Luminary
Lighting Up Lives
PHOTOGRAPHY CIC
www.luminary.org.uk

Policy Documents 2026

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Safeguarding Policy

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.

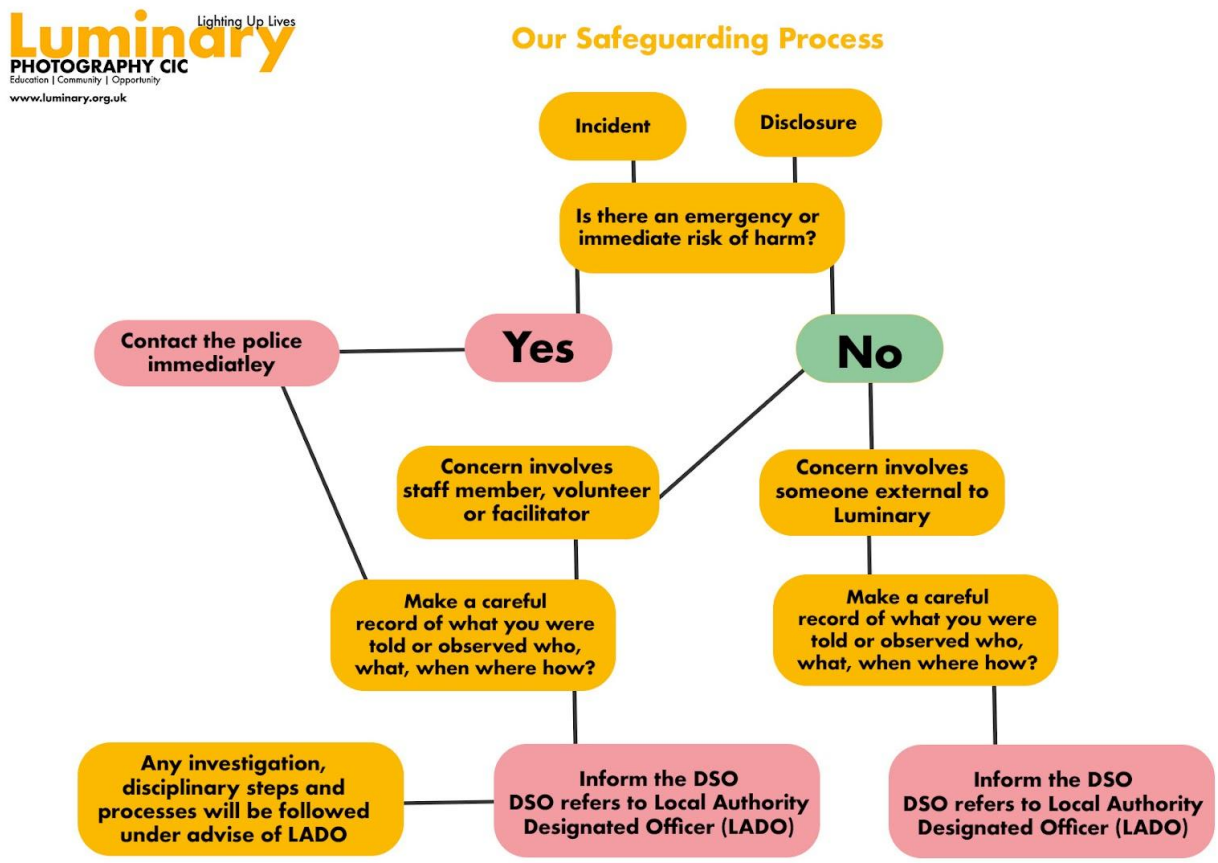
Procedures

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.



1. 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.

2. 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.

1. 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 of 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.

2. 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 Tel: 0808 2000 247

Health and Safety Policy

Introduction

The Luminary Photography CIC Management Committee has overall responsibility for health and safety in the organisation, and for ensuring that it fulfils all its legal responsibilities. It recognises that it is the duty of the directors to uphold this policy and to provide the necessary funds and resources to put it into practice.
The CIC is committed to ensuring that all its activities are safe and it will do whatever it can to provide for the health, safety and welfare of those using or providing our services and visitors, ensuring that risks are minimised at all times.
It will observe the Health and Safety at Work Act 1974 ("HASAWA") and all relevant regulations and codes of practice made under it.
This policy will be reviewed annually by the management committee.

