

**Child Protection Procedure (Revised)**  
November 2025

## Procedure

This Child Protection Procedure should be read in conjunction with the Glasgow School of Art Child Protection Policy [HR Policies and Forms](#). The purpose of this document is to provide additional detail to colleagues on how Child Protection is managed at the GSA.

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## **Child Protection Procedure**

### **Why do we have a Child Protection Procedure?**

1. This procedure supports the Child Protection Policy and ensures that staff and students understand their roles and responsibilities. GSA places the highest priority on the safety and protection of children and young people. It explains what to do and who to contact where there are concerns about a child.
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 Child 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 *children*, defined as anyone under the age of 18.
6. 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.

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

7. This procedure applies when:
  - Concerns arise about a child's safety or wellbeing.
  - A child discloses that they are being harmed.
8. 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.
  - The statutory context for safeguarding is outlined in the Child Protection Policy.
  - All actions under this procedure must comply with relevant Scottish legislation and guidance.

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

9. 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.
10. 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.
11. Everyone involved in the Child Protection procedure 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

12. 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.
13. While safeguarding is a shared responsibility, some roles at GSA carry enhanced safeguarding duties. These include Designated Child Protection Officers, Heads of Department, Programme Leaders, Student Support staff, HR colleagues, and Senior Leaders. Responsibilities for each role are outlined below.
14. Staff in designated safeguarding roles must complete additional safeguarding training, refreshed regularly, covering areas such as online safeguarding, managing disclosures, and inter-agency working.
15. The **Designated Child Protection Officer (DCPO)** is held jointly by:
- Head of Student Support and Development
  - Director of Human Resources
  - Head of Professional and Continuing Development
16. 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 Child 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 a child 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 demonstrate compliance with safeguarding responsibilities.</li> <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</li> </ul>

	<p>abuse, neglect, exploitation, or mental health crises.</p> <ul style="list-style-type: none"> <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 children 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>

17. 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 Child Protection Procedure, as per the process for Employees.</li> </ul>

## **Recognising, Responding, and Reporting Concerns or Disclosures**

18. 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.

Children rarely disclose that they are being abused or exploited. However, there may be signs that give cause for concern and these may be an indication of abuse or neglect. The child may:

- have unexplained bruising or bruising in an unusual place.
- appear afraid, quiet or withdrawn.
- be afraid to go home.
- appear hungry, tired or unkempt.
- be left unattended or unsupervised.
- have too much responsibility for their age.
- be acting out in a sexually inappropriate way.
- be misusing drugs or alcohol.
- being subject to bullying or harassment online,
- receiving inappropriate or sexualised contact through social media or digital platforms,
- evidence of online grooming or sexual exploitation,
- sudden changes in online behaviour (secretive, distressed, withdrawn),
- exposure to harmful or age-inappropriate digital content.

These are some examples of what might cause concern but it is important to bear in mind that not all children who are abused, neglected or exploited will display these signs. Equally some of these signs and symptoms may be present for other reasons.

Concerns about actual or potential harm to a child may arise over a period of time or in response to a particular incident. They may arise as a result of direct observation, reports from the child or young person themselves or from a third party. Abuse may not always be carried out by an adult. In some cases, a child may be abused by another child. Concerns may also arise through the visual or pictorial expression of thoughts, feelings and emotions as a result of participating in creative activities.

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

19. If a child discloses to you, or if you suspect a child is being abused or is at risk of abuse, you must not try to resolve the issue yourself. As with all sensitive communication it is important to listen and be aware that the child 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 child 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 child'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 child 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.

20. 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 Child Protection Officer remains mandatory.
21. Immediate action must be taken for dealing with a situation where a child discloses that they are at risk of significant harm or where there is reason to be concerned that there is a risk of significant harm, 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 Child 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 Child Protection Officer within twenty-four hours of the incident or concern arising, or earlier if the risk of further harm is immediate.
22. The Police or Social Work Services are responsible for investigating the child'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 child and their family. The statutory services will decide whether the harm is or is likely to be significant and whether a response under child protection is required.

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

23. If a child 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 Child Protection Officer, for example out-with working hours, you should contact the Police by dialling 999.
24. **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.

25. You must then alert your Head of Department/Programme/Stage Leader (MSA) or in their absence the Designated Child Protection Officer as soon as possible and provide a written report immediately to the Designated Child Protection Officer.

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

26. The DCPO 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**

27. GSA ensures that staff and students working with children hold appropriate disclosure under the PVG Scheme. See the **PVG Policy** for details.

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

28. If a child alleges that a member of staff has caused them harm the process set out in this procedure must be followed immediately.
29. 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.
30. 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**

31. The number and profile of staff who have been subject to Child 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**

32. 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**

33. GSA recognises that a child 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 child 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.

Safeguarding modules

[HR Policies and Forms](#)

- Disciplinary Policy & Procedure
- PVG Policy & Procedure
- Adult Protection Policy & Procedure

Student safeguarding process -

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

Student Prevent duty -

<https://gsofa.sharepoint.com/sites/intranet/ProfessionalSupport/StudentSupportServices/Pages/PR-EVENT.aspx>

**APPENDIX 1**

**REPORTING AN INCIDENT OR CONCERN**

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

**DETAILS OF THE CHILD :**

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

**DETAILS OF INCIDENT / CONCERN:**

<b>Date:</b>	<b>Time:</b>	<b>Location:</b>
<b>Briefly describe the circumstances and nature of the incident or concern:</b>		
<b>Comment or Explanation given by the child in their own words:</b>		
<b>Initial Action Taken:</b>		
<b>Location of the child now:</b>		

<b>Details of staff member completing this form:</b>	
<b>Name:</b>	<b>mobile tel. number:</b>
<b>Signature:</b>	<b>Date:</b>

<b>Received by Designated Child Protection Officer</b>	
<b>Name:</b>	
<b>Signature:</b>	<b>Date:</b>

## **Child Protection Safeguarding Checklist – Recognising, Responding, Reporting**

### **Recognising Concerns**

Be alert to pastoral concerns (stress, wellbeing, financial difficulty).

Look for possible signs of abuse or neglect:

- Unexplained bruising/injuries
- Withdrawn, afraid, unkempt, very tired/hungry
- Too much responsibility for age
- Sexualised behaviour, drug/alcohol misuse

Watch for online risks:

- Bullying or harassment
- Inappropriate/sexualised contact
- Grooming or sudden secretive behaviour
- Access to harmful content

### **Responding to a Child or Young Person**

Do:

- Stay calm and listen carefully.
- Use minimal, precise questions (Who? What? Where? When?).
- Reassure them they did the right thing by speaking up.
- Record their words exactly.
- Tell them what will happen next.

Do Not:

- Ask leading questions or press for details.
- Make promises you cannot keep.
- Express shock, anger, or disbelief.
- Attempt to investigate or resolve yourself.

### **Reporting Concerns**

Always act promptly.

- Report immediately to:
  - Head of Department / Programme / Stage Leader (MSA), OR
  - Designated Child Protection Officer (DCPO).
- Complete a safeguarding report (use template) and send to DCPO within 24 hours.
- If student at risk → notify Student Support.
- If staff member at risk → 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**

- DCPO decides if referral to Police or Social Work is required.
- GSA cooperates fully with statutory investigations.
- You may be contacted by statutory services for further information.

### **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 can be important