

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

## Procedure

This Adult Protection Procedure should be read in conjunction with the Glasgow School of Art Adult Protection Policy. The purpose of this document is to provide information for colleagues on how Adult Protection is managed at the GSA.

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## ADULT PROTECTION PROCEDURE

### Why do we have an Adult Protection Procedure?

1. This procedure supports the Adult Protection Policy and ensures that staff and students understand their roles and responsibilities. GSA places the highest priority on the safety and protection of all staff and students. It explains what to do and who to contact where there are concerns about an adult at risk of harm.
2. Many colleagues will encounter pastoral concerns in the course of their role. While these may be addressed through appropriate support and guidance, any pastoral concern that indicates a risk of harm must be treated as a safeguarding matter and escalated in line with this procedure.
3. This procedure should be read alongside the Adult Protection Policy, which sets out GSA's safeguarding principles, values, and statutory context.

### Who is covered by this procedure?

4. This procedure applies to:
  - All GSA employees.
  - Visiting workers (non-contracted, casual, hourly-paid).
  - Contractors, consultants, agency workers, and self-employed individuals working for GSA.
5. It aims to protect all adults at risk of harm which is defined as an adult 16 years and over who
  - Is unable to safeguard their own wellbeing, property, rights, or interests.
  - Is at risk of harm.
  - Is more vulnerable to being harmed because of disability, mental disorder, illness, or physical/mental infirmity.All three elements must be met for a person to be considered an adult at risk.

### Overlap between 16–17 year olds

6. Individuals aged 16–17 may also fall under the **Child Protection Policy & Procedure** [HR Policies and Forms](#).
7. For the purposes of safeguarding at GSA, anyone under the age of 18 will be regarded as a child. In line with the Adult Support and Protection (Scotland) Act 2007, individuals aged 16 and over may also be considered 'adults at risk' where they meet the statutory criteria. Where a 16–17 year old falls within both definitions, they will be treated as a child but may also receive protections afforded to adults at risk, ensuring the highest standard of safeguarding applies.
8. For the purposes of this policy and procedure *Safeguarding* means protecting vulnerable adults from harm and neglect, promoting their well-being, and ensuring they can learn and develop in a safe environment.
9. A key consideration in the definition of adult at risk is the adult's ability to safeguard themselves in a particular situation, context or circumstance. An adult who is capable of taking action to safeguard

themselves from harm but is unwilling to do so may not be considered an adult at risk.

### **What is covered by this procedure?**

10. This procedure applies when:

- Concerns arise about an adult at risk's safety or wellbeing.
- An adult at risk discloses that they are being harmed.

11. It applies across GSA activities, including:

- Organised visits, classes, summer schools.
- Outreach in schools or external venues.
- Research involving children on GSA premises or external sites.

### **What are the GSA core behaviours and how do these apply to the Adult Protection Procedure?**

12. Ethical leadership practice and the GSA values detailed in the Strategic Plan, translate into core behaviours that can be seen every day in our work at the GSA – our decision making, how we treat each other and how we work together. These behaviours contribute to an empowering, responsible, and caring culture that values our people. Our core behaviours are:

- Collaborative – we communicate clearly and respectfully with others. We listen and seek opportunities to work together to achieve common goals.
- Enabling – we empower and foster positive working environment by recognising and encouraging contributions from others.
- Caring – we are kind, respectful and compassionate in our interactions with all colleagues, students, and external partners. We encourage social responsibility and sustainability.
- Inclusive – we embrace workplace trust, value difference, recognise and welcome diverse views and opinions without inducing fear or favour.
- Curious – we inspire innovation and encourage new ways of working, we are inquisitive, and offer constructive challenge.
- Transparent – we are open in how we deliver. Others can see understand decision making and actions. Our actions are aligned to our values, policies, and procedures.

13. The [GSA Employee Assistance Programme](#) is available to all employees and provides access to an online source of self-help and wellbeing information. Should the employee wish further information on the support available, they should contact a member of the HR Team.

14. Everyone involved in the Adult Protection process is entitled to be treated calmly and with respect. We will not tolerate abusive or insulting behaviour from anyone taking part in this procedure and will treat any such behaviour as potential misconduct.

### **Roles & Responsibilities**

15. Many roles at GSA involve pastoral support to students. Staff in these roles must be alert to the possibility that pastoral concerns may indicate safeguarding risks, and are responsible for escalating them in line with this procedure.

16. While safeguarding is a shared responsibility, some roles at GSA carry enhanced safeguarding duties. These include Designated Protection Officers, Heads of Department, Programme Leaders, Student Support staff, HR colleagues, and Senior Leaders. Responsibilities for each role are outlined below.

