



Crown
Commercial
Service



PRIVACY / GENERAL DATA PROTECTION REGULATION GDPR ASSESSMENT SERVICES

GCloud Service Description Document

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paconsulting.com

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PRIVACY / GENERAL DATA PROTECTION REGULATION GDPR ASSESSMENT SERVICES

1.1 Short Service Description

Our Privacy assessment services support our clients' compliance journey, meeting Data Protection / Privacy requirements by assessing the key areas of the regulation including responsibility and accountability, individual rights requests and privacy notices, maintaining a data inventory, data security, vendor assurance, breach handling, change assurance, data retention and demonstrating compliance.

1.2 Key Service Features

1. PA's proprietary Readiness Assessment helping to understand compliance gaps
2. GDPR Programme-Project Assurance to ensure progress is appropriately focused
3. GDPR Audit for independent verification of compliance
4. GDPR Maturity Assessments to ensure that compliance is proportionate
5. Assessing the quality of Data Protection Impact Assessments (DPIAs)
6. Validating depth and completeness of the Record of Processing
7. GDPR Data Protection Act DPA policies and procedures review
8. Governance and operating model review
9. Vendor assurance and data sharing agreement review
10. Assessing the organisation's technical and organisational measures.

1.3 Key Service Benefits

1. Delivers a summary of your organisation's data privacy effectiveness
2. Identifies opportunities for programme acceleration, optimisation and simplification
3. Produces clear, pragmatic, implementable recommendations
4. Highlights risks and issues and proposes mitigations
5. Builds a roadmap and delivery approach for future compliance
6. Establishes monitoring mechanisms and implements continuous improvement
7. Provides prepared evidence to demonstrate compliance to third parties
8. Helps understand privacy implications of Artificial Intelligence (AI) implementations
9. Completely independent advice - we are technology and vendor agonistic
10. Track record of successful delivery across some of the largest privacy programmes.

1.4 Service Definition

We are differentiated by our focus of not just meeting compliance needs but also the potential business benefits of getting data privacy right. We prioritise high risk activities and have a clear focus on overall privacy risk reduction for our clients. Our clients rate us highly on our pragmatism, flexibility and ability to automate. We recognize that compliance driven programs need to demonstrate efficiencies and are relevant to the increasing digital agenda.

We have a proven approach to conducting GDPR assessments using our proprietary assessment tools to help you rapidly prioritise any remediation activities. We provide a detailed understanding of current maturity against the GDPR requirements in a number of areas such as:

- **Governance** – The framework assuring Personal Data is managed in alignment with regulatory requirements.
- **Organisation** – The effectiveness of structure and processes to support responsible data processing practices.
- **Processes and Awareness** – The understanding of practices to prevent, contain and mitigate data breaches.
- **Technical Aspects** – The suitability of controls and safeguards in preventing breaches and minimising exposure.

GAPS & RECOMMENDATIONS

Breakdown of gaps and recommendations

Section	Description	Capable	Comment	Recommendation
81	Dispose, or arrange for the disposal, of customer records when the records are no longer to be retained	Optimised	Automatic retention do you have in place	NA
81.5	Provide reasonable security for personal information	Optimised	Multiple certifications, such as ISO27001	NA
81.5 (b)	Implement and maintain reasonable security procedures and practices	Optimised	Multiple certifications, such	
82	Disclose a breach of the security of personal data in the most expedient time possible	Optimised	Are Agreed Breach Process	
82 (d)	Breach notification shall be written in plain language and cover specified details	Defined	Need a standard CCPA tri	
83	Provide to the customer free of charge, categories of data held and who holds the data	Not Done	Information request capabi process likely to need deve	
83.5	Ensure an individual's age will not be used in furtherance of employment or age discrimination	Not Done	Information request capabi process likely to need deve	
100	Right to data portability	Not Done	Information request capabi process likely to need deve	
105	Right to erase what data is held with business and service providers	Not Done	Information request capabi process likely to need deve	
110	Right to discover what data is held and with who	Not Done	Information request capabi process likely to need deve	
115	Right to discover what data is held and with who	Not Done	Information request capabi	

DETAILED ASSESSMENT IN EACH AREA

Detailed breakdown of each area of the assessment

1. RESPONSIBILITY AND ACCOUNTABILITY

Currently responsibility is with VP Technology, with support from legal and other teams. Intention to introduce new role for 2019 specifically focusing on data privacy which will create clearer line of responsibility.

2. INDIVIDUAL RIGHTS AND REQUESTS

As Claritas does not operate in Europe, this capability will only require devek There are plans in place to introduce functionality in 2019 to enable to finding CCPA's introduction in 2020.

3. MAINTAINING DATA INVENTORY

Data is classified into four categories, and all personal data held by Claritas i

4. DATA SECURITY

Data Privacy is taken seriously within the business and security of data is co activity. There are some gaps today in frequency of training and in delivering put in place or in plan to be implemented through 2019.

OVERVIEW OF DATA PRIVACY CAPABILITY

Based on our assessment we provide a summary overview of where the organisation's data privacy capability stands today against each of the 9 areas and what changes already in train might be



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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