



College Cause for Concern Policy

Higher Education · Performing Arts
Validated by the University of West London

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Document Control

Policy Title	College Cause for Concern Policy
Institution Name	Triple Threat Training Limited (trading as GAMTA)
Policy Category	Student Welfare, Early Intervention and Safeguarding
Approval Authority	Academic Board
Oversight Committee	Safeguarding, Wellbeing and Prevent Committee
Validating Partner	University of West London
Applicable Provision	All students across GAMTA provision, including the HNC Acting and Performance (SQA, GPRO Scotland), which admits learners from age 16
External Regulatory Alignment	National Guidance for Child Protection in Scotland; Adult Support and Protection (Scotland) Act 2007; Counter-Terrorism and Security Act 2015 (Prevent); Equality Act 2010; UK GDPR; Data Protection Act 2018
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TRIPLE THREAT COLLEGE

CAUSE FOR CONCERN POLICY

1. Aims and Scope

1.1 Triple Threat Training Limited, trading as GAMTA (the “College”) is committed to identifying and responding to students who may be in difficulty, and to enabling staff to act appropriately, confidently, and consistently when concerns arise. This Policy aims to:

- raise awareness of how to recognise when a student is in difficulty;
- describe common categories of difficulty students may experience;
- provide a clear method for assessing the urgency of a concern;
- set out internal and external sources of support to which students may be referred;
- offer practical guidance to staff on responding to non-urgent, urgent, and emergency situations;
- ensure that the College discharges its duty of care to students;
- ensure compliance with statutory duties, including safeguarding under Scottish law and the Prevent duty under the Counter-Terrorism and Security Act 2015.

1.2 This Policy applies to all members of College staff who come into contact with students, including academic staff, visiting practitioners, technical and production staff, Student Support Services, College Registry, library, finance, and administrative staff. Many situations can be helped by listening and signposting; in more serious cases, prompt action can prevent escalation and protect the wellbeing of the student, of other students, and of staff.

1.3 Where a concern relates to a student under the age of 18, or to an adult at risk within the meaning of the Adult Support and Protection (Scotland) Act 2007, this Policy shall be read alongside the Safeguarding Policy, which takes precedence in respect of the safeguarding procedures and referral routes.

1.4 Where a concern relates to a student’s capacity to engage with their studies for reasons relating to health, wellbeing, or behaviour, this Policy shall be read alongside the Fitness to Study Policy.

2. Why Students May Need Help

2.1 Most people experience difficult times during their lives. Being a student in a demanding performing arts environment can itself be unsettling and stressful. Performing arts education places particular demands on students through sustained physical, vocal, emotional, and creative work in rehearsal, studio, technical, production, and performance settings, and through repeated public exposure of work in progress. Personal difficulties may be exacerbated by these demands and may significantly affect a student’s capacity to progress and achieve.

2.2 Students may also be more vulnerable to outside influences during their studies, including pressures relating to housing, finance, relationships, substances, online environments, and identity. The College recognises this and seeks to respond in a supportive, proportionate, and non-judgemental manner.

3. When to Report Concerns

3.1 Where a member of staff has a concern about a student, the staff member shall consider whether the concern is non-urgent, urgent, or an emergency, using the triage at Appendix A. Advice may be sought from Student Support Services or the Designated Safeguarding Lead.

3.2 Significant concerns, including substance misuse, self-harm, suicidal ideation, coercion, forced marriage, domestic abuse, sexual violence, and serious mental health difficulties, shall be reported to Student Support Services or the Designated Safeguarding Lead without delay. For students under the age of 18, or where an adult at risk is involved, the Safeguarding Policy applies.

3.3 Concerns about radicalisation or violent extremism shall be reported to the Designated Safeguarding Lead in accordance with Appendices B and F. The College's Prevent arrangements engage Police Scotland's Prevent Multi-Agency Panel.

4. The College's Role in Supporting Students

4.1 The College aims to ensure that students who need it receive an appropriate level of support to overcome obstacles to learning. Support shall, wherever possible, respect students' autonomy and right to make decisions about their own lives, while building their confidence and coping skills.

4.2 College staff do not stand in loco parentis in relation to adult students. Staff shall not contact a student's family or any other third party about a personal matter without the student's consent, save where disclosure is necessary to protect life or where required under safeguarding duties.

4.3 Student Support Services can only work effectively with students who are willing to engage. Staff shall not take students to Student Support Services against their will or insist upon engagement; doing so risks damaging the student's long-term willingness to seek help.

