



Llywodraeth Cymru
Welsh Government

GUIDANCE

Homes for Ukraine: safeguarding and modern slavery guidance

Advice on how public bodies can help protect people living in households from Ukraine.

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Safeguarding

The Welsh Government is working to ensure that safeguarding is a central consideration in the systems, policy and advice being developed to support the arrival of people from Ukraine. We know this is also a priority for local authorities and relevant safeguarding partners.

Overall, local authorities are required to carry out their existing statutory safeguarding functions in relation to this individual sponsoring scheme, as they would for any other population in Wales. These responsibilities apply whether persons from Ukraine are accommodated in initial temporary accommodation, Welcome Centres, with individual host sponsors or in move-on host sponsor accommodation.

Advice on identifying and responding to safeguarding concerns about children or adults at risk (as defined in the Social Services and Well-being (Wales) Act 2014) is explained in the [Wales Safeguarding Procedures](#) and in the [All Wales Practice Guides](#) on Social care Wales.

Additional advice and guidance

A range of UK Government security checks including Police National Computer (PNC) and Warnings Index are carried out on people from Ukraine applying for a Visa. These checks must be passed in order for a visa to be issued. The same level and type of checks will be carried out by the UK Government on people from Wales aged over 18, applying to become hosts. Work is underway to increase the type of checks carried out and further advice will issue in due course.

Local authorities may be in possession of information held on their systems, for example, safeguarding concerns, to suggest that individuals in the host address

are not suitable to act as hosts. Checking of such internal systems is a decision for the individual local authority. In this way decisions that some individuals cannot act as hosts can be made by the local authority in advance of the Disclosure and Barring Service (DBS) checking process.

If a match is made which involves a person from Ukraine who is a child (i.e., under 18), an Enhanced DBS check will be undertaken on all members of the host household who are aged 16+. The Enhanced check (including a check of the children's barred list) is needed due to the level of safeguarding risk within households where the sponsor and/or other individuals aged 16+ may provide care or supervision of a child guest under the scheme on more than three occasions in a 30-day period, or overnight, bringing the sponsors and other adults into regulated activity (Safeguarding Vulnerable Groups Act 2006, Sch4, Part1). However, this does not apply if the child from Ukraine is related to the host sponsor. In this instance only a Basic DBS check is required.

If your local authority decides that an adult from Ukraine requires additional support, due to age, illness or because they are disabled and it is proposed that an adult (16+) member of the sponsoring household provides them with this support, then you may ask for an Enhanced DBS check (including a check of the adults' barred list) to be undertaken on any members of the sponsor's household who is proposed to provide that support. Existing guidance regarding **Regulated Activity with Adults** and **Regulated Activity with Children** can support the assessment of the eligibility of individuals for this level of check.

In all other cases, including where there is a family relationship between the sponsor and the people from Ukraine, a Basic DBS check should be undertaken on all members of the host household who are aged 16+.

To facilitate the swifter move on of people from Ukraine out of Welcome Centres and in to host/sponsor households, a national approach to DBS checks has been introduced. Complete Background Screening have been contracted by Welsh Government to provide advice to local authorities on the DBS checks

process and to undertake DBS checks on behalf of local authorities. Information has been circulated; however, further advice can be sought from rachelb@cbscreening.co.uk.

DBS checks and associated costs can be paid for from the £10,500 tariff UK Government is providing to local authorities via the Welsh Government for each person from the Ukraine hosted in the UK.

Further information on DBS checks is set out in the Welsh Government's letter to local authority Chief Executives and other statutory partners dated 1 April 2022. A series of FAQs about DBS checks can be found at the end of this guidance.

Information for hosts and people from the Ukraine

In undertaking safeguarding checks, local authorities are asked to request that hosts complete the [online safeguarding training module](#).

The Welsh Government has published a [guide for sponsors](#) that includes information for hosts on the need to report any safeguarding concerns and how to do so.

Via the Welsh Government's [Sanctuary website](#), people from Ukraine arriving in Wales will receive information about life in Wales including about how to report any safeguarding concerns and that it is appropriate to do so. It currently contains initial information for people from Ukraine which will be added to over time.

