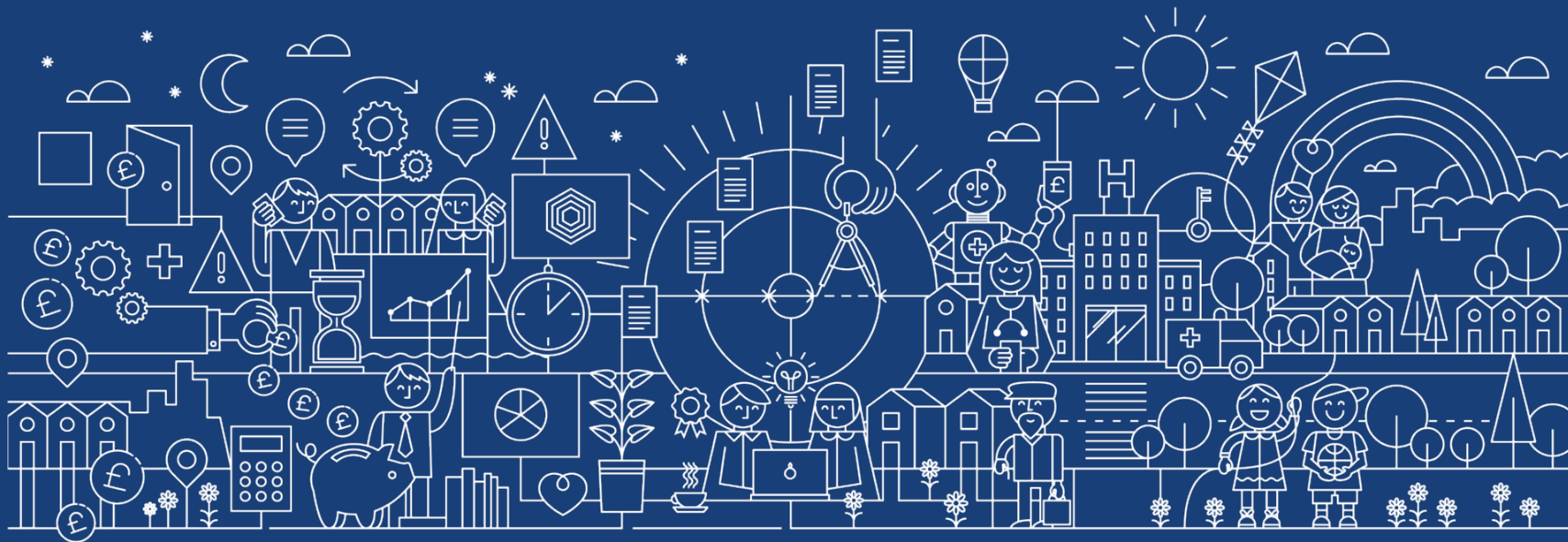


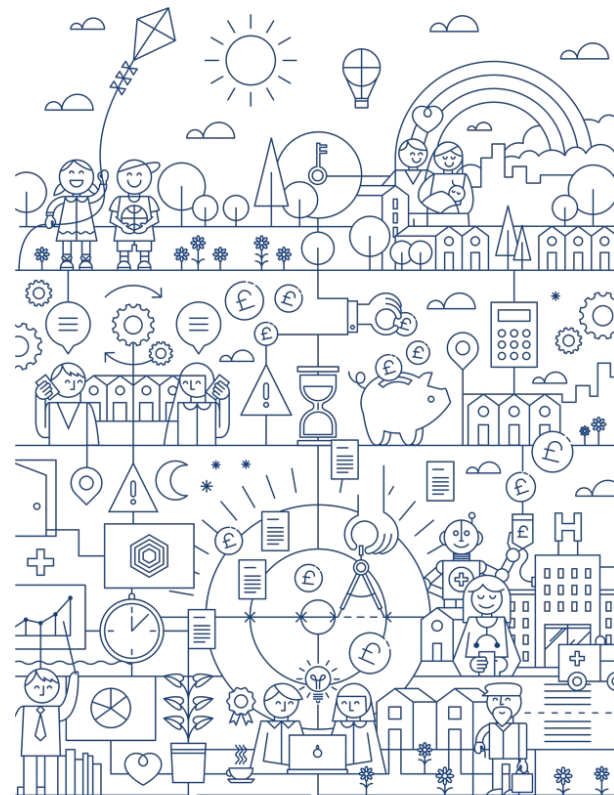
MCA Consulting Excellence

IMPOWER Commitments

April 2026



As a proud MCA member and signatory to Consulting Excellence, IMPOWER adopt the fourteen principles of the scheme through our codes of practice, and day-to-day operations. Our commitments are set out in this document.



