

Review of the Recruitment Principles 2014

Consultation Responses

Responses

1) **Written responses**

A senior manager said:

- Revised RP's at paragraph 26 – 'I thought where the next candidate is above the line you **must** offer the job to him/her'
- Heads of Department competitions – 'Option 1 is confusing, it is hard to see how a further meeting with the Commission or candidates could result in anything other than an informal instruction by the Secretary of State to the panel, therefore I prefer Option 2 which still gives the PM the option to choose but is more transparent about the basis of the choice. I also think that the PM should record the basis of his choice'.

An individual said:

- The proposed changes to the Recruitment Principles are largely positive and most of the common queries are covered.
- Q18 - 'I agree largely with the first part, that the essential steps are set out clearly, there is nothing missing, there is nothing which is superfluous, and there is nothing that could be made less onerous without compromising the legal requirement.
- Q35 – 'yes' to both parts of the question
- Q40 – 'I agree largely with the first part and yes to the next 2 parts.
- Q52 – 'I prefer Option 1 and consider that Option 2 has the potential to lead to internal pressure for candidates to be equally ranked where there might be a preferred candidate or one known to be the preferred candidate of Ministers (albeit PM's involvement could be a safeguard to some extent).
- Para 15 of the draft RP's – are Ministers included as 'key people'? Perhaps there should be a cross-reference here to later sections on ministerial involvement.
- Para 25 – the second 'candidates' should be singular.
- Para 27 – is it sufficiently clear that there needs to be enough vacancies left to be able to do this?
- Para 34 – as well as playing a key part in the deliberations, is the Commissioner also to play a part in the actual decision. This needs to be clarified.
- Para 35 – there should be clarification over whether this needs to be a final Panel report, or can be a draft one.
- Para 39 – clarify whether all the Minister's questions must be asked of all candidates or whether these may be tailored to individuals.
- Para 44 – perhaps insert the word 'such' before the word 'briefings'.

- Para 59 – second bullet point, Annex A – EMO bullet – private offices often want to appoint their junior support staff who had been recruited without FOC permanently to their offices. Is it the intention to require approval for such staff?
- Exception 1 – perhaps cross-refer here to requirements for senior grades.

- Exception 3 – further clarification on what is meant by secondment out/secondment in and the difference between loans and secondments.

A senior manager said:

- Exception 7 – of the revised principles - Transfers of staff from other public bodies. The wording “staff may transfer” is misleading and could be interpreted that “transfer” also means that the member of staff has continuity of service as a civil servant. The Cabinet Office’s position is that employment with a NDPB is not “Crown employment” within the meaning of the Employment Rights Act 1996 and that employees transferring from organisations which are non departmental public bodies (NDPB) to government departments do not have continuity of service.
- Exception 10 –of the revised principles - Conversion to permanency – administrative & industrial grades. The delegated authority for departments to convert STTAs to permanency after 12 months by exception to the CS Principles is unclear. It raises questions about how this would be managed, who it would effect and when to apply it. Also, is it in fact a change to the Principles rather than an exception?
- It is unclear how a competition with permanent staff would be managed, for example: would an internal job at any grade be opened up for applicants from the permanent workforce and an individual STTA who had the relevant service and was an admin/industrial grade (this would be unmanageable); or would every internal job be opened up to the permanent workforce and all STTAs in admin/industrial grades who had over 12 months service (how is this an exception as it would be a significant change to the principles so that you could only join the civil service if you were selected on merit on the basis of a fair and open competition or if you had been working temporarily for 12 months in an admin/industrial post and applied for an internal job). This exception creates a different approach at different grades and it is unclear how this is justified

An individual said:

- I think that your footnotes e.g. 20,21 & 22 should say January 2014 not Jan 2013.

A senior manager said:

- Exception 3 on secondments - anything above 2 years requires Commission approval - our secondments from HSE e.g. for conventional health and safety may typically be for 3 years, so a 3 year limit would be more helpful.