A Contact Centre which is open 24 hours a day, 7 days a week, has been established for both host sponsors and people from Ukraine. Freephone within the UK: 0808 175 1508. From outside the UK: +44(0)20 4542 5671.

We expect Contact Centre staff to complete the [online safeguarding training module](#).

We have provided guidance to the Contact Centre on responding to and reporting any safeguarding concerns and are working to develop further training and advice.

We also expect Contact Centre staff to [complete the Violence Against Women Domestic Abuse and Sexual Violence \(VAWDASV\) training](#) and have provided similar guidance to the Contact Centre on responding to and reporting concerns in these areas.

Social media

We know there have been cases where individuals have used social media to match with a person or people from Ukraine. While social media and the internet have many benefits, there are also many well-acknowledged risks in respect of safeguarding and the potential for exploitation.

To ensure effective safeguarding for all individuals and families, the [use of the RESET matching system](#) is strongly encouraged.

Advice included in the guidance for sponsors states:

Social media: some do's and don'ts

Everyone uses the internet and social media to stay in touch and even more so when families are separated. This advice is to help you as a sponsor to protect the privacy and dignity of the person or people from Ukraine you are hosting. The good intentions of people can sometimes be taken advantage of by those less scrupulous. A rule of thumb would be to ask yourself if you would be happy

to have images and information shared about you or your family/children on a public network, with or without consent. Remember that children are unable to give 'informed consent'.

As a sponsor, there are a range of simple things you can do to help secure privacy:

Do

Make sure that everyone in your home who is using social networks is aware of their security settings and how to change them.

Be aware that usernames, profile pictures and social media biographies are always public, even on private accounts.

Be very careful about friend requests from people you don't know. Ensure that the person or people you are hosting have downloaded the 'panic button' onto Facebook.

Don't

Publish photographs of the people you are hosting on public networks.

Publish any information about where the people you are hosting are living.

Publish any information about where the people you are hosting will be at a particular time.

Assume people are who they say they are.

If you are sponsoring people from Ukraine including a child or children, these resources for both adults and children are helpful: **Children and young people**

- **UK Safer Internet Centre** and **Parents and Carers - UK Safer Internet Centre**.

Safeguarding home visits to host households

Following the arrival of people from Ukraine in to host households and to confirm that there are no safeguarding or wellbeing concerns about people from Ukraine or people already residing in the host household, it is suggested that a home visit is scheduled for the first week of placement and then the third week of placement. If no concerns are established following these home visits, then no further visits need be made. Local authorities will need to decide whether additional visits are necessary on a case by case basis. Local authorities are recommended to provide information about their services, to host households.

Unless specific safeguarding and/or care and support needs are identified then home visits will not need to be undertaken by qualified staff/social workers. However, staff undertaking home visits should have undertaken relevant safeguarding training. As a minimum, this **online safeguarding training** should be completed.

Concerns identified through local authority safeguarding checks in advance of people from Ukraine arriving at host sponsor address

Where local authority checks identify that a sponsor and/or address is unsuitable on safeguarding grounds, the local authority should make a decision on the appropriate course of action, subject to the level of risk. Local authorities may wish to consider establishing a panel of relevant officers to consider cases.

Where a person(s) from Ukraine is at risk of immediate harm from a potential host sponsor and the local authority needs the assistance of Border Force to

intercept people on arrival, the local authority should log this issue with the **UK Government helpdesk** (known as Jira).

Local authorities will need to register via the same link. In raising your Jira ticket, add 'safeguarding' to the subject header as these cases are prioritised.

Alternatively, local authorities can contact the UK Government Telephone Helpdesk on 0303 444 4445. This operates between 9am-6pm, Monday to Friday (except Bank Holidays).

The local authority will then need to arrange alternative accommodation for the person/people from Ukraine. Where people present or are identified as requiring emergency accommodation, it remains the responsibility of the local authority to identify suitable accommodation in their area.

Welcome Centres should not be viewed as an emergency placement mechanism. They have been designed to provide capacity to support those arriving via the Super Sponsor route and not as a mechanism for emergency placements. In extremely exceptional circumstances, a very short-term placement may be offered within a Welcome Centre while a more appropriate local solution is urgently sourced. This will only be offered in the most exceptional of circumstances, where all local options have been exhausted and only where there is sufficient capacity within a Welcome Centre.

