



Code of Responsible Use of Artificial Intelligence

for the Management Consulting Profession

Public Professional Standard

Building upon the ICMCI Code of Conduct



CMC - GLOBAL
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Foreword

Artificial intelligence is redefining professional services, offering management consultants both new opportunities and significant responsibilities as trusted advisers globally.

The International Council of Management Consulting Institutes (ICMCI), as the global body representing the management consulting profession, upholds high ethical and professional standards through the ICMCI Code of Conduct and the Certified Management Consultant (CMC) designation. The rise of AI reinforces the need for professional integrity, sound judgment and public trust.

This Public Professional Standard (the “AI Code”) establishes profession-wide standards for the responsible design, procurement, configuration and use of AI systems that influence advice, analysis, decisions or deliverables provided to clients and stakeholders.

It applies to management consultants, consulting firms and member institutes operating under ICMCI standards and may also be voluntarily adopted by other consultants and consulting organisations.

The Code is based on seven core principles: human responsibility and oversight; fairness and non-discrimination; transparency; privacy and confidentiality; safety and robustness; accountability; and environmental sustainability. It draws on internationally recognised AI principles and leading responsible AI frameworks, while remaining practical and proportionate for a diverse global profession.

Through this Public Professional Standard, ICMCI affirms its commitment to responsible innovation and calls upon consultants and firms worldwide to uphold the highest standards of ethical and professional conduct in the use of AI.

PART 1 – Public Professional Standards for the responsible use of AI by Management Consultants

1. Purpose, Scope and Definitions

1.1 Purpose

This AI Code aims to uphold integrity, professionalism, and public trust in management consulting when AI is used across the consulting value chain, including marketing, business development, engagement delivery, analytics, knowledge management, and internal operations.

It provides a principle-based framework to help consultants and firms benefit from AI while responsibly and ethically managing its risks in the interests of clients and the public. AI use is recognised as an evolving area of emerging risk requiring periodic review and adaptive oversight.

The following examples illustrate how the principles of this AI Code may be applied in practice:

- When drafting a client report using generative AI tools, a consultant reviews and adapts the AI-generated content, ensures all confidential information is protected, and discloses AI use where it materially shapes recommendations.
- A firm implementing an AI-driven analytics tool conducts a bias assessment and explains how outputs are derived, aligning with fairness and transparency.
- Before using a new AI tool, consultants ensure that the provider meets appropriate data protection standards and complies with applicable law.

These examples demonstrate how the Code's principles translate into confident consulting practice.

1.2 Scope

This AI Code applies to:

- all ICMCI member institutes and their officers;
- all holders of the Certified Management Consultant (CMC) designation;
- all consulting firms and individual practitioners operating under the standards of an ICMCI member institute;
- all persons engaged in assessment, accreditation or renewal processes administered by ICMCI or its member institutes, or
- any individual management consultant or consulting organisation that voluntarily adopts this AI Code.

It covers client-facing and internal AI uses, including generative AI, machine learning, predictive analytics, decision-support tools, automated agents, and any other systems that meet the definition of an AI system set out below.

This AI Code applies whenever a management consultant designs, procures, configures or uses an AI system that materially influences advice, analysis, decisions or deliverables for clients or stakeholders.

1.3 Definitions

These terms are used throughout this AI Code. Where appropriate, definitions align with internationally recognised AI principles and regulatory terminology to support clarity and consistency.

- AI system: a machine-based system that, for explicit or implicit objectives, infers from the input it receives how to generate outputs such as predictions, content, recommendations or decisions that can influence physical or virtual environments.
- Generative AI: a category of AI systems capable of generating text, images, code, audio or other content in response to prompts or inputs.
- High-risk AI use: any use of an AI system that may materially affect the fundamental rights, safety, employment, access to services, creditworthiness or life opportunities of individuals, or that relates to critical infrastructure or public policy.
- Provider: the entity that develops or places an AI system on the market or puts it into service, whether for commercial purposes or otherwise.
- Deployer: an entity that uses an AI system under its authority, unless used for personal, non-professional activities.
- Personal data: any information relating to an identified or identifiable natural person, in accordance with applicable data protection legislation.
- Client: any organisation or individual to whom the consultant or firm provides professional services, advice or deliverables.
- Stakeholder: any party with a legitimate interest in or affected by the consultant's work, including clients, end users, employees, regulators and the public.