1. Responsibilities

The Committee is responsible for the implementation and monitoring of health and safety policies and recommending changes where necessary.
All accidents or unsafe incidents will be investigated by the committee.
The committee is responsible for

- Assessing the risk to the health and safety of staff providing our services (directors, facilitators, volunteers, members) and visitors and identifying what measures are needed to comply with its health and safety obligations;
- Ensuring that venues or vehicles used for trips are safe and without risk to health including safe ways of entering and leaving;
- Ensuring that equipment is safe and well maintained;
- Providing information, instruction, training and supervision to staff or service users in safe working methods and procedures as required;
- Encouraging staff and service users to co-operate in ensuring safe and healthy conditions and systems by effective joint consultation
- Establishing emergency procedures as required;

2. Staff Responsibilities

All staff will ensure that:

- They are aware of the contents of this safety policy
- They comply with this policy
- They take care of themselves and others who may be affected by their actions or omissions
- They will report all accidents, or unsafe situations, and any near misses (things which could have led to an accident), to a staff member, who will record accidents or near misses in the accident book.
- They are aware of all fire procedures for the area in which they are working

- If they identify anything which they think could be in any way unsafe, they will report it.

3. Risk Assessments

Staff are responsible for ensuring that all premises and tasks are assessed in line with the current relevant legislation. Assessments will be repeated when there is a

- trip or event to organise
- change in legislation
- change of premises
- significant change in work carried out
- transfer to new technology

or any reason which makes the original assessment not valid.

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4. Training

To comply with legislation and to promote the health, safety and welfare of volunteers, health and safety training will be provided as follows:

- at inductions
- on the introduction of new technology
- when changes are made to venues
- when training needs are identified during risk assessments.

5. Resolving health and safety problems

Any staff member (or volunteer) with a health and safety concern must first tell a responsible committee member.
If, after investigation, the problem is not corrected in a reasonable time, or the responsible committee member decides that no action is required but the staff member is not satisfied with this, they may then refer the matter to the management committee chairperson. This must be in writing.
If the staff member is still dissatisfied, the matter will be entered on the agenda for the next meeting of the Management Committee.

Risk Management Policy

Introduction

Luminary Photography CIC is dedicated to delivering high-quality services while ensuring the safety and wellbeing of our participants, clients, and staff. This Risk Management Policy outlines our approach to identifying, assessing, and managing risks to minimise their impact on our operations and objectives.

Purpose

The purpose of this policy is to:

- Establish a framework for effective risk management.
- Promote a culture of risk awareness.
- Ensure compliance with legal and regulatory requirements.
- Protect the organisation's assets and reputation.

Scope

This policy applies to all employees, volunteers, and stakeholders involved in Luminary Photography CIC's activities and operations.

Definition of Risk

Risk is defined as the effect of uncertainty on objectives. It can arise from various sources, including operational, financial, reputational, legal, and strategic factors.

Risk Management Objectives

The objectives of our risk management process are to:

1. Identify potential risks that could affect our operations.
2. Assess the likelihood and impact of these risks.
3. Develop strategies to mitigate or manage identified risks.
4. Monitor and review risks on an ongoing basis.
5. Foster a risk-aware culture throughout the organisation.

Risk Management Process

1. Risk Identification

We will regularly identify and document risks associated with our activities, including but not limited to:

- Operational risks (e.g., equipment failure, staffing issues)
- Financial risks (e.g., funding shortfalls, budgeting errors)
- Reputational risks (e.g., negative publicity, stakeholder dissatisfaction)

- Legal and compliance risks (e.g., breaches of data protection laws)

2. Risk Assessment

Once risks are identified, we will assess them based on:

- **Likelihood**: The probability of the risk occurring (e.g., low, medium, high).
- **Impact**: The potential consequences of the risk on our objectives (e.g., minor, moderate, severe).