A senior manager said:

- *A new provision on previous political activity*; The provision requests that the panel ‘must satisfy itself that the candidate will, if appointed, comply with the Civil Service Code requirement for impartiality and objectivity’ and asks that the panel assess this in both an ‘appropriate and proportionate’ way. We would like to see some additional guidance from the Commission in respect of both appropriate and proportionate, specifically how this might be balanced with the principle of fairness across a field of

candidates. In addition we would welcome some additional guidance in the application of proportionality in the treatment of different grades.

- *Proposals for a new approach to Head of Department appointments*; My department has no comment on this proposal.

The Better Government Initiative – written response dated 17 February 2014

<http://www.bettergovernmentinitiative.co.uk/recruitment-for-the-civil-service-should-preserve-political-independence/>

A senior manager said:

- The additional points of clarification and guidance are welcomed and help to make it clearer what the Commission expects to see in practice.
- I have one comment / point of feedback in relation to clarity in the revised set of exceptions. The wording in the second paragraph of Exception 1 on page 23 appears to be inconsistent with the wording in Exception 3 on page 24. Exception 3 allows for the appointment of an individual on a second secondment after 12 months without the approval of the Commission but Exception 1 states that repeated exceptions for the same individual are not permitted. If the repeated exception ban only relates to Exception 1 then perhaps this could be stated more explicitly, or if it is possible to appoint an individual on a second temporary appointment after a certain time period without the approval of the commission, this should be stated.

Brian Rowntree – Chair – Northern Ireland Commissioners – written response dated 18 February 2014

- In terms of our comments, I would wish to commend you on producing a very clear and well structured Code, which has the merit of being comprehensive without appearing cumbersome.
- *Heads of Department appointments*; Commissioners discussed, at length, your proposals in relation to Heads of Department appointments and we noted with interest the House of Lords debate entitled the *Future of the Civil Service*, in particular the views of peers in relation to the draft Consultation document. We would endorse the views expressed in relation to the critical importance of maintaining an effective and impartial Civil Service.
- You will understand that I am conscious of the very difficult and challenging environment which you face. I recognise that it is not easy to strike an appropriate balance between meeting the demands and expectations of modern government whilst, at the same time, staying true to the statutory duty to uphold the Merit Principle.
- However, we share some of the concerns expressed during the 16 January debate, in relation to the providing options for Heads of Departments appointments. As you may know, in addressing the issue of Ministerial involvement in Northern Ireland, our Code provides that only the name of the lead candidate is provided to the Minister for endorsement. If the Minister does not endorse the appointment of the lead candidate, the Minister must record, in writing to the Department, his or her justification for not accepting the lead candidate. The Department must then inform Commissioners that the competition has been terminated and of any revised

proposals for filling the post, as appropriate. I would observe that Commissioners in Northern Ireland would have reservations that a process which involves a person other than the lead candidate going forward for Ministerial endorsement does not sufficiently embrace the principle of appointment on merit on the basis of fair and open competition.

- *Civil Service Code*; Commissioners noted with interest the requirement for panels to properly test and be satisfied that all appointees to the Civil Service must comply with the Civil Service Code (equivalent to the NICS Code of Ethics), specifically those related to impartiality and objectivity. The question we would invite you to consider is, if former political activity is not per se a barrier to appointment and the person is entitled to apply for a post in the Civil Service, why require, through testing, that person to demonstrate that he or she can so act? The Code of Conduct would presumably apply to such a person and if he or she fails to demonstrate impartiality and objectivity whilst in post then they can be dealt with in accordance with the Code in the same way as any other Civil Servant whose more recent political interest or activity may threaten their impartiality or objectivity. Commissioners had some reservations as to whether the proposal is practicable and workable and, in particular, whether questioning during the course of an interview with respect to a future hypothetical situation is likely to produce the strength of evidence which would be deemed sufficient to deny an otherwise competent candidate the opportunity to compete for a post.
- *Exceptions*; As you will know, your Commission's exceptions are more permissive in terms of range and scope of categories of appointment made by way of exception to merit. In particular, Commissioners note Exception 6 – Interchange with the Northern Ireland Civil Service, which allows NICS staff to transfer freely into the Home Civil Service, which I would imagine would be very welcome the NI Civil Servants.