17. Staff in designated safeguarding roles must complete additional safeguarding training, refreshed regularly, covering areas such as online safeguarding, managing disclosures, and inter-agency working.

18. The **Designated Protection Officer (DPO)** is held jointly by:

- Head of Student Support and Development
- Director of Human Resources
- Head of Professional and Continuing Development

19. Their responsibilities include:

- Designated Safeguarding Leads
- Act as main points of contact for safeguarding concerns.
- Liaise with external and statutory agencies.
- Inform emergency contacts where required.
- Maintain all safeguarding case records and reports.
- Ensure responsibilities are jointly fulfilled.

**Safeguarding Roles with Enhanced Responsibilities**

<b>Role</b>	<b>Responsibility</b>
<b>Human Resources Department</b>	<ul style="list-style-type: none"> <li>• Identify roles requiring PVG checks, carry out and maintain these checks.</li> <li>• Act as a point of contact for staff who disclose safeguarding concerns, ensuring they are listened to in a calm, supportive, and non-judgemental manner.</li> <li>• Report safeguarding concerns in line with the Adult Protection Procedure, as per the process for Employees.</li> <li>• Must complete enhanced safeguarding training on safer recruitment, vetting, and responding to allegations.</li> </ul>
<b>Head of Department/Programme Leader/Stage Leader (MSA)</b>	<ul style="list-style-type: none"> <li>• Act as the first point of contact for staff or students in reporting an adult at risk protection concern, offering immediate support to the person reporting the concern.</li> <li>• Ensure all PVG checks have been carried out before work is undertaken</li> <li>• Report concerns to the DCPO in line with policy.</li> <li>• Ensure local implementation of safeguarding policy, including staff/student awareness, training, and compliance with external organisation procedures where applicable.</li> <li>• Seek advice from the DPO if unsure about policy relevance to a case.</li> <li>• Must complete enhanced safeguarding training, covering managing disclosures, escalation routes, and compliance with external procedures.</li> </ul>
<b>Head of School</b>	<ul style="list-style-type: none"> <li>• Oversee development and implementation of local safeguarding measures, ensuring compliance with statutory responsibilities.</li> <li>• Ensure all staff/students are aware of and trained in safeguarding responsibilities.</li> </ul>
<b>Head of Student Support and Development</b>	<ul style="list-style-type: none"> <li>• Responsible for the development of institution-level policy and guidance on the systems, mechanisms and measures required to</li> </ul>

	<p>demonstrate compliance with safeguarding responsibilities.</p> <ul style="list-style-type: none"> <li>The Head of Student Support and Development is also the primary source of advice for safeguarding matters at GSA and responsible for drafting appropriate formal reports, in consultation with the Secretary and Registrar.</li> </ul>
<b>Student Support Staff</b>	<ul style="list-style-type: none"> <li>Must complete enhanced safeguarding training on safer recruitment, vetting, and responding to allegations.</li> <li>Act as the first point of contact for students who disclose safeguarding concerns, ensuring they are listened to in a calm, supportive, and non-judgemental manner.</li> <li>Identify and assess potential safeguarding risks, including signs of abuse, neglect, exploitation, or mental health crises.</li> <li>Follow institutional safeguarding procedures by promptly reporting concerns to the DPO.</li> <li>Maintain accurate, timely, and confidential records of safeguarding disclosures and actions taken, in line with data protection requirements.</li> <li>Liaise with external agencies (e.g. social services, NHS, police) as appropriate to safeguard the student</li> </ul>
<b>SLG</b>	<ul style="list-style-type: none"> <li>Responsible for ensuring that institution-level policy is implemented and delivered effectively within the areas for which they have leadership and management responsibility.</li> <li>GSA Senior Leadership Group Members are also responsible for the development and implementation of relevant local-level measures, to ensure alignment with institution-level policy and compliance with statutory safeguarding responsibilities including those relevant to safeguarding children.</li> </ul>
<b>Secretary and Registrar</b>	<ul style="list-style-type: none"> <li>Responsible for briefing the Director on safeguarding requirements and for formal institutional reporting, including to the Board of Governors with information from the Head of Student Support and Development.</li> </ul>
<b>Board of Governors</b>	<ul style="list-style-type: none"> <li>Must be assured that GSA is compliant with its statutory responsibilities to safeguard adults at risk of harm as defined in this policy and procedure.</li> </ul>
<b>Director and Principal of GSA</b>	<ul style="list-style-type: none"> <li>Provide leadership and ensure institutional compliance with safeguarding responsibilities.</li> </ul>

