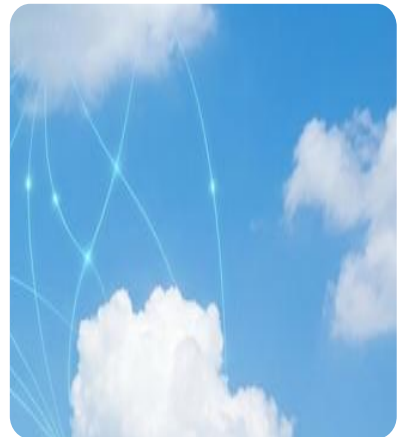




Crown
Commercial
Service



Artificial Intelligence (AI) and Data Ethics

GCloud Service Description Document

Bringing Ingenuity to Life.
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Artificial Intelligence (AI) and Data Ethics

1.1 Short Service Description

Increased use of data and data-driven technologies presents increased risk of harm, breaches of privacy and unjust decision making. Organisations need a clear ethical approach to data and AI use that goes beyond what is legally permissible or technically possible to consider what is good for consumers and society.

1.2 Key Service Features

1. Builds on ethical practice from public and private sectors
2. Understands emerging data-driven technologies, Artificial Intelligence and Machine Learning
3. Meets legal, regulatory and policy requirements for data handling
4. Defines core ethical principles
5. Develops Data Ethics Framework
6. Understands ethical risk
7. Implements ethical data controls
8. Leverages and builds upon existing data governance
9. Open Data Institute (ODI) Data Ethics Certified Professionals
10. Leverages ODI Data Ethics Canvas and Consequence Scanning tool.

1.3 Key Service Benefits

1. A clearly defined Data Ethics Framework for the organisation
2. Improved data quality
3. Data and AI capabilities are ethical by design
4. Improved data culture
5. Reduced risk of harm
6. Reduced risk of breaches of privacy
7. Justified data-driven decision making
8. Improved results from data-driven technologies, including AI and ML

1.4 Service Definition

Data is a valuable asset, used to drive insights, deliver customer satisfaction and deliver improved organisational outcomes. Organisations' reliance on data will only increase, whilst increased use of data and AI data driven technologies present increased risk of harm to individuals through breaches of privacy or unjust decision making. The use of AI technologies further exacerbates these risks, reducing Explainability and being prone to bad interpretation if training data sets are inadequately representative.

Individuals and society expect organisations to be transparent and accountable in how they use data and reward those with good practices. Ethical practices also support strong relationships between organisations as customer organisations, partners and suppliers seek reassurances that companies are implementing best practice when it comes to data.

Organisations taking an ethical approach to data go beyond what is legally permissible or technically possible to consider what is good for the consumer, the organisation and society. By adopting an approach to data ethics which focusses on the impact to individuals, organisations will ensure positive consumer experience and secure reputational advantage.

Core ethical principles will underpin your data ethics framework for AI

We take a holistic approach to develop a data ethics framework for AI that works for the organisation. The foundations of the framework are built on an organisation's key ethical principles, consider the application and potential consequences of data driven technologies and implement controls and governance structures that allow 'data ethics by design'.

Data ethics is not a tick-box exercise. Our diverse team of privacy and ethics experts, technology experts, and problem solvers work with clients to develop a data ethics framework that considers regulatory, industry specific and technical constraints as well as wider ethical questions about the application of data.

We start with three core principles designed to underpin activities throughout the data lifecycle, as set out below.



Beneficial



Fair



Transparent

These principles along with the organisation's key values underpin a data ethics framework which promotes accountability and trust in the organisation.

Our approach

We use a four-phase approach to develop a data ethics framework that reflects the unique context, priorities and values of the organisation. Our approach results in greater accountability over data processing and digital practices as well as confidence that an organisation is doing the right thing and abiding by ethical practices for AI.

