



IMPACTFUL GOVERNANCE
Community Interest Company

Speakers Policy 2026

The purpose of this policy is to:-

Accept our legal duty

It's vital that Impactful Governance – Community Interest Company act in our best interests and manage its resources responsibly. Implement reasonable risk management strategies to identify and mitigate the risk of our funds, assets, people and reputation becoming used for extremism.

Comply with the law.

We must not run an event or publish material that glorifies terrorism or incites hatred on the grounds of race, religion or sexual orientation, as this would be a criminal matter.

Implement the necessary safeguards to ensure that your C.I.C. doesn't glorify terrorism or incite hatred on the grounds of race, religion or sexual orientation.

Carry out our C.I.C.'s purposes for the public benefit.

Views or activities that incite hatred on the grounds of race, religion or sexual orientation cannot be for the public benefit because they are illegal.

Ensure that your C.I.C. does not promote views that denigrate those of a particular faith, race or sexual orientation.

Why are extremism issues relevant to this C.I.C.?

As Directors we have a duty to manage our C.I.C.'s resources responsibly.

We must make sure that its assets, people, beneficiaries and reputation are not exposed to undue risk. This includes any risk from becoming drawn into or involved in extremism because this would also involve a breach of criminal law/illegality. This applies to all C.I.C.s even if they are not registered with the Commission. Managing the risks of extremist or terrorist abuse also forms part of protecting people and safeguarding, which should be a governance priority for all C.I.C.s.

In addition, some C.I.C.s, because of the nature of their particular work or the type of beneficiaries they support - some of whom may be at particular risk of radicalisation - may be attractive to those wishing to promote extremist views or behaviour. Directors of such C.I.C.s must take additional steps to ensure that their C.I.C. is not abused. However, the extent of those steps will vary according to the type and level of activity and the associated risk in certain areas. These additional steps are not intended to be overly complex or place disproportionate burdens on Directors. Rather, the steps aim to help Directors navigate situations which can require challenging judgements and ensure that the risk of criticism of their actions is minimised whilst also enabling us to comply with our legal duties.

Directors also have an important role in helping to prevent the promotion of extremist ideas that may encourage terrorism, or that incite criminal acts or hatred on the grounds of race, religion or sexual orientation or that breach equality laws.

Some views may not be the norm or traditional. They may even offend, shock or disturb others. That does not mean they cannot be promoted or supported by a C.I.C..

On the other hand, expressing or acting on certain views, such as inciting religious hatred, may be a criminal offence and/or in breach of human rights and equality laws.

Beyond that, there is a range of views that under C.I.C. law may not be appropriate for a C.I.C. to support because they, for example, breach political campaigning, public benefit rules or other laws which apply to particular types of C.I.C.s, such as schools, under education law.

If a C.I.C. provides a platform for the expression or promotion of extremist views, this is not likely to support the C.I.C.'s purposes or to comply with the public benefit requirement not to cause undue detriment or harm.

Directors are also likely to be in breach of their duties as Directors

Abuse can occur in many ways, such as:

through the use of the C.I.C.'s premises by speakers at the C.I.C.'s events

through the use of the C.I.C.'s communications network, including social media, to promote extremist literature

This abuse may be carried out by a person or organisation, either connected to a C.I.C. or outside of it.

Freedom of Speech

Provided speech is legal, the right to speak freely includes saying things which may offend, shock or disturb others. You and your co-Directors must act to manage your C.I.C.'s assets responsibly, which includes its reputation, and to act with reasonable care and skill and in your C.I.C.'s best interests. We will take all reasonable steps to protect it from harm by being vigilant, and putting in place appropriate policies and procedures, particularly if you regularly run events or distribute literature. This does not mean that such events or speeches cannot take place where there is a higher risk, but it does mean that Directors might have to consider in more detail what the risks are and what steps can be taken to address or mitigate those risks so that the event or speech can take place in furtherance of the C.I.C.'s best interests.

If a speaker or author breaks the law, they will be culpable. However in some instances, if we knew, or ought to have known, that the speaker or author would break the law, we may also find ourselves liable or otherwise in breach of our legal duties

Other legal duties:

In addition to complying with our duties under C.I.C. law, we must comply with our legal duties under the general law including criminal, human rights and equality law. This means ensuring that the C.I.C.'s decision-making and risk assessment procedures take account of the relevant law as it applies to our C.I.C.. If there is any doubt, we will consider taking legal advice.

As a Director, we have a duty to manage our C.I.C.'s resources responsibly and must protect its assets and avoid taking undue risks. In most instances, speeches or events can take place unhindered or without detailed risk assessments. Directors should however be mindful of the risk of giving a platform to speakers who break the law by glorifying or supporting terrorism, inciting violence or hatred on the grounds of race, religion or sexual orientation or other illegal activity.

