

Minister for Culture, Europe and International  
Development and Minister with special  
responsibility for Refugees from Ukraine  
Ministear airson Cultar, na Roinn-Eòrpa is Leasachadh  
Eadar-nàiseanta agus Ministear le dleastanas sònraichte  
airson Fògarraich bhon Ucràin  
Neil Gray BPA/MSP



Scottish Government  
Riaghaltas na h-Alba  
gov.scot

T : 0300 244 4000  
E : scottish.ministers@gov.scot

Alison Bavidge  
scotland@basw.co.uk

Our Reference: 202200294122  
Your Reference: Correspondence from SASW- Ukraine

9 May 2022

Dear Alison,

Thank you for your letter of 8 April 2022 regarding concerns around safeguarding, and impacts on social workers. As you are aware I am the Minister with Special Responsibility for Refugees from Ukraine. Firstly, may I apologise for the delay in responding to you.

We are alert and responding to the safeguarding concerns you highlight with regards to the heightened risks of trafficking and exploitation of women and children. The Scottish Government has published [People arriving from Ukraine: Risk and Need: Public Protection Guidance](#) to assist local authorities and other organisations responding to the crisis. This guidance makes clear our preferred approach to identifying risks, as well as supporting and maximising safety. The guidance highlights the principles that should be applied and how these can be achieved within the existing safeguarding, child or adult protection legal frameworks underpinning practice. Revision of this public protection guidance is currently underway to address emergent information from circumstances of some arrivals from Ukraine to date.

Within our emergency preparedness governance structures, at bronze level the Scottish Government has established a Safeguarding Strategy sub-group with specific tasks to support implementation of the Public Protection guidance. The group will share information and work together to develop solutions where existing or developing safeguarding risks are identified. The Safeguarding sub-group is co-chaired by Iona Colvin, Chief Social Work Adviser, Scottish Government and Detective Chief Superintendent Samantha Faulds, Head of Public Protection, Specialist Crime Division, Police

Scottish Ministers, special advisers and the Permanent Secretary are covered by the terms of the Lobbying (Scotland) Act 2016. See [www.lobbying.scot](http://www.lobbying.scot)

Tha Ministearanna h-Alba, an luchd-comhairleachaidh sònraichte agus Rùnaire Maireannach fo chumhachan Achd Coiteachaidh (Alba) 2016. Faicibh [www.lobbying.scot](http://www.lobbying.scot)

St Andrew's House, Regent Road, Edinburgh EH1 3DG  
[www.gov.scot](http://www.gov.scot)



INVESTORS  
IN PEOPLE

Accredited  
Until 2020



Scotland.

The first meeting was held on 21 April and the group will continue to meet weekly. The group membership has representation from local government social work, Social Work Scotland, Solace and COSLA as well as other statutory and third sector providers. Intelligence is being escalated to this bronze level group via the Trafficking and Exploitation Strategy Implementation sub-group. These regular meetings of expert partners are providing a forum to identify and mitigate developing Exploitation and Trafficking risks for people fleeing the conflict in Ukraine and arriving in Scotland. Where it may be necessary, safeguarding issues will be further escalated through the Scottish Government and COSLA's silver and gold command structure for the response to Ukraine.

As a first priority, the Safeguarding Strategy sub-group has developed process maps to detail the points at which safeguarding checks should be undertaken under the Homes for Ukraine and Scottish Super Sponsor Schemes. The group is also working on actions to mitigate against and respond to any unanticipated arrivals and any unchecked properties and/or prospective hosts. Steps are being taken to improve the data flows and to monitor emergent data, enabling us to move from anecdotes to meaningful and useful safeguarding information.

Work is already underway on a revised version of the Public Protection guidance. This aims to strengthen the approaches that should be taken to ensure people are aware of and supported to go through the Welcome Hubs. The Hubs are designed to obtain relevant wellbeing and risk information from arrivals; to offer support link details; to confirm that all necessary safeguarding checks have been undertaken or are scheduled; and to support interim arrangements, should these be required to mitigate risk.