20. All Staff and Students have a duty to recognise and report concerns.

<b>Role</b>	<b>Responsibility</b>
<b>Employees</b>	<ul style="list-style-type: none"> <li>Recognise and report safeguarding concerns promptly to their line manager or Head of Department/Programme/Stage Leader (MSA). If unavailable, report directly to a Designated Protection Officer (DPO).</li> <li>Record concerns clearly and accurately using the reporting template (Appendix 1) and submit it to a DPO within 24 hours (or sooner if immediate risk).</li> <li>Do not share safeguarding information except with the appropriate manager or DPO.</li> <li>Where the concern involves a Head of Department/Programme/Stage Leader (MSA), deliver the completed reporting template directly to the DPO.</li> </ul>

<b>Trade Union representative</b>	<ul style="list-style-type: none"> <li>• Report safeguarding concerns in line with the Adult Protection Procedure, as per the process for Employees.</li> </ul>
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### **Recognising, Responding, and Reporting Concerns or Disclosures**

21. Staff may initially encounter pastoral concerns (stress, wellbeing, financial difficulty). Concerns may arise gradually through pastoral discussions (e.g. about wellbeing, stress, or relationships). Where such concerns indicate risk of harm, they must be treated as safeguarding concerns and escalated in line with this procedure.
22. Harm takes many different forms and can occur in many contexts. Not all harm is deliberate, for example there may be no premeditation but a persistent failure to meet someone’s basic physical or emotional needs. Harm includes all harmful conduct.
23. The Adult Support and Protection (Scotland) Act 2007 describes four main types of harm: physical, psychological, financial and self-harm.
24. Some examples of harmful conduct are:
  - Conduct causing physical harm – being hit, kicked, punched.
  - Conduct causing physical neglect – inadequate nutrition, self-neglect, isolation, inadequate care.
  - Conduct causing sexual harm – unwanted or inappropriate sexual contact, rape, sexual exploitation or exposure to unsuitable materials.
  - Conduct causing emotional and psychological harm - constant criticism, shaming, humiliation, intimidation, bullying including online bullying and grooming.
  - Conduct or practices which subjugate a person – honour-based violence or enforced marriage, female genital mutilation, controlling behaviour.
  - Discriminatory harm – racist, homophobic, ageist, sexist behaviours, harassment and stereotyping.
  - Conduct causing self-harm – dangerous risk taking, drug/alcohol misuse, overdosing, neglect of own needs.
  - Conduct causing financial harm – exploitation, theft, inappropriate lending or borrowing.
25. Any location is a potential environment for harmful conduct although evidence shows that most harm to adults at risk takes place in their home.
26. Patterns of harm vary and can include harmful conduct that occurs because pressures have built up in particular situations or harm may have occurred over a long period of time in the context of ongoing relationships. Harm can equally be opportunistic, such as theft or people can be sought out and ‘groomed’. Sexual abuse usually falls into this pattern as can some forms of financial harm.
27. The use of technology, digital media and the internet has opened up additional risks of exploitation such as identity theft and abuse of personal information, exposure to unsuitable material, and online sexual exploitation and grooming.

28. Typically, harm is disclosed either because an incident, which is harmful or of concern, is witnessed by an individual, or, the person being harmed chooses to speak to someone to disclose harm or say that they feel unsafe.
29. There can be powerful disincentives for a person to disclose that they are being harmed including emotional/psychological factors and the person inflicting harm may be a significant individual in the life of the person being harmed. A key indicator of harm is behaviour which is atypical of the person or a significant change in their usual presentation and functioning as an individual.
30. Harm may also be disclosed or concerns prompted as a consequence of:
  - Unexplained absences
  - Changes in the appearance, behaviour and health of an individual
  - A complaint
  - A grievance or disciplinary procedure
  - A change in motivation, attainment or performance

### **How to respond to disclosure or concerns**

31. Responding to disclosure requires sensitivity. There are many barriers that may prevent an adult at risk of harm from disclosing that they are being harmed. These include being dependent on the person that is harming them, being in a minority, the fear of losing familiar relationships and of isolation or exclusion.
32. As with all sensitive communication it is important to listen and be aware that the person may not appreciate the significance of what they are telling you. They may not realise or accept that they are being harmed. It is important that you gather as much information as possible taking account of the following:

#### **Do:**

- Remain calm
- Listen carefully to what is being said and pay attention to nonverbal messages
- Keep questions to a minimum
- Reassure the person that they are right to talk about what has happened / is happening
- Ask precise questions – who, what, where, when - in order to obtain key information about what has happened / is happening
- Tell them what you are going to do next and why
- Record in the person's own words what has been said
- Act promptly and report to your Head of Department/Programme/Stage Leader (MSA) or, if they are unavailable, the Designated Protection Officer.

