

# COGNITA



## **Breaside Preparatory School**

# **Safeguarding: Use of Host Families Policy and Procedure**

## **September 2019**

## Safeguarding: Use of Host Families Policy and Procedure

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### 1 Introduction

- 1.1 This policy applies to:
- all schools which are part of Cognita in the UK;
  - any host family provider appointed by Cognita Schools to source families for Cognita pupils to stay with (“host family provider”); and
  - host families that are appointed to support pupils at Cognita schools in England and Wales.
- 1.2 This policy should be read in conjunction with other relevant Cognita Schools’ policies, including the Educational Visits Policy and Safeguarding and Child Protection Policy and Procedure.
- 1.3 This policy complies with, and is informed by:
- Children Act 1989
  - Children Act 2004
  - Safeguarding Vulnerable Groups Act 2006
  - Children (Private Arrangements for Fostering) Regulations 2005
  - The Education (Independent School Standards) Regulations 2014
  - The ISI Handbook
  - DfE Statutory Guidance on Keeping Children Safe in Education, 2018
  - DfE Guidance on Working Together to Safeguarding Children, 2018
  - DfE Statutory Guidance on the Prevent Duty, July 2015
  - Child Death Review Statutory Guidance, October 2017
- 1.4 Consideration has also been given to the British Council’s Guidance for ELT Providers for the Care of Under 18’s.

### 2 Application of Policy

- 2.1 This policy relates specifically to the safeguarding of Cognita pupils that are placed with host families. The policy should be read and understood by:
- all Cognita staff involved in placing children with host families;
  - any host family provider appointed by Cognita to provide a host family service; and
  - host families caring for – or considering caring for – Cognita pupils.
- 2.2 Cognita is aware that placing pupils with host families may increase safeguarding risks. This policy is intended to mitigate those risks.
- 2.3 Pupils may be placed with host families on a long or short-term basis and in any of the following circumstances:
- Where the parent of a child arranges privately with another family to place the child with that family;
  - Where the school identifies a family to look after a pupil where that family has volunteered to do so; or
  - Where the school engages the services of a host family provider to look after the pupil.
- 2.4 It is not permissible for any Cognita school or host family provider to arrange for a child to be placed with a host family without following the procedure outlined in this policy.
- 2.5 Children may be removed from a host family where that family fails to comply with this policy.

### 3 Publication

- 3.1 This policy is updated annually and is published to all staff and volunteers, host family providers and host families. It is also placed on the school website.
- 3.2 Rather than duplicating content from Keeping Children Safe in Education 2018 in this policy, it should be understood that the school will always refer to the above document as the benchmark for all safeguarding practice and decision making. Cognita Schools' wider commitment to safeguarding is set out in separate safeguarding policies.
- 3.3 Since drafting this policy, the DfE has revised its statutory guidance, Working Together to Safeguard Children and Keeping Children Safe in Education. This policy has therefore been reviewed in line with the latest guidance.

### 4 Private Fostering

- 4.1 Private fostering is when a child or young person under 16 years old (or under 18 if they have a disability) is looked after for 28 days or more by someone who is not a close relative, legal guardian or person with parental responsibility. Close relatives only include parents, step-parents, aunts, uncles and grandparents. It is not private fostering if the child is 'looked after' by the local authority (also known as 'in care' and which includes placement in residential care, with an approved foster carer or a 'kinship' carer). Private fostering occurs in all cultures, including British culture.
- 4.2 If a host family is going to be caring for a child for 28 days or longer, this is classed as private fostering. The host school is required to notify Children's Social Care at least six weeks before the private fostering arrangement is due to start, or as soon as they become aware. Children's Social Care should then carry out their own assessment of the suitability of the arrangement.
- 4.3 For the avoidance of doubt, private fostering may also occur where, for 28 days or more, a pupil is on work experience or taking part in a school exchange trip in the UK from overseas. In such circumstances, the procedure for private fostering should be followed.
- 4.4 If a period of care lasts for 27 days or less but it is intended that further periods are planned which total 28 days or more, the procedure for private fostering also applies.
- 4.5 It should be noted that private foster carers do not assume parental responsibility for the child – the child's parent or legal guardian will retain parental responsibility.
- 4.6 Schools organising exchange visits abroad should take reasonable steps to ensure that a comparable approach is taken by relevant schools in that country.

