intervene”. It would be helpful to clarify in what ways it would be appropriate for the local authority to intervene.
- (ii) “That the financial arrangements for the care..... the local authority to intervene” (1.2.14, regulation 12). It would be helpful to clarify in what ways it would be appropriate for the local authority to intervene.

8. *Suitability of the private fostering arrangement – Safeguarding checks:*
It would be helpful if the guidance could be more specific about what checks should be undertaken, because when there is pressure on resources the tendency is to do the absolute minimum.

9. *Disqualified person - written permission for the placement to continue:*
When a child is allowed to stay with a disqualified person, the guidance should specify that the local authority **must** (not may) give written permission for the placement to continue. It should also clearly indicate that it is the responsibility of the Director, or delegated person with responsibility for private fostering, to authorise this permission.

10. *Subsequent visits:* Local authorities must arrange for an officer to visit from time to time (1.2.13 (Regulation 11 (1)). It would be helpful if this duty could be further clarified. Some professionals say this is insufficient and might not be a priority.

11. *Monitoring Compliance:-*

- (i) (1.2.15) “ they deal effectively with situations.... Decision is taken about whether an offence has been committed”. It would be helpful if the following phrase could be added – and whether to prosecute; and the guidance should specify who prosecutes – the local authority or the police.

12. *Content of Notice:-*

- (i) (1.3.4) Regulation 3(4) “requires that the content of the notice must specify”. This specification in the guidance is not

consistent with that given in the Regulations - 3(4) and 3(5) are separate. It would be more helpful if the previous details for this section as given in volume 8 are included here.

13. *Notifications – General:-*

- (i) (1.3.19) “Teachers, health and other professionals should notify the local authority of a private fostering arrangement...” It would be helpful if a statutory justification for this is included.
- (ii) (1.3.20) “The design and content of notification forms”. It would be helpful if centrally prepared forms could be made available.

14. *Continuity and Change:-*

- (i) (1.4.10) “... If they can no longer keep the child it is for the parent to make alternative arrangements”. It would be helpful if the following phrase could be added here - and if they cannot contact the parent, then they should approach the local authority.

15. *Financial arrangements:-*

- (i) (1.4.27) “Private foster carers can receive child benefit...” It would be helpful if the guidance could clarify whether this means the private foster carer may be able to access child tax credits.

16. *Health care and treatment (1.4.33):* It should be noted that such ‘screening’ is not currently offered. It would be helpful if this section is cross-referenced with the ICA Practice Note 46.

17. *Personal Child Health Record (1.4.36):* It would be helpful if the guidance could clarify how local authorities will ensure that the primary care services are made aware of the private fostering arrangement.

18. *The child’s medical history (1.4.37):* it would be helpful if the guidance could clarify how the information relating to the child’s medical history will be collected from the child’s parents for the prospective private foster carer and the local authority. It is suggested that the guidance takes a very clinical approach and implies that the birth parents will be in a position to pass over all this health information.

19. *The child’s medical history (1.4.38):* There should be a requirement for arrangements concerning consent to be evidenced in writing.

20. *Parenting capacity (1.4.45):* It would be helpful if the guidance could clarify how the local authority will form a view of the parenting capacity of the person proposing to foster a child privately.

21. *Advice and support for private foster carers (1.5.3 – 6)*: It would be helpful if the guidance could clarify who will be responsible for ensuring the support outlined takes place.
22. *Aftercare*: The previous guidance (Volume 8: Aftercare, 1.8.19 – 21, p24) usefully reminds local authorities that disabled children are children in need. It is a matter for regret that privately fostered children, who cease to be privately fostered, are not entitled to an after-care service.
23. The guidance should include an explanation of the circumstances in which third parties might be involved in making private fostering arrangements (Regulation 3, p3).
24. The guidance should include an expectation that local authorities must co-operate in terms of Regulation 4(2)(c) (see point 7 under the Regulations above).