3. Risk Mitigation

For each identified risk, we will develop appropriate mitigation strategies, which may include:

- Implementing preventive measures (e.g., training, safety protocols).
- Developing contingency plans to address potential incidents.
- Allocating resources to manage and monitor risks effectively.

4. Monitoring and Review

We will continuously monitor the risk environment and review our risk management strategies regularly to ensure their effectiveness. This includes:

- Conducting periodic risk assessments.
- Reviewing incident reports and feedback.
- Engaging stakeholders in discussions about risk management.

Roles and Responsibilities

- **Board of Directors**: Responsible for overseeing the risk management framework and ensuring that appropriate policies are in place.
- **Management**: Responsible for implementing risk management procedures and ensuring staff are trained to identify and manage risks.
- **Staff and Volunteers**: Responsible for adhering to risk management policies and reporting any identified risks to management.

Training and Awareness

We will provide training and resources to staff and volunteers to enhance their understanding of risk management practices and encourage proactive risk identification and reporting.

Policy Review

This Risk Management Policy will be reviewed annually and updated as necessary to reflect changes in legislation, organisational practices, or the external environment.

Sustainability Policy

Luminary Photography CIC believes in the three pillars of sustainability, Environmental, Social and Financial.

Environmental

We recognise that a healthy environment is fundamental to the wellbeing of everyone and maintaining the environment is extremely important.

We commit to uphold environmental regulations and laws and will do everything we can to promote and positively contribute to a healthy environment. We will encourage and promote circular recycling, reuse, energy saving and efficiency.

We will buy only what we need. Source recycled and pre-owned resources and equipment where practical, scrutinising the environmental impact of each item we buy and considering how we can reduce or remove that impact through our choices, for example finding suitable reusable photographic backdrops instead of paper, investing in higher quality equipment that has a longer life, use rechargeable batteries, favouring longevity over convenience. We will take care of and maintain our equipment to extend its life and re-sell or recycle our unused equipment.

Minimise energy usage, by switching off electrical equipment and unnecessary lighting when not in use. Use low energy options when available. Evaluate the impact of our online / cloud footprint and how we can reduce the environmental impact of it. Evaluate and compare the power usage of different products when purchasing electronic equipment, to find the most efficient.

Minimise waste by evaluating our ordering, working and disposal practices, sorting, storing and disposing of waste appropriately, recycling waste where appropriate and using recyclable, compostable and biodegradable products where possible. Minimise using single use plastics.

Actively promoting recycling with our staff (directors, employees, facilitators, volunteers) and service users (funded and paying).

Regularly review our suppliers, processes, and environmental impact.

Social

We work to improve people's lives through photography, we will continue to work to increase positive impact, promoting inclusive, equitable and lifelong learning. Create equal and equitable opportunities for everyone, reduce barriers to our services and work with our customers and service users to identify ways to make what we do more accessible.

Value our team, ensure that they have every opportunity to express themselves, fulfil their potential and contribute to society. Create a rewarding experience for our staff. Ensure that our staff can maintain a healthy work life balance, through flexible working and considerate planning and provide a respectful and considerate environment to work in. Provide support services and

signposting for our staff before they are needed

Consider how everything we do impacts the communities we work in and the people we work with.

Financial

Build a strong and valuable brand that creates a sustainable company.

Keep costs to a minimum. Eliminate debt by identifying and exploiting other revenue streams, leverage our strengths and use them to create income. Budget realistically, plan our spending for the maximum return, in terms of both financial and social impact. Ensure that we have considered all costs in a project and that they are covered sufficiently in our funding applications.

Branding and marketing - Social enterprises depend on marketing and branding to promote and sustain their programs and services, marketing considerations are often given lowest priority or overlooked completely. Clear and consistent marketing will help to promote and raise the profile of the organisation.

Collaborate with other organisations who have similar goals and overlapping audiences to increase the diversity of communities we are working with and to gain access to harder to reach communities.

Monitor everything we do to measure impact and sustainability, maintaining detailed tracking of our work. Have definable, achievable goals throughout our projects that are easily identifiable, internally and externally. Monitor and track our work while it is in progress, not just at the end. Adjust and develop what we are doing, as we are doing it. Differentiate for different groups and audiences, what works for one person, may not work for another. We will not know what our beneficiaries need or are capable of until we start working with them. Report our progress and financial position at regular meetings.