2. Relationship to the ICMCI Code of Conduct

2.1 Foundation in the Code of Conduct

This AI Code builds upon and compliments the ICMCI Code of Conduct. It clarifies how the Code's established duties apply when AI systems are used in professional consulting work.

All obligations arising from the ICMCI Code of Conduct—including the core duties of integrity, objectivity, competence, confidentiality, and responsibility to clients, the public and the profession—continue to apply in full when AI is used.

The use of AI within ICMCI structures and by CMCs is also subject to ICMCI's Enterprise Risk Management (ERM) Framework. AI-related risks should be identified, assessed and managed in alignment with the organisation's Risk Appetite and established governance processes.

2.2 AI does not dilute accountability

The use of an AI system does not reduce, transfer or extinguish the personal and professional accountability of the consultant or firm. Consultants remain fully responsible for work products, advice and impacts, whether or not AI tools were used in their preparation.

Where an AI system contributes to an output, the consultant who presents, delivers or relies upon that output bears the same professional responsibility as if the work had been produced entirely by human effort.

2.3 AI misuse as a breach of ethical standards

Misuse of AI in the context of professional consulting work is treated as a breach of the ICMCI Code of Conduct comparable to traditional forms of misconduct. Conduct that may constitute AI misuse includes, but is not limited to:

- presenting AI-generated content as the consultant's own work without appropriate review, adaptation and, where necessary, attribution;
- submitting unreviewed or materially unverified AI outputs as finished professional work;
- using AI to circumvent competence, learning or assessment requirements, including those for the CMC designation;
- entering confidential client data into AI systems in breach of data protection obligations or client instructions; and
- deploying AI systems in a manner that foreseeably discriminates against, or causes harm to, individuals or groups.

3. Core Principles for AI Use in Management Consulting

The following seven principles govern the responsible use of AI systems by management consultants and firms. They reflect internationally recognised responsible-AI frameworks and give practical expression to the duties contained in the ICMCI Code of Conduct.

For individual CMCs, these principles constitute mandatory professional standards. Firms and member institutes are expected to align their policies and practices with these principles in a manner proportionate to their size, risk exposure and regulatory context.

3.1 Human responsibility and oversight

- All AI-supported outputs must be subject to meaningful human review and professional judgement before influencing client decisions, public communications or professional deliverables.
- Consultants must be able to explain, in language appropriate to the audience, how an AI-assisted result was obtained and its limitations, commensurate with the nature and significance of the use case.

- For high-risk AI uses, a qualified individual must have the authority and practical ability to intervene in, override or discontinue the operation of the AI system.

3.2 Fairness and non-discrimination

- Consultants shall take reasonable steps to mitigate the risk that AI systems introduce, perpetuate or amplify bias or discrimination, particularly in work affecting individuals' rights and opportunities, such as human resources, recruitment, restructuring, access to services and public policy.
- Where practicable, firms should test AI outputs for disparate impact on protected groups and should document their approach to bias identification and mitigation.
- Particular caution should be exercised when AI systems rely on data that may not be representative of the populations or contexts to which the outputs will be applied.

3.3 Transparency to clients and stakeholders

- Clients shall be informed when AI tools materially contribute to the analysis, recommendations or deliverables, particularly where this affects methodology, risk profile or reliance.
- Consultants shall not present AI-generated content as purely their own original work without appropriate review, adaptation and, where necessary, attribution.
- Transparency should be proportionate to the significance and sensitivity of the AI use; routine productivity tools need not be individually disclosed, but material analytical or generative uses must be.

3.4 Privacy, data protection and confidentiality

- AI use must comply with all applicable data protection and confidentiality obligations in the jurisdictions concerned.
- Personal or confidential client data shall not be entered into AI systems that may reuse, train on or expose that data, unless governed by appropriate contractual and technical safeguards.
- Consultants must respect client instructions regarding the use or restriction of AI in relation to the client's data and business information.

3.5 Safety, robustness and security

- Consultants should favour AI systems that demonstrate appropriate levels of security, robustness, reliability and ongoing monitoring, and avoid systems likely to produce unreliable or harmful outcomes.
- High-risk uses of AI—including those affecting fundamental rights, safety or critical infrastructure—should be managed using structured risk-based approaches consistent with recognised international good practice.