A civil service team said:

- As discussed we would appreciate some further guidance on how to test and record a candidate's ability to comply with the Civil Service Code and await further guidance regarding the appointment of Permanent Secretaries.

A civil service team in Scotland said:

- We are grateful to have the opportunity to feed in our thoughts. In general, we thought that the proposals all looked very sensible but we had the following observations:
- *Delegation to Departments*; Para 34 – we felt that this needed a bit more clarity as we envisaged that this may be quite tricky to manage for inward secondees which for the SCS, in particular, is the main exception that we use. We are not usually aware of the salary of the inward secondee at the point that they are identified although we are clear of the grade of the role that we are appointing to. In our department, a lot of our inward secondees come from the NHS or our ALB family and their salary levels are higher than DH for similar roles. For example, we currently have a couple of medical advisers seconded into SCS1 roles – their salaries exceed £120k but these salaries don't really reflect the weight of the role in terms of JESP or Civil Service

competences. Other than the salary bands being very wide the rationale for the change isn't particularly obvious.

- *Civil Service Code*; Para 40 – although we refer to the CS Code in our recruitment packs we do not seek any further information about political activity as part of the selection process. Whilst para 23 is clear, Departments will need to think about how to request this information and how it is thoroughly tested by the panel. I suspect Departments would appreciate some handling advice on this issue.
- *Head of Department appointments*; This all looks sensible but suspect colleagues at Cabinet Office who handle most HoD appointments will be better placed to give views.
- *Miscellaneous*; Para 53 – it would be great if in the revised Recruitment Principles there could be a link to a list of accredited NDPBs – we tend to rarely need to know this info but when we do it's been really hard to track a current definitive list down or a contact who will know.

A civil service team said:

- *Is there anything that could be made less onerous without compromising the legal requirement?* The following question was raised by one of our business units: As the "war on talent" rages on, we recognise there are several large capability gaps across the Civil Service. While in principle we still agree that appointment to the Civil Service should be open, fair, transparent and on merit, we also recognise that there is a need to be able to draw resource from the correct market without needing to satisfy a bureaucratic approvals process and being able to reduce the time to recruit for high profile critical projects. How does the Civil Service Commission plan to tackle this challenge?
- *Head of Department appointments – we would welcome comment on these proposals for Head of Department appointments (paragraphs 46 to 54)* No comment on this.

An individual said:

- Our department have sought clarity from the Civil Service Commission regarding the relevance of the need to test and record whether candidates would be able to work within the requirements of the Civil Service Code and serve the 'Government of the day'. Whilst the principles of honesty, integrity, impartiality and objectivity that underpin the Civil Service Code are paramount, the requirement to serve the 'Government of the day' may not necessarily be applicable to all organisations, in particular those that are independent from ministerial accountability.
- The SCS for example has agreed shared principles with ministers but we have no direct accountability to the Government of the day to uphold Judicial independence. There may therefore need to some provisions accounted for whereby particular departments/agencies are exempt from this requirement.
- The above point is one the Civil Service Commission have acknowledged and are seeking further advice on.
- One additional point that I would add for consideration is the possible need for the Civil Service Recruitment Principles to capture, align and support the Government's

commitment to tackling Youth unemployment. We find that younger job applicants find it difficult to compete with more experienced applicants, particularly given the competency based assessments most organisations use. With the economic context attributing to an employment market which is rich with a wealth of experience, younger applicants are finding barriers to employment.

- The Civil Service Commission rightly have a specific exception for the recruitment of disabled people who are in a government scheme to promote the employment of disabled people (currently entitled "Work Choice") or to sponsor internships for disabled people in recognition of the barriers disabled people face in gaining employment. The Commission have positively included provisions to allow the permanent appointment of apprentices and there are other ways for organisations to operate within the principles (for example using exception 1) and tackle this national issue. This being said I believe there may be further room for including an exception which captures the permanent appointment of young adults in a government scheme to promote the employment 18-24 years, for example those under DWP's "Youth Contract".