#### **Do not:**

- Ask too many or leading questions
- Press the person for more detail than they are willing to give
- Make suggestions
- Make any promises that you are unable to keep
- Express shock or anger at what is being said to you
- Interpret what is being said – just record and report
- Delay listening to the person or passing on your concerns
- Carry out an investigation into the allegation or try to resolve the issue yourself.

33. You must explain to the person that you will be passing what they have told you on to an appropriate person so that the next steps that need to be taken can be identified.
34. If you suspect that an adult at risk is being harmed, the information above concerning disclosure continues to be relevant.
35. If the individual at risk is a student, staff should ensure the Student Support team is informed as part of the safeguarding response. If the individual at risk is a member of staff, Human Resources must be informed as part of the safeguarding response. In all cases, escalation to a Designated Protection Officer remains mandatory.
36. Immediate action must be taken by following the procedure set out in GSA's Adult Protection Policy and Procedure as follows:
  - Report the matter as soon as possible to your Head of Department/Programme/Stage Leader (MSA) or in their absence directly to a Designated Protection Officer.
  - Record the disclosure or the nature of your concern, clearly and accurately using the reporting template.
  - Securely provide the completed template (**Appendix 1**) to the Designated Protection Officer within twenty-four hours of the incident or concern arising, or earlier if the risk of further harm is immediate.
37. The Police or Social Work Services are responsible for investigating the adult at risk's circumstances and the risk of significant harm. Significant harm is a complex matter and subject to professional judgement based on a multi-agency assessment of the circumstances of the adult at risk and their family.

#### **In an emergency when risk of harm is immediate**

38. If an adult is at risk of **immediate** harm or injury and you are unable to contact your Head of Department/Programme/Stage Leader (MSA) or the Designated Protection Officer, for example out-with working hours, you should contact the Police by dialling 999.
39. **Do not put yourself or anyone else at risk.** Do not physically intervene unless reasonable restraint is both necessary and possible in order to protect someone who is an **immediate** danger to themselves or to others. In any such circumstance the minimum amount of force required should be used for the shortest period of time. Remain calm and get help as soon as possible. Any incident in which reasonable restraint is used must be recorded in writing, with a witness statement where possible, immediately afterwards.
40. You must then alert your Head of Department/Programme/Stage Leader (MSA) or in their absence the Designated Protection Officer as soon as possible and provide a written report immediately to the Designated Protection Officer.

#### **Next steps when responding to disclosure or concerns**

41. The DPO will refer to Social Work or Police where appropriate. GSA cooperates fully with statutory investigations. Staff may be contacted by statutory services as part of inquiries.

## **Protection of Vulnerable Groups Scheme**

42. GSA ensures that staff and students working with adults at risk hold appropriate disclosure under the PVG Scheme. See the **PVG Policy** for details.

## **Allegations against a member of GSA staff or student**

43. If an adult at risk alleges that a member of staff has caused them harm the process set out in this procedure must be followed immediately.
44. Where an allegation is made about a Head of Department/Programme/Stage Leader (MSA) the completed reporting template should be hand delivered directly to the Designated Protection Officer.
45. In any such case, GSA will consider any action required in line with the Staff Disciplinary Policy and Procedure. An employee against whom an allegation is made will be suspended without prejudice as provided for under paragraph 36 of the Disciplinary Procedure.

## **Monitoring**

46. The number and profile of staff who have been subject to Adult Protection Policy & Procedure will be monitored by the HR department for a determined period as outlined in GDPR guidance and in line with any statutory reporting obligations. The outcomes of the monitoring process will be presented along with other performance indicators to the relevant committees within the GSA to enable understanding of organisational effectiveness. Where data is for less than 5 employees, data will not be reported to avoid identification of individuals.

## **Review**

47. This policy and procedure will be formally reviewed every 3 years to ensure alignment with employment legislation and best practice, however any substantive changes in the interim period should be reviewed and agreed in partnership with approval sought from the People & Culture Committee.

## **Further information & Training Resources**

48. GSA recognises that an adult at risk may disclose events or circumstances that are distressing. In such circumstances it is important to manage yourself and the situation ensuring that the wellbeing of the adult at risk is dealt with in the first instance. After dealing with the situation you should speak to your Head of Department who will make themselves available to you. Additional support is available to you through the Human Resources department if you are a member of staff/ or the Student Support and Development department if you are a student.