Equality and Diversity Policy

Aims

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.

Accessibility

All our events, workshops, courses and services are held in accessible venues and we aim to remove barriers to inclusion. We provide free places on workshops, courses and trips for carers and support workers of members who can only attend if they bring a carer or support worker. We will continue to assess accessibility to our events, workshops, courses and services, to ensure inclusion and address any accessibility issues when they arise.

Diversity Inclusion and respect

Luminary Photography CIC welcomes anyone from any community, background or culture. We aim to organise a range of events and activities to suit the interests and meet the needs of a wide variety of people. We are open to new ideas, and encourage opportunities for residents to share their cultural heritage with one another. Everyone should be made to feel equally welcome at Luminary Photography CIC.

Sexist, racist, homophobic, transphobic or otherwise offensive and inflammatory remarks and behaviour are not acceptable. These constitute harassment, and have no place within any of the workshops, courses, or other services we provide.

Behaviour

If any member of staff, volunteer, attendee, beneficiary feels they have been discriminated against by anyone attending a workshop or involved in the work we do, the complaint should be taken to one of the management team. We will investigate the complaint, listening to all involved. (If the complaint is against one of the management team, that person will not be part of conducting the investigation).

If the complaint is against a particular individual, this person will have the opportunity to express their point of view, accompanied by a friend. The person making the complaint will also have this opportunity.

If the complaint is against the Organisation as a whole, the management team must work to ensure that such discrimination is not repeated in the future and define how they propose to do this.

Any decision to exclude a person from the organisation due to discriminatory or harassing behaviour will be made with reference to the Organisation's constitution. Luminary Photography CIC will support people who feel they have been harassed or discriminated against, and will not victimise or treat them less well because they have raised this.

We will always try, at the earliest possible opportunity intervene where discriminatory language or actions are taking place and where necessary exclude those involved.

Ethics Policy

Introduction

At Luminary Photography CIC, we are committed to conducting our business with integrity, respect, and accountability. This Ethics Policy outlines our core values and the ethical principles that guide our operations, interactions, and decision-making processes.

Core Values

Integrity: We uphold honesty and transparency in all our dealings, both internally and externally.

Respect: We treat all individuals with dignity and respect, valuing diversity and inclusion.

Quality: We strive to provide high-quality services and products that meet the needs and expectations of our clients.

Community: As a Community Interest Company, we are dedicated to contributing positively to our local community and supporting social causes.

Ethical Principles

Professional Conduct

- We will maintain the highest standards of professionalism in our photography work, ensuring that all services are delivered with skill and care.
- We will avoid conflicts of interest and disclose any potential conflicts to relevant parties.

Client Relationships

- We will communicate openly and honestly with clients, providing clear information about services, pricing, and deliverables.
- We respect client confidentiality and will not share personal information without explicit consent.

Fairness and Non-Discrimination

- We will provide equal opportunities to all clients and collaborators, regardless of race, gender, age, disability, sexual orientation, or any other characteristic.
- We will actively promote inclusivity and diversity within our team and in our photography projects.

Environmental Responsibility

- We are committed to sustainable practices in our business operations and will seek to minimise our environmental impact.

- We will encourage eco-friendly practices in photography and encourage our clients to consider sustainability in their projects.

Community Engagement

- We will engage with and support local community initiatives, using our skills and resources to foster positive change.
- We will seek partnerships with local organisations that align with our values and mission.

Implementation and Compliance

- All employees and collaborators of Luminary Photography CIC are expected to adhere to this Ethics Policy.
- We will provide ongoing training and resources to ensure that our team understands and implements these ethical principles in their daily activities.
- Any violations of this policy should be reported to management, and appropriate action will be taken to address concerns.

Conclusion

At Luminary Photography CIC, we believe that ethical practices are essential to building trust and maintaining strong relationships with our clients, partners, and community. By adhering to this Ethics Policy, we commit to creating a positive impact through our photography services.