- Firms should establish proportionate procedures for identifying, reporting and addressing harmful, erroneous or unsafe AI outputs.

3.6 Accountability and documentation

- Firms should document significant AI-supported decisions and the rationale for relying on particular tools and outputs, in a manner proportionate to the risk and significance of the engagement.
- Clear lines of accountability for AI governance should be established within firms, appropriate to their size and complexity.
- Individual consultants are accountable for ensuring that their use of AI complies with this AI Code and their firm's internal policies.

3.7 Sustainability

- The operation of AI systems, particularly large-scale data infrastructure, has material environmental, societal and economic implications.
- Consultants should consider the environmental, societal and economic impact of the AI tools and systems they select and promote proportionate and responsible use in line with professional and civic responsibility.

4. Organisational Responsibility and Professional Oversight

The effective and responsible use of AI requires appropriate organisational oversight. Consulting firms and member institutes should ensure that their internal arrangements support compliance with this AI Code and promote responsible innovation.

Organisations are expected to adopt governance and risk management approaches proportionate to their size, structure and risk exposure. Such arrangements should ensure that:

- AI use is aligned with applicable laws and regulations, professional standards and ethical obligations;
- roles and responsibilities for AI oversight are clearly defined;
- material AI-related risks are identified and addressed in a structured manner;
- consultants receive appropriate training to understand the capabilities, limitations and risks of AI systems; and
- mechanisms exist for raising and addressing concerns related to AI use.

For high-risk AI applications, organisations should ensure enhanced oversight and documentation proportionate to the potential impact on clients, stakeholders and the public.

Member institutes are encouraged to support firms and consultants within their jurisdiction by promoting awareness, guidance and professional dialogue on responsible AI practices.

5. Individual Consultant Responsibilities and Acceptable Use

This section sets out the personal professional obligations of individual consultants when using AI in their work. It complements the duties established in the ICMCI Code of Conduct and the principles set out in this AI Code.

5.1 Permissible uses of AI in professional work

Consultants may use AI tools for purposes such as ideation, drafting, summarisation, research, coding, data analysis and translation, provided that the consultant:

- preserves client confidentiality and applicable data protection and client requirements;
- critically reviews and, where necessary, adapts all AI outputs before incorporating them into professional work;
- independently verifies factual content, calculations, citations and references;
- ensures that the final work product meets the professional standards expected of a competent management consultant; and
- complies with applicable transparency obligations under this AI Code.

5.2 Prohibited uses

Consultants must not:

- submit unreviewed AI outputs as finished professional work;
- present AI-generated content as entirely their own original work without appropriate review, adaptation and, where warranted, disclosure;
- use AI to evade or circumvent competence, learning or assessment requirements, including those relating to the CMC designation and continuing professional development (CPD);
- enter client-confidential or personal data into AI systems in a manner that contravenes legal, contractual or professional obligations; or
- deploy AI in ways that foreseeably produce discriminatory, harmful or materially misleading outcomes.

5.3 Professional competence and reliance on AI

The use of AI does not replace the obligation to maintain and apply professional skill, judgement and sector-specific knowledge. Consultants must continue to meet the competence standards required by their member institute and by the CMC designation.

Consultants should guard against over-reliance on AI, particularly in domains outside their own expertise. Where AI is used in technically complex or regulated areas, consultants should seek appropriate specialist input and must not treat AI outputs as a substitute for qualified professional advice in those disciplines.

5.4 Client instructions regarding AI

Consultants must comply with client instructions regarding the use or restriction of AI tools within an engagement.

Where a consultant considers that a client's AI practices or instructions may give rise to ethical, legal or reputational risks, the consultant should raise those concerns constructively and in a timely manner, recommend appropriate mitigation and, if necessary, consider whether continued participation in the engagement is consistent with professional obligations.

6. Integrity of Qualifications, Accreditation and Assessments

The credibility of the CMC designation and of ICMCI's accreditation processes depends upon the genuine demonstration of professional competence. The use of AI in applications, examinations, case studies and CPD submissions must preserve that integrity.

6.1 Permissible and impermissible AI use in assessments

ICMCI and its member institutes should provide clear guidance on the permissible and impermissible use of AI in qualification and assessment processes.