There are a number of steps we will consider taking to manage the risks, depending on your C.I.C.'s activities and how often it holds events giving a platform to speakers. You should take a measured and proportionate approach - the greater the risks, the more you'll need to do to protect your C.I.C. and ensure you comply with your duties. If you and your co-Directors, or those in the C.I.C. organising the event, invite and allow speakers who you might have reasonably suspected would use the platform to break the law - for example because they have done so previously - they may find themselves in breach of criminal law and/or C.I.C. law. In addition, if you and your co-Directors fail to implement appropriate measures to protect your C.I.C., you may be in breach of your Director duties.

On the other hand, where speech is lawful, we will consider the risk of damage to your C.I.C.'s reputation that could be caused by inhibiting free speech. This could include a detrimental impact towards your C.I.C.'s independence or credibility. For C.I.C.s with purposes to advance education, this risk assessment should also include consideration of their charitable purposes.

For some C.I.C.s, enabling debate and discussion of controversial issues may even be integral to their charitable purposes. This guidance should not be used, and is not intended ever to be used, to prohibit those with lawful, albeit unpopular, views. Nonetheless, you and your co-Directors must be clear about how this will further the C.I.C.'s objects and take active steps to manage any resulting risks.

Speaking events held by C.I.C.s are normally open to anyone and not limited to a small defined group. However, it may sometimes be acceptable to set restrictions due to the vulnerability of our LGBTQ+ communities and restrict who can attend if it can be shown that the restriction is lawful, reasonable and relevant to the C.I.C.'s aims.

If Directors believe:

If Directors allow another organisation to use our C.I.C.'s premises for an event but we believe, or have reasonable cause to suspect, that this may result in an illegal activity, we will immediately report our concerns to the police and take steps to stop the event.

There is a long and successful history of Directors and their C.I.C.s being in the forefront of social change and promoting ideas that, at the time, were unpopular or controversial. This guidance should not be used, and is not intended ever to be used, to prohibit those with lawful, albeit unpopular, views.

All Directors must act in the best interests of the C.I.C. only and must ensure any conflicts of interest are properly managed. In some instances, expressing strongly contentious or partisan views may compromise the independence of the C.I.C. and make it unsuitable for the individual to act as a Director. This will depend on the circumstances and the nature of the person's conduct.

Extremist Literature:

C.I.C.s use a wide range of means to distribute information and educational materials. Examples include through electronic media, including television and radio, social media, including Facebook, Twitter and YouTube, or physical recordings, including memory cards, CDs and DVDs.

C.I.C.s may also sell, use, distribute or otherwise promote literature at their premises, in prayer rooms and through bookshops.

As Directors, we must ensure that the risks associated with promoting material in these ways are assessed and that appropriate measures are put in place to mitigate against those risks.

Directors can and will report our concerns about illegal or harmful online content (information, videos and pictures) to the police at the Counter Terrorism Internet Referral Unit (CTIRU), through the GOV.UK (<https://www.gov.uk/report-terrorism>) website.

If the inappropriate content involves the C.I.C.'s own material, or is connected to the C.I.C., we will take the necessary steps to remove the material and deal with the incident promptly.

Education material that is bias against our cause or incorrect:

A C.I.C. will not distribute, display or use educational materials that contain biased or incorrect information about other people, groups or beliefs (for example, material that is anti-Semitic or homophobic).

Neither is it acceptable for any C.I.C. to publicise extremist views that breach UK law or are not for the public benefit or to preach hatred, particularly against members of other religions and faiths.

Some educational C.I.C.s are subject to the Prevent duty under section 26 of the Counter-Terrorism and Security Act 2015 (the 2015 Act), to have 'due regard to the need to prevent people from being drawn into terrorism'. Section 9 of this chapter provides more information, whilst specific published guidance is also available at Prevent duty guidance: for England and Wales

(https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance__England_Wales_V2-Interactive.pdf).

Directors having concerns themselves about our C.I.C.:

If one of our Directors are concerned about activities at our C.I.C., that Director should raise their concerns with the other Directors as soon as possible. If they have failed to act on your concerns or you feel unable to raise this with them because it may risk your personal safety, then you must report your concerns to the police.

The Board of Directors should also report this to the Commission using the online Reporting concerns about a C.I.C. (<https://forms.C.I.C.commission.gov.uk/raising-concerns/>) form mentioned above, when reporting an incident without the authority of the other Directors.

Date of last review	April 2026
Date of next review	May 2027
Date it was first implemented	Mar 2025
Author(s)	Directors
Audience	All Employees, Volunteers and work placements
Other relevant policies and/or procedures	All Policies & Procedures
Where it is saved	Online