An individual said:

- *Are the essential steps set out clearly?* – Yes and it's helpful to have the Principles re: constitution of panels etc., clearly applying to all grades and to have the clarity around reserve lists for example.
- *Is there anything missing?* – Note from Commission to HRDs dated 1 February 2013 – re fixed term appointees and eligibility to apply for internally advertised vacancies provided recruited through fair and open competition and regardless of whether the original advert mentioned an option for extension or permanency. Also clarification that FTAs who are recruited through fair and open competition and selected on merit cannot simply be converted to permanent – that they must apply for internally advertised vacancies?
- Consultation document talks about the new version of the Recruitment Principles being clear on apprentices – the revised version so far doesn't add in this new detail/clarification.
- On apprentices, the revision could be clearer that the references to Departments not having to 're-recruit' their apprentices means that there is no need to have them compete internally (in contrast to what will be the Exception 10s in new version of Principles – where as it reads, it is clear that for these exception appointments to be converted to permanent status there would need to be an internal competition with the short-term appointees competing with permanent staff at same or more junior grades).
- On accredited NDPB's – it would be helpful to have the links to the most up to date list of accredited NDPBs and know when the accreditations are up for renewal, perhaps the Principles could contain a link through to the appropriate list/website information.
- From a practitioner perspective – customers have struggled with the differences between exception appointments and what are 'exemptions' under Government's external recruitment freeze processes – with that in mind, would welcome a bit more clarity around the exception 3 – secondments and the fact that the references to 'other employers' could mean those bought in on secondment without a competition

from either public sector or private sector (from practitioners point of view my observations are that 'inward secondment' often always taken to mean from industry/private sector.

- Paragraph 17 of the Consultation document talks about competitions being scored using the Commission's published marking frame. If there isn't a link to this on the website then it would be helpful if there could be.
- Page 17, footnote 16 – again, it might be helpful to have a link through to the Senior Appointments Protocol.
- *Is there anything superfluous?* – No – I see the bringing together of extant guidance and what is currently separate information into the consolidated version of the Principles as a good thing. I think it will serve customers better than the high level document and then a need to supplement as is the case now from either existing information or by individual approaches to the Commission for clarification.
- *Is there anything that could be made less onerous without compromising the legal requirement?* – Not that I can think of – although from an operational point of view if Departments are to record and identify TUPE, COSOP and transfers from NI office from 1 April 2014 that will have implications for e.g. in house systems and parallel running of existing HR databases and manual records, so the impact on recording systems.

A civil service team said:

- *Political Impartiality* - Clause 23 - We welcome the inclusion of a provision regarding political activity and would suggest the addition of a more detailed definition of what constitutes such activity and practical guidance for identifying it.
- *The Involvement of Ministers*- Clauses 36-40 - We would appreciate greater clarification of wording with regard to the minister or ministers to which these clauses refer. We suggest that they are intended to refer to the 'minister from the recruitment department' and that this could be made more explicit in the guidance.
- Clause 44 – We appreciated the Commissioner's comments at the liaison group meeting that more innovative alternatives to a final interview process might sometimes be a more sensible option for an appointment. We feel therefore that clause 44, and possibly clauses 41-45, could be redrafted to reflect this and, more broadly, that the Commission could consider alternatives to final panels for other appointments also.
- Clauses 45-54 - We believe that Option Two will work better in practice and give the First Civil Service Commissioner an appropriate position in the process. In both options, we would welcome inclusion of the Cabinet Secretary in addition to the Head of the Civil Service, as in practice the Cabinet Secretary is the line manager for some roles.
- *Exceptions* - Clause 59 - We note the inclusion of the SCS Pay Band 2 minimum as an additional factor alongside the grade of vacancy in determining whether responsibility for the use of exceptions is delegated from the Commission to departments. We support appropriate use of exceptions and understand the Commission's role in this. However, we feel that the introduction of an absolute salary limit is not practical as a criterion for the following reasons:
 - i. level of responsibility and the pivotal nature of the role should be a key factor in deciding whether exceptions can be delegated to departments;

- ii. the current SCS Pay Band 2 minimum of £85¹,000 may be too low as the 'test level' for determining the Commission's involvement;
- iii. final salary tends not to be negotiated until an appointment has already been made.