Understand the context	The initial phase of developing a data ethics framework is about understanding the context behind the use of data in an organisation. This should consider the organisation's data strategy and purpose. An organisation's core values are an essential part of establishing the context and should be visible in how they use data. These values should be embedded in a data ethics framework along with the core ethical principles. The context also considers the requirement to use data ensuring that this is legal and appropriate. Although a data ethics framework goes beyond compliance, we look to best practice from data privacy and compliance to ensure that use of data is lawful and appropriate to the requirement.
Understand ethical risk	In this phase we help the organisation consider unforeseen and undesirable consequences resulting from use of data and methods of acquiring and processing data. We explore the ethical risks these may present and any tensions with the core ethical principles an organisation has established.
Implement controls	In this phase we consider the range of controls required to embed data ethics. These will vary depending on the organisational context and risks identified and may include technical, procedural or organisational measures implemented throughout the data lifecycle. Controls will be periodically reviewed and refreshed to encompass any changes to the context or risk profile of the organisation.
Implement appropriate governance structures	Clear, documented and agreed ownership for data ethics across the organisation is vital to ensure that ethical by design capabilities permeate the operating culture of an organisation. Role descriptions document the local level application of data ethics responsibilities and processes. Where possible these should leverage and complement existing data governance structures.

1.5 Why PA Consulting Group (PA)?

A trusted partner for cloud, AI, and digital technologies

PA Consulting Group (PA) is a leading technology and innovation consultancy and one of the UK government's most trusted advisors, combining strategy, delivery assurance and deep engineering to turn complex ambition into assured outcomes. We bring end-to-end capability across cloud architecture, data and AI, cyber, and advanced technology R&D, backed by a track record of scaling innovation in the public and private sectors.

Our UK work is anchored by secure, standards-led delivery. PA maintains ISO/IEC 27001 certification across global operations, demonstrating disciplined information security and operational control, and applies UK government good practice (GDS, NCSC CAF) across cloud and digital programmes.

We combine consultancy with real engineering. At our Global Innovation & Technology Centre (Cambridge), 300+ scientists, designers and engineers operate extensive labs and studios to prototype and industrialise solutions, bridging physical and digital from concept to production.

1.5.1 Why PA for cloud, data and AI

- **Hyperscaler alliances without vendor lock-in.** PA is Premier Tier with **Google Cloud** (13+ years; 150+ certifications; specialisations in infrastructure, data analytics, app dev and security) and holds deep **AWS** and **Microsoft** credentials, accelerating secure data foundations and generative AI at scale while keeping advice independent and outcome-led.
- **Responsible AI you can trust.** Our Responsible AI framework, governance toolkits, and risk policy make AI adoption transparent, auditable, and compliant, embedding lifecycle controls, model documentation, and human-in-the-loop safeguards aligned to evolving regulation.
- **Impact beyond pilots.** We help organisations become *intelligent enterprises*, using data and agentic AI to create and protect value, with pragmatic roadmaps from use-case selection to scaled operations.
- **Proof through delivery.** Our client stories span enterprise data platforms, IoT and analytics (e.g., Rentokil Initial), and product innovation at scale (e.g., Unilever) where PA has put data and AI at the heart of continuous, market-leading improvement.

1.5.2 Cloud capability (assess, design, build, assure, run)

PA applies an assured cloud delivery approach to complex government and regulated environments, blending client-side delivery assurance, multi-cloud architecture, and resilient operations:

- **Strategy & readiness.** Maturity assessments, target operating models for hybrid/multi-cloud, and cost/benefit modelling; proportionate GDS compliance and ISO 27001 controls embedded upfront.
- **Design & architecture.** Secure, well-architected patterns across Azure, AWS, and Google Cloud; data platforms, identity and access, and cross-domain solutions for sensitive estates.
- **Build & deploy.** Cloud-native engineering, DevSecOps (CALMR), CI/CD, infrastructure-as-code; automated testing and quality assurance to accelerate safe release.
- **Migration & modernisation.** Legacy transformation, platform reviews, and workload migration tuned to resilience and cost; pragmatic FinOps to keep spend predictable and efficient.
- **Operate & optimise.** Observability, incident management, performance tuning, backup/restore, and change management, maintaining business continuity and reducing total cost.
- **Client-side delivery assurance.** Forward-looking, risk-based assurance that keeps complex programmes on track, covering governance, architecture, testing, migration, service readiness and cutover. See our *IT Delivery Assurance* service.

