

CENTRE FOR LIMINAL STUDIES

POLICIES & PROCEDURES FRAMEWORK

Community Interest Company
Broughton Hall Business Park, Skipton

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Approved by	CLS Board
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Next Review	Annual, or following significant incident or regulatory change
Applies to	All CLS directors, staff, volunteers, associates, and third parties using CLS premises or operating under the CLS name

Questions about this document should be directed to: info@centreforliminalstudies.com
<http://centreforliminalstudies.com>

1. Introduction & Scope

1.1 About This Document

This Policies and Procedures Framework sets out the principles, responsibilities, and procedures that govern the operations of the Centre for Liminal Studies CIC (CLS). It is a living document, reviewed annually and updated in response to regulatory changes, incidents, or organisational development.

CLS is a Community Interest Company limited by guarantee. Its objects include the advancement of research into consciousness, parapsychology, and anomalous human experience, and the provision of public benefit through events, education, and the dissemination of research findings.

1.2 Scope

This Framework applies to:

- All CLS directors, staff, and volunteers.
- Associate researchers, collaborators, and contractors working under a CLS agreement.
- Third-party individuals and organisations using CLS premises or operating under the CLS name.
- All CLS-branded public events, workshops, retreats, and research activities.

Where a third party is using CLS premises, they are required to read and comply with the sections of this Framework relevant to their activity, as specified in their Venue Use Agreement.

1.3 Related Documents

CLS-RA-001	Event Risk Assessment Form
CLS-COC-001	Code of Conduct — Events & Activities
CLS-IR-001	Incident Report Form
CLS Articles	Articles of Association
CLS Ethics Form	Research Ethics Application Form

2. Governance & Operations

Policy Statement

CLS is committed to transparent, accountable governance that fulfils its CIC obligations, protects the public benefit purpose of the organisation, and maintains the confidence of participants, funders, and the wider research community.

2.1 Legal Structure & Regulatory Obligations

CLS is registered as a Community Interest Company limited by guarantee and is subject to the Companies Act 2006, the CIC Regulations 2005, and the oversight of the CIC Regulator. Directors must ensure that the company files an annual Community Interest Report and complies with all Companies House filing obligations.

2.2 Board of Directors

The Board of Directors is the governing body of CLS. Directors are collectively responsible for the strategic direction, financial health, and regulatory compliance of the organisation. Director responsibilities include:

- Acting in the best interests of CLS and its community benefit purpose at all times.
- Attending a minimum of three Board meetings per year (or such other minimum as the Articles specify).
- Reading Board papers in advance and engaging substantively in decisions.
- Declaring any conflict of interest at the earliest opportunity (see Section 2.4).
- Ensuring they are familiar with the contents of this Framework and with CLS's Articles of Association.

No director may bind CLS contractually above a value of £2,000 without the approval of at least one other director, or above £10,000 without a resolution of the full Board. These thresholds may be revised by Board resolution.

2.3 Decision-Making & Delegated Authority

Type of Decision	Required Authority
Day-to-day operational decisions (< £500)	Any Director or delegated staff member
Expenditure £500 – £2,000	Any single Director
Expenditure £2,001 – £10,000 / significant commitments	Two Directors in agreement
Expenditure > £10,000 / new partnerships / premises	Full Board resolution (minuted)
Amendment of Articles or CIC objects	Full Board + CIC Regulator approval
Employment or dismissal of staff	Full Board resolution

2.4 Conflicts of Interest

A conflict of interest arises when a director or associate has a personal, financial, or professional interest that could — or could appear to — influence their judgement on a CLS matter. CLS maintains a Conflicts of Interest Register.

Procedure:

- Directors must declare any actual or potential conflict at the earliest opportunity, and before any related discussion or vote.
- Declarations must be recorded in the minutes and in the Conflicts of Interest Register.
- The conflicted individual must withdraw from the relevant discussion and vote unless the Board decides their participation is in the interests of CLS and that decision is minuted.
- Third-party researchers and contractors must declare any relevant conflict prior to commencing work with CLS.

