



Protection of Children and Vulnerable Adults Policy 2026

Introduction

Luminary Photography CIC believes in protecting everyone's right to live in safety, free from abuse and neglect. This policy sets out the aims of Luminary Photography CIC in working together in promoting a person's welfare and safeguarding them from abuse and neglect.

The purpose of this policy is to set out guidance for our staff and volunteers to actively protect children, young people and vulnerable adults who are provided services by Luminary Photography CIC from harm and to protect the reputations of themselves and Luminary Photography CIC. This Safeguarding Policy supersedes earlier versions and overrides any other policy.

This policy applies to anyone who works for or on behalf of Luminary Photography CIC including directors, management committee, staff and volunteers. All suspicions and allegations of abuse will be taken seriously and responded to quickly and appropriately. All staff have a responsibility to protect children and vulnerable adults from abuse and to report any concerns to the Designated Safeguarding Officer (DSO).

Luminary Photography CIC Designated Safeguarding Officer is Simon Green
Tel: 07766705261 Email: simon@luminary.org.uk

Our commitment

- To provide a safe environment for all of our beneficiaries and protect children and vulnerable adults from harm
- To ensure staff who have access to children and vulnerable adults are kept informed, supported and protected.
- To ensure children and vulnerable adults are respected, taken seriously and listened to.
- To raise awareness of our safeguarding strategies through staff training
- To distribute this safeguarding policy to all new contacts
- This policy is publicised on our website and distributed to relevant agencies including funders, investors, partners and staff.
- This policy is mandatory for all staff.
- This policy is renewed every year or when there is a major change to policy, legislation or the people we work with.

Procedures

It is not the role of staff to investigate or assess whether abuse has occurred, but it is every person's duty to report a suspicion or concern that a child or vulnerable adult has been or is at risk of being harmed or abused. In the first instance contact the Luminary Photography CIC DSO.

If a child or vulnerable adult requires immediate protection from harm, contact the police and Local Designated Safeguarding Officer

Early sharing of information is the key to providing an effective response where there are emerging concerns. To ensure effective safeguarding arrangements no one should assume that someone else will do it.

If a disclosure about abuse is made, the disclosure must be taken seriously.

Our Safeguarding Process



Handling Disclosures

Receive

- Listen to what is being said without shock or disbelief. Stay calm.
- Accept what is being said without judgement
- Take it seriously

Reassure

- Reassure the person or child but only as far as is honest
- Don't promise confidentiality and never keep secrets. You have a duty to report concerns
- Tell them, you will need to tell some people, but only those whose job it is to protect them
- Acknowledge how difficult it must have been to talk
- Reassure them that they were right to tell

React

- Listen quietly, carefully and patiently. Do not assume anything
- Do not investigate, interrogate or decide if the child is telling the truth.
- Do ask open questions like "Is there anything else that you want to tell me?"
- Communicate with the person or child in a way that is appropriate to their age, understanding and preference. This is especially important if they have disabilities or their first language is not English.
- Do not ask them to repeat what they have told you to another member of staff. Explain what you have to do next and whom you have to talk to.

Record

- Make some very brief notes at the time and write them up in detail as soon as possible
- Do not destroy your original notes in case they are required by Court
- Record the date, time, place, words used by the child and how the child appeared to you – be specific. Record the actual words used, including any swear words or slang
- Draw a diagram to indicate the position of any marks
- Record statements and observable things, not your interpretations or assumptions – keep it factual
- Do not assume anything – don't speculate or jump to conclusions

Disclosures or allegations against colleagues or staff should be treated in the same way. This information must be immediately passed to the DSO. Allegations of abuse against staff and volunteers must NEVER go unreported.

Making a referral

The DSO will make a referral to the LADO, Children or Social Services or the Police. At the minimum the following information should be included in the referral:

- What your concerns are
- The person or child's name, date of birth or age, address, parent/carer's name, school and doctor if possible
- The person or child's ethnicity and religion if known
- What you saw, or were told; when and where this happened giving as much details as possible
- What you have done so far; anyone you have spoken with including the parents/carers and child
- Your name, phone number, email, workplace, address, job, manager etc.
- Any potential danger or risk to staff or the public

Recognising the signs of abuse

Employees, trustees and volunteers are well-placed to identify abuse the child or adult may say or do things that let you know something is wrong. There may be a change in behaviour, or withdrawal from activities. It may come in the form of a disclosure, complaint, or an expression of concern. Concerns may not only be raised by the people we work with, but may be raised by and about people outside of the organisation. Everyone within the organisation should understand what to do, and where to go to get help, support and advice.