1.5.3 AI, ML and data (from strategy to scale)

- **Strategy & governance.** AI blueprints, operating models, and policy; enterprise data governance; regulatory readiness; centre-of-excellence setup and change adoption.
- **Engineering & MLOps.** Data platforms on Azure/AWS/GCP, pipelines and feature stores; robust ML lifecycle with monitoring, drift detection and auditability.
- **Generative & agentic AI.** Secure integration of LLMs (including Copilot) into workflows for measurable productivity and quality gains, using guardrails, system cards and ROI framing.
- **Responsible AI.** Lifecycle controls and assurance tooling to manage bias, security and transparency.

1.5.3.1 Quantum and emerging technologies

PA's applied physics and quantum engineering teams help clients unlock near-term value, combining quantum techniques with classical systems for decision support, advanced sensing and secure communications:

- **Decision support & optimisation.** Hybrid quantum/classical algorithms to accelerate complex planning, routing and resource allocation where speed and quality of decisions matter.
- **Quantum sensing & RF.** Novel quantum radio and Rydberg-based sensing to enhance spectrum use, detection sensitivity and resilience in contested environments.
- **Commercialisation insight.** Advisory at the "whole-stack" level, hardware, supply chain, interfaces, and ethics, to move from lab to market within national strategies.

These capabilities are industrialised at our Cambridge centre, turning concepts into robust prototypes and pre-production systems across sectors like defence, energy and transport.

1.5.4 Cyber security and digital trust

Digital trust is central to PA's approach. We design security into architecture, operations and culture, aligning to NCSC CAF and GovAssure, and delivering testing, red-team, SOC design and OT/IoT security:

- **Transformation & architecture.** Secure-by-design patterns, cloud security, identity, and cross-domain data protection (including NCSC-approved Oakdoor data diode products).
- **Assurance & regulation.** CAF/GovAssure alignment and pragmatic remediation plans for government organisations.
- **Testing & resilience.** CREST-aligned penetration testing, red-teaming, incident readiness, and operational resilience.

1.5.5 What PA will bring

Ideation & Strategy

- Cloud strategy and advisory services
- Cloud readiness assessments
- Cost/benefit and ROI modelling
- Security and compliance by design.
- AI/ML and data strategy (blueprints, operating model, governance) with Responsible AI policy and guardrails.
- Quantum opportunity framing and whole-stack commercialisation roadmaps.

Design & Architecture

- Bespoke enterprise and cloud architectures
- Integration with existing IT infrastructures
- Hybrid/multi-cloud design
- Continuity and disaster recovery
- Data platforms and MLOps patterns
- Security, privacy and resilience embedded by design in technical designs
- User-centred-design
- Secure cross-domain solutions and high-side/low-side integration where required.

Development & Deployment

- Cloud-native engineering
- Containerisation, microservices and serverless
- DevSecOps (CALMR) with CI/CD and automated testing
- Generative AI and Copilot enablement with measurable productivity outcomes and run-controls.

Implementation & Migration

- Data migration and legacy modernisation
- Vendor selection and management
- Infrastructure-as-code with progressive, low-risk cutover.

Operations & Management

- Observability, incident management, SIEM/SOC design
- Performance optimisation and cost management (FinOps)
- Backup/restore
- User training and change adoption.

Innovation & Scaling

- Scalable cloud infrastructure to support growth
- AI/ML implementation and scaling
- IoT integration
- Ongoing innovation sprints and R&D, supported by our Cambridge engineering labs for rapid prototyping and pre-production.

1.5.6 PA is fully equipped to manage any challenges or requirements you may present

Across strategy, design, build and run, PA blends independent advice with hands-on engineering, operating to ISO 27001 and UK government standards, and backed by hyperscaler partnership depth. Whether the brief is modernising a sensitive cloud estate, industrialising AI responsibly, or de-risking a quantum-adjacent programme, we bring the multidisciplinary team to get from idea to reality, safely, quickly, and at scale.