25. *Assessments*

- 25.1 A positive aspect of the guidance is that there is scope for social workers to be creative in terms of the assessments they undertake. However, there is a presumption that an initial assessment will be conducted under the Assessment Framework. It is suggested that an initial assessment of the carer might not be adequate. It is recommended that in the guidance, a stronger emphasis should be given to the assessment process, and the private foster carer's understanding of the responsibility he/she will have for the privately fostered child.
- 25.2 It was agreed that the term "process" is not strong enough and gives no guidance about the "process" which would be suitable. A panel to approve carers would be useful and would add and build on best practice, although its remit must be clearly identified. The underlying principle for each assessment should be "is this carer able to provide for this child's needs?" It would also be important for an assessment to consider the purpose of the placement.
- 25.3 The information about the "assessment process" in the guidance should include the appointment of a designated person to agree suitability, if a panel is not possible and, in any event, an agency "decision maker". A specific format for the assessment at this stage should also be suggested. Forms, such as those used by Essex County Council (PFA forms and PFP) are recommended. There must also be a published process that can be referred to in legal proceedings, should they arise.
- 25.4 The guidance should specify which local authority should hold the financial responsibility for the assessment. Should it be with the local authority in which the parent lives, or the local authority where the child lives? One viewpoint is that it should be with the local authority where the child lives. In the case of a proposed private foster care arrangement, the assessment might identify the child as

being a child in need, and a private foster care arrangement might not be needed.

25.5 It would be helpful to know if the Monitoring system will fit in with the Integrated Children's System? There should be guidance about the use of core assessments, the integrated children's system and sensitivity to the particular situation of the privately fostered child.

26. *Considering whether a privately fostered child is a child in need (1.6.33 – 34, p 31)*: It would be more helpful if this section is placed earlier in the section, at a similar position to that given in volume 8 (1.3.7, p4).

27. *Unsatisfactory Care (1.6.28)*:

- (i) It would be helpful if the guidance could indicate the criteria that should be used by local authorities when deciding the level at which the care becomes unsatisfactory.
- (ii) In the guidance, point 1.6.31 (p31) specifies that "..... the local authority will need to obtain court authority if the child is to live overseas". This recommendation implies that a court's authority is always needed. This is not the case. A court authority is only needed if the child is on a care order.

28. It would be helpful to have some standardised formats for the assessment process, recording of visits etc.

29. *Timescales*

- (i) There is no reference in the guidance to timescales for completing an assessment of a private foster carer. This is a critical omission.
- (ii) The guidance refers to "police checks" without specifying CRB checks.

30. *Suitability of private foster carer and household – Discipline (1.4.47)*: It would be helpful if this section could advise the practitioner to discuss and ascertain the parents views on discipline. It would be helpful to include the content in the section on discipline, as given in volume 8 (1.5.13 – 14, p13).

31. *Parental Responsibility (1.4.58, p23)*: The local authority also needs to be alerted about the possibility of the risk of an unlawful private foster care arrangement that is being presented as a lawful one.

32. *Admission to Schools of Children from Overseas*: Paragraph 1.8.9 appears to contradict paragraph 1.8.11.

33. *Offences (1.6.39, p32)*: It would be helpful if the guidance could make it clear who will prosecute.

34. *Prohibitions*: it could be helpful if the guidance could clarify who is responsible for effecting a prohibition order – is it the police or the local authority?

35. It would be helpful if a framework for handling prohibitions, appeals etc could be included in the Appendix section.

THE NATIONAL MINIMUM STANDARDS

The Standards add clarity to the Regulations. However, there is some concern about the experience and understanding of CSCI inspectors in relation to private fostering arrangements.

1. *Introduction*

It would be helpful if clarification of the definition of step-parent is given. This should include an unmarried partner of either sex.

2. *Standard 1: Statement on Private Fostering*

In this standards, the seventh bullet point should include 'support' as well as 'advice and information'.

3. *Standard 2: Notification*

It is suggested that regions and sub-regions could do some joint publicity on notifications.

4. *Standard 3: The private fostering arrangement*

- 4.1 Supporting Criteria 3.2.3

Contact arrangements should be in writing for all parties.

- 4.2 The risk assessment of the privately fostered child and other children in the household should be addressed in the consultation documents. A privately fostered child may face abuse from other children present in the household. It would be helpful if the regulations could address the risk assessment in relation to other adults in the household, as well as other children.