Our guiding principles underpin how we operate

At IMPOWER our guiding principles inform how we operate and guide everything we do, they flow through our approaches and processes, supporting us to deliver best value to clients and remain a place for colleagues to develop and grow.



Make a Difference	- We are tenacious, bold and ambitious - We set high expectations for ourselves and our clients - We act commercially so that we can scale our impact
Act with Head and Heart	- We think ahead; focussing on results - We are curious, creative and adaptable, - We use evidence and innovation to solve complex problems
Work together	- We share diverse perspectives and draw on the sum of our strengths - We collaborate and co-produce by default - We are inclusive and strengths based
Be Honest and Fair	- We are transparent and accountable - We prioritise integrity, ethics and fairness

Ethical Behaviour

1. We are responsible and good citizens.

IMPOWER's contribution to a fairer and more compassionate society is to increase the quality of citizens' lives by making meaningful and measurable improvements to local public services, making the best use of the public pound and with a particular focus on the most vulnerable in our communities.

- Corporate Social Responsibility (CSR) and Environmental, Social & Governance (ESG) has an explicit role within our company strategy; we believe it enables us to increase our social impact, whilst facilitating our learning and the development of our staff. This applies at two levels: how we operate on a day-to-day basis and in our strategic approach supported by specific initiatives.
- We plan to deliver social value when working with our clients and have shaped an 'offer' to our clients so we can partner with them in an area reflective of their goals and our strengths. Examples of how we do this ranges from supporting Christmas gifts for children in temporary accommodation through to providing workplace experience to children in care.
- Meaningful co-production is at the heart of our approach, with lived experience consistently factored into our delivery of change. We have a co-production toolkit that we deploy and we also bring together colleagues across the public sector to explore and expand the topic within the sector through our sector learning events.
- IMPOWER gives staff two paid days each year for CSR activity; this ranges from holding Trustee positions with charities to tutoring and sharing our skills with Voluntary and Community Organisations.
- In shaping our client partnerships we consistently see opportunities for CSR, including delivering skills training to local VCS organisations or shaping secondments with our clients.
- As a company we are committed to supporting the charitable sector. As examples we participate in the match funding of charity endeavours from team members, raising funds through our away days, and we invite employees to speak about causes they are passionate about.
- We continue to work with the Early Careers Foundation to provide mentors who support young people from socio-economically disadvantaged backgrounds to raise their ambition and stay in education. 10 members of our team are currently mentors for the scheme.

Ethical Behaviour

2. We conduct our business ethically.

- Our guiding principles set the tone for how we operate, we are honest and fair, acting with accountability, honesty and transparency.
- We have a strong code of conduct, regularly reviewed, which clarifies the ethical standards we expect in line with MCA and other professional body standards.
- We only bid for work that we have the capacity and capability to deliver.
- We are always transparent regarding how our work is scoped and costed.
- We are honest with our customers about whether we think their desired outcomes are achievable. Our client feedback reflects the value our clients place on our honesty and transparency.
- Our approach is founded upon sustainability, leaving the client with increased capability and more resilient. Skills transfer is explicit in our planning and regularly features in client feedback highlighting development of their own staff.
- Our approach is backed by strong information governance and security, protecting our clients' data and ensuring our systems, processes and staff are setup to meet our responsibilities. We are Cyber Essentials Plus certified and our IT support partner is ISO 27001 accredited.
- We pay our subcontractors, associates and suppliers promptly.
- Our staff are all paid above the London Living Wage.
- Where mistakes are made (e.g. incorrect invoicing), we take steps to ensure that errors are identified and corrected quickly.