2.5 Financial Controls

CLS handles public and research funds and must maintain clear financial records. The following minimum controls apply:

- All income and expenditure must be recorded promptly in the CLS accounts.
- Bank payments above £500 require dual authorisation by two directors.
- Expenses claims must be submitted with receipts within 30 days and approved by a director other than the claimant.
- Annual accounts must be prepared and filed in accordance with Companies House requirements and any applicable audit threshold.
- The Board will review management accounts at least quarterly.

CLS does not permit the making of personal loans to directors or staff from CLS funds.

2.6 Records Management

CLS maintains records that are accurate, secure, retrievable, and retained for appropriate periods. The Data Protection Policy (Section 4) governs personal data. For corporate records:

Record Type	Minimum Retention Period
Board minutes and resolutions	Permanently
Financial accounts and receipts	7 years
Contracts and legal agreements	7 years after expiry
Correspondence (significant)	6 years
Research data (anonymised)	As per ethics approval, minimum 5 years
Participant consent forms	3 years after end of study
Incident reports	10 years
DBS check records	6 months after decision

3. Research Integrity & Ethics

Policy Statement

CLS is committed to the highest standards of research integrity. All research conducted under the CLS name must be ethical, rigorous, transparent, and conducted with full respect for participants. CLS adopts the UK Research Integrity Office (UKRIO) Code of Practice for Research (all research, all disciplines), and additionally the ESRC Framework for Research Ethics (for research involving human participants), the BPS Code of Human Research Ethics (for psychological research), and the AHRC Ethics Framework/SRA Ethical Guidelines (for arts-based research) as its governing standards.

3.1 Ethics Review

All research involving human participants, personal data, or sensitive topics — including (para)psychological experiments, psychophysiological measurement, and experiential or altered-state activities — requires ethics review before commencement.

Review process:

- The researcher completes the CLS Research Ethics Application Form (CLS-REA-001).
- All applications are reviewed by the Institutional Review Board.
- Approval, conditional approval, or rejection is communicated in writing within 21 days.
- Conditions of approval must be discharged and documented before research commences.
- Amendments to approved studies must be re-submitted for review.
- Multi-site studies or studies involving vulnerable populations may be referred to an external ethics body.

Research must not commence without written ethics approval. In genuine emergencies where delay would cause harm, a director may grant provisional approval pending full review, documented in writing within 48 hours.

3.2 Informed Consent

Participation in any CLS research activity must be based on free, informed, and ongoing consent. Consent must be:

- Obtained prior to any data collection, using an approved consent form.
- Based on a clear participant information sheet explaining the study's purpose, procedures, risks, benefits, confidentiality arrangements, and right to withdraw.
- Documented in writing or, where written consent is not feasible, via an audio-recorded verbal procedure approved in the ethics application.
- Refreshed if the scope of the study changes materially.

Participants have the right to withdraw from a study at any time and to request withdrawal of their data up to the point at which anonymisation makes individual extraction impossible. Pseudonymisation is encouraged as standard. Withdrawal of consent must not result in any disadvantage to the participant.

3.3 Participant Wellbeing

Researchers must take all reasonable steps to protect the physical and psychological wellbeing of participants, including:

- Pre-screening for contraindications (see CLS-COC-001 and CLS-RA-001).
- Providing adequate debriefing and integration time after any altered-state or emotionally engaging activity.
- Ensuring that trained support is available during and after sessions.

- Providing signposting to relevant support services if a participant discloses distress or vulnerability.

Researchers must not use their position to exploit the trust, dependency, or altered state of participants.

3.4 Research Misconduct

Research misconduct includes fabrication, falsification, plagiarism, misrepresentation of findings, and undisclosed conflicts of interest. CLS takes a zero-tolerance approach. If research misconduct is suspected:

- Concerns should be raised with the CLS lead director (or, if they are implicated, directly with the CIC Regulator).
- An initial assessment will be made within 10 working days.
- If a formal investigation is warranted, an independent reviewer will be appointed.
- Findings and any remedial action will be documented. Where published work is affected, correction or retraction will be pursued.

Whistleblowers who raise concerns in good faith will be protected from retaliation.

