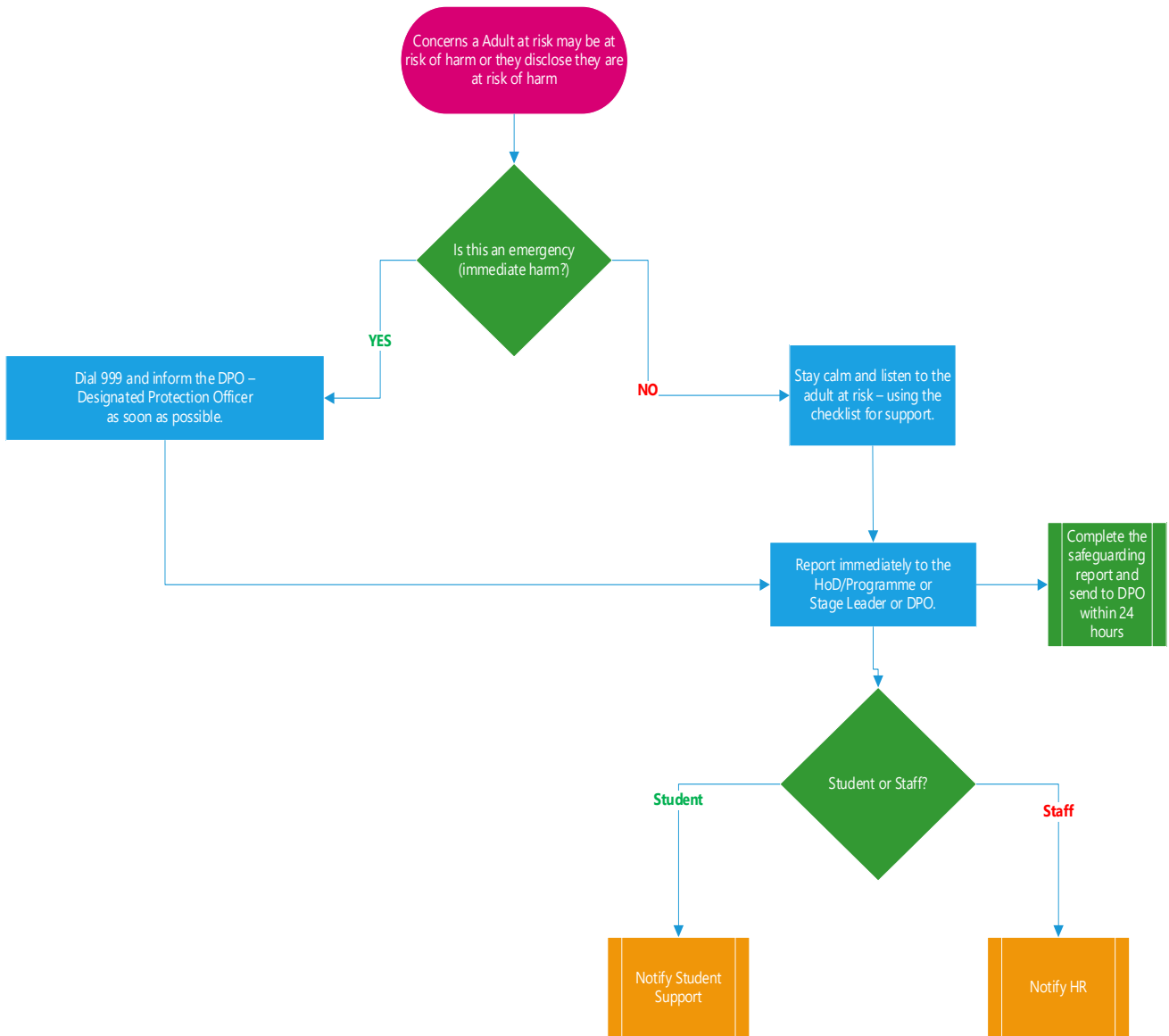


**Adult Protection Policy (revised)  
November 2025**

**Policy control**

<b>Date approved</b>	Refreshed Policy November 2025
<b>Approving Bodies</b>	SLG
<b>Implementation Date</b>	November 2025
<b>Supporting Policy</b>	Child Protection Policy Protection of Vulnerable Groups Scheme Policy
<b>Review date</b>	April 2027
<b>Author</b>	Louise Higgins, Interim HR Manager
<b>Date of Impact assessment</b>	October 2025
<b>Benchmarking</b>	University of Edinburgh University of the Arts, London Falmouth University Royal College of Art Royal Conservatoire of Scotland