5. *Standard 5: The general welfare of the child*

- 5.1 Clarification is needed about whether a core assessment should be carried out, or whether an initial assessment will be enough. It would be helpful to indicate if privately fostered children are to be seen as 'children in need' and therefore subject to the assessment framework?

- 5.2 It would be helpful to have consistency throughout the regulations and standards in the wording about the requirement to see the child alone 'unless it is considered inappropriate'. Reasons for not seeing the child alone should be required to be included in the written report of the visit.

- 5.3 This standard should include contact arrangements with siblings.

6. *Standard 6: Advice and support for private foster carers*

- 6.1 The training referred to in this section is positive.

- 6.2 This section does not mention support for private foster carers at all. It would be helpful to make reference to support groups, telephone helplines, support workers etc.
- 6.3 In advice and support for parents, reference should be made to the possible legal consequences for parents if they do not maintain contact with their children.
- 6.4 It is important to be sensitive to the cultural expectations of some families where it is perfectly acceptable for children to be brought up by other people. Parents may need to be provided with advice and support from the local authority they are living in, which could be some distance from where the child is living, so the wording should reflect this - i.e., 'appropriate' local authority.

7. Standard 7: Advice and support for parents of privately fostered children

Standard 7.2 could be strengthened to ensure joint working with other local authorities. Would this be a role for a private fostering worker in the other local authority? This could be specified. A further issue relating to reciprocity is how parental responsibility is exercised in international cases where the parents of the privately fostered child do not live in the UK. This could be clarified, especially in relation to language school situations.

8. Standard 8: Advice and support for privately fostered children

- 8.1 Standard 8.2. Is there an expectation that there will be a Children's guide to private fostering, as there is for mainstream fostering and adoption?
- 8.2 Every privately fostered child should have access to an advocacy service whether or not they are seen as a 'child in need'. Such an advocacy service should include the right to access the Children's Rights Officer.
- 8.3 Standard 8.5. This section should read: "like all disabled children, privately fostered disabled children have a right to an after-care and adult service " – i.e., a seamless service provision. An advocacy service should be offered to the privately fostered child, regardless of whether he/she is deemed to be a child in need or not.

9. Standard 9: Monitoring compliance with duties and functions in relation to private fostering

- 9.1 Standard 9.3. Use of the Integrated Children's System would ensure that these areas are covered in the report. This format could be used even if the privately fostered child is not seen as a child in need.
- 9.2 Standard 9.4 covers recording the numbers of private foster carers and privately fostered children living in an area. It would be more useful if the records of the data on notification could include:
 - the type of notification
 - who initiated the notification

- details of the private fostering arrangement
- whether the child was previously privately fostered

This would provide details about the success of a local authority's raising awareness campaign.

9.3 Standard 9.6. The Integrated Children's System should capture this data on the contact sheet.

9.4 Standard 9.10 This is a very positive section of the standards. The inclusion of reporting requirements, especially those to ensure that the child is visited, is very helpful.

9.5 There is no system for reviewing the child's progress. This should be a written report as opposed to solely case notes. The underlying assumption is that the parent is checking on the child's welfare, yet the reality is very different.

9.6 After a statutory visit, a copy of the report should be sent to the private foster carer, the parent and the child after each visit. This could be included in the guidance. This would have parallels with the looked after system, which is independently reviewed. A foster carer in this system would be much more robustly assessed in the first place, although ongoing assessments are required in private fostering situations.

LIST OF COMMON SITUATIONS IN WHICH CHILDREN ARE PRIVATELY FOSTERED

- **African and African Caribbean children with parents or families overseas**

These children may come from countries such as Nigeria, Ghana, the Ivory Coast, Liberia and Sierra Leone. Their parents may send them to live with distant relatives or other casual acquaintances in the hope that the children will have “a better life” and receive a good education. In these situations parents may remain in the African country, and therefore be unable to exercise their parental responsibility effectively. The reason for the children entering the country, and perhaps their parentage, may not be clear at the port of entry because of anxiety about immigration restrictions. Practitioners have noted an increasing group of Caribbean children, in particular Jamaican children, whose parents are also still overseas or in some case who have died; these children are likely to be living with extended family or family friends.