3.5 Intellectual Property & Publication

Research produced under the CLS name or using CLS resources is subject to the following:

- CLS retains ownership of research outputs produced primarily through CLS funding or facilities, unless a separate agreement provides otherwise.
- Authorship on publications must reflect genuine intellectual contribution; honorary or gift authorship is not permitted.
- CLS supports open access publication wherever possible and consistent with funder requirements.
- Pre-registration of experimental studies is strongly encouraged. Where studies are pre-registered, any deviations from the registered protocol must be disclosed in any resulting publication.
- Collaborators must agree the terms of IP ownership and publication rights in writing before commencing joint work.

4. Data Protection & GDPR

Policy Statement

CLS processes personal data lawfully, fairly, and transparently, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. CLS is registered with the Information Commissioner's Office (ICO) as a data controller. Data is collected only for specified, legitimate purposes and is not retained longer than necessary.

4.1 Data Controller & Responsibilities

Responsible Party	Responsibility
CLS Board (collectively)	Overall accountability for data protection compliance.
Designated Data Lead (a director)	Day-to-day oversight; maintain records of processing activities; serve as first point of contact for data subject requests and breaches.
All directors, staff, and volunteers	Process data only as instructed; report breaches or near-misses immediately to the Data Lead.
Third-party event organisers	Act as separate data controllers for data they collect independently; must provide their own privacy notice and comply with UK GDPR.

4.2 Lawful Bases for Processing

CLS relies on the following lawful bases depending on the context:

Processing Activity	Lawful Basis
Event booking and administration	Contract / Legitimate interests
Participant health screening (special category data)	Explicit consent
Research participation data	Explicit consent
Safeguarding records	Legal obligation / Vital interests
Director and staff records	Legal obligation / Contract
Marketing and newsletters	Consent (opt-in only)

4.3 Special Category Data

CLS routinely processes special category data, including health information (event screening), data about mental health (welfare records), and potentially data revealing religious or philosophical beliefs (research contexts). Such data must:

- Be collected only with explicit, documented consent or another clear special-category condition under Article 9 UK GDPR.
- Be stored separately from general event data where practicable, with access restricted to those with a clear need.
- Be anonymised or pseudonymised as soon as processing purposes no longer require identification.
- Not be shared with third parties without the explicit consent of the data subject, except where legally required.

4.4 Data Subject Rights

Individuals have the right to access, rectify, erase, restrict, or port their data, and to object to processing. CLS will respond to valid data subject requests within one calendar month. Requests should be sent

to Luigi.Sciambarella@centreforliminalstudies.com. Where identity is uncertain, CLS may request reasonable verification before responding.

4.5 Data Breach Procedure

A personal data breach is any event that results in the accidental or unlawful destruction, loss, alteration, or disclosure of personal data.

- Any actual or suspected breach must be reported to the Data Lead within 24 hours of discovery.
- The Data Lead will assess the risk to data subjects within 48 hours.
- If the breach is likely to result in risk to data subjects, it must be reported to the ICO within 72 hours of CLS becoming aware.
- If high risk to data subjects is identified, affected individuals must be notified directly without undue delay.
- All breaches must be recorded in the CLS Data Breach Log, regardless of whether ICO notification is required.

4.6 Retention & Disposal

Personal data must not be kept longer than necessary for the purpose for which it was collected. Refer to the retention schedule in Section 2.6. When data is no longer required, it must be securely disposed of: paper records shredded; digital records deleted and storage overwritten or encrypted. Third-party processors must provide confirmation of secure disposal on request.

5. Safeguarding

Policy Statement

CLS believes that all people who engage with its activities have the right to do so safely and free from harm. CLS is committed to safeguarding the welfare of all participants, with particular attention to adults at risk and any young people who may attend CLS events. Safeguarding is the responsibility of everyone associated with CLS.

5.1 Designated Safeguarding Lead

CLS appoints a Designated Safeguarding Lead (DSL) from among its directors. The DSL is responsible for:

- Maintaining this Safeguarding Policy and associated procedures.
- Receiving and managing safeguarding concerns raised by staff, volunteers, participants, or third parties.
- Liaising with statutory agencies (police, social services) where required.
- Ensuring that safeguarding training is completed by all relevant CLS personnel.