## **Training resources**

Safeguarding modules

[HR Policies and Forms](#)

- Disciplinary Policy & Procedure
- PVG Policy & Procedure
- Child Protection Policy & Procedure

Student safeguarding process -

<https://gsofa.sharepoint.com/sites/intranet/ProfessionalSupport/StudentSupportServices/Pages/GSA-Safeguarding-Process.aspx>

## Appendix 1

### ADULT SUPPORT AND PROTECTION PROCEDURE - REPORTING A DISCLOSURE OR CONCERN

This form must be completed by the staff member raising the concern and must be handed to the Designated Protection Officer within 24 hours of the incident or concern being raised.

#### DETAILS OF THE ADULT AT RISK

Full name:	
Date of birth:	
Address:	
Home telephone number:	
Mobile telephone number:	
Course/activity attended:	
Religious, cultural or other relevant factors to be considered:	

#### DETAILS OF DISCLOSURE/CONCERN:

Date:	Time:	Location:
Briefly describe the circumstances and nature of the disclosure or concern:		
What the adult at risk said in their own words:		
Initial action taken:		
Location of the adult at risk now:		

Details of staff member completing this form:	
Name:	mobile tel. number:
Signature:	Date:
Received by Designated Protection Officer	
Name:	
Signature:	Date:

## **Adult Safeguarding Checklist – Recognising, Responding, Reporting**

### **Recognising Concerns or Disclosures**

Staff or students may initially encounter pastoral concerns (stress, wellbeing, financial difficulty).

Where concerns indicate risk of harm, they must be treated as safeguarding concerns and escalated.

Types of harm (Adult Support and Protection (Scotland) Act 2007):

- Physical harm – being hit, kicked, punched.
- Physical neglect – inadequate nutrition, isolation, inadequate care, self-neglect.
- Sexual harm – unwanted/inappropriate contact, rape, exploitation, exposure to unsuitable material.
- Emotional/psychological harm – criticism, shaming, bullying (incl. online), grooming.
- Subjugation – honour-based violence, enforced marriage, FGM, controlling behaviour.
- Discriminatory harm – racist, sexist, ageist, homophobic behaviours, harassment.
- Self-harm – risk-taking, substance misuse, neglect of own needs.
- Financial harm – exploitation, theft, inappropriate lending or borrowing.

Other indicators:

- Unexplained absences
- Significant changes in appearance, behaviour or health
- Complaints or grievances
- Changes in motivation, attainment, or performance

### **Responding to Disclosure or Concerns**

Do:

- Remain calm
- Listen carefully, including non-verbal cues
- Keep questions minimal (Who, What, Where, When)
- Reassure them it is right to speak up
- Tell them what will happen next and why
- Record in their own words
- Act promptly – report to Head of Department/Programme/Stage Leader (MSA) or Designated Protection Officer (DPO)

Do Not:

- Ask too many or leading questions
- Press for detail they don't want to share
- Make suggestions
- Make promises you cannot keep
- Express shock or anger
- Interpret what is said – just record and report

- Delay passing on concerns
- Try to investigate or resolve yourself

### **Reporting Concerns**

- Report immediately to your Head of Department/Programme/Stage Leader (MSA), or if unavailable, to the Designated Protection Officer (DPO).
- Complete the safeguarding report template and send securely to the DPO within 24 hours (or sooner if risk is immediate).
- If the individual at risk is a student → notify Student Support.
- If the individual at risk is a member of staff → notify HR.
- Escalation to a DPO is mandatory in all cases.

### **Emergency – Immediate Risk of Harm**

- If unable to contact MSA or DPO and the risk is immediate → dial 999.
- Do not put yourself or others at risk.
- Only use reasonable restraint if absolutely necessary to protect from immediate danger.
- Use minimum force, for the shortest time possible.
- Record any restraint used immediately, with witness statement if possible.
- Alert your Head of Department/Programme/Stage Leader (MSA) or the DPO as soon as possible and provide a written report immediately.

### **Next Steps**

- The DPO may refer to Social Work or Police.
- Police/Social Work decide if harm is significant and if protection measures are required.
- GSA cooperates fully with statutory investigations.
- Staff may be contacted by statutory services as part of inquiries.

### **Golden Rules**

- Do not delay – safeguarding is always urgent.
- Do not investigate – your role is to report, not resolve.
- Do not ignore – even small concerns matter.
- Do not promise confidentiality – explain you must share information appropriately.