An individual said:

- I also note in the policy that you make provision for Civil Servants to apply for reinstatement but time limited to 5 years. I do feel (considering my own circumstances and others) that this should be increased to between 10 and 15 years. This would allow for persons who resigned to raise a family to rejoin the Civil Service and perhaps keep the entitlements that they had built up previously. Five years is a very short time when raising more than one child.

An individual said:

- Para 59 in the draft Principles and the change to STFTA approvals, to those above the Payband 2 minimum requiring up front approval, is a big concern of the business who see this as curtailing their ability to bring in key specialist skills at very short notice. On occasion we also pay staff at Band A salaries above the Payband 2 minimum (including Recruitment and Retention allowances for technical specialists). That being the case, this change could throw into the mix more roles than intended. My personal view, although I do in many ways like the additional scrutiny around these, is that it would also drive the wrong behaviour and lead to the business taking on someone on a contract (easy to do, you can get an individual to sign up to Capita) to circumnavigate getting approval. This would end up being an additional cost to the taxpayer. If this principle goes ahead a quick approval process for STFTAs – I'd suggest a two day turnaround – would I think be necessary to ensure we don't drive the business down the contractor route.
- Para 23 in the draft and the references on political activity – it would help to clarify how this applies across the grades.

A civil service team said:

- Exception 1 – greater clarity and guidance on how and when this exception can apply would be welcome, given the confusion from departments outlined in the consultation document.
- The Commission should maintain oversight over how these appointments are made and whether they are genuinely 'experts'. Subject to that salutation, consideration should be given to whether there should be greater flexibility in length of tenure. A two year limit seems arbitrary in this context, when considering the many long-term public policy programs that these individuals will be bought in to support.
- In relation to the Civil Service Code and testing this at interview, whilst we support this approach, there may be some merit in the Commission reviewing how this has worked in practice, including the possibility of issuing further guidance.

¹ £84,000 during the consultation, £85,000 from April 2014

- Heads of Department – we strongly argue that where there is a candidate who is clearly ‘more meritorious’ than the others, then the panel must recommend that candidate for appointment.
- Where there are a number of candidates of equal merit and the First Civil Service Commissioner agrees, then the panel submits more than one appointable candidate to the PM for consideration then Option 2 would be the preferred model.
- Clearly we cannot pre-judge how often the circumstances of a panel determining that they have a number of candidates of equal merit will occur. However we would be concerned if there was a significant number and the practice of Prime Ministerial involvement became the de facto norm. It is unclear how this will be monitored and whether there will be full transparency as the number of appointments made under this provision and we would welcome clarification on this.

A Scottish Government Human Resources Director – written response dated 24 February 2014

- We currently have a modern apprenticeship programme in place (this is year 3). Apprentices are brought in under current exceptions 1 & 2 via a fair and objective process approved by the Commission.
- Rather than being chosen on merit following a fair and open competition, individuals are nominated by Skills Development Scotland based on job descriptions provided by business areas that have vacant A3 (administrative officer – we no longer have the administrative assistant grade) posts. Apprentices are appointed on a permanent basis if the following conditions are met at the 12 month stage:
 - a satisfactory attendance record;
 - meeting our standards of conduct;
 - meeting the performance requirements of their job which includes satisfactorily completing the Modern Apprenticeship Programme which is SVQ level 2; and
 - passing a competency based interview – with panel members outwith the local chain.
- The new exception 10 to some extent firms up this agreed process, however we have some concern that it adds the condition that the individuals should compete with permanent staff at the same grade, (we do not have a more junior grade). This is currently not the case in our procedure i.e. - the positions are not advertised to other staff. It remains the case however that, should they fail the interview, (or fail to satisfy any of the other conditions), they would not be made permanent and their contract would be terminated.
- We would be grateful if you could confirm that you remain content with the process we are following, which was agreed with the Commission in April 2011
- Political Activity and Compliance with the Civil Service Code - we are assuming here that, similar to the Civil Service Management Code provisions, not only will the type of the activity be relevant but also the grade of and nature of the post recruited to. This will require changes to our process and the guidance and training made available to panel chairs.
- As we currently do for senior civil service vacancies, we would propose a new section in the application form asking candidates to provide details of any potential conflict of interest including previous political activity should they be successful in

securing the post. We would then require the panel to question the candidate on this, seeking their assurances that they will be able to comply with the Civil Service Code's Requirements - particularly impartiality and objectivity.