# PROCESS MAP



## Adult Protection Policy

1. The Glasgow School of Art (the GSA) is committed to ensuring a safe and supportive environment for all students and staff. This policy sets out the GSA's approach to protecting and safeguarding Adults at risk of harm with whom GSA works.
2. Our approach is guided by ethical leadership practice and by the GSA values detailed in the Strategic Plan. These values translate into core behaviours — how we make decisions, how we treat each other, and how we work together. They underpin an empowering, responsible, and caring culture that places the safety and wellbeing of people at its centre.
3. Safeguarding is distinct from general pastoral care. While pastoral care provides support, advice, and guidance to promote the well-being of students and staff, safeguarding specifically relates to adults at risk from harm, abuse, and neglect, and ensuring concerns are acted upon promptly and appropriately.
4. For further details, please refer to the **Adult Protection Procedure** [HR Policies and Forms](#).

## Policy Objectives and Context

5. The purpose of this policy and related procedure is to:
  - Clarify safeguarding responsibilities as distinct and in addition to pastoral care.
  - Clearly define roles and responsibilities, including escalation routes.
  - Assure staff and students those safeguarding adults at risk with whom GSA works is a priority.
  - Ensure consistency with statutory guidance and sector best practice.

## Principles Guiding Protection

6. Any intervention by GSA will be guided by the principle that it must benefit the individual. GSA will ensure that:
  - The wishes and feelings of the adult are taken into account.
  - The adult is supported to participate in the referral process.
  - The adult is not treated less favourably than others.
  - The adult's background and characteristics (age, sex, sexual orientation, beliefs, race, ethnicity, culture, language) are respected.

## Legal and Statutory Context

7. This policy is framed by the **Adult Support and Protection (Scotland) Act 2007**, which provides the statutory framework for safeguarding adults at risk.
8. Scottish Government's **Protection of Vulnerable Groups (PVG) Scheme** ensures people working with adults at risk do not have a history of harmful behaviour. GSA's **PVG Policy** [HR Policies and Forms](#) provides further guidance.
9. Safeguarding at GSA is underpinned by Scottish and UK legislation, including but not limited to:
  - Protection of Vulnerable Groups (Scotland) Act 2007 and the PVG Scheme.
  - Adult Support and Protection (Scotland) Act 2007.
  - Equality Act 2010 and Human Rights Act 1998.
  - Data Protection Act 2018 and UK GDPR.

- UN Convention on the Rights of the Child (UNCRC).

10. This legal and policy framework ensures that the GSA's safeguarding responsibilities align with statutory duties, sector best practice, and the rights of adults at risk of harm.

## Definitions

### 11. Adult:

- For the purposes of this policy and adult at risk of harm is 16 or over who:
  - I. Is unable to safeguard their own wellbeing, property, rights, or interests.
  - II. Clarify safeguarding responsibilities as distinct and in addition to pastoral care.
  - III. Is at risk of harm.
  - IV. Is more vulnerable to being harmed because of disability, mental disorder, illness, or physical/mental infirmity.

All 4 elements must be met for a person to be considered an adult at risk.

### 12. Child:

- For the purposes of safeguarding at GSA, any individual under the age of 18 will always be treated as a **child** and afforded child protection safeguards.
- Young people aged 16–17 may also, in certain circumstances, meet the statutory definition of an **adult at risk** under the *Adult Support and Protection (Scotland) Act 2007*. This applies where all three statutory criteria are met:
  - they are unable to safeguard their own wellbeing, property, rights, or interests;
  - they are at risk of harm; and
  - they are more vulnerable to being harmed because of disability, mental disorder, illness, or physical/mental infirmity.
- Where both child protection and adult protection duties could apply, **staff must always follow the procedure that provides the higher level of protection and support**. This ensures that young people aged 16–17 are safeguarded to the fullest possible extent.