Ethical Behaviour

3. *We foster an ethical culture.*

- We exist to make a difference, as our guiding principles show we are ambitious and tenacious in the pursuit of outcomes.
- Our quality review process actively engages our clients in a conversation about the behaviour of our teams, including how they demonstrate integrity.
- Each project has a fortnightly delivery meeting with senior leadership where we can explore any ethical challenges and client issues to ensure senior oversight and engagement. Each delivery team submits weekly delivery reports into the Chief Operating Officer that highlight any areas where difficult decisions are required or integrity comes into play.
- We provide transparent platforms to challenge senior leaders and our colleagues. IMPOWER 'People Fridays' are one such example of a structured opportunity to do this. More informally, our senior team all operate an 'open door' policy and welcome suggestions on how things can be improved.
- Our promotion process is transparent and open to all staff. We are an accredited Disability Confident Employer to encourage disabled and neurodivergent candidates to apply to work with us, and to support those who already do. This contributed to a significant increase in applications from individuals with these characteristics.
- We encourage staff to record their time honestly, and not 'hide' time to distort project performance. Working hours are reviewed weekly and discussed to ensure any individual or project issues are identified quickly.
- Since 2021 we have used an online employee engagement system to ensure we can regularly and anonymously check in with our people and take action based on their feedback. This is now measured and reported at board level as part of our key organisational measures.

Client Service and Value

4. We provide excellent consulting services which deliver services clients seek and need.

Complex social problems cannot be effectively addressed through narrow framing, a focus on single entities, linear processes or with a bias toward financial measures. By definition, collaboration is fundamental to creating better and more innovative solutions to complex problems. Collaboration, teamwork and developing strong relationships are our starting point.

- We focus on outcomes and value that our clients are trying to achieve. We will challenge their specification if we feel it is not the best solution – even if that means a reduced role for IMPOWER.
- We deliver our work within our Quality framework which sets the standards we expect and ensures we reflect on how we effectively we are delivering for clients, this incorporates a range of activities within the project lifecycle to ensure quality standards.
- We carry out Quality Reviews to ensure the quality of our work, flag any risks to successful delivery and maintain a focus on achieving outcomes. 100% of our clients interviewed through these reviews say that they would recommend us (measured since April 2023) and our NPS score is over 90.
- EDGEWORK® is our unique approach to understanding and delivering change in complex systems. We developed this, in consultation with our clients, because we recognise that such work requires a different mindset, an ability to work with people – not just datasets – alongside unique methods and tools.
- All of our projects involve co-producing outcomes with client staff; not only does this ensure better outcomes but it also means we can transfer skills and knowledge to local staff to ensure sustainability. Many of our projects are also founded on co-production with those with lived experience. Within our projects this can also mean work placements for these individuals. This is increasing as we continue to develop our Inclusive Consulting approach, which is a core element of our Company Value Proposition.
- Our project planning approach ('Storyboarding') means investing time in detailed planning and scoping to ensure that outcomes can be achieved within the project timescales.
- We conduct lessons learned to ensure any learning is fed into wider continuous improvement. We report at a project level but also collate and reflect on the collective performance of our projects to help drive improvement and consistency.
- We capture the impact we have for our clients the number of lives that our work positively impacts. We capture and report on the return on investment to help us ensure that investment with us delivers a return on public money.

Client Service and Value

5. We are transparent with clients and respond to their concerns.

We work with integrity to improve quality of life. Respect for all people – local citizens, clients, partners and colleagues – in ways that they themselves understand and value is therefore essential.

- Where data or resources provided to us are insufficient to deliver the project outputs, we flag this to the client and look to re-scope the project to take this into account.
- Our 'Quality Reviews' give our clients the opportunity to raise any concerns with a member of IMPOWER's leadership team. The review involves a thorough assessment of risk across the project and provides an opportunity for further mitigating actions to be undertaken.
- Our contracts include clear processes for change management; we recognise that client needs change over time and we have processes to ensure that we can capture and respond to these in a flexible way.
- Our contracts stipulate the need for regular and on-going meetings with project sponsors to ensure their views are regularly captured and reflected in the work undertaken.
- Our focus is on building long-standing delivery partnerships with our clients, acting as their trusted advisors on a wide range of complex challenges and offering greater value, insights and economies of scale over the longer term.
- Our Chief Operating Officer and Assistant Director for Skills and Quality provide independent oversight of projects with a clear focus on doing the right thing for our clients and uploading our IMPOWER Quality Standards whilst having a focus on identification of trends that are addressed as part of a focus on continuous improvement.