As general guidance:

- Permissible uses may include grammar and spell-checking, formatting assistance, reference collation and similar productivity aids that do not substitute for the candidate's own professional analysis or reasoning.
- Impermissible uses include generating substantial content, analysis or recommendations through AI that are presented as the candidate's own work, or using AI to produce answers to examination or assessment questions.

6.2 Declaration and investigation

- Applicants and candidates should disclose whether and how AI tools were used in their submissions, in accordance with guidance issued by the relevant member institute.
- Suspected misuse of AI in assessment submissions may be subject to review and investigation by ICMCI or the relevant member institute using reasonable and proportionate means.
- Confirmed misuse may result in sanctions, including rejection of the submission, withdrawal of the CMC designation, suspension from further assessment or referral to disciplinary procedures.

6.3 Member institute alignment

Member institutes are encouraged to develop detailed policies on AI use in qualifications and assessments, aligned with this AI Code as the profession-wide standard.

ICMCI may provide guidance or supporting materials to assist member institutes in this process.

7. Client Communication and Informed Consent

Trust is the foundation of the consulting relationship. Clients are entitled to understand how AI is used in work performed on their behalf and to make informed decisions regarding its use..

7.1 Disclosure obligations

Consultants and firms must communicate clearly to clients:

- when AI is used in a way that materially affects advice, analysis or deliverables;
- the nature and role of the AI tools employed, in terms the client can reasonably understand;
- the key risks and limitations associated with AI outputs, including the potential for inaccuracy or bias; and
- how client data will be used, processed and protected in connection with AI use.

7.2 Client consent for sensitive and high-impact uses

Where AI is used in ways that involve personal data, profiling, automated decision-making or other high-impact applications, consultants should obtain explicit client agreement before proceeding.

Such agreement should address the nature of the AI use, the data involved, the safeguards in place and the client's ability to raise concerns or withdraw consent, consistent with applicable legal and contractual obligations

7.3 Engagement letters and contractual provisions

Consulting firms are encouraged to ensure that engagement terms appropriately address the scope of AI use within the engagement, including matters such as intellectual property, allocation of responsibilities, data protection and any agreed restrictions on AI tools or data processing. Following the guidelines of ISO 20700:2017 is recommended.

8. Data Protection, Confidentiality and Intellectual Property

The use of AI must not compromise the lawful, ethical or secure handling of information entrusted to consultants. Professional confidentiality, data protection and intellectual property obligations remain fully applicable when AI tools are used.

8.1 Responsible data governance

When AI forms part of a consulting engagement or methodology, consultants and firms must ensure that personal and confidential data are handled responsibly and proportionately. This includes:

- limiting the use of personal data to what is necessary and appropriate for the engagement;
- processing data only for agreed and legitimate purposes;

- applying suitable technical and organisational safeguards to protect data used in AI systems; and
- ensuring that data is not retained or reused beyond what is appropriate for the engagement and consistent with legal and contractual obligations.

8.2 High-risk data processing

Where AI systems process personal data in ways that may materially affect the rights or interests of individuals, consultants and firms should apply structured and proportionate risk assessment and oversight measures consistent with applicable law and professional good practice.

8.3 Protection of confidential information

Confidential client information must not be entered into AI tools or platforms where the provider may reuse, train on, store, or otherwise expose that data, unless appropriate contractual and technical safeguards are in place to prevent such outcomes.

8.4 Intellectual property and attribution

Consultants must exercise care to ensure that AI-assisted outputs do not infringe intellectual property rights.

Accordingly, consultants should:

- review AI outputs for potential intellectual property concerns before incorporating them into deliverables;
- ensure that appropriate permissions, licences or lawful justifications exist for any third-party content used;
- respect contractual provisions governing the ownership of engagement materials; and
- address intellectual property considerations in engagement terms where AI-generated or AI-assisted content forms part of the deliverables.

9 Sustainability

9.1 Environmental responsibility

The use of AI systems carries environmental implications, including energy consumption, water usage and associated carbon emissions. Management consultants should recognise that AI-enabled services have an environmental footprint and consider this impact in their professional decision-making.