In such circumstances, the local authority should contact: **Ukraine.Safeguarding@gov.wales** to assess whether this option can be offered. In these rare circumstances, the responsibility for accommodating the individuals will remain with the local authority, who will be expected to urgently source a suitable local solution.

The local authority should also:

- as soon as possible, notify the person who has applied to become a host

sponsor that they will not be able to act as a sponsor, in person or by telephone, followed by a letter or email. There may be cases where the local authority decides that the support of the police is needed in informing the person who has applied to become a host sponsor that they will not be able to act as a sponsor. This is a decision for local authorities to take on a case by case basis. If the local authority assesses that police involvement is necessary due to the risk to local authority officers, please contact the Police Liaison Unit on plu@gov.wales

- if the local authority believes there is a possibility that the person who has applied to become a host sponsor may have breached any conditions of a license or community sentence by applying to be a host sponsor the local authority should notify the Probation Service via: WalesPSIAR@justice.gov.uk
- raise a Jira ticket to request that the host sponsor is removed from the UK Government's host sponsor list
- notify the Welsh Government of the actions taken by email Ukraine.Safeguarding@gov.wales.

Where the local authority has safeguarding concerns about a potential host sponsor but does not believe they pose a risk of immediate harm to others. The local authority should:

- as soon as possible, notify the person who has applied to become a host sponsor that they will not be able to act as a sponsor, in person or by telephone, followed by a letter or email
- confirm with the person who has applied to become a host sponsor the expected date of arrival of people from Ukraine and their travel and arrival arrangements at the sponsor address
- visit the address on the date of arrival and arrange for people from Ukraine to be taken to alternative accommodation
- If the risk is assessed to have the potential to increase, raise a Jira ticket to request that the host sponsor is removed from the UK Government's host sponsor list

- notify the Welsh Government of the actions taken by email: Ukraine.Safeguarding@gov.wales.

Concerns identified or reported after people from Ukraine have started living with a host sponsor

Where a safeguarding concern is identified or reported after the hosting arrangement has commenced, the local authority should respond in the usual way, making decisions on a case-by-case basis in line with existing statutory duties.

Where the local authority believes the nature of the safeguarding concerns means that the person or people from Ukraine should no longer live at the host sponsor address, they should provide advice about the unsuitability of the current arrangements and associated risks and make recommendations about moving to alternative accommodation.

In the event that a local authority makes a decision to remove people from the Ukraine from a host sponsor to address to alternative accommodation, they should notify Welsh Government of the actions taken by email:

Ukraine.Safeguarding@gov.wales.

Alternative and move on accommodation

The Welsh Government has published a [Framework for Accommodation](#) which sets out a series of arrangements for housing people from Ukraine following their initial period of accommodation in a Welcome Centre or where existing placements under the individual Homes for Ukraine scheme have broken down. You are advised to read this together with this guidance.

People from Ukraine going missing

The Welsh Government has provided advice in the [guide for sponsors](#) on responding in the event that a person(s) from Ukraine does not arrive at their address as expected. This includes making reasonable efforts to contact and locate the person(s) from Ukraine and in event that these attempts are unsuccessful, to make a missing person(s) report to the police.

In cases where we have been informed by UK Government that a person(s) has arrived in the UK on the Homes for Ukraine Super Sponsor Scheme but have been uncontactable by the Contact Centre. Contact Centre staff will report the person as missing to the police on 101.

In cases where a person(s) from Ukraine have been contacted by Contact Centre staff and have failed to arrive at initial temporary accommodation, the local authority providing wraparound support into the temporary accommodation is required to report the person(s) as missing to the police on 101.

In cases where a person(s) from Ukraine have been contacted by Contact Centre staff and have failed to arrive at a Welcome Centre as planned, Welcome Centre staff must notify the local authority who are then required to report the person(s) as missing to the police on 101.

In cases where a person(s) from Ukraine is being hosted on the Ukraine Family Scheme or the Homes for Ukraine Individual Sponsor Scheme and they fail to arrive at their agreed host sponsor, the host sponsor is required to report the person as missing to the police on 101.