Client Service and Value

6. We always strive to improve the value we can deliver to our clients.

We are committed to demonstrating our impact, leadership and professionalism with clients and colleagues alike. We hold ourselves and each other accountable for our commitments, making clear recommendations and decisions, and communicating them effectively.

- We employ empathetic and experienced people who are passionate about transforming lives and delivering better outcomes that cost less.
- We invest time in developing new tools and propositions to enable our clients to deliver sustainable change.
- We are committed to demonstrating impact from the work we do with our clients. We help them measure the improvements in outcomes, financial performance, organisational resilience and system confidence that result from the interventions we deliver together.
- All of our projects are subject to a 'Lessons Learnt Review' so that we can capture areas of success, and areas for improvement, and ensure that these are fed back in to how we scope and deliver future work.
- On a quarterly basis we review the learning from our quality reviews and lessons learned and assess how we need to develop our approaches. We reflect on these findings in our Delivery Step Backs to ensure shared learning from our delivery teams.
- Co-produced with our network, IMPOWER Shared Learning Events foster sector collaboration, supporting knowledge-transfer across organisational boundaries.
- We publish our Annual Impact Report to share what we achieve with our clients.

Professional Development

7. We undertake training and professional development planning each year.

- We are an MCA / CMI accredited training organisation and support our consultants in working towards Chartered Management Consultancy status through both our in-house training programme and the MCA / CMI experienced professional and Senior Leader routes.
- We invest in training and education to allow trust and facilitate greater autonomy of our people, which feeds into the transparent and fair culture that we want to build on.
- We recognise that all functions contribute to the success of the business – recognising the strength of and investing in our Applied Analytics Practice and Business Services (People, Finance, Operations and MarComms functions) in supporting our people and therefore our clients.
- We undertake an annual learning needs analysis to inform and shape our learning and development offer and plan, addressing skills gaps and needs of the business and our clients, as well as individuals' development plans.
- IMPOWER allocates all employees with a Performance Manager and Team Leader, and we support our staff through our online continuous performance management approach, with regular 360 feedback and planned career and development discussions for all colleagues.
- We have a core programme of training (including external industry leading core consulting), a compliance programme for all staff, and tailored formal and informal learning opportunities. We have an onboarding programme for new starters in our business with a full programme of induction, a buddy and a learning group, as well as an in-house mentoring scheme.
- We have an established People team led by a Chief People Officer, with an Assistant Director for Skills & Quality dedicated to planning and operationalising learning and development for our team. This is a reflection of our growth, whilst also recognising the strategic importance of developing and supporting our staff.

Professional Development

8. We promote strong core consulting capabilities and specialisms in our consultants and teams.

- Productive and cohesive team working is fostered at IMPOWER with the provision of team and support networks, and professional development around team behaviour.
- We have established a dedicated Applied Analytics Practice focused on analytics and digital specialisms supporting our consultancy teams both in projects and in their skills in these areas.
- IMPOWER encourage employees to pursue activities and events which enable them to increase their specialist knowledge and gain industry insight, including through our sector delivery groups and EDGEWORK capability practice groups.
- We are focussed on behaviours and values, from the recruitment phase, where we recruit on this basis, through to the promotion process. This has been recently accredited via the MCA / CMI Senior Leader process.
- We put provisions in place to support our people and strengthen both their personal and professional resilience; this ranges from subject matter or setting-specific training, to Mental Health First Aid courses.