This policy will be reviewed annually and updated as necessary to ensure its relevance and effectiveness in guiding our operations.

Modern Slavery Policy

Introduction

Luminary Photography CIC has a zero-tolerance approach to modern slavery and human trafficking in all aspects of our business and supply chains. We are committed to acting ethically, transparently, and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within our organisation or partners.

Scope

This policy applies to all individuals working for or on behalf of Luminary Photography CIC in any capacity, including employees, directors, officers, agency workers, volunteers, interns, contractors, external consultants, third-party representatives, and suppliers.

Our Commitment & Standards

• Zero Tolerance: We strictly prohibit any form of forced, bonded, or compulsory labour, human trafficking, involuntary prison labour, or child exploitation.
• Fair Employment Practices: We ensure that all recruitment processes are transparent, lawful, and fair. All employees and workers are provided with clear employment contracts and paid at least the national minimum/living wage.
• Supply Chain Due Diligence: We expect the same high standards from all of our contractors, suppliers, and business partners. We prefer to work with suppliers who share our commitment to ethical labor standards.
• Freedom of Movement: We will not withhold worker passports, identity documents, or work permits, nor restrict reasonable movement.

Reporting & Concerns

Any employee, volunteer, or partner who suspects or knows of any occurrence of modern slavery or human trafficking within Luminary Photography CIC or its supply chain must report it immediately.

- **Designated Lead: Reports should be made directly to Simon Green, Managing Director (simon@luminary.org.uk).**

• Whistleblowing Protection: Anyone raising a concern regarding modern slavery in good faith will be protected under our Whistleblowing Policy from any retaliation or detrimental treatment.

Breach of Policy

Any employee who breaches this policy will face disciplinary action, up to and including dismissal for gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Photography and Filming Policy

Introduction

Luminary Photography CIC, its staff and representatives are very aware of the issues around representation in photography and film and how media can be used to misrepresent people in a variety of ways. However photography can help people celebrate their accomplishments and achievements, can support social issues such as identity, body confidence and can help community organisations to promote their work, raise their profile and have a greater impact. However, the safety of the people we photograph is the priority and we will always consider the potential negative consequences of publishing photographs of the people we work with.

Legal

Legally photographers are allowed to take photographs without consent if they are in a public place and there is no law preventing them from doing so:

“No one has the right to: ask a photographer to stop, ask for a copy of the photos or force a photographer to delete the photographs” (Avon and Somerset Police 2023).

However, we will always ask for consent from anyone attending workshops, projects, photoshoots or photography used for publicity or promotion of our work or services. All personal data and imagery we handle complies with UK Data Protection law (including UK GDPR).

Consent

On organised shoots on private land, in classrooms, studios or other private locations we will always ask for consent. We always ask for consent from anyone who engages with our organisation directly.

We will always explain what the images are for and allow anyone to refuse consent, without any impact on their engagement with the services we provide. Consent can be withdrawn at any time, however it may not be possible to remove or delete images that have been shared or published. Images that have had consent removed will not be published any further.

Anyone under the age of 18 will need to have their consent supported by a parent or guardian.

Use of Artificial Intelligence (AI) and Digital Processing

Luminary Photography CIC utilises digital tools and software assistance, including AI-powered editing plugins, to optimise workflow efficiency, photo editing, cataloguing, and administrative processing. We only use AI tools for basic technical adjustments, such as improving lighting, balancing colours, and blurring backgrounds for privacy.

We never use generative AI to alter anyone's physical appearance or create fake images,

people, or events. Before any photo or file is processed by an AI plugin, all personal information is stripped to protect your privacy under UK data protection laws. Furthermore, we strictly select secure software vendors who promise never to use your photos to train public AI models. Giving us consent simply covers standard image editing and will never allow your likeness to be manipulated or used for AI generation.

Storage

We will store images securely on offline hardware. Images may be stored online for short periods to facilitate transmission of the images to appropriate parties (participants, involved organisations). All images will be stored in line with data protection law and will only be retained for as long as necessary for project archives or promotional purposes before being securely deleted.