### 5 Engaging with Host Family Providers or Guardianship Organisation

- 5.1 From time to time, Cognita Schools may engage the services of a host family provider/Guardianship Organisation in order to source families for pupils to stay with. All host family providers contracted by Cognita Schools must be members of the Association for the Education and Guardianship of International Students ("AEGIS") and be willing to undergo inspections of their safeguarding practice.
- 5.2 All host family providers must:
  - provide a copy of their own safeguarding and/or child protection policies to Cognita School Support Centre staff, the host school, the host family and to the student's parents, should they request it;
  - share information required by Cognita Schools for the purposes of safeguarding and provide such information in a timely manner;

- work collaboratively with Cognita Schools and the host family in making host family arrangements;
- act in the best interests of the children they are placing with host families; and
- act honestly and with integrity so as not to diminish the reputation of Cognita Schools.

### 6 Suitability Checks

#### 6.1 Disclosure and Barring Service (“DBS”) Checks

- 6.1.1 Suitability checks must be carried out on any individual carrying out a ‘regulated activity’. In broad terms, ‘regulated activity’ is any position that has direct contact with children, or a position which manages staff who work with children. Due to the nature and frequency of most host family arrangements, acting as a host family will normally be a regulated activity if organised by the school.<sup>1</sup>
- 6.1.2 No pupil must be placed with a host family until all necessary checks have been completed.
- 6.1.3 DBS checks are required in the following circumstances:
- Where the school selects a host family for a pupil to stay with, the school will be required to obtain an Enhanced DBS with Barred List check on every member of the household over the age of 16 that who will, or may provide care, support or supervision to the pupil(s).
  - Where the school engages the services of a host family provider to identify a host family, the host family provider will be required to obtain an Enhanced DBS with Barred List check on every member of the household over the age of 16 who will, or may provide care, support or supervision to the pupil(s).
  - In respect to other members of the household where the child is staying who are over the age of 16, schools are free to decide whether they consider it necessary to obtain a DBS enhanced certificate.
- 6.1.4 If an Enhanced DBS with Barred List check shows any individual as barred, the pupil must not be placed with the family.
- 6.1.5 Where hosting is arranged privately (i.e. between two families), with no intervention by the school, KCSIE Annex E states that “this would be a private arrangement, therefore the school or college would not be the regulated activity provider” and the school will not be required to carry out DBS checks. Note, however, the requirements under ‘private fostering’ in clause 4. In this circumstance, the school should seek written confirmation from the parent(s) of the pupil that the arrangement has been made privately and that the school has no involvement with the arrangement. A referral to Children’s Social Care should still be made in accordance with the Private Fostering Regulations.
- 6.1.6 Where pupils are placed with host families overseas (i.e. not in the United Kingdom), schools will not be able to obtain checks on host families but should work with partner schools to ensure that appropriate assurances are obtained before a visit (p98, KCSIE). Parents must be aware of arrangements and schools are free to decide whether to contact the relevant foreign embassy or High Commission to discuss what checks may be possible.

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<sup>1</sup> For greater detail regarding ‘regulated activity’ please see Schedule 4 of the Safeguarding Vulnerable Groups Act 2006

