EXTERNAL INDIVIDUALS, UNAUTHORISED REPRESENTATION AND ORGANISATIONAL DISASSOCIATION POLICY

All Communities Matter CIC (ACM)

Policy owner	Board of Directors – All Communities Matter CIC
Approval status	Approved
Effective date	Nov 2026
Review date	12 months after approval, or sooner if required

1. Purpose

All Communities Matter CIC ("ACM") works to bring people and communities together in inclusive, welcoming and respectful environments. This policy explains how ACM will prevent its name, reputation, branding, events or activities from being wrongly presented as endorsing an unaffiliated individual or their views; how concerns about an individual's conduct may be assessed; and how ACM will respond if someone attends an ACM activity without invitation or claims an association that has not been authorised.

The policy is intended to protect participants, beneficiaries, traders, staff, volunteers, partners and the organisation. It applies consistently and is not written for, or aimed at, any named individual.

2. ACM's values and position

ACM is committed to equality, dignity, inclusion and respect. ACM does not condone racism, sexism, misogyny, harassment, bullying, threats, hate speech or discriminatory conduct. ACM will not knowingly endorse, promote or provide an official platform for conduct that conflicts with these values.

ACM recognises that people may hold personal views and that lawful expression must be treated fairly. A disagreement with a person's opinion, by itself, will not automatically justify exclusion or other action. Decisions under this policy will be based on relevant evidence, the person's actual or claimed connection with ACM, the nature and context of the conduct, any risk or impact, and the legal rights and obligations that apply.

3. Scope

This policy applies to the organisation's dealings with external individuals, including people who:

- attend, approach or seek to participate in ACM events or activities without an invitation;
- are not directors, employees, volunteers, contractors, traders, partners or authorised representatives of ACM;
- claim, imply or allow others to believe that they represent, speak for, work with or are endorsed by ACM;
- use ACM's name, logo, photographs, social media channels or event materials in a way that suggests an unauthorised connection; or
- are the subject of a concern that their conduct at an ACM activity, or their public conduct where a genuine ACM connection is asserted or reasonably perceived, may create a safeguarding, safety, equality or reputational risk.

This policy does not replace ACM's safeguarding, health and safety, complaints, event management, employment, volunteer, data protection or venue procedures. Where another policy or legal duty applies, it must also be followed.

4. No automatic association or endorsement

- A person's attendance at an ACM event, market, meeting or activity does not make them an ACM representative, associate, partner or supporter.

- ACM does not endorse the personal views, statements or online activity of people who are not authorised to speak or act on its behalf.
- Only people expressly authorised by the Board or an appropriately delegated manager may represent ACM, make statements on its behalf, enter agreements in its name or use its branding for an official purpose.
- ACM may correct inaccurate claims of affiliation and may ask an individual to remove or correct unauthorised references to ACM, subject to applicable law and any platform or contractual process.

5. Uninvited attendance at ACM activities

ACM activities may take place in public spaces, privately managed premises or venues subject to a licence, hire agreement or other access conditions. The rights of attendees and the powers of ACM will depend on the location, the event arrangements and the law.

Where an individual attends without invitation or where concerns arise, ACM will:

- remain calm and avoid confrontation, public argument or discriminatory treatment;
- consider whether the person is simply present as a member of the public, or is disrupting the event, intimidating others, behaving abusively, making threats, harassing people, breaching event conditions or falsely claiming to represent ACM;
- where appropriate, explain that the individual is not authorised to represent ACM and that their presence does not imply ACM's endorsement;
- refer any access or removal decision to the venue owner, landowner, event controller or other person with the relevant legal authority, where ACM does not itself have that authority;
- ask a person to leave only where ACM or the relevant venue/event controller has a lawful basis to do so, and follow the venue's procedures and any applicable contractual or public-access rights;
- seek assistance from venue security or the police where there is an immediate safety concern, threat, violence or suspected criminal conduct; and
- record significant incidents and actions taken in line with section 8.

ACM will not assume that it can exclude someone from a public place simply because their views are unwelcome. Any restriction on attendance must be lawful, necessary, proportionate and applied consistently.