To request a removal of any images or to discuss a safeguarding issue, please contact our team at theoffice@luminary.org.uk

Data Protection Policy

Introduction

At Luminary Photography, we are committed to protecting the privacy and personal data of our participants, clients, and partners. This policy outlines how we collect, use, store, and protect personal data in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Scope

This policy applies to all personal data collected and processed by Luminary Photography, including data related to participants in our workshops, community projects, and events. It also covers data collected from clients and partners.

Data Collection

We may collect the following types of personal data:

- **Contact Information**: Names, addresses, email addresses, and telephone numbers.
- **Demographic Information**: Age, gender, and other relevant demographic data.
- **Health Information**: Information related to mental and physical health, as necessary for our programmes.
- **Photographic Data**: Images and video footage captured during events and workshops.

Purpose of Data Processing

We process personal data for the following purposes:

- To communicate with participants and clients regarding our services and activities.
- To manage bookings and registrations for workshops and events.
- To evaluate and improve our programmes and services.
- To conduct research and gather feedback.
- To share updates, newsletters, and promotional materials, with consent.
- To document and promote our activities through photographs and videos.

Legal Basis for Processing

We rely on the following legal bases for processing personal data:

- **Consent**: We obtain explicit consent from individuals before processing their data for specific purposes, such as marketing communications.
- **Contractual Necessity**: We process data as necessary to fulfil our contractual obligations to participants and clients.
- **Legitimate Interests**: We process data to pursue our legitimate interests in providing and improving our services, provided that these interests do not override the rights of the

individuals.

Data Sharing

We do not share personal data with third parties except in the following circumstances:

- When required by law or to comply with legal obligations.
- With trusted partners who assist us in delivering our services, under strict confidentiality agreements.
- With explicit consent from the individual.

Data Storage and Security

Personal data is stored securely in accordance with industry best practices. We implement appropriate technical and organisational measures to protect personal data from unauthorised access, loss, or misuse.
Data is retained only for as long as necessary to fulfil the purposes for which it was collected, after which it will be securely deleted or anonymised.

Individuals' Rights

Individuals have the following rights under UK data protection law:

- **Right to Access**: Individuals can request access to their personal data.
- **Right to Rectification**: Individuals can request correction of inaccurate or incomplete data.
- **Right to Erasure**: Individuals can request deletion of their personal data in certain circumstances.
- **Right to Restrict Processing**: Individuals can request limitation of processing in certain situations.
- **Right to Data Portability**: Individuals can request to receive their data in a structured, commonly used format.
- **Right to Object**: Individuals can object to processing based on legitimate interests.

To exercise any of these rights, individuals can contact us using the details below.

Contact Information

For any questions or concerns regarding this policy or our data protection practices, please contact Luminary Photography CIC theoffice@lumianry.org.uk

The Armed Forces Covenant

An Enduring Covenant Between The People of the United Kingdom His Majesty's Government and All those who serve or have served in the Armed Forces of the Crown And their Families

The first duty of Government is the defence of the realm. Our Armed Forces fulfil that responsibility on behalf of the Government, sacrificing some civilian freedoms, facing danger and, sometimes, suffering serious injury or death as a result of their duty. Families also play a vital role in supporting the operational effectiveness of our Armed Forces. In return, the whole na5on has a moral obligation to the members of the Naval Service, the Army and the Royal Air Force, together with their families. They deserve our respect and support, and fair treatment.

Those who serve in the Armed Forces, whether Regular or Reserve, those who have served in the past, and their families, should face no disadvantage compared to other citizens in the provision of public and commercial services. Special consideration is appropriate in some cases, especially for those who have given most such as the injured and the bereaved.

This obligation involves the whole of society: it includes voluntary and charitable bodies, private organisations, and the ac5ons of individuals in supporting the Armed Forces. Recognising those who have performed military duty unites the country and demonstrates the value of their contribution. This has no greater expression than in upholding this Covenant.1.

Section 1: Principles of the Armed Forces Covenant

1. We Luminary Photography CIC will endeavour in our business dealings to uphold the key principles of the Armed Forces Covenant, which are:

   • no member of the Armed Forces Community should face disadvantage in the provision of public and commercial services compared to any other citizen

   • in some circumstances special treatment may be appropriate, especially for the injured or bereaved.