- This could prove a difficult call for panel chairs, (it is not the type of decision they are used to making), and we would expect them to call on the relevant HR Policy Officer for advice and guidance in individual cases as required.
- A decision to fail the candidate on the basis of their perceived inability to meet this requirement would have to be consistent, robust and defensible. We would be interested to learn about the feedback you have had from other Departments on this point and may approach them to benchmark. In addition, any further clarity or guidance that can be added to the new principles on this point would be very welcome.
- Secondments (Senior Civil Service) – as regards secondments, the exception (although reworded and renumbered) remains essentially the same as regards departments being able to make secondments without fair and open competition for up to 2 years and thereafter requiring Commission approval for any extension. We have no issue with this for more junior grades.
- My HR officials who deal with Senior Staff secondments have asked that a note be added to explain that the 2 year rule does not apply where a secondment route is taken following a fair and open recruitment competition. Unless at the outset we think secondment would be inappropriate for a particular senior role, all of our senior vacancy further information notes say:

“This appointment to the Senior Civil Service will be made on the basis of an indefinite contract on standard Civil Service terms. If applicable, secondment from your existing employer would also be considered”.

This allows us to appoint an individual on their existing salary where they are being paid outside the SCS pay range for the role, but they are the recommended candidate.

- Delegation to Departments to apply exceptions below SCS Pay Band 2 - following on from the secondment issue above, we would contend that, for senior appointments in the Scottish Government, the delegation of £84k per annum is set too low. This is particularly the case where a Deputy Director (SCS Pay Band 1) specialist is being bought in.
- We would suggest that the salary figure should be higher, taking into account that in the Scottish Government we start all our SCS Pay Band 2 Directors at £93k.
- Head of Dept/Perm Sec appointment options – we have a clear and strong preference for option one, as the best way of ensuring fair and open competition, whilst still allowing the PM/FM to exercise a final judgement of veto after the scope for reconsideration has been exhausted. On a general point, it may be helpful to note that these functions in Scotland are exercised by FM and that any role for Cabinet Secretaries is at his discretion.
- Miscellaneous – conversion to permanency at administrative and industrial grades - In the current Recruitment Principles there is a facility to convert certain short term appointments (made other than on merit on the basis of fair and open competition) to permanent employment through a process approved by the Commission. This allows

Departments that have brought in temporary staff at administrative and industrial grades to retain those staff, rather than having to run a competition to recruit them a second time.

- We would appreciate clarity about what the Commission deem 'certain short term appointments'?
- Accredited NDPB bodies – we would welcome a regular updated list of these bodies
- Meeting the legal requirements – Para 8 states that a panel of 2 or more people must be set up to oversee the appointments process collectively. Does this require the same 2 people to undertake the sift and interview?
- Para 18 – a Department must not make an appointment under materially changed terms and conditions from those advertised. If a Department needs to consider paying more than 20% above the advertised salary, they must obtain the approval of the Commission before making such an offer.
- The SG advertises both the band minimum and maximum salaries of the pay band and states that usually the successful person is paid at band minimum rates. Should we approach you only if we were considering paying more than 20% above the Band minimum?

A civil service team said:

- Essential steps - Whilst there is reference to making reasonable adjustments for disabled candidates there is no specific reference to the Guaranteed Interview Scheme as there is in the current version. Perhaps consideration should be given to making the GIS mandatory or at least best practice according to the Recruitment Principles?
- Para 7 of the consultation note refers to the Civil Service Reform programme and in that vein, should there be mention of the Government wide framework which should now be used consistently across government and also the policy of honouring appointments made on a temporary promotion basis for staff going out on loan? Whilst these don't need to be covered in depth in the Principles, if referenced they will bring together all the factors and decisions in relation to recruitment.
- Civil Service Code – what is the definition of political activity? And does this extend beyond the UK? If previous political activity is not stated at the time of application how can the ability to act within can the Code be tested? It might be helpful to have political activity more defined, perhaps in the way it set out for existing civil servants in the Civil Service Management Code (section 4.4)
- Head of Department Competitions - There seem to be merits in both options but option 2 seems to be more streamlined whilst still allowing the PM to consult with the relevant Secretary of State if necessary. The proposals for both seem clear and unambiguous and set out the responsibilities of the various roles in appointing.