1.6 A Genuine commitment to Social Value

At PA, we believe in the power of ingenuity to create a positive human future. Central to this ambition is our commitment to developing high-quality opportunities that enable individuals to acquire leading-edge skills, all within an environment that supports personal wellbeing and growth. We invest in our people through comprehensive training and development, ensuring they are fully prepared to tackle our clients' most complex challenges and advance their own careers.

We recognise that diversity drives innovation. Therefore, our recruitment practices are inclusive, welcoming individuals from all backgrounds. Every member of our team is empowered to reach their full potential through inclusive policies, processes, and a culture that is continuously improved using robust data.

We are passionate about creating genuine opportunities for those facing significant barriers to employment. Since 2023, our Digital Apprenticeship Programme has offered a Digital and Technology Solutions Degree through the University of Roehampton or Northumbria University. Our apprentices typically include first-generation professionals, college leavers, and individuals from ethnic minority backgrounds, many living in deprived areas. Additionally, we offer summer internships for undergraduates entering their final year, hosted at both our central London office and the Global Innovation and Technology Centre in Cambridge.

Economic responsibility is integral to our purpose. PA is accredited as a Living Wage employer, and where relevant, we ensure that our suppliers and subcontractors are paid at least the minimum living wage. We are also a signatory to the Prompt Payment Code, demonstrating our commitment to fair and responsible payments to suppliers.

Our carbon reduction targets have been validated by the Science Based Targets initiative (SBTi). We have a published carbon reduction plan and are committed to achieving carbon net zero by 2040, in alignment with PPN 06/21 criteria for UK public sector contracts exceeding £5 million. In 2024, we achieved a silver EcoVadis rating, reflecting our ongoing progress in sustainability.

We are dedicated to delivering targeted social value and will collaborate with you to determine the most effective approach for you, ensuring our efforts have the greatest possible impact.

1.7 Security Clearance

PA are fully compliant with industry best practices for information security, which includes compliance with the UK MOD Industry Personnel Security Assurance (IPSA) standard, against which we are independently audited every three years. PA also has multiple sites with FSC (previously List X) where our dedicated in-house Security Vetting team are based. This allows PA to achieve security vetting of its employees in a time effective manner ensuring the correct processes are always followed (In accordance with the Security Policy Framework/GS007). As a matter of standard process, PA puts all its eligible employees through the Baseline Personnel Security Standard (BPSS), set out by the Cabinet Office. Those employees working on, or planning to work on, government projects are automatically put forward for SC clearance which are processed via UK-SV (formally the Defence Business Services – National Security Vetting). PA also process DV vetting through the UK-SV and other agencies, these are generally client sponsored.

PA currently have a large pool of cleared individuals (80% of UK Staff). Should a resource be identified where clearance is needed, the PA Security Vetting team will then process the individual through the relevant clearance procedure. The team will also be able to validate all existing clearances held by PA employees when requested.

1.8 Next Steps

This service is intended to help customers develop and deliver successful outcomes regardless of the life cycle stage they are at. PA prides itself on working with clients and helping them to deliver outcomes whilst also providing them the ability to 'stand on their own' so that they can move their solutions forward without future involvement. Please contact us on GCloudFramework@paconsulting.com to discuss your needs further.



About PA.

We believe in the power of ingenuity to build a positive human future.

As strategies, technologies, and innovation collide, we create opportunity from complexity.

Our diverse teams of experts combine innovative thinking and breakthrough technologies to progress further, faster. Our clients adapt and transform, and together we achieve enduring results.

We are over 4,000 strategists, innovators, designers, consultants, digital experts, scientists, engineers, and technologists. And we have deep expertise in consumer and manufacturing, defence and security, energy and utilities, financial services, government and public services, health and life sciences, and transport.

Our teams operate globally from offices across the UK, Ireland, US, Nordics, and Netherlands.

PA. Bringing Ingenuity to Life.

Discover more at paconsulting.com and connect with PA on [LinkedIn](#) and [X](#).

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