9.2 Societal responsibility

Consultants should use AI ethically, responsibly, and accountably by ensuring transparency, protecting privacy, avoiding bias, and maintaining human oversight in decision-making. AI applications should support fairness, inclusivity, and societal well-being and promoting

sustainable development. Consultants must comply with professional standards, legal requirements, and ethical principles to ensure AI is used to create long-term value for clients, communities, and society.

9.3 Economic responsibility

Consultants should use AI to drive sustainable economic impact by improving efficiency, supporting innovation, reducing waste, and enabling data-driven decisions that create long-term value. AI should enhance productivity while promoting responsible resource use, inclusive growth, and resilient business practices. Consultants must ensure AI adoption balances economic benefits with ethical considerations, workforce development, and sustainable outcomes for organizations, communities, and future generations.

9.4 Proportionate and efficient use

Consultants should use AI in a manner proportionate to the task, selecting tools and approaches that are appropriate to the engagement while avoiding unnecessary computational intensity or waste.

AI should not be deployed where a less resource-intensive approach would deliver comparable outcomes, unless justified by clear professional considerations.

9.5 Responsible selection of tools and providers

Where practicable, firms should take account of environmental considerations when selecting AI tools and providers, including the provider's transparency and commitment to sustainable operations.

Where comparable tools offer similar functionality and quality, preference should be given to options with lower demonstrated environmental impact.

9.6 Advising clients

When advising clients on the adoption or scaling of AI systems, consultants should draw attention to relevant environmental considerations and, where appropriate, recommend measures to reduce unnecessary energy consumption and resource use.

10. Implementation, Compliance and Enforcement

For this AI Code to fulfil its purpose, its principles must be embedded in professional practice and supported through appropriate oversight and accountability mechanisms.

ICMCI member institutes, consulting firms and individual consultants each have a role in upholding this Public Professional Standard.

10.1 Member institutes

ICMCI member institutes are expected to:

- promote this AI Code within their jurisdiction;
- integrate the principles into accreditation criteria, membership standards and disciplinary frameworks, as appropriate; and
- support consultants and firms through guidance, education and professional dialogue on responsible AI use.

10.2 Consulting firms

Firms are encouraged to:

- align their internal policies and practices with the standards set out in this AI Code;
- foster a culture in which ethical concerns regarding AI use may be raised and addressed constructively; and
- cooperate with member institutes in any review or disciplinary process relating to AI use.

10.3 Individual consultants

Individual consultants holding the CMC designation or membership of a member institute should:

- affirm their commitment to this AI Code as part of their ongoing professional obligations;
- maintain appropriate AI literacy through continuing professional development; and
- raise concerns about AI misuse through established professional channels.

10.4 Breach and disciplinary procedures

Serious or repeated violations of this AI Code may constitute breaches of the ICMCI Code of Conduct and may trigger disciplinary procedures under the enforcement mechanisms of the relevant ICMCI member institute.

Sanctions may include, where proportionate to the circumstances:

- formal warning or reprimand;
- mandatory remedial training or supervision;
- suspension or withdrawal of the CMC designation;
- suspension or expulsion from membership; and
- referral to regulatory or law enforcement authorities where appropriate.

PART 2 – Professional Practice Guidance on Advising Clients on AI

11. Professional Competence and Ethical Conduct in Advising Clients on AI

Management consultants increasingly advise clients not only by using AI in their own work, but by counselling clients on the strategic adoption, governance and responsible deployment of AI within the client’s own organisation. This advisory role carries heightened duties of competence, candour and ethical care. The present section establishes the standards of professional conduct applicable to such engagements.

11.1 Scope of application

This section applies whenever a management consultant or firm provides advice, recommendations or implementation support to a client concerning the client’s own development, procurement, deployment, governance or use of AI systems. It applies regardless of whether the engagement is described as strategy, transformation, technology, operations, people or change consulting, and regardless of the sector in which the client operates.

11.2 Duty of competence in AI advisory work

The existing duty of competence under the ICMCI Code of Conduct requires that consultants undertake only those engagements for which they possess, or can reasonably acquire, the necessary knowledge and skill. In the context of AI advisory work, this duty has the following specific implications:

Foundational AI knowledge

- Consultants advising clients on AI must possess a sound working understanding of the categories of AI technology relevant to the engagement, including their capabilities, limitations, failure modes and risks. This understanding must extend beyond marketing claims to encompass the practical realities of AI system behaviour.
- Where the engagement involves specific technical disciplines—such as machine learning engineering, data science, natural language processing, computer vision or robotics—the consultant must either hold relevant expertise or ensure that appropriately qualified specialists are included in the engagement team.
- Consultants must be familiar with the regulatory and legal landscape affecting AI in the client’s sector and jurisdiction, including applicable provisions of the EU AI Act, data protection legislation and sector-specific rules.