Violence against Women, Domestic Abuse and Sexual Violence

Violence against women, domestic abuse and sexual violence (VAWDASV) covers a range of abusive acts and violence disproportionately committed against women, which can include, domestic abuse (physical, sexual, psychological, emotional or financial abuse and coercive control), sexual violence and rape, 'honour-based' abuse including female genital mutilation, forced marriage and 'honour' killings, as well as public sexual harassment.

Whilst the term VAWDASV acknowledges the vast majority of victims are female, the scope of domestic abuse, sexual violence and harassment can extend to all victims regardless of gender.

In Wales, the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 aims to improve the prevention of VAWDASV and the protection and support provided to victims and survivors.

Ukrainians coming to the UK may have experienced VAWDASV in their home country, as part of their journey to the UK or when they arrive in the UK.

It is important that local authority staff engaging with Ukrainians have an awareness of what VAWDASV is, what signs to look out for and how to support anyone who has experienced VAWDASV or who is at risk of doing so.

Under the VAWDASV Act 2015, all local authority staff should undertake VAWDASV training. All staff should have completed the **VAWDASV awareness module** within the last 3 years.

Local authority staff working in a public facing role, coming into contact with potential victims of VAWDASV (clients in which either an assessment is made and/or care is delivered) should have also undertaken Ask and Act training. Ask

and Act training provides the local authority workforce with the skills to safely ask and respond to disclosures of violence and abuse.

There are specialist VAWDASV support services in every region of Wales that can offer information, advice and support to victims of VAWDASV. Support can include; emotional, practical, access to emergency accommodation, educational and preventative measures, risk assessing and safety planning.

It is highly recommended that a referral to a specialist service is considered at the earliest opportunity following a disclosure of VAWDASV.

The Live Fear Free helpline

Our Live Fear Free helpline is a free, 24/7 service for all victims and survivors of violence against women, domestic abuse and sexual violence and those close to them, including family, friends and colleagues. Live Fear Free can be contacted in the following ways:

Call: 0808 80 10 800 (Croesawir galwadau yn Gymraeg / Calls are welcomed in Welsh)

Text: 0786 007 7333

Email: info@livefearfreehelpline.wales

Live chat.

Dyn Wales helpline, is an organisation supporting male victims of domestic abuse. 0808 801 0321 or email support@dynwales.org (support for male victims).

BAWSO is a specialist organisation dedicated to supporting ethnic minority communities.

Meic is a free, confidential, anonymous, and bilingual helpline service for children and young people up to the age of 25 in Wales providing information, useful advice and support. Meic is open 8am - midnight, 7 days a week, by telephone, SMS text and instant messaging.

Telephone: 0808 80 23456

Text: 54001

Live chat.

Modern slavery

Modern slavery is an umbrella term that covers human trafficking, slavery, and forced labour. The main legislation is the Modern Slavery Act 2015. Whilst modern slavery is a reserved matter, the Welsh Government works with partners in Wales, the Home Office, and other governmental and non-governmental agencies to tackle this crime and support victims and survivors.

Modern slavery takes place internationally, including across communities in Wales. There were 479 Welsh referrals for suspected victims of modern slavery in 2021. Over half of those referred were children. In Wales, around half of referrals are for non-UK nationals from countries such as Albania, Sudan, and Eritrea.

The Welsh Government recognises Ukrainian refugees are at risk of modern slavery. This includes Ukrainians who are internally displaced, those who have travelled to neighbouring countries, and those who have arrived or are currently transiting to the UK. We have raised these concerns with the UK Government, are monitoring the situation closely, and are engaging with relevant partner agencies concerning these issues.

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Local Authority staff engaging with Ukrainians should have awareness of modern slavery. There are many **free resources on modern slavery**, including e-learning courses for **First Responders** and on **child victims of modern slavery**. The Home Office has produced a **Modern Slavery Awareness Booklet**.