Section 2: demonstrating our Commitment

2.1 We recognise the value that serving personnel, reservists, veterans and military families bring to our business and to our country. We will seek to uphold the principles of the Armed Forces Covenant, by:

• promoting the Armed Forces: promoting the fact that we are an Armed Forces-friendly organisation, to our seaff, customers, suppliers, contractors and wider public.

• Veterans: supporting the employment of veterans, recognising military skills and qualifications in our recruitment and selection process.

• Service Spouses & Partners: supporting the employment of Service spouses and partners and
providing flexibility in granting leave for Service spouses and partners before, during and after a partner's deployment.

- Reserves: supporting our employees who are members of the Reserve Forces; granting additional leave for annual Reserve Forces training.

• Cadet organisations: supporting our employees who are volunteer leaders in military cadet organisations, granting additional leave to a_end annual training camps and courses; actively encouraging members of staff to become volunteer leaders in cadet organisations; recognising the benefits of employing cadets/ex-cadets within the workforce.

• National Events: supporting Armed Forces Day, Reserves Day, the Poppy Appeal Day and Remembrance activities.

• Armed Forces Charities: supporting Armed Forces charities with fundraising and supporting staff who volunteer to assist.

2.2 We will publicise these commitments through our literature, on seaff notices, and on our website, setting out how we will seek to honour them and inviting feedback from the Service community, our staff and our customers on how we are doing.

Whistleblowing Policy

Purpose

Luminary Photography CIC is dedicated to promoting an ethical workplace where all employees and stakeholders can raise concerns about wrongdoing without fear of retaliation. This policy outlines the procedure for reporting concerns and ensures that whistleblowers are protected.

Scope

This policy applies to all employees, volunteers, and stakeholders associated with Luminary Photography CIC.

Definition of Whistleblowing

Whistleblowing is the reporting of suspected misconduct, illegal activities, or unethical behaviour that may harm the organisation, its employees, or the public.

Reporting Procedure

1. **Designated Whistleblowing Officer:**
Concerns should be reported to the Whistleblowing Officer, Simon Green, the Managing Director who is responsible for managing reports.

2. **How to Report:**
Reports can be made verbally or in writing. Employees are encouraged to use the designated email address: simon@lumianry.org.uk or contact the Whistleblowing Officer directly.

3. **Information to Include:**
- A clear description of the concern.
- Names of individuals involved (if known).
- Relevant dates and times.
- Any supporting evidence or documentation.

Protection for Whistleblowers

- Luminary Photography CIC will not tolerate retaliation against anyone who reports concerns
- in good faith.
- All reports will be investigated thoroughly and promptly, and appropriate action will be taken
- where necessary.

Confidentiality

Reports will be treated confidentially, and the identity of the whistleblower will be protected to the fullest extent possible. However, complete anonymity cannot always be guaranteed.

Investigation Process

1. **Initial Assessment**: The Whistleblowing Officer will conduct an initial assessment of the report.
2. **Investigation**: If warranted, a thorough investigation will be conducted, and the whistleblower may be asked for further information. If necessary an external organisation may be brought in, particularly where there is a conflict of interest.
3. **Outcome**: The whistleblower will be informed of the outcome of the investigation, where appropriate.

Conclusion

We encourage all employees and stakeholders to speak up if they suspect wrongdoing. By doing so, you help us uphold the values and integrity of Luminary Photography CIC.
For any questions or further information, please contact the Whistleblowing Officer.

Complaints Procedure

At Luminary Photography CIC we take complaints very seriously.
If you have a complaint please contact us and we will do everything we can to resolve the problem.

Our complaints policy

- To provide a fair complaints procedure which is clear and easy to use for anyone wanting to make a complaint.
- To publicise our complaints procedure so everyone knows how to contact us to make a complaint.
- To ensure that everyone in the organisation knows what to do if a complaint is made.
- To ensure complaints are investigated in a fair and timely manner.
- To use complaints constructively in the planning and improvement of all services.
- To gather information which helps us improve what we do.

What is a complaint?