Professional Development

9. We support our employees' career progression, professional development and welfare.

- IMPOWER welcomes all requests for flexible and alternative ways of working. We support our colleagues to work in a way that positively supports their wellbeing. To support this we have a Flexible Working Group and have 34% of our workforce formally working flexibly. Many more work flexibly in an informal way.
- All staff are encouraged to provide feedback on our culture and working practices through our annual engagement survey, which we are committed to using as a base for continuous improvement. Our latest survey in 2026 showed us that the vast majority of our workforce are positively engaged. This year we have participated in the 'Sunday Times Best Places to Work' survey and benchmarked strongly against external professional services companies.
- We strongly believe in supporting our staff with families and ensuring that parents feel able to remain working in a consultancy career. We offer enhanced parental leave which is above industry average levels. We are proud of a 100% retention rate of mothers returning to the workplace from Maternity leave since 2022.
- As a company we champion our comprehensive competency framework and use this as a consistent base for measuring performance and supporting personal growth.
- Consultants are encouraged to honestly reflect upon their performance, both with regards to specific project work and overall picture, and highlight any areas for development.
- We work with each employee to identify their strengths and weaknesses, and co-design bespoke development plans that stretch them in their weaker areas and help them finesse their areas of strength.
- We have a range of initiatives to support staff including our Netflix group, DEI group, Lunchtime listening club, Book club and many other wellbeing benefits such as health subscription subsidies.

Professional Development

10. We support the adoption of the Chartered Management Consultant (ChMC) Accreditation across industry and champion its values.

In April 2024, IMPOWER achieved Chartered Management Consultant (ChMC) Programme Accreditation. In 2025 we were also recognised as meeting the standard for our Senior Leaders to gain their Chartered status following a thorough review of our talent acquisition and performance management processes, to ensure they reflect and align with the MCA competency framework and ethical standards. As an accredited company, our in-house training programme has been recognised as delivering excellent standards in the management consulting profession, as well as our commitment to professional development for our staff guided by the ChMC competency framework.

We have already supported a significant number of our team to achieve chartered status and are continuing to roll this out across the business, with tailored routes for staff at different stages of their consulting career. As at May 2026 nearly 40% of staff including senior leaders have achieved the accreditation, with further colleagues who will be working towards it across the Experienced Professional, Senior Leader Chartered and Associate routes over the coming year.

Case study: [James Swaffield from IMPOWER Discusses How ChMC Can Catalyse Change In Healthcare and Local Government Consulting - MCA](#)

Commitment to Diversity & Inclusion

11. We respect & embrace diversity & inclusion & understand the importance & positive benefit of people from different backgrounds working for our companies & our clients.

- Diversity, Equity and Inclusion (DEI) has a clear place in our company strategy and our approach in this area continues to be strengthened. As an organisation we have collectively developed a DEI Charter that reflects how we work:
 - We are committed to ensuring that our culture prioritises DEI; this is the right thing to do. It will also ensure our client work is more creative, more insightful and of higher quality.
 - We have adopted a learning mindset, with an ongoing commitment to improving our understanding of colleagues, clients and the communities we work with.
 - We are committed to creating an environment that enables employees to bring their whole selves to work and allows them to be vulnerable, recognising the strength in that.
 - Senior leaders model a 'speak up' culture to ensure people know they will be listened to.
- During 2022 we launched and reported on our first Diversity, Equity and Inclusion survey to the business. This annual survey will be running again in the coming months and we will be using feedback to grow and develop our inclusive culture, as well as using feedback from our Sunday Times Best Places to Work survey for 2026.
- We have in place a DEI Group – a group of interested colleagues with representatives from across the organisation who are focussed on recognising, celebrating and enhancing the diversity and inclusion of our teams. This may include in office events & celebrations, information and education events for colleagues and external speakers / training as required to support inclusion and belonging across the business. They also act as an advisory board for internal DEI initiatives.
- In many areas our client work helps remove bias from client approaches, thereby supporting DEI e.g. an assessment framework based on need for Children in Care and those with High Needs, and the "Listening Tool" that support clients to remove bias from resident feedback (e.g. identifying differential outcomes achieved for vulnerable cohorts and supporting the organisation to train staff to address this).
- We also refine our Inventive Methods (key consulting tools and approaches) to support greater inclusion in our engagement with clients and ensure the DEI benefits are articulated.

Commitment to Diversity & Inclusion

12. We recruit & retain people from a diverse talent pool & strive to build cultures where difference is valued, respected & celebrated at all levels. Furthermore we are committed to developing diverse future leaders & ensuring their progression in the industry.