Accessible and multilingual information and resources on modern slavery are also available at online sources including:

- **The Welsh Government's Sanctuary site**
- **The Welsh Government's Live Fear Free site**
- **The Wales Safer Communities Network site**

Ukrainian refugees are at risk of the 4 main types of modern slavery as identified by the Home Office:

- Labour exploitation: where victims are forced to work in a highly exploitative situation in which they cannot freely leave for other employment or exercise choice.
- Criminal exploitation: where victims are exploited and coerced to commit a crime for someone else's gain. An example of criminal exploitation is the transportation and cultivation of drugs
- Sexual exploitation: where victims are coerced into sex work or sexually abusive situations. This includes child sexual exploitation.
- Domestic servitude: which typically involves victims working in a private family home where they are ill-treated, humiliated, subjected to unbearable conditions or working hours or made to work for little or no pay.

Local Authorities in England and Wales are required to follow the **Statutory Guidance for England and Wales under section 49 of the Modern Slavery Act 2015**. Local Authorities in Wales should also follow the **Wales Modern Slavery Safeguarding Pathway**.

There are many different signs of modern slavery that depend on the type of exploitation. Unseen UK, who run the [Modern Slavery and Exploitation Helpline](#) have produced information on [signs of modern slavery](#) to look out for.

Read [Information about reporting modern slavery](#). In Wales, a Multi-Agency Risk Assessment Conference (MARAC) approach is adopted to refer adult victims into support and appropriate MARAC guidance should be followed. Complete the [online form](#) to make a [National Referral Mechanism](#) (NRM) referral.

Informed consent is required for an adult to be referred into the NRM. Where an adult does not consent to be referred, a Duty to Notify referral should be completed using the [same online form](#).

Following referral to the NRM, a decision should be made within five days by the Home Office competent authority on whether there are reasonable grounds to suspect the person referred is a victim of modern slavery. This is called a Reasonable Grounds (RG) decision. Following a positive RG decision, the potential victim will enter a recovery period until a Conclusive Grounds (CG) decision is made.

Adults and their dependents should receive support through the recovery period. This includes financial support, medical support, accommodation, translation and interpretation services, and access to legal representation. [Bawso](#) are the Modern Slavery Victim Care and Coordination (MSVCC) service provider in Wales.

Children who are suspected victims of modern slavery must always be referred to the NRM and do not have to provide consent. In addition, children should also be referred to the Independent Child Trafficking Guardianship (ICTG) service. The ICTG service, operated by Barnardo's, operates nationally in Wales. This service provides various practical, psychological, and emotional specialist

services to children. Children can be referred using [this online form](#). This is in addition to NRM and safeguarding referrals which must also be made.

The Gangmasters and Labour Abuse Authority (GLAA) have produced '[Know Your Rights' posters](#) about exploitation in English and Ukrainian. Local authorities should ensure these posters are displayed in all Welcome Centres and initial temporary accommodation within their areas.

People seeking sanctuary from Ukraine have the right to work as soon as they have been given a visa to stay in the UK from Ukraine. However, offers of accommodation are not permitted to be linked to employment offers. While some sponsors may offer employment opportunities following Ukrainians arriving in sponsor accommodation, the employment rights of Ukrainians must be fully respected. They must not be required to take up or continue in employment in order to maintain their accommodation.

Annex: frequently asked questions (FAQs)

These FAQs supplement Claire Bennett's letter of 1 April 2022 and apply in relation to the individual host sponsor scheme

Can individual host sponsors carry out their own DBS checks?

For Basic DBS checks, there are two options available to local authorities; they could either come to a new arrangement with a 'Responsible Organisation' (these are Registered Bodies but they only submit Basic checks) or they could direct sponsors toward the direct DBS application route.

Enhanced checks can only be requested via a Registered Body. Some local

authorities will be Registered Bodies in their own right while others will have an existing commercial arrangement with another organisation. All Local Authorities will have experience of submitting Enhanced DBS checks and so to a point these checks will be business-as-usual

What about confirmatory ID?

The ID process is necessarily strong, however there is an option to post original documents to the Registered Body and have them checked that way. There is also an option for ID documents to either be scanned or viewed over a video call in advance of the DBS check being submitted but this approach requires the physical documents to be examined 'at the commencement of employment'. This approach may work well if local authorities are able to do home visits prior to guests arriving.

When do local authorities need to carry out Basic checks and when do they need to carry out Enhanced checks?