You also ask for clarification about the plans for how decisions will be made about which local authorities will look after unaccompanied children and, more importantly, how they will ensure that all children are sufficiently supported in culturally appropriate environments. Scottish Ministers continue to push the UK Government to create a safe and legal route for unaccompanied children without a familial connection and remain deeply concerned that the lack of such a route is exposing Ukrainian children to needless risk.

While we have yet to see any wholly unaccompanied children arrive in Scotland, we agree mechanisms are needed for ensuring the welfare of these children is protected once they arrive in Scotland and that no one local authority is disproportionately impacted. Learnings from the National Transfer Scheme will be central should Scotland be required to accommodate large numbers of unaccompanied Ukrainian children. As part of this preparatory activity, the Scottish Government will be monitoring this issue through the Bronze Safeguarding Strategy Sub-Group.

Reporting through the Safeguarding subgroup, the Scottish Government is also establishing a working group to explore the options and challenges for children arriving from Ukraine. It will ensure work is aligned closely with any changes in UK legislation regarding how age assessments should be carried out. The group is currently being coordinated and we are welcoming suggestions regarding membership. Please let my officials know by email to [UkraineCandFResponseTeam@gov.scot](mailto:UkraineCandFResponseTeam@gov.scot) if you would like to be involved and we can keep you updated as this work is progressed.

We also absolutely recognise the critical role social workers provide and the acute additional demand that will be required from social workers and social services with the arrival of people forced to flee

Scottish Ministers, special advisers and the Permanent Secretary are covered by the terms of the Lobbying (Scotland) Act 2016. See [www.lobbying.scot](http://www.lobbying.scot)

Tha Ministearanna h-Alba, an luchd-comhairleachaidh sònraichte agus Rùnaire Maireannach fo chumhachan Achd Coiteachaidh (Alba) 2016. Faicibh [www.lobbying.scot](http://www.lobbying.scot)

St Andrew's House, Regent Road, Edinburgh EH1 3DG  
[www.gov.scot](http://www.gov.scot)



INVESTORS  
IN PEOPLE

Accredited  
Until 2020



Ukraine. We understand that this will also create funding pressures arising from providing a public protection response, particularly for children and vulnerable adults arriving from Ukraine to Scotland. I can assure you that work is ongoing to scope the potential costs associated with providing a public protection response for Ukrainian families arriving in Scotland. This work is being done in parallel to the arrangements being worked out with the UK Government regarding the allocation of funding committed through the established visa schemes intended to support the Local Authority resettlement activity.

We are keeping in very close contact with local authorities on the support which the Scottish Government can offer, including setting up a Ukraine appeal recruitment portal with SSSC, offering opportunities to social work students either for placements or part time roles, or inviting non-frontline social workers to be temporarily redeployed to the front line. The developing situation around people arriving from Ukraine is being closely reviewed and considered within the longer terms strategy required to sustain healthy and professional social work services across Scotland.

Scottish Government is also aware of issues when individuals seek to transfer sponsors as part of the Homes for Ukraine scheme. The UK government has confirmed to us that there are currently no provisions to transfer people between schemes. They recognise the significant safeguarding risks in the matching process and are working on a policy for people to be re-matched safely, with relevant funding arrangements in place. Scottish Ministers have raised this issue with the UK government and will continue to press for an urgent solution to it.

Thank you for writing to me, and I trust that you will find the foregoing information useful.

Yours sincerely



**NEIL GRAY**

Scottish Ministers, special advisers and the Permanent Secretary are covered by the terms of the Lobbying (Scotland) Act 2016. See [www.lobbying.scot](http://www.lobbying.scot)

Tha Ministearanna h-Alba, an luchd-comhairleachaidh sònraichte agus Rùnaire Maireannach fo chumhachan Achd Coiteachaidh (Alba) 2016. Faicibh [www.lobbying.scot](http://www.lobbying.scot)

St Andrew's House, Regent Road, Edinburgh EH1 3DG  
[www.gov.scot](http://www.gov.scot)



INVESTORS  
IN PEOPLE

Accredited  
Until 2020