Continuous professional development

- AI technology, regulation and good practice are evolving at an exceptional pace. Consultants who advise clients on AI must commit to continuous professional development that keeps

their knowledge current. This obligation goes beyond the general AI literacy requirements of Section 4.4 and demands sustained, substantive engagement with the field.

- Firms should ensure that consultants engaged in AI advisory work have access to, and make regular use of, structured learning opportunities, including formal training, industry conferences, peer learning, research publications and hands-on experimentation with AI tools.
- Member institutes should consider establishing specialist CPD pathways or accreditation modules for AI advisory competence, enabling consultants to demonstrate and maintain the depth of knowledge that clients and the public are entitled to expect.
- Consultants should maintain a personal record of AI-related CPD activity and be prepared to demonstrate the currency of their knowledge to clients, firms and member institutes upon reasonable request.

Limits of competence

- Where the scope of a proposed engagement exceeds the consultant's current competence in AI, the consultant must disclose this to the client and must not accept the engagement unless adequate steps are taken to bridge the gap, whether through additional team members, sub-contractors, specialist partners or the consultant's own accelerated development.
- Consultants must not overstate their AI expertise, credentials or experience, whether in proposals, marketing materials, credentials presentations or client discussions. The temptation to present a generalist understanding as deep specialisation is a particular risk in a fast-moving field and must be resisted.

11.3 Meaningful client consultation and engagement

AI advisory work must be grounded in genuine, sustained and inclusive consultation with the client and its stakeholders. The consultant's role is to help the client make well-informed decisions, not to impose solutions or to defer uncritically to AI-generated recommendations.

Understanding the client's context

- Before recommending any AI solution, the consultant must invest sufficient time and effort in understanding the client's organisational context, strategic objectives, operational realities, workforce capabilities, risk appetite, regulatory obligations and ethical values. AI recommendations that are technically sound but contextually inappropriate fail the professional standard.
- The consultant should actively seek out the perspectives of those within the client organisation who will be most affected by the proposed AI deployment, including operational

staff, middle management, employee representatives, customers and, where relevant, members of the public.

Inclusive and transparent dialogue

- Consultants should facilitate open, honest and accessible dialogue with clients about what AI can and cannot do. This requires translating technical concepts into language the client's decision-makers and affected stakeholders can understand, without oversimplification or the suppression of inconvenient limitations.
- Where AI proposals affect the client's workforce—through automation, augmentation, role redesign or redundancy—the consultant should advise the client to consult meaningfully with employees and their representatives at an early stage, and should support the client in doing so.
- The consultant should present the client with a balanced assessment of the options available, including the option of not adopting AI, and should ensure that the client has the information needed to exercise genuine choice.

Ongoing engagement throughout implementation

- Where the consultant's role extends to the implementation of an AI system, the consultant should maintain ongoing dialogue with the client and its stakeholders throughout the process, rather than treating consultation as a one-off event at the outset.
- The consultant should establish mechanisms for the client's stakeholders to provide feedback on the AI system's performance and impact, and should ensure that such feedback is acted upon in a timely manner.
- Post-implementation reviews should be recommended and, where the consultant is retained, conducted, to assess whether the AI system is performing as intended, whether unforeseen risks have materialised, and whether the client's objectives have been met.

11.4 The primacy of human judgement

A central tenet of responsible AI use, and a core duty of the management consultant, is that human judgement must remain the decisive factor in all significant decisions. AI is a tool that can inform, augment and accelerate human reasoning; it is not a substitute for it.

AI as a complement, not a replacement

- Consultants must advise clients that AI outputs—however sophisticated—are probabilistic, pattern-based and limited by the data and assumptions upon which they are built. They do not possess understanding, ethical reasoning or contextual sensitivity, and they are liable to error, bias and hallucination.