The legislation underpinning DBS checks means that there is no legal basis for conducting Enhanced checks on host sponsors unless they are either supervising children or providing regulated activity to an adult. This latter scenario is seen as being very rare as the host sponsors would have to be providing personal or medical care due to the age, illness or disability of the person moving into their home. Where neither of the scenarios above is explicitly taking place then the only option is a Basic DBS check.

How are DBS checks paid for?

Local authorities will be receiving £10,500 per person from Ukraine from the UK Government paid via Welsh Government to Welsh local authorities, arriving via

the Homes for Ukraine scheme. All costs associated with DBS checks can be funded from these allocations.

Are local authorities able to accept existing DBS certificates in any circumstances, either by seeing the certificate or where the applicant is signed up to the DBS Update Service?

Yes, existing DBS certification can be accepted if it is the same type (Enhanced/ Basic; Children/ Adults). For example, if someone has a current DBS in place then that offers a level of assurance. It is for local authorities (and employers more generally) to decide what qualifies as a sufficient period of time remaining on a check and this will determine the need for preparations to undertake a new check.

How are local authorities expected to support people from Ukraine if host sponsors do not pass DBS checks?

We know that over 12,500 people in Wales applied to become host sponsors via the Homes for Ukraine scheme and that many of these offers have not yet been taken up. Welsh Government is currently working with local authorities to establish a re-matching system using data acquired by UK Government via the Homes for Ukraine Expression of Interest process. This data will inform a Wales-specific re-matching process which will be led by local authorities with the aim of using as many of these offers as are needed.

Can local authorities undertake Standard DBS checks if they feel there are administrative hurdles or other reasons to undertaking Basic checks?

The carrying out of Standard checks is not an option from a legal perspective –

the same barriers exist as for Enhanced checks. In brief, host sponsors are eligible for Enhanced with a Children's or Adults barred lists check or Basic checks and nothing in between.

If the host sponsor and their adult family members do not live in the property they are offering to people from Ukraine with children and/or a vulnerable adult (i.e. because it is a second home), do they still need to undergo Enhanced checks?

This is a risk-based decision for local authorities' discretion. As the host sponsor won't be living with the guests, it could be difficult to justify an Enhanced check. However, it is up to the local authority to decide whether a Basic check is proportionate. In reaching a decision, local authorities may wish to factor in the likely contact between the host sponsor and people from Ukraine. Proximity may also be a factor, for example, if the accommodation for people from Ukraine is next door to the host sponsor then it is far more likely that there will be regular contact.

A host sponsor household includes an individual over the age of 16 who is severely disabled and lacks mental capacity. Is a DBS check on this individual required or could an exception be made?

The DBS legislation and regulations do not take account of scenarios like this. As a result, the proportionality and risk-based decision sits with the local authority. In reaching a decision, the local authority may wish to consider this question: 'does this individual have the capacity (physical or mental) to actively partake in criminal activity?' If the answer is 'no' then that may influence that risk-based decision.

These FAQs apply in relation to short term hotel

accommodation and Welcome Centres

Can local authorities undertake Enhanced DBS checks in advance of knowing if a sponsor household will be accommodating a child(ren) and/or vulnerable adult(s) but where a sponsor household has indicated via the EoI process they are willing to accommodate a child(ren) and/or vulnerable adult(s)?

in the context of arranging move-on accommodation for Welcome Centre residents, it is possible to undertake checks in advance of a specific sponsor-guest match being confirmed. The Expression of Interest data sent to local authorities via Objective Connect contained information confirming if a host was willing to accommodate children and adults, or only adults. If the sponsors in question have the accommodation available to support a family with children and, during conversations with local authority officers they have confirmed that they are still content to accommodate children or vulnerable adults, then it is permissible to undertake Enhanced DBS checks. There is no requirement for a named Ukrainian family to have been matched with the sponsors before any checks are submitted.

Do hotel staff need to undertake DBS checks?

Unless the hotel was receiving multiple families and part of their service provision was formal childcare, there is no requirement for checks to be carried out. There is a significant practical distinction between the original HfU scheme and subsequent placement in hotels and as such the idea that significant relationships which may lead to Regulated Activity with children might be built falls by the wayside. Similarly, hotel staff would not be expected or be qualified to provide Regulated Activity to adults.

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