6. Assessing concerns about public conduct and reputational association

A concern about an individual's online or public conduct may be considered under this policy where there is a genuine connection to ACM or a reasonable risk that the individual is being presented as associated with ACM. Relevant factors may include:

- the content, seriousness, context and apparent meaning of the material or behaviour;
- whether the material appears to promote or include discriminatory abuse, threats, harassment or intimidation;
- whether the conduct is isolated or repeated, and whether reliable evidence is available;
- whether the individual has claimed an ACM role, used ACM branding, appeared in ACM publicity as an official representative, or been publicly described as an ACM partner or associate;
- whether ACM has any actual relationship with the individual, and the nature and extent of that relationship;
- the potential impact on people who use, attend, work at or support ACM activities, including the risk that people may feel unsafe or excluded;
- the views of relevant venue managers or partners, where appropriate; and
- any explanation or relevant context provided by the individual.

ACM will not treat an unverified screenshot, allegation or third-party description as conclusive. Where practicable, the original source, date, context and authenticity of material should be checked. ACM will avoid unnecessary circulation of offensive material.

7. Actions ACM may take

Depending on the evidence, risk, relationship with ACM and applicable legal or contractual requirements, ACM may take one or more proportionate steps:

- make clear privately or publicly that the individual is not authorised to represent ACM;

- issue a factual clarification that an individual's personal views or actions are not ACM's views and are not endorsed by ACM;
- decline a proposed collaboration, speaking role, promotion, volunteering opportunity or other formal association;
- withdraw permission to use ACM's name, logo, branding, photographs or materials, where ACM has the right to do so;
- ask a venue or event controller to consider appropriate access or safety measures;
- apply relevant event conditions or ask an individual to stop disruptive, abusive, threatening or harassing conduct;
- review, pause or end an existing arrangement where the agreement permits and after appropriate consideration; or
- refer the matter to the relevant authorities or seek legal advice where necessary.

ACM will not present an individual as having been found responsible for misconduct unless that conclusion is supported by a fair process and reliable evidence. Public statements will be limited to what ACM needs to clarify and can substantiate.

8. Reporting, recording and decision-making

Concerns should be reported to a director or the person designated by the Board. If the concern involves that person, it should be referred to an unconflicted director or another suitable independent person.

- Record the date, time, location, people involved, what was observed or reported, and any immediate safety action.
- Preserve relevant evidence securely and record where it came from. Do not alter screenshots or circulate them more widely than necessary.
- Assess immediate risks to people and decide whether urgent interim steps are needed. Interim steps are precautionary and are not a finding of wrongdoing.
- Where appropriate and safe, give the individual a reasonable opportunity to respond to material concerns before a non-urgent decision is made.
- Use an unconflicted decision-maker. Any director with a personal connection or conflict should declare it and take no part in the decision, except to provide factual information if requested.
- Record the reasons for the decision, the evidence considered, the action agreed, who authorised it and when it will be reviewed.

Where there is an immediate threat, violence, harassment or safeguarding concern, ACM may take urgent protective action first and complete the record and review as soon as practicable.

9. Fairness, equality and proportionality

ACM will apply this policy consistently and without unlawful discrimination. It will consider relevant equality duties, human rights, freedom of expression, public-access rights, contractual obligations and the circumstances of the event. Action will be no more restrictive than reasonably necessary to address the evidenced concern or risk. ACM will not use this policy to punish lawful disagreement or criticism of the organisation.

10. Confidentiality and data protection

Information about concerns will be shared only with people who need it to assess or manage the matter. ACM will collect and retain only information that is relevant and necessary, store it securely, set an appropriate retention period and handle personal data in accordance with its data protection obligations. Special care will be taken with sensitive personal data and allegations of criminal conduct.

11. Responsibilities

- The Board of Directors is responsible for approving this policy, ensuring it is implemented and reviewing significant decisions.
- The event lead or delegated manager is responsible for following venue/event procedures, responding to immediate issues and escalating concerns.
- All directors, staff and volunteers must not imply that an external individual is an ACM representative unless that status has been authorised.
- Anyone acting for ACM must treat individuals fairly, maintain confidentiality and report serious concerns promptly.

12. Review and approval

The Board will review this policy at least annually and after any significant incident, material change in law or change to ACM's activities. The Board may approve supporting event conditions or procedures where needed.

Approved by the Board of Directors: _____

Date of approval: Nov 2026