Signs of Abuse

This is not an exhaustive list but is a guide to behaviour that may lead to a safeguarding enquiry. This includes:

- **Physical abuse** - Including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
- **Domestic Violence/ Domestic Abuse** - Including psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence.
- **Exploitation**- Including sexual and/or criminal exploitation
- **Sexual abuse** - Including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography. Witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
- **Psychological abuse** - Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- **Financial or material abuse** - Including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills,

property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

- **Modern slavery** - Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and those who coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
- **Discriminatory abuse** - Including forms of harassment, slurs or similar treatment because you are, or are perceived to be different due to race, gender and gender identity, age, disability, sexual orientation or religion.
- **Organisational abuse** - Including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example or in relation to care provided in one's own home. This may range from one off incidents to long-term ill treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes or practices within an organisation.
- **Neglect and acts of omission** - Including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
- **Self-neglect** - This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Radicalisation to Terrorism

The Government through its PREVENT programme has highlighted how some adults and young people may be vulnerable to exploitation and radicalisation and involvement in terrorism. Signs and indicators of radicalisation may include:

- Being in contact with extremist recruiters.
- Articulating support for violent extremist causes or leaders.
- Accessing violent extremist websites, especially those with a social networking element.
- Possessing violent extremist literature.
- Using extremist narratives to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining extremist organisations.
- Significant changes to appearance and/or behaviour.

Prevention

1.Safe Recruitment & Selection

Luminary Photography CIC is committed to safe employment and safe recruitment practices that reduce the risk of harm to adults with care and support needs from people unsuitable to work with them. All staff, freelancers, volunteers and facilitators must hold a DBS check. The Freedoms Act 2012 requires that anyone engaged in Regulated Activity must have an enhanced DBS disclosure and a check against the DBS barred list. Any role (paid or voluntary) that involves contact with children or vulnerable adults is classed as Regulated Activity.

2. Training and Awareness

Luminary Photography CIC will ensure an appropriate level of safeguarding training is available to its Staff and any relevant persons linked to the organisation who requires it (e.g. contractors).

For all staff who are working or volunteering with adults, children and young people at risk this requires them as a minimum to have awareness training that enables them to:

- Understand what safeguarding is and their role in Safeguarding Adults and Children.
- Recognise an adult potential in need of safeguarding and take action.
- Understand how to report a safeguarding Alert.
- Understand dignity and respect when working with individuals.
- Have knowledge of the Safeguarding Adults Policy.

3. Equality, Diversity and Inclusion

Luminary Photography CIC (the organisation) provides services to communities and is open to anyone from any community. We are committed to encouraging equality, diversity and inclusion among staff, volunteers, attendees, beneficiaries and the wider public.

- We aim for the organisation to have an atmosphere of friendship, respect and care.
- We aim to treat everyone equally, regardless of their age, disability, mental or physical health, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation, their heritage, culture, background or socioeconomic status.
- We aim to create an inclusive organisation and design our activities and services to encourage and support people who face disadvantage in society.
- Discriminatory, violent and offensive behaviour against anyone is unacceptable and will be acted upon.

4. Confidentiality and Information Sharing

Luminary Photography CIC expects all staff to maintain confidentiality. Information will only be shared in line with the General Data Protection Regulations (GDPR) and Data Protection.

However, information should be shared with the Local Authority if an adult is deemed to be at risk of harm or abuse. Never make promises of confidentiality in a safeguarding situation and never keep secrets. **Contact the police if there is an immediate danger, or a crime has been committed.**

5. Whistleblowing

Luminary Photography CIC is committed to ensuring that employees and volunteers who in good faith whistle-blow in the public interest, will be protected from reprisals and victimisation.

6. Cyber Security and Online Safety

Luminary Photography CIC is committed to a "Secure by Design" approach. We recognise that as technology evolves, so do the risks to our beneficiaries. We maintain a robust digital infrastructure and an informed safeguarding culture to mitigate these risks.

Network and Infrastructure Security

- **Boundary Protection:** The organisation maintains a dedicated hardware firewall gateway to secure the perimeter of our network, monitoring all traffic for external threats.
- **Network Segregation:** We utilise managed switches to enforce logical isolation (VLANs). Classroom computers used by beneficiaries are strictly segregated from administrative systems and sensitive organisational data.
- **Content Filtering:** Automated security measures, including internal DNS filtering, are active across the network to block malware, phishing, and inappropriate digital content.

Identity and Access Control

- **Password Standards:** All accounts must follow a "Three Random Words" format, including at least one number and a special character.
- **Multi-Factor Authentication (MFA):** Access to all cloud-based services (e.g., Google Workspace) and administrative accounts is protected by mandatory MFA.
- **Access Rights:** Daily tasks are performed on standard user accounts. Administrative privileges are strictly limited to Management for system maintenance and software installation.

Artificial Intelligence (AI) and Emerging Technology

- **Internal Use of AI:** Luminary utilises generative AI and learning models as professional tools. This includes Adobe Creative Cloud for image editing and administrative AI for research, copywriting, and proofreading.
- **AI Safety and Governance:** We do not upload beneficiary personal data or sensitive imagery into public or unregulated AI tools. Staff are trained to verify AI-generated output for accuracy and to ensure it aligns with our ethical standards.

- **Future-Proofing:** Management regularly monitors discussions around AI and technological advancements to update our risk assessments and inform our teaching practice.