### 6.2 Home Visit

- 6.2.1 Where the school identifies a host family with whom a pupil can be placed, it should carry out a risk assessment - which considers, at the very least, the risks identified in **Appendix A** - prior to the pupil's placement.
- 6.2.2 Where a host family provider is appointed to provide a host family, that provider should carry out a risk assessment prior to the pupil's placement. This must consider, at the very least, the risks identified in **Appendix A**.
- 6.2.3 When assessing the suitability of the host's home, the school or host family provider (whichever is relevant) should be sure that:
- A responsible adult, for whom an Enhanced DBS with Barred List Check must have been carried out, will always be present overnight and normally whenever the pupil is at the host family residence;
  - Suitable sleeping arrangements are in place and the host family will not place males and females in the same bedroom;
  - Children will not be placed in the same room as other children who are more or less than 2 years older than them;
  - The host family will not host more than four pupils at any one time;
  - Where applicable, the home is suitable to the child's special educational, medical or disability needs;
  - The host family's boiler has been approved by an approved practitioner on the Gas Safe Register (see [www.gassaferegister.co.uk](http://www.gassaferegister.co.uk)); and
  - The host family's accommodation has smoke alarms fitted and has completed an up to date fire safety risk assessment.
- 6.2.4 Where the home does not meet the requirements set out in clause 6.2.3 and this cannot be overcome, the pupil must not be placed with that host family.
- 6.2.5 The host school or host family provider (whichever has identified the host family) must provide the host family with clear written guidelines regarding:
- Provision of meals;
  - Standard of accommodation (i.e. a bed must be provided, arrangements must be made for laundry, the level of privacy expected, etc.);
  - Bed times and sleeping arrangements;
  - Any special instructions regarding medical conditions, allergies, etc. (i.e. how they should be managed);
  - Levels of supervision necessary;
  - Written clarification that no child will be placed under the supervision of an adult who has not had an Enhanced DBS with Barred List Check; and
  - Arrangements for travel, including appropriate drivers, escorts, and transportation.
- 6.2.6 Pupils should also be provided with clear rules and guidelines regarding what to expect when placed with a host family, including but not limited to:
- What the general house rules are;
  - How the pupil should access the property;
  - Any areas of the house that should not be accessed by the pupil;
  - What the protocol will be for meal times;
  - What the arrangements will be for their laundry;
  - Where they will be expected to sleep;
  - Whether they are able to have friends over;
  - What time they are expected home;
  - What behaviour they can reasonably expect from the family they are placed with;
  - What they should do if they have any concerns (see clause 7.6);

- What they should do in an emergency; and
- The consequences if they break any rules.

### 7 Communication and Record Keeping

- 7.1 Any host family provider appointed to provide host families must provide written notification that an Enhanced DBS with Barred List check has been carried out on the relevant members of the host family.
- 7.2 The host school and the host family provider (regardless of who is placing the pupil) must record details of:
- The names of pupils staying with host families;
  - The names and photo ID of all family members with whom a pupil is staying, e.g. passport;
  - DBS certificate numbers of all individuals over 16 years within the host family and the date on which the certificate was obtained;
  - Address and contact details for the host family; and
  - Address and contact details for the home family.
- 7.3 The above information should be held on a central record within the school.
- 7.4 Host families must be made aware that if any further individuals over the age of 16 join the household then the host family must notify the host family provider or the host school immediately (whichever placed the child).
- 7.5 The host school should share the information outlined in clause 7.2 with the pupil's home school, where applicable.
- 7.6 The host school or host family provider (whichever has sourced the host family) will ensure that both they and the host family are given a telephone number or contact details to enable 24-hour contact with the parents or legal guardians of pupils. Where communication is necessary and contact cannot be made, the host school or host family provider will use their best endeavours to make contact. If contact cannot be made after 24 hours, Children's Social Services will be contacted in the borough where the child is being hosted.

### 8 Reporting Concerns

- 8.1 Prior to their visit/stay, pupils should be provided with details of at least one key contact; one from the host school and, where applicable, one from their home school that they can contact if they need to. If the pupil does not have access to a mobile phone, they should be provided with details of how they can communicate with their key contact(s) at any time of the day or night. Students must be reassured that any concerns raised would be dealt with sensitively and taken seriously.
- 8.2 Pupils should be seen every school day during term time by a member of staff from the host school whilst staying with a host family. Where the child is absent or does not attend school, the host school will follow the procedure set out in its Attendance Policy.
- 8.3 Host families should be alert to inappropriate relationships and the potential for peer on peer abuse.
- 8.4 Host families should be aware of the need to ensure online safety where pupils access such technology at home. The host family should ensure that relevant filters are applied to the internet in order to reduce the likely risk of a pupil accessing illegal, inappropriate or harmful material or interactions whilst in their home.