5. Identifying Difficulties

5.1 The Student May Tell You

5.1.1 Students may indicate that there is a problem, sometimes indirectly. A calm and understanding response, with open questions, can encourage the student to share more. Listening attentively, acknowledging difficulty, and offering signposting may itself be the most important intervention.

5.2 Indicators That Staff May Notice

5.2.1 Indicators that a student may be in difficulty include:

- information shared by friends or classmates;
- persistent or regular absence, or persistent lateness;
- failure to submit work or sudden decline in academic, technical, or performance achievement;
- withdrawn, disorganised, or unpredictable behaviour;
- persistent low mood, irritability, agitation, tearfulness, or apparent loss of motivation;
- excessive working as a sign of anxiety or avoidance;
- lack of concentration, constant fatigue, or difficulty making decisions;
- noticeable deterioration in personal hygiene, appearance, or significant change in weight;
- signs of alcohol or substance use;
- apparent loss of friendships or social withdrawal;

- visible injuries, bruising, cuts, or scars;
- changes in the rehearsal, studio, technical, or production environment, including avoidance of physical or vocal work, withdrawal from ensemble engagement, or reluctance to take part in intimate or contact-based work.

5.2.2 Where a member of staff has concerns, they may discreetly check with colleagues, have a private informal conversation with the student, and seek advice from Student Support Services or the Designated Safeguarding Lead. Action taken should be documented, particularly where the student declines further help.

6. Emergency Situations

6.1 A situation is an emergency where:

- there is an imminent risk of suicide or the student has already taken action to harm themselves;
- the student is likely to seriously harm others;
- the student is clearly mentally or physically ill and needs urgent medical help;
- the student is so disturbed, aggressive, or distressed that others feel unsafe.

6.2 In an emergency, do not delay by contacting Student Support Services or by escorting the student elsewhere. Where the student will accept help and is able, support them to contact NHS 24 on 111, their GP, or to attend an NHS Accident and Emergency department. Where the student will not accept help, or cannot safely act for themselves, contact emergency services on 999, requesting police and/or ambulance. Inform College reception or on-site security so that emergency responders can be directed to the location. In Scotland, where a person is not consenting to ambulance attendance, paramedics will normally only attend in the presence of police.

6.3 Where reasonably safe to do so, stay with the student in a calm, private space until emergency services arrive. Keep a colleague informed of your location. Provide responders with factual information; the Data Protection Act 2018 permits disclosure of personal data where necessary to protect the vital interests of an individual. Staff are not required to accompany the student to hospital or to a police station.

6.4 Following the incident, a factual written account shall be made, including date, time, location, key events, those involved, and actions taken. Notes should distinguish fact from opinion. A copy shall be sent to the Designated Safeguarding Lead, who shall consider follow-up support for the student and for others involved. Staff should access support for themselves, including via their line manager and the College's Employee Assistance arrangements.

7. Significant but Non-Emergency Concerns

7.1 Significant concerns that are not emergencies, including disclosures of mental health difficulties, substance misuse, sexual violence, domestic abuse, forced marriage, and concerns about radicalisation, shall be reported to the Designated Safeguarding Lead. A factual record shall be kept of what is being reported and why. The Designated Safeguarding Lead shall coordinate the College response and, where appropriate, statutory referral.

7.2 Concerns about radicalisation or violent extremism shall be reported to the Designated Safeguarding Lead in accordance with Appendices B and F. Concerns may include phrases used by the student, observations of social media activity, or reports from third parties. It is the responsibility of staff to report concerns; the decision whether to refer matters externally rests with the Designated Safeguarding Lead in accordance with the Prevent arrangements.

8. Referring a Student to Support

8.1 Where a concern is urgent but not an emergency, or where the student would benefit from access to support, the staff member should provide the student with the contact details of Student Support Services and encourage the student to make contact themselves. Where the student is anxious about contacting the service, the staff member may, with the student's agreement, telephone Student Support Services with the student present, or accompany the student to the service for an introduction.

8.2 Confidentiality applies; Student Support Services cannot confirm to the referring staff member whether a student has engaged with the service without the student's explicit consent. Staff may notify Student Support Services of a referral and the nature of the concern, but the service will not normally provide an update on the student's engagement.

8.3 Staff should not insist that a student engages with Student Support Services where the student is unwilling, save where the matter falls within the safeguarding or Fitness to Study procedures.