The current DSL contact is: Kirsty.Allan@centreforliminalstudies.com. If the concern involves the DSL, it should be raised with another CLS director.

5.2 Adults at Risk

CLS activities — particularly those involving altered states of consciousness, experimental participation, or emotionally engaging content — may attract participants who are vulnerable. An adult at risk is any adult aged 18 or over who has care and support needs and is unable to protect themselves from abuse or neglect as a result.

CLS applies the following safeguards:

- Pre-event health screening identifies participants who may require additional support (see CLS-RA-001).
- At least one trained facilitator maintains oversight throughout altered-state or experiential sessions.
- A designated quiet/recovery space is available at all residential and half-day+ events.
- Facilitators are trained in psychological first aid and trauma-aware practice.

5.3 Young People

CLS events are primarily designed for adults aged 18 and over. Where a young person under 18 is permitted to attend (for example, at a public lecture):

- Written consent from a parent or guardian must be obtained in advance.
- A responsible adult must accompany the young person throughout.
- The young person must not participate in any altered-state, experimental, or biofeedback activity.

No CLS personnel may be left alone with a child or young person. CLS does not provide regulated activity in relation to children, but will follow the guidance of the Disclosure and Barring Service (DBS) if the nature of its activities changes.

5.4 Recognising & Reporting Concerns

Indicators of concern include, but are not limited to: unexplained distress or withdrawal; disclosure of harm; signs of coercive control; severe psychological reactions during or after sessions. Anyone who observes or receives a disclosure that raises a safeguarding concern must:

- Listen calmly and without judgement; do not promise confidentiality.

- Record what was said or observed, in the person's own words where possible, as soon as practicable.
- Report to the DSL on the same day, using the CLS Incident Report Form (CLS-IR-001).
- Not investigate independently or confront the alleged perpetrator.

In an emergency, or if a person is at immediate risk of harm, call 999 first. Do not delay emergency action to consult the DSL.

6. People

Policy Statement

CLS values the contribution of every person who works with or for it, whether as a director, volunteer, associate researcher, or contractor. CLS is committed to treating all people fairly, with dignity, and without discrimination.

6.1 Equal Opportunities & Non-Discrimination

CLS does not discriminate on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation, whether in relation to its personnel or its participants. CLS actively seeks to make its events and activities accessible and inclusive.

6.2 Volunteers & Associates

Many CLS activities are delivered with the support of volunteers and associate researchers. All such individuals must:

- Complete a CLS volunteer/associate induction, including this Framework, before undertaking any activity.
- Sign a CLS Volunteer/Associate Agreement setting out their role, responsibilities, and confidentiality obligations.
- Hold any qualifications required for their specific role (for example, a first-aid certificate for event support, or relevant postgraduate qualifications for research roles).
- Report any concerns, incidents, or conflicts of interest to a CLS director promptly.

Volunteers and associates are not employees of CLS. CLS does not offer guaranteed hours, paid leave, or other employment benefits unless a separate employment contract is in place.

6.3 Wellbeing

CLS recognises that working with consciousness-related, experiential, and anomalous phenomena can be personally significant. CLS encourages all personnel to:

- Maintain appropriate personal and professional boundaries.
- Seek peer support or supervision where the content of their work raises personal resonance or distress.
- Raise any wellbeing concern with a CLS director in confidence.

CLS will endeavour to provide reflective practice space for facilitators and researchers involved in intensive or altered-state work.

6.4 Complaints & Grievances (Personnel)

Anyone working with or for CLS who has a grievance regarding their treatment should raise it informally with a CLS director in the first instance. If the matter is not resolved within 10 working days, a written complaint may be submitted to info@centreforliminalstudies.com. Written complaints will receive a written response within 21 days. If the complaint involves all directors, an independent mediator may be appointed by mutual agreement.

7. Events & Venue Use

Policy Statement

All events and activities held at CLS premises or under the CLS name must be conducted safely, ethically, and consistently with CLS's community benefit purpose. Third-party use of CLS space is welcomed but subject to clear conditions to protect participants, the organisation, and the reputation of CLS.

