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How to Use This Document

This document sets out Impera's Responsible Business Principles. It is designed for use by staff, suppliers, delivery partners, and clients. These principles:

- Inform our project design, delivery, recruitment, and procurement processes.
- Are embedded in contracts, onboarding, and policy frameworks.
- Guide ethical decision-making across all areas of our organisation. Each section includes an **Operational Implementation Owner** to make responsibilities clear. This document will be reviewed annually

Impera's Responsible Business Principles:

Embedding equity, accountability, and integrity into every layer of our work

Introduction

At Impera, responsible business sits at the heart of our practice. Working at the intersection of community engagement, public policy, and data analytics, we are acutely aware of the power our work holds. That power must be exercised with care, transparency, and responsibility.

These principles reflect our commitment to ethical conduct, social and environmental responsibility, and inclusive systems change. They integrate global environmental, social, and governance (ESG) standards with community-rooted practices and insights gained through our work with residents, frontline professionals, and public agencies.

They also guide our development and deployment of tools such as the Place Insight Tool and Citizen-Led Impact (CLI) model framework—ensuring data, design, and delivery are informed by ethics, lived experience, and the needs of those most impacted by systemic inequality.

This is a living framework—adaptable to new contexts, challenges, and learning. We share these principles publicly to hold ourselves accountable and to offer clarity to our partners, clients, and communities.

1. General Principles

Operational Implementation Owner: Account Leads / CEO to incorporate into project kick-off and closure processes.

1.1 Avoid Harm

We actively work to prevent harm to individuals, communities, and the environment. This includes assessing risks, mitigating negative outcomes, and centring the dignity of those affected by our work.

1.2 Integrity and Fairness

We operate with honesty, respect, and diligence in all engagements. We respect confidentiality, honour commitments, and conduct business with fairness across all levels of partnership.

1.3 Proportionality and Context Sensitivity

We apply ethical and ESG standards in ways that are proportionate to the scale, risk, and context of each initiative. We prioritise sensitivity when working with marginalised or under-resourced communities.

2. Environmental Responsibility

Operational Implementation Owner: Client Liaison & Marketing Manager to oversee supplier engagement.

2.1 Environmental Stewardship

We strive to reduce our environmental impact by embedding sustainability in our operations, digital tools, and delivery practices. We promote the responsible use of resources and seek environmentally conscious suppliers and partners.

2.2 Addressing Climate Change

We prioritise approaches that mitigate and reverse the impact of climate change, particularly in projects that intersect with health, housing, infrastructure, and equity.

3. Social Responsibility

Operational Implementation Owner: Chief Impact Officer responsible for workforce and supply chain.

3.1 Purpose-Driven Impact

Our mission is to enable measurable, lasting improvements in people's lives. We prioritise interventions that are shaped by communities and lead to long-term wellbeing, not short-term outputs.

3.2 Fair Work and Wellbeing

We support fair pay, safe working conditions, and psychological wellbeing across our teams and supply chain. We actively recruit and fairly remunerate people with lived experience and local knowledge.

3.3 Equity, Diversity, and Inclusion

We commit to challenging structural inequalities. This includes equitable recruitment, inclusive procurement, culturally competent design, and transparent governance. We work to ensure inclusion is systemic, not symbolic.

4. Governance and Organisational Ethics

Operational Implementation Owner: CEO & Board for overarching governance.

4.1 Transparent Governance

We strive for clarity in leadership, ethical oversight, and decision-making. Our governance structures aim to reflect our values and invite scrutiny and learning.

4.2 Open Accountability

We are open about our goals, processes, outcomes—and failures. We disclose how we use public or community resources and invite feedback from those affected by our work.

4.3 Transformative Systems Thinking

We do not aim to reform broken systems in isolation. We partner with those most impacted to design new, inclusive systems. We see policy, design, and data as tools for reimagining collective futures.

5. Data and Digital Ethics

Operational Implementation Owner: Policy Impact Manager

5.1 Community Data Rights

We treat community and demographic data as a form of collective agency—not merely a technical resource. Communities have the right to know what data is held about them, how it's used, and to influence its application.

5.2 Consent and Transparency

We ensure that any use of personal or community-level data is based on clear, informed consent. Where direct consent is not applicable, we apply high standards of public transparency and community accountability.

5.3 Data Minimisation and Fair Use

We collect only the data required to achieve a stated public benefit. We avoid excessive profiling and ensure that data use is proportionate to the goals of each initiative.