9. Supporting the Student to Help Themselves

9.1 For non-urgent concerns, staff may offer informal support within the limits of their role. Adult students are entitled to make their own decisions; staff should listen, acknowledge difficulty, and signpost rather than direct. Staff should:

- listen empathetically without imposing solutions drawn from their own experience;
- ask whether the student is already receiving support and whether they would benefit from re-engaging with it;
- avoid making promises that cannot be kept, such as guaranteeing assessment outcomes or completion of the programme;
- set clear boundaries about what support they can and cannot offer;
- not provide personal mobile or home contact details, or offer support outside working hours;
- provide details of 24-hour external support services, such as Breathing Space Scotland (0800 83 85 87), Samaritans (116 123), or NHS 24 (111);
- recognise when a situation is escalating beyond their role and refer the student to Student Support Services;
- keep brief notes of the support offered;
- look after their own wellbeing and access support where needed.

9.2 It is not necessary to find perfect language. A respectful tone and reflection of the language the student uses will generally suffice. If unsure, staff may invite the student to correct terminology as needed.

10. If a Student Will Not Accept Help

10.1 Outside an emergency, little can be done without the student's consent. The College cannot require a student to engage in medical treatment or counselling, and seeking to do so may amount to discrimination by perception under the Equality Act 2010.

10.2 Where a student will not engage, staff should document the position, normally via a short email to the student setting out the support options available should they wish to take them up at a later date. Where the student's behaviour is disruptive or poses a risk to others, the matter may be considered under the Student Code of Conduct and Disciplinary Regulations or the Fitness to Study Policy.

11. Confidentiality and Data Protection

11.1 Disclosures by students are normally made on the basis of trust. Information shall be processed in accordance with the UK GDPR, the Data Protection Act 2018, the College's Student Privacy Notice, and the Records Management and Data Retention Policy, and shared on a need-to-know basis.

11.2 Staff cannot guarantee absolute confidentiality. Where information may need to be shared, this should be explained to the student at the earliest appropriate moment. Information shall not be disclosed to third parties, including parents, sponsors, or partners, without the student's consent, save where disclosure is necessary to protect the vital interests of an individual or as required by law or by safeguarding duties.

11.3 Records of cause-for-concern interactions shall be retained securely in accordance with the Records Management and Data Retention Policy.

12. Review

12.1 This Policy shall be reviewed annually, or earlier where required by legislative, regulatory, operational, or validating partner changes.

Appendix A – Student in Distress: Triage Flow

Staff member is concerned about a student. Assess urgency before acting.

Non-Urgent

A.1 The student is withdrawn, low in mood, tearful, or anxious; there has been a sudden decline in attendance, engagement, or performance; the student does not display features identified as urgent or emergency. Action: have a private informal conversation; signpost to Student Support Services; document; review.

Urgent

A.2 The student presents significant concerns short of immediate emergency, including disclosure of mental health difficulties, self-harm without immediate risk to life, disclosure of sexual violence, domestic abuse, forced marriage, or radicalisation; substance misuse; persistent significant disengagement. Action: contact Student Support Services or the Designated Safeguarding Lead the same working day; document; agree referral pathway.

Emergency

A.3 The student is actively suicidal or has acted to harm themselves; is severely disorientated or presenting psychotic symptoms; has taken an overdose; is a recent victim of assault; is aggressive or threatening towards others; presents an immediate risk to self or others. Action: do not delay. Call 999 for police and/or ambulance. Inform College reception or on-site security. Stay with the student where safe. Notify the Designated Safeguarding Lead immediately afterwards. Complete a factual incident note. Seek support for yourself.

Post-Incident Support for Staff

A.4 Supporting a distressed student can affect the staff member's own wellbeing. Staff are encouraged to debrief with their line manager, to access the College's Employee Assistance arrangements, and to seek further support where needed. NHS 24 (111) and Breathing Space Scotland (0800 83 85 87) are available 24 hours.

Appendix B – Responding to Potential Radicalisation

B.1 Statutory Basis. Under section 26 of the Counter-Terrorism and Security Act 2015, the College has a duty to have due regard to the need to prevent people from being drawn into terrorism. The duty covers all forms of extremism, including far-right, far-left, religious, and single-issue extremism.

B.2 Scottish Arrangements. In Scotland, the operational Prevent response is led by Police Scotland through Prevent Multi-Agency Panels. The College engages with Police Scotland Prevent officers where appropriate, and may seek advice on a confidential basis without disclosing personal details in the first instance.