Increasing our diversity and feeling of inclusion is a strategic priority for IMPOWER.

- In 2025 we upgraded our HR systems, allowing us to collate, report and understand detailed data on the demographics of our workforce, this is now regularly reported and discussed within our delivery and quality space. In 2026, this data will be used in conjunction with internal survey and benchmarking tools, to direct future focus for internal DEI activity to where it will have the most impact.
- As a Disability Confident Employer, we have a disability and neurodivergent positive recruitment process, including a guaranteed interview scheme for those self-declaring as disabled / ND, and we use our ATS to ensure all candidates are anonymous at the 'first sift' point of the process.
- As a result of our guaranteed interview scheme for disabled or neurodivergent candidates, we increased our number of applicants from those groups by more than 13 x.
- We celebrate diversity through recognition of events such as International Women's Day, Black History Month, Mental Health Awareness Week, Pride Month and various religious and cultural festivals.
- We support colleagues to work effectively when they have a specific need e.g. occupational health assessments for colleagues with Dyslexia, neurodivergence, physical or mental health conditions.
- We actively look to recruit from more diverse backgrounds, including the use of diversity job boards, anonymous CVs, and using diversity track record as a selection criteria for our recruitment partners. We also review the wording of our job adverts to ensure a lack of gender bias.

Commitment to Diversity & Inclusion

13. We support industry efforts to improve progress on diversity & inclusion, implementing best practice & monitoring the diversity of the consultancy sector workforce over time. This includes encouraging the collection of data to assess the effectiveness of D&I policies and participating in the MCA annual report.

- Every year we participate in an externally benchmarked survey specifically on DEI issues, using our employee engagement tool which allows us to benchmark against industry standards and start to set appropriate targets which will be able to report and benchmark progress against.
- The results and findings are used to create both our long- and short-term strategies for DEI within our business.
- In responding to the survey in 2026 we will work with our DEI Group and the Senior Leadership Team and hold focus group discussions to explore the findings and create actions based on those.
- In 2024 we became fully accredited Employers under the government's Disability Confident Scheme. To do this, we developed a programme to support neurodivergent and disabled university students and provide them with an opportunity to gain valuable work experience, as well as reviewing all our recruitment, selection and employment practices to ensure we're supporting the recruitment and retention of disabled / neurodivergent colleagues.
- We have established forums as a safe space to explore topics in relation to DEI. We also encourage participation in relevant industry forums/webinars e.g. Women in Consulting or Young Consultants run by the MCA, as well as setting up internal Lunch and Learns and training opportunities for our staff.
- With a company representative as part of the MCA D&I Working Group, we will continue to support the MCA in any way we can to understand progress and impact across the consulting industry.

Commitment to Sustainability

14. We commit to ensuring that our firms operate in an increasingly sustainable way and strive to ensure that sustainability is considered by our clients in our work with them.

- When working with our clients we develop the skills in local workforces by providing coaching and mentoring to client staff as part of the delivery of our work to ensure our clients become more resilient and sustainable once we conclude our support.
- As part of delivering our client work sustainably we aim to deliver social value initiatives in the places we work. For example supporting a client in their latest social value policy we delivered two workshops to local VCSE groups on “Developing a strong bid” and “Impact and performance” which were co-produced with a VCSE rep, and delivered a workshop on “Using applied behavioural science to tackle climate change” to client staff.
- We make environmentally sustainable choices wherever we can, e.g. we use environmentally friendly cleaning products, provide bins for recycling, and source ethical gifts for our wellbeing initiatives.
- Recognising that our teams work away from home we promote using local products and services, prioritising social enterprises and community groups.
- Reflecting our need to travel we use a travel booking system which calculates the carbon footprint of our travel, collects the monies generated into a pool, and invests the funds in VERRA certified carbon-offsetting projects.
- We are an accredited carbon literacy organisation with 45 staff trained and accredited.
- We have just transferred our company pension scheme provider to a green / ESG pension fund, which is now the default fund for new starters.
- As part of a review of our benefits to our team, we are exploring how we can offer an EV car scheme to our team, to promote the sustainable use of electric vehicles.

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