### 13. Safeguarding;

- For the purposes of this policy *Safeguarding* means protecting vulnerable adults from harm and neglect, promoting their welfare, and ensuring they can learn and develop in a safe environment. Staff should provide pastoral care where appropriate but must escalate to safeguarding procedures whenever there is concerns that a an adult is at risk.

### 14. Pastoral care:

- The support and guidance provided to students to help them manage academic, personal, and social challenges, and to promote their general well-being. This may include listening, signposting to services, and fostering a supportive environment. [link](#) to Mental Health and Wellbeing Champion Network' will be inserted if approved at SLG.

## Scope and Duty to Act

15. In practice, pastoral care and safeguarding often overlap. For example, a student may initially present with a pastoral need (stress, housing, financial worries) which, if left unaddressed, may escalate into a

safeguarding concern (risk of harm, neglect, or exploitation). Staff should provide pastoral care where appropriate, but any suspicion, disclosure, or evidence of an adult at risk of harm must be treated as a safeguarding concern and escalated without delay in line with the Adult Protection Procedure.

16. This duty applies equally to in-person and online contexts. GSA has a responsibility to protect adults at risk from online harm, including risks associated with social media, digital communication, third-party platforms, and online grooming or exploitation. While pastoral care may include supporting students with digital wellbeing (such as managing online pressures), safeguarding procedures must be followed whenever online activity presents a risk of harm.
17. This policy applies to activities organised and delivered by GSA on its own premises or those of another organisation.
18. Where GSA staff, students or volunteers take part in activities run by another organisation (e.g., schools, hospitals, or universities), adult protection matters will be addressed under that organisation's policy.
19. This duty is supported by GSA's recruitment and vetting processes, mandatory safeguarding training, IT policies on online use, and the detailed guidance set out in the Adult Protection Procedure.

### **Risk and Harm**

20. Risk relates to the person's ability (or inability) to safeguard themselves whether from others or through self-harm.
21. Harm includes:
  - Physical harm.
  - Psychological harm (fear, alarm, or distress).
  - Financial exploitation (theft, fraud, extortion).
  - Self-harm.
22. While pastoral care may address many wellbeing concerns (for example, stress or financial difficulty), concerns must be escalated to safeguarding procedures whenever they indicate or reveal that a child or young person and adults may be at risk of harm.

### **Roles and Responsibilities**

23. Many roles at GSA involve providing pastoral care to support student wellbeing, and this responsibility remains important. Staff should continue to offer appropriate support, advice, and guidance within their role. However, pastoral care does not replace safeguarding. When pastoral concerns suggest a risk of harm, they must be treated as safeguarding concerns and escalated in line with this policy and procedure.
24. In all cases, safeguarding concerns must be escalated to the Designated Protection Officers, who retain overall responsibility for safeguarding. Where safeguarding concerns relate to a student, the Student Support team will normally act as the coordination point; where they relate to a member of staff, Human Resources will normally act as the coordination point.
25. Everyone who works with adults at risk at GSA has safeguarding responsibilities, supported by:

- **Recruitment and Vetting** processes.
- **Mandatory training**, including safeguarding awareness for all staff, and enhanced training for designated roles.
- **Guidance** available in the **Adult Protection Procedure**.
- **IT policies** covering online use, monitoring, and filtering.

### **Employee Support**

26. All employees can access the **Employee Assistance Programme** [Employee Assistance Programme](#) for confidential support, available at any time.

### **Information Sharing and Data Protection**

27. Information sharing must be necessary and proportionate, prioritising the adult's safety. All data will be managed in accordance with GSA's **Data Protection Policy** - [HR Policies and Forms](#) .

### **Review**

28. This policy will be formally reviewed every 3 years to ensure compliance with legislation and best practice. Interim changes must be agreed in partnership with the Trade Union Forum and approved by the People & Culture Committee.