B.3 There is no single profile of a person vulnerable to being drawn into terrorism. Possible contributory factors include experiences of identity-based harassment or discrimination, significant life change, depression or feelings of worthlessness, social isolation, family or peer pressure, distrust of institutions, exposure to extremist content online, and perceived grievances. The presence of one or more factors does not, of itself, indicate radicalisation; concern arises where behaviour, communication, or content suggests movement towards support for violence.

B.4 Higher-Risk Indicators may include expressed support for violence or terrorism; possession of violent extremist material; attempts to access or contribute to violent extremist content; possession of material on weapons, explosives, or military training; claims of attendance at training camps or involvement in violence.

B.5 Lower-Risk Indicators may include espousal of an extremist worldview, support for groups that promote such ideology, and rhetoric of apparently non-violent extremist groups. These indicators warrant supportive engagement and assessment, not assumption of intent.

B.6 Channel and Prevent Multi-Agency Panel. Where appropriate, the College may engage with the Police Scotland Prevent Multi-Agency Panel, which provides voluntary, confidential, multi-agency support to individuals identified as vulnerable to being drawn into terrorism. Engagement with the Panel does not appear on Disclosure Scotland or other checks and is not a criminal sanction.

B.7 Action by Staff. Concerns shall be reported to the Designated Safeguarding Lead with contemporaneous notes of what prompted the concern, including phrases used, dates, times, and any third-party reports. It is the responsibility of staff to report concerns; the decision whether to refer externally rests with the Designated Safeguarding Lead in accordance with the Prevent Information Sharing Protocol at Appendix F.

Appendix C – Responding to a Disclosure of Sexual Violence

C.1 Approach. Ask what the student wants to do. Do not make assumptions and do not act without consent. Sexual offences in Scotland are defined under the Sexual Offences (Scotland) Act 2009. The College's Harassment and Sexual Misconduct Policy provides the substantive framework; this Appendix sets out the immediate response.

C.2 Take the student to a confidential, quiet space free from interruption. If they are accompanied, check whether they wish the companion to remain. Offer the option of speaking with a person of a different gender or with a specialist supporter.

C.3 Listen without probing about the incident itself. Your role is to listen, support, and signpost, not to investigate. Take only minimal notes recording date, time, the student's name, the alleged perpetrator (if known and disclosed), and the support offered; detailed accounts may be misremembered and could be relevant in any future police or court process.

C.4 Allow the student time to talk. Consider whether the student requires alternative accommodation; contact Student Support Services where this may be needed.

C.5 Provide information on internal options under the Harassment and Sexual Misconduct Policy and on external services, including Rape Crisis Scotland (0808 801 0302), the National Sexual Assault Helpline, and the nearest NHS Sexual Assault Self-Referral Centre. Forensic evidence can be collected up to seven (7) days after an incident; if the student wishes to preserve forensics, they should be referred urgently. Pending such a referral, the student should not eat, drink, smoke, urinate, or wash where reasonably possible. Do not contact the police without the student's clear consent unless the alleged perpetrator presents an immediate ongoing danger to the student or others.

C.6 Where the alleged perpetrator is a member of the College community, internal procedures under the Harassment and Sexual Misconduct Policy and the Student Code of Conduct and Disciplinary Regulations or the Staff Disciplinary Procedure may apply. The student is not required to make a formal complaint to access support.

Appendix D – Responding to a Disclosure of Domestic Abuse

D.1 Definition. Domestic abuse in Scotland is defined under the Domestic Abuse (Scotland) Act 2018. It includes physical, sexual, psychological, emotional, and financial abuse, coercive and controlling behaviour, so-called honour-based abuse, forced marriage, and female genital mutilation. The Forced Marriage etc. (Protection and Jurisdiction) (Scotland) Act 2011 provides civil protective orders in Scotland.

D.2 Action. Recommend that the student speaks to Student Support Services and provide contact details. Where the student consents, refer the matter directly. Provide details of external services, including Scotland's Domestic Abuse and Forced Marriage Helpline (0800 027 1234), Scottish Women's Aid, and Victim Support Scotland. In an immediate threat to life, call 999.

D.3 Recognise that intersectional factors, including ethnicity, disability, sexuality, immigration status, language, and faith, can shape both the experience of abuse and access to support. Each disclosure should be received with respect, without judgement, and at the student's pace.

Appendix E – Responding to Harassment

E.1 Harassment may be physical, verbal, or non-verbal, and may be related to a protected characteristic under the Equality Act 2010. The College addresses harassment substantively under the Harassment and Sexual Misconduct Policy. This Appendix supports staff in receiving a disclosure.