5.4 Secure and Ethical Storage

All data is stored and processed in accordance with the UK GDPR and international privacy standards. Sensitive data is anonymised and encrypted where applicable.

5.5 Responsible Analytics and AI

We do not use opaque or discriminatory algorithms. Our analytical tools, including the Place Insight Tool, are interpretable, auditable, and designed to prevent the automation of bias.

5.6 Right to Be Forgotten and Opt-Out

Individuals and communities may withdraw consent, request data deletion, or opt out of analysis at any time. We ensure such requests are processed fairly and promptly.

5.7 Participatory and Ethical Use

We ensure that insights derived from data are shared back with communities, used to inform inclusive decision-making, and do not reinforce stigma or exclusion.

6. How Our Tools Reflect These Principles

Operational Implementation Owner: Product Leads to monitor alignment.

6.1 Place Insight Tool

The Place Insight Tool is designed to surface local need and inform targeted investment—without disempowering the communities it analyses. It embodies our responsible business values by:

- Using publicly available and ethically sourced data only
- Avoiding individual profiling or surveillance
- Sharing results back with communities, councils, and service providers transparently
- Enabling data-informed decision-making without replacing human judgement
- Protecting sensitive local data with security protocols that comply with UK Data Protection standards
- Reducing analysis burden on over-stretched local authorities

By making structural inequalities visible and actionable—without exploiting or stereotyping communities—Place Insight helps translate responsible data practice into real-world policy and funding decisions.

6.2 Citizen-Led Impact (CLI) Framework

Our Citizen-Led Impact (CLI) model is Impera's signature approach to designing and measuring change. CLI operationalises our principles by:

- Embedding community voices at every stage—from problem-framing to delivery
- Paying and training local people to lead inquiry, co-production, and evaluation

- Building capacity within communities to generate, interpret, and act on insights
- Centring relational accountability—between communities, councils, and funders
- Prioritising reflection and course-correction over rigid KPIs

CLI doesn't just deliver responsible outcomes—it transforms the delivery process itself. It challenges the legacy of extractive research, tokenistic consultation, and policy disconnect by centring co-ownership and long-term relationships.

7. Prohibited Activities (Negative Screen)

Operational implementation / Owner: Due diligence led by CEO and Operations, with Board oversight.

Impera will not fund, support, or engage in activities that involve:

- Illegal practices under UK or international law
- Hate-driven, racist, misogynistic, or anti-democratic media
- Unregulated gambling (we will consider licensed charitable lotteries)
- Pornography
- Tobacco (as a significant revenue source)
- Arms, weapons, or goods with military end-use
- Animal testing outside regulated medical/pharmaceutical research
- Fossil fuel exploration, refining, or production
- Organisations or entities in violation of UK, EU, or US sanctions
- Modern slavery

Impera will assess on a case-by-case basis any proposals from organisations in these sectors. If such companies approach us for work, we will request their ethical business policies and conduct a review to determine alignment with our Responsible Business Principles. This helps ensure that we do not inadvertently endorse or enable harmful practices, and that our partnerships remain consistent with our values. In case of any uncertainty in the application of these principles, management will refer to Board for review.

Practical Implementation: The Negative Screen will be hosted on our website as a standalone, publicly accessible document and referenced in all supplier and client onboarding processes. It will also be embedded into our internal due diligence checklist and reviewed annually.

8. Living the Principles

Operational Implementation Owner: CEO

These principles are embedded in our organisational culture through:

- Staff and partner onboarding and training
- Reflective practice and public reporting
- Independent ethical review of tools and methods
- Community participation in design and evaluation
- Transparent accountability processes for raising concerns or opting out
- Governance: where applicable including an Ethics Board for decisions

9. Standard Operating Procedure for Unethical Client Conduct

Operational Implementation Owner: Chief Impact Officer

Where a current client is found to be undertaking activities that breach these Responsible Business Principles, Impera will follow a formal Standard Operating Procedure (SOP). This includes:

- Immediate internal escalation to the CEO.
- Documented engagement with the client to clarify and attempt remedy.
- A timebound improvement notice.
- Proportionate escalation up to and including termination of the client relationship.

This SOP ensures transparency, consistency, and accountability in responding to unethical client behaviour.

Conclusion

These Responsible Business Principles serve as a living foundation for how Impera engages with people, systems, and data. They reflect our ambition not only to deliver results—but to redefine how results are imagined, pursued, and shared.