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- 8.5 All host family members are required to be vigilant and report immediately to the host school any concerns regarding suspicions of neglect, abuse, bullying, radicalisation, depression or homesickness.
- 8.6 If a pupil flouts any of the rules (see clause 6.2.6), the host family must notify the host family provider and the host school (regardless of who placed the pupil with the host family) immediately.
- 8.7 If a pupil becomes unwell, the host family must notify the host family provider and the host school. If the illness is serious, the host family should take the pupil to the nearest appropriate medical centre or hospital and inform the host school contact.
- 8.8 When concerns are reported to the host school, the school will also share these concerns with the pupil's home school (where applicable).
- 8.9 If the host school has any reason to believe that the host family provider or anyone within the host family is failing in their statutory duties, they should notify Children's Social Care or the police.
- 8.10 If the host family provider has any reason to believe that anyone within the host family is failing in their statutory duties, they should notify the host school, Children's Social Care and/or the police.
- 8.11 In the event that a pupil dies unexpectedly in the care of a host family, the host family must immediately dial 999. They should then notify the host family provider (if relevant) and the host school. The child should normally be taken to an Emergency Department, however, advice should be sought from the 999 operator. The host school or host family provider (whichever sourced the host family) must engage with the appropriate professionals in accordance with the Child Death Review Statutory Guidance and the local arrangements made by the local authority and the relevant Clinical Commissioning Group. An initial meeting should take place at the Emergency Department, at which point the necessary further action will be determined in line with statutory guidance.



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### Appendix A

Template Safeguarding Risk Assessment for Children and Young People staying with Host Families

Risk to Child	Risk Control (What will be done to mitigate the risk?)	Further Action Required (if any)
Bullying (including cyber-bullying, racist or homophobic bullying)		
Child abuse, including physical, sexual, emotional abuse or neglect and.		
Peer on peer abuse including sexual harrassment/violence		
Social isolation or homesickness		
Unmet medical needs, illness or disability		
Medical emergency, injury or death		
Inability to practice faith or religion		
Radicalisation		
Lost or missing child		
Child does not attend school		

## Safeguarding: Use of Host Families Policy and Procedure

<b>Ownership and consultation</b>	
Document sponsor (role)	Group Director of Education
Document author (name)	Susan Harrison - Head of Safeguarding Governance Laura Thompson - Senior Solicitor, EMW Law LLP
Consultation – March 2018	James Carroll (DE), Ryan Henderson (International Recruitment Manager), Independent Reviewers, Headteachers & Designated Safeguarding Leads at Akeley Wood Senior School, Colchester High School, Hydesville Tower School, NBH Canonbury, Quinton House School and St Clare's School.

<b>Audience</b>	
Audience	All school-based staff and volunteers, Cognita Marketing and Admissions and School Support Centre staff.

<b>Document application and publication</b>	
England	Yes
Wales	Yes
Spain	For general guidance only as the legislation is UK specific.

<b>Version control</b>	
Implementation date	01.09.2019
Review date	Review and update for implementation in September 2020

<b>Related documentation</b>	
Related documentation	<p>All safeguarding related policies, including:</p> <ul style="list-style-type: none"> <li>• Anti-Bullying Policy</li> <li>• Behaviour Policy</li> <li>• Complaint Procedure</li> <li>• Data Protection Policy</li> <li>• Digital Safety Policy</li> <li>• Early Years - Use of Mobile Phones and Devices Policy</li> <li>• Educational Visits Policy</li> <li>• Exclusion Policy</li> <li>• First Aid Policy</li> <li>• Health and Safety Policy</li> <li>• Intimate Care and Toileting Policy</li> <li>• Premises Management Policy</li> <li>• Preventing Extremism and Radicalisation Policy</li> <li>• Safeguarding and Child Protection Policy and Procedure</li> <li>• Safeguarding Risk Assessment: Welfare, Health &amp; Safety Policy</li> <li>• Safer Recruitment Policy</li> <li>• SEND Policy</li> <li>• Staff Code of Conduct, including Acceptable Use Policy</li> <li>• Staff Discipline, Conduct and Grievance Policies</li> <li>• Staff Handbook</li> <li>• Supporting Pupils with Medical Conditions Policy</li> <li>• Use of Reasonable Force Policy</li> </ul>