7.1 All Events

The following requirements apply to every event hosted at CLS premises or branded under the CLS name, whether organised by CLS or a third party:

- A completed Event Risk Assessment (CLS-RA-001) must be submitted to the CLS Director or Venue Liaison at least 5 working days before the event.
- All participants must receive a copy of the CLS Code of Conduct (CLS-COC-001) or an equivalent third-party code approved by CLS.
- A trained first-aider with a valid certificate must be present at all events.
- Fire evacuation procedures must be briefed to all participants at the start of the event.
- Any incident, near-miss, or welfare concern must be recorded using CLS-IR-001 and submitted within 24 hours.

7.2 Altered-State & Experiential Events

Events involving altered or non-ordinary states of consciousness carry additional obligations:

- At minimum two trained facilitators must be present for any group size above six participants.
- Pre-event health screening and consent (including contraindications checklist) must be completed for all participants where applicable.
- A quiet recovery and integration space must be available throughout.
- Facilitators must not themselves enter an altered state during a session in which they have supervisory responsibility.

7.3 Third-Party Venue Use

Third-party individuals or organisations wishing to use CLS premises must:

- Complete a CLS Venue Use Application and be approved in advance by a CLS director.
- Hold current public liability insurance of at least £5 million; a certificate must be provided to CLS.
- Sign the CLS Venue Use Agreement, which incorporates this Framework by reference.
- Comply with all sections of this Framework relevant to their activity.
- Ensure their lead facilitator is familiar with CLS emergency procedures, fire exits, and first-aid arrangements.

CLS reserves the right to decline or withdraw venue use if an activity is deemed inconsistent with CLS's purpose, values, or obligations. Venue use approval does not constitute endorsement of a third party's methods, products, or claims.

8. Health & Safety

Policy Statement

CLS will, so far as is reasonably practicable, provide and maintain a working environment that is safe and without risk to the health and welfare of all persons on its premises or participating in its activities. This statement meets the requirements of the Health and Safety at Work Act 1974.

8.1 Responsibilities

Responsible Party	Responsibility
CLS Board (overall)	Ensure adequate resources for health and safety; review H&S performance annually; ensure this policy is implemented.
Designated H&S Lead	Maintain risk assessments; arrange first-aid provision; investigate incidents; liaise with venue management at Broughton Hall.
Event Leads	Complete event risk assessments; brief participants on emergency procedures; ensure equipment is safe; report incidents promptly.
All personnel	Follow safe working practices; not misuse safety equipment; report hazards, near-misses, and incidents immediately.
Participants	Follow facilitator safety guidance; report any hazard or concern to the Event Lead.

8.2 Risk Assessment

A documented risk assessment must be completed for every CLS public event using CLS-RA-001. Risk assessments must be reviewed after any incident and at least annually. Significant residual risks (rated High on the CLS matrix) must not be accepted without a specific director sign-off and documented mitigation plan.

8.3 Electrical Equipment

All mains-connected electrical equipment used at CLS events must be Portable Appliance Tested (PAT) and have a current certificate available for inspection. Equipment showing signs of damage must be removed from service immediately. Any equipment provided by a third party for use at CLS premises must also meet this standard.

8.4 First Aid

A minimum of one person holding a current first-aid at work or emergency first-aid at work certificate must be present at every CLS event. The location of the first-aid kit and the nearest AED (at Broughton Hall main reception) must be confirmed and communicated to all facilitators before every event. A list of emergency contact numbers must be posted visibly at the venue (see CLS-RA-001 Section 6).

8.5 Incident Reporting & Investigation

All accidents, injuries, near-misses, and adverse psychological reactions must be recorded using CLS-IR-001 within 24 hours and submitted to the CLS H&S Lead. Where an incident meets the criteria under RIDDOR 2013 (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations), it must also be reported to the Health and Safety Executive.

Incident records are retained for a minimum of 6 years. Patterns in incidents will be reviewed annually as part of the Board's H&S review.