E.2 Listen, take the matter seriously, signpost the student to Student Support Services, and provide information about reporting routes under the Harassment and Sexual Misconduct Policy. Do not investigate. Document the disclosure factually and in line with confidentiality requirements.

Appendix F – Prevent Information Sharing Protocol

F.1 Purpose

F.1.1 The College has a statutory duty under section 26 of the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism. In discharging this duty, the College may need to share information with Police Scotland and partners. This Protocol sets out how such information sharing is managed.

F.2 Concerns About Students

F.2.1 Staff with concerns about a student shall follow this Cause for Concern Policy and report concerns to Student Support Services or the Designated Safeguarding Lead. On receipt, the College shall convene a Prevent Assessment Group comprising the College Principal, the Designated Safeguarding Lead, and the Head of Student Support Services. The Group shall consider the concern and may decide to:

- inform the student of the concern and offer support on how to avoid the situation;
- offer advice on social media and online activity;
- invite the student to a supportive interview;
- contact Police Scotland Prevent officers for confidential advice without disclosing personal details in the first instance;
- refer the student, with their consent where reasonably possible, to the Police Scotland Prevent Multi-Agency Panel;
- where a criminal offence may have occurred, refer the matter to Police Scotland.

F.3 Concerns About External Speakers or Visitors

F.3.1 Concerns about external speakers, visiting practitioners, or visitors shall be considered by the Prevent Assessment Group as part of the College's event approval arrangements under the Code of Practice on Freedom of Speech and Academic Freedom. The Group may seek confidential advice from Police Scotland Prevent officers.

F.4 Legal Basis for Sharing

F.4.1 The legal basis for sharing personal data under this Protocol is section 26 of the Counter-Terrorism and Security Act 2015 and, where applicable, the public interest and vital interests provisions of the UK GDPR and the Data Protection Act 2018. Sharing shall be proportionate and limited to what is necessary for the discharge of the Prevent duty.

F.5 Consent and Records

F.5.1 Wherever reasonably possible, the consent of the individual shall be sought before personal data is shared, save where consent cannot be obtained without compromising safeguarding or law enforcement objectives. The Designated Safeguarding Lead shall maintain a confidential record of each information sharing event, including date, organisation, and details of the transaction, retained for one (1) year following the date of sharing, in accordance with the Records Management and Data Retention Policy.

Appendix G – College Contacts

The College shall maintain and publish current internal contact details, including:

G.1 Designated Safeguarding Lead and Deputy Designated Safeguarding Lead.

G.2 Head of Student Support Services.

G.3 Student Support Services general contact (email and telephone).

G.4 On-site reception and security contact details for each campus or site.

G.5 Office of the Principal and University Secretary.

G.6 Out-of-hours contact arrangements.

Appendix H – External Sources of Support (Scotland)

The following services may be useful in supporting students. Staff are encouraged to signpost rather than to act on the student's behalf without consent.

H.1 Emergencies and Health. 999 (emergency police, ambulance, fire); NHS 24 (111, 24-hour); nearest NHS Accident and Emergency.

H.2 Mental Health and Wellbeing. Breathing Space Scotland (0800 83 85 87, evenings and weekends); Samaritans (116 123, 24-hour); SAMH (Scottish Association for Mental Health); the student's registered GP.

H.3 Sexual Violence. Rape Crisis Scotland (0808 801 0302); NHS Sexual Assault Self-Referral Centres; local Rape Crisis Centres.

H.4 Domestic Abuse and Forced Marriage. Scotland's Domestic Abuse and Forced Marriage Helpline (0800 027 1234, 24-hour); Scottish Women's Aid; Hemat Gryffe Women's Aid; Shakti Women's Aid; Abused Men in Scotland (AMIS); LGBT Helpline Scotland.

H.5 Stalking and Harassment. Action Against Stalking; Police Scotland 101 (non-emergency).

H.6 Substance Use. Scottish Drugs Forum; Alcohol Focus Scotland; local NHS addiction services.

H.7 Financial and Practical Support. Citizens Advice Scotland; SAAS (Student Awards Agency Scotland) for funding queries; Money Advice Scotland.

H.8 Identity-Based Support. LGBT Youth Scotland; Stonewall Scotland; Equality and Human Rights Commission Scotland; Victim Support Scotland.

H.9 Online Safety. Report Harmful Content (UK Safer Internet Centre); Revenge Porn Helpline.

END OF POLICY