A complaint is any expression of dissatisfaction, whether justified or not, about any aspect of the organisation.

Complaints may come from supporters, beneficiaries, facilitators or anyone we come into contact with in our work and activities.

How to make a complaint

We want to resolve any complaint as soon as possible. Most complaints can be resolved informally.

In the first instance speak to a manager or member of staff. If you make contact in person or by phone, make a note of the name of the person you speak to. If a solution is offered at this point, make a note of this as well.

A complaint can be made verbally by phone, email, social media or in writing.
If you are not satisfied or do not wish an informal solution, you may pursue a formal complaint.

Written complaints can be made to:

Luminary Photography CIC,
First Floor, 90 Coronation Street,
Sunderland SR1 2HE

or by email to theoffice@luminary.org.uk
or by phoning 07476 201 097

What will we do on receiving your complaint?

- We will listen to and record your complaint, we will explain how we intend to proceed.
- We will investigate.
- We will take action to resolve the problem and tell you what the action is.
- We will take steps to avoid a repeat occurrence.

At all times, we will treat you with understanding and respect. All we ask is that you do the same for our staff.

Confidential information in relation to your complaint will be handled sensitively.

We are unable to respond to anonymous complaints or matters for which the organisation is not directly responsible.

How long will it take to respond?

We endeavour to respond full and conclusively to all complaints within 10 working days.

You will receive acknowledgement of your complaint within 5 working days of receipt. You will be contacted to make sure that we have understood your complaint properly. You may be interviewed by the person investigating the complaint.

Whenever possible we will deal with it more quickly, if we think it will take longer we will let you know.

If an in-depth investigation is required we aim to provide a response within 20 working days.

Conflict of Interest Policy

Introduction

Luminary Photography CIC is committed to maintaining the highest standards of integrity and transparency in all its activities. This Conflict of Interest Policy aims to ensure that any potential conflicts are identified, disclosed, and managed appropriately to uphold our commitment to ethical practices.

Purpose

The purpose of this policy is to:

- Define what constitutes a conflict of interest.
- Provide guidance on identifying, disclosing, and managing conflicts of interest.
- Protect the interests of Luminary Photography CIC and its stakeholders.

Definition of Conflict of Interest

A conflict of interest arises when an individual's personal interests—financial, professional, or otherwise—may influence or appear to influence their decisions and actions in their role with Luminary Photography CIC. This includes, but is not limited to:

- Personal relationships with clients, suppliers, or other stakeholders.
- Financial interests in organisations that compete with or provide services to Luminary Photography CIC.
- Outside employment or consultancy that may conflict with duties to Luminary Photography CIC.

Responsibilities

Employees and Volunteers

All employees and volunteers of Luminary Photography CIC are required to:

- Be aware of potential conflicts of interest.
- Disclose any actual or perceived conflicts to their line manager or designated officer promptly.
- Avoid situations where personal interests may conflict with their responsibilities to Luminary Photography CIC.

Management

Management is responsible for:

- Reviewing disclosed conflicts of interest and determining appropriate actions to mitigate or eliminate the conflict.
- Ensuring that all employees and volunteers are aware of this policy and understand their responsibilities.

Disclosure Process

1. **Initial Disclosure**: At the time of recruitment or onboarding, employees and volunteers will be required to complete a conflict of interest declaration form.
2. **Ongoing Disclosure**: Employees and volunteers must inform their line manager or designated officer of any potential conflicts of interest as soon as they arise.
3. **Documentation**: All disclosures will be documented and retained for review.

Managing Conflicts of Interest

Upon disclosure, management will assess the situation and may take the following actions:

- Implement measures to avoid the conflict, such as reassigning responsibilities.
- Require the individual to recuse themselves from decisions related to the conflict.
- Provide guidance on how to proceed ethically in the situation.

Breach of Policy

Failure to disclose a conflict of interest or to comply with this policy may result in disciplinary action, up to and including termination of employment or volunteer status.

Review of Policy

This Conflict of Interest Policy will be reviewed annually and updated as necessary to reflect changes in legislation or organisational practices.

For any questions or concerns regarding this policy, please contact Luminary Photography CIC