9. Communications & Reputation

Policy Statement

CLS operates at the interface of science, consciousness research, and experiential practice — a field in which public and academic credibility are hard-won and easily damaged. All external communications must be accurate, appropriately qualified, and consistent with CLS's commitment to evidential rigour.

9.1 Authorised Spokespersons

Only CLS directors, or individuals explicitly authorised by a director in writing, may speak on behalf of CLS to the media, at public events, or in published materials. Unauthorised statements that could be attributed to CLS as an organisation must not be made by staff, volunteers, associates, or third-party venue users.

9.2 Claims & Evidential Standards

CLS is committed to intellectual honesty in all its public communications. This means:

- Research findings must be communicated accurately and with appropriate qualification; preliminary or unpublished findings must be clearly labelled as such.
- A clear distinction must be maintained between empirical findings, theoretical proposals, and personal or experiential accounts.
- CLS does not endorse commercial products, therapeutic claims, or paranormal services in its institutional communications.
- Where CLS platforms are used by third parties (e.g., in event promotion), the same standards of accuracy apply; CLS reserves the right to require amendment or withdrawal of third-party content that does not meet these standards.

9.3 Social Media

CLS maintains institutional social media accounts. The following guidelines apply to anyone posting on behalf of CLS:

- Posts must be approved by a director, or by a designated social media lead appointed by a director.
- Do not share participant images or personal information without written consent.
- Do not engage in public disputes or share unverified claims.
- CLS accounts should not be used to promote the personal commercial activities of directors, staff, or associates.

Individuals are free to post personal content from their own accounts but must make clear that their views are their own and not those of CLS when commenting on matters relevant to CLS's work.

9.4 Use of the CLS Name & Logo

The CLS name, logo, and associated branding may not be used by any individual or organisation without prior written permission from a director. Third-party venue users may not represent themselves as affiliated with or endorsed by CLS in their own marketing without explicit agreement. Any approved use of CLS branding must be consistent with the style guidelines and purpose of the organisation.

10. Complaints Procedure

Policy Statement

CLS welcomes feedback and takes complaints seriously. A clear, fair, and accessible complaints process supports CLS's accountability to the public it serves and helps the organisation to learn and improve.

10.1 Scope

This procedure applies to complaints from participants, members of the public, and third parties about any aspect of CLS's activities, events, research conduct, or communications. Personnel grievances are handled under Section 6.4.

10.2 How to Complain

Complaints may be submitted:

- By email to: info@centreforliminalstudies.com
- By post to: Four Arches, Broughton Sanctuary, Broughton, Skipton, North Yorkshire BD23 3AE
- In person, by speaking to the Event Lead or any CLS director.

Complainants should include their name and contact details, a description of the issue, the date(s) involved, and, if applicable, any steps already taken to resolve the matter informally.

10.3 Process & Timescales

Stage	Action & Timescale
Acknowledgement	CLS will acknowledge receipt of a written complaint within 5 working days.
Investigation	A director will review the complaint and gather relevant information. Response provided within 21 working days. Complex complaints may require up to 40 days; the complainant will be advised of the delay.
Decision & Response	A written response will set out the findings, any action CLS will take, and the complainant's right to escalate.
Escalation	If unsatisfied, the complainant may request a review by a different director within 14 days of receiving the response.
Final Review	The review outcome is final within CLS. For regulatory matters, complainants may also contact the CIC Regulator or the ICO (data-related complaints).

10.4 Learning from Complaints

Complaints and their outcomes are recorded (in anonymised form where appropriate) and reviewed by the Board annually. Recurring themes must result in a documented improvement action.

11. Document Control

11.1 Ownership & Review

This Framework is owned by the CLS Board of Directors. It must be reviewed in full at least once per year and additionally following any significant incident, regulatory change, or material change to CLS's activities. The current version is the only authoritative version; superseded versions must be clearly marked and archived.

11.2 Version History

Version	Date	Author	Summary of Changes
1.0	25-05-2026	Paul Stevens	Initial draft for Board review.

11.3 Approval Sign-Off

Approved by (Director 1)	Signature: 	Date: 25 May 2026
Approved by (Director 2)	Signature: 	Date: 25 May 2026

This document is available at <https://centreforliminalstudies.com>