- **Black and minority ethnic children with parents working or studying in the UK**

Generally these children are babies or very young, their parents have demanding careers or jobs, work unsocial hours (e.g. in the restaurant trade) or may be studying to improve their prospects. They sometimes arrange for their children to be cared for by extended family members (but not members of the immediate family as defined in The Children Act 1989) or by other people known to them from within their own community. Others arrange for their children to be looked after by strangers, identified often through recommendation because the carer(s) have privately fostered other children, or through word of mouth or informal advertisement.

Parents may have approached the social services department hoping to find a carer but discover that only child minders are available and they cannot have the children overnight for any length of time – and the parents find the fees too expensive. These children, placed outside the community, are often placed transracially in rural areas and their carers may have little understanding of racial identity and the impact of broken attachments and separation.

- **Asylum seekers and refugees**

These children may arrive in this country seeking asylum, travelling with other adults who may not even be known to their family in their country of origin, but because they were brought in by someone they were not considered “unaccompanied” at the time of arrival. Other children, who have acquired refugee status, may be living in similar situations. Their isolation, immigration

status, lack of understanding of available services and lack of knowledge of the English language, will all contribute to their vulnerability.

- **Trafficked children**

These children are brought into this country for the benefit of adults. They may have been “bought” from their birth family in order to be sent as servants to more affluent families, sometimes from a similar background, or they may have been acquired for prostitution. They are generally young teenagers, may not speak the language and are not easily identified as they rarely attend schools. These children are privately fostered by those adults with whom they are living, even though they do not act as parents or are seen as such by the children. These children are at great risk.

- **Local children living apart from their families**

Children may live part from their parents for a range of different reasons. They may have had only one parent taking responsibility for them and, due to this parent’s death, imprisonment or working commitments away from home, the child may be living with former neighbours or kinship carers. Some infants and young children whose parents abuse drugs and alcohol may be left with different acquaintances for lengthy periods of time. Others may have parents with mental health problems or simply be unable or unwilling to care for children. Some Caribbean and African children who are born in the UK are cared for in their wider local community which is an accepted cultural practice.

- **Adolescents and teenagers**

These children may be estranged from their own families, perhaps through behaviour their parents find unacceptable. They may have run away because they are unhappy or being abused or they may have been “thrown out” as a result of arguments at home. Sometime their parents’ own relationship may have broken down and the children are considered to be too disruptive to the reconstituted family relationships. Practitioners are observing that many privately fostered teenagers in this category appear to have similar histories and behavioural and emotional profiles to the children in the looked after system. Parents may have tried to get their children accommodated by the local authority without success. Others will have allowed their children to live with family friends or with their older sexual partners or the family home where their boyfriends/ girl friends live. Some of the adults these children find to live with will be grossly unsuitable

- **Children attending language schools**

Children may be studying English at day language schools and have come from a wide range of countries. Amongst the many thousands who do so, a significant number will stay with host families for periods exceeding the 28 day period or may move between host families for a total period exceeding 28 days which still therefore falls within the private fostering definition. The children’s knowledge of English or of “normal” English family life may be slight

and they can be very vulnerable. The school may vet the families to some extent but others will have no safeguards in place at all. Other children may be on holiday exchanges.

- **Children at independent boarding schools who do not return home for holidays**

Some children may not return to their parents during holidays, particularly where the parents are working overseas, and other people are caring for them.

- **Children living with host families for a variety of reasons**

Some charitable organisations and other individuals arrange for children to come into this country for a variety of purposes. These include holidays for disadvantaged children, education, medical treatment and sports trainees (e.g. football). During their stay, they may be placed with host families.

- **Children brought in from abroad with a view to adoption**

Some children brought into this country ostensibly for other reasons but may really be intended to be adopted. Others may form close relationship with the families caring for them and then adoption may be the plan. All of them would legally be defined as privately fostered until formal notice of intention to apply to adopt is given. In addition, some children who are also subject to a form of interim overseas adoption order or “entrustment” which will be finalised in due course in their country of origin are also considered by the DfES to be privately fostered.