Social Media and Online Safeguarding

- **Beneficiary Engagement:** Staff maintain an active awareness of how beneficiaries engage with social media. We recognise the risks of online grooming, bullying, and harmful content.
- **Responding to Online Incidents:** Any safeguarding concern involving social media (e.g., cyber-bullying or suspicious contact) must be reported to the DSO immediately. We will preserve digital evidence (screenshots) where appropriate and provide a supportive space to help the beneficiary manage their digital safety.
- **Professional Boundaries:** Staff are prohibited from interacting with beneficiaries via personal social media accounts. All digital communication must be through official Luminary channels.

Device and Data Integrity

- **Encryption and Patching:** All computers utilise full-disk encryption. All hardware and software are updated with critical security patches within 14 days of release.
- **Digital Literacy:** We proactively educate beneficiaries on the ethics of photography, digital footprints, and the potential impact of AI-generated imagery on society.

Codes of Conduct and Behaviour

In all activities delivered by Luminary Photography CIC, the physical, mental and emotional safety of our beneficiaries and staff is paramount. At the beginning of all courses, workshops and activities staff should clearly define boundaries and behaviours for the people taking part.

Everyone should treat each other with respect and kindness, all communication should be kind, positive and understanding. Bullying, controlling or threatening behaviour is unacceptable. If anyone has complaints they should report it to the facilitator or staff member running the group.

1. Good Practice

- Carry out risk assessments for every workshop, course and event that Luminary Photography CIC delivers.
- Work in an open environment wherever possible, with an open door policy (avoid private or unobserved spaces, leave the door open when unaccompanied).
- Encourage honest and open communication, no secrets.
- Treat everyone with respect, dignity and positive regard.
- Prioritise each and every person's welfare.
- Maintain a safe and appropriate distance.

- If you need to touch someone to assist, ask permission first and ensure it is an open, non-secretive offer.
- Build a balanced relationship based on mutual understanding and trust.
- Make activities fun and enjoyable.
- Avoid confrontations, always give people a 'way out' of discussions, activities and rooms.
- Keep up to date with technical skills and qualifications.
- Keep your own professional insurance in place.
- Involve parents, guardians, support workers and carers involved in anything outside of your remit: changing, dressing, washing etc.
- Be an excellent role model. Avoid smoking, drinking and anti-social behaviour in front of beneficiaries, particularly children and young people.
- Record any accidents in Luminary Photography CIC's accident book.
- Avoid personal association outside of work with young people, children and vulnerable adults that you work with.
- Immediately inform a colleague and the parents/ guardians of a child if you think there may be reason to make an allegation against you, if you accidentally hurt a child, if they seem upset or distressed by your actions or misunderstands or misinterprets something you have done.

2. Practise to be avoided

- Never engage with young people or vulnerable adults on social media, unless a group has been specifically set up for that purpose. Use only formal methods of communication. Don't accept friend requests from children and young people, even after a project is finished.
- Avoid spending time alone with children and vulnerable adults away from others
- Never offer anyone a lift in your own vehicle.
- Never meet with anyone outside of the professional working environment, unless in an appropriate public location. Invite a colleague to join you.
- Never allow yourself to be alone with a child or children.
- Never intentionally humiliate or distress.
- Never use violent language or physical force.
- Don't allow anyone to use inappropriate, aggressive or threatening behaviour unchallenged.
- Never allow allegations to go unrecorded or not acted upon
- Do not use discriminatory actions or language. Don't allow others to use it either.

Risk Assessment

- As much information as possible should be gathered prior to any workshop, course, activity or event, to minimise the risks to the people we work with, staff and the wider public. Risk assessments should be dynamic, working documents that can change as new risks are encountered. We have a comprehensive Risk Assessment Form to be completed, however risks to be considered should include:
- Travel
- Physical hazards

- Personal injury or ill health
- Food and other allergies
- Medication
- Getting lost travelling to or while at the venue
- Emotional and mental health needs
- Lone working
- Conflict in the group
- Specific measures around COVID-19
- Personal safety
- Emergency first aid procedures

Important Contacts

Designated Senior Lead for Safeguarding Emergency First Aider

Name: Simon Green.

Email address: simon@luminary.org.uk. Tel: 07766 705 261

Sunderland City Council

Adult Social Care Tel: 0191 520 5552

Children's Safeguarding Tel: 0191 561 7007

Out of Hours Emergency Duty Team Tel: 0191 520 5560

Local Designated Safeguarding Officer (LDSO) Danielle Rose Tel: 0191 5613901

E-mail: designatedofficer@togetherforchildren.org.uk

Sunderland City Council Report Safeguarding Concerns

Adult Safeguarding: <https://adultsportal.sunderland.gov.uk/web/portal/pages/safeguarding>

Children and Young People: <https://www.togetherforchildren.org.uk/contact-us>

Sunderland Safeguarding Partnership <https://www.safeguardingchildrensunderland.com/>

Sunderland Safeguarding Adults Board http://www.sunderlandsab.org.uk/?page_id=9

Durham

Adult Safeguarding: <https://www.durham.gov.uk/socialcaredirect>

First Contact <https://www.durham.gov.uk/firstcontact>

First Contact / Social Care Direct: Tel: 03000 267 979

Police

Emergency Tel: 999

Non-emergency Tel: 101

NSPCC Helpline Tel: 0808 800 5000

National Domestic Abuse Helpline - 0808 2000 247