- Recommendations to clients should always position AI as a complement to, and not a replacement for, skilled human analysis, professional expertise and informed judgement. Where there is a risk that the client may come to treat AI outputs as self-evidently correct or authoritative, the consultant has a duty to challenge that tendency.

Designing for human oversight

- When advising on the design or deployment of AI systems, consultants should recommend architectures and workflows that preserve meaningful human oversight at every decision point of consequence. This means that a qualified person must be able to review AI outputs, apply independent judgement, and override or reject the AI's recommendation where appropriate.
- The consultant should advise against AI deployments in which human oversight is nominal, perfunctory or structurally undermined—for example, where the volume, speed or complexity of AI outputs makes genuine human review impracticable, or where organisational incentives discourage overriding the AI.
- For high-risk AI applications, consultants should recommend that the client establishes explicit escalation procedures, intervention thresholds and human decision-making checkpoints, documented in operational policies.

Resisting automation bias

- Consultants should be aware of the well-documented phenomenon of automation bias: the tendency of human decision-makers to defer to the output of an automated system, even in the face of contradictory evidence or professional instinct. This tendency is amplified when AI systems present outputs with apparent confidence or precision.
- Consultants should advise clients to implement safeguards against automation bias, such as requiring decision-makers to articulate an independent view before consulting the AI output, rotating the individuals who exercise oversight, and periodically auditing decisions to assess the degree of independent human judgement applied.
- In the consultant's own advisory work, the same discipline applies: the consultant must form and maintain an independent professional view and must not subordinate that view to AI-generated analysis, however persuasive.

Ethical dimensions of AI deployment

- Consultants advising clients on AI deployment should raise and address the ethical implications of the proposed system, including its potential effects on fairness, equality, employment, privacy, dignity and public trust. These are not secondary considerations to be

addressed after the technical and commercial case has been made; they are integral to sound professional advice.

- Where a proposed AI deployment presents significant ethical risks, the consultant should recommend appropriate mitigation and, if the risks cannot be adequately addressed, should advise the client against proceeding. This duty applies even where the client is enthusiastic about the proposal and where declining to support it may be commercially disadvantageous to the consultant or firm.
- Consultants should encourage clients to establish their own ethical review processes for AI deployments, including, where appropriate, the creation of AI ethics boards, stakeholder advisory panels or independent review mechanisms.

11.5 Documentation and accountability in AI advisory work

- Consultants should maintain clear records of the advice given to clients on AI matters, the evidence and reasoning upon which that advice was based, the alternatives considered, and the client's response. Such records support professional accountability and may be essential in the event of a dispute, a regulatory inquiry or an unforeseen adverse outcome.
- Where a client decides to proceed with an AI deployment against the consultant's advice, or in a manner materially different from the consultant's recommendations, the consultant should record this fact and the reasons given, and should consider whether a formal written reservation is appropriate.
- Engagement letters for AI advisory work should clearly set out the scope of the consultant's responsibilities, the limitations of the advice, the respective roles of the consultant and the client, and the basis upon which the client will make decisions.

12. External Reference Documents

The following documents have informed the development of this AI Code and may provide additional guidance on the responsible use of AI. This list is non-exhaustive and inclusion does not imply endorsement of every element of the referenced materials.

International standards and principles

- OECD AI Principles (2019, updated 2024)
- UNESCO Recommendation on the Ethics of Artificial Intelligence (2021).

Legislation and regulation

- Regulation (EU) 2024/1689 (EU Artificial Intelligence Act)
- UK Data Protection Act 2018
- Equivalent data protection and AI-related legislation in other jurisdictions

Regulatory guidance

- Guidance issued by national data protection and supervisory authorities on AI and data protection
- Guidance on impact assessments and accountability for AI systems processing personal data

Professional codes and policies

- ICMCI Code of Conduct.
- ICMCI CMC Competence Framework.

ISO 20700:2017 Guidelines for Management Consultancy Services

- Professional codes of ethics of ICMCI member institutes
- Policies of other recognised professional bodies addressing AI use in qualifications and assessments

Responsible AI frameworks and scholarship

- Leading responsible AI governance frameworks developed by academic institutions, standards bodies and international organisations.

Environmental sustainability and AI

- International Energy Agency reports on digital infrastructure and energy use.
- International climate agreements and sustainability reporting standards relevant to digital and AI-related emissions

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