An individual commented on Heads of Department competitions

A civil service team said:

- Paragraph 9 of the new recruitment principles document advises that “the panel must be chaired by a civil servant from the Department or, for the more senior competitions, by a Civil Service Commissioner.” Paragraph 12 goes on to say that the Chair of the Panel must approve the essential criteria, job description, panel

membership etc. This does not fit with our practices where we use an independent chair to bring an unbiased, consistent approach to the interview process i.e. ensuring panel members fully understand and follow both the Commissioners' Principles and the department's protocols and processes. But, it remains the job of the civil servants to agree the essential criteria etc and make the final decision. Use of an independent chair is considered important for a service which spans Government departments and in which those who are recruited can move around easily. What we try to guard against is a department-specific approach and the independent Chairs, who chair panels for a number of our department's teams, help us to achieve that aim. In many ways, the independent Chairs act in a similar capacity to Civil Service Commissioners for recruitment at more junior levels. Recommendation: the principles are extended to allow the use of an independent panel chair in the way described.

- Para 36 refers to appointments in which a Minister has an interest but gives no guidance on what might constitute a legitimate interest. In an environment where politicisation of appointments is a live debate, who will make a decision on whether there is a legitimate interest. Taking the scenario to the extreme, a Minister could say he is interested in all appointments to his/her department. This is, of course, tricky ground, but I believe that greater clarity would be useful here.

A civil service team said:

- The Committee also agrees that streamlining, simplifying and consolidating the range of guidance relating to civil service appointments is appropriate and welcomes the approach taken by the Civil Service Commission to move to a single document that focuses on principles and essential processes only. The Committee believes that clearer and simpler Recruitment Principles should make the regulatory framework more transparent, which is to be welcomed. Any changes to the provisions for Head of Department appointments which may arise from the consultation process should therefore also be uncomplicated and transparent, whilst clearly in line with the overarching principles of merit, fairness and openness which apply to all civil servants.
- Given the role of the Committee on Standards in Public Life in calling for the introduction of the Civil Service Code, and promoting the Seven Principles of Public Life, we are also pleased to note your proposal to introduce explicit testing of the Code values of impartiality and objectivity into the selection process where appropriate. We believe that a commitment to the Civil Service Code values and the Seven Principles of Public Life should be at the heart of what it means to be a civil servant.

A senior manager said:

- For a variety of reasons, my business area relies heavily on secondees (approximately half of all my marketing campaign managers) but because of the two-year rule we have to release them back to their home organisation just at that point that they are working at the top of the game and then start recruiting again from a relatively small pool (i.e. specialist marketing staff in other organisations). Most of our secondees tell us they would like to stay longer, if not permanently. Why does the

two-year rule exist and can it be relaxed or scrapped altogether? We have occasionally applied successfully to the Commission for short extensions but I have found the process very cumbersome. Can it be streamlined?

A senior manager said:

- Paragraph 9 relates to the requirement for a substantive civil servant to chair external recruitment panels for posts at G6 and below. Where departments are running bulk recruitment campaigns with large numbers of interview panels and have engaged a third party supplier to provide additional panel members for interviews is there any flexibility to have panels without a substantive civil servant. The reason I ask this relates to requests we have had from vacancy holders who work on the frontline. They are finding it particularly challenging to deliver the requirements of their day job and the need to sit on a number of recruitment panels at the same time. The option to use a third party supplier would be very useful.
- Paragraph 13 requires panel chairs to sign off a panel report summarising actions and outcomes. Our department, along with a number of other departments use the CS Jobs online recruitment system to manage campaigns so would not hold separate panel reports. Would I be correct to assume that the records held on CSJobs would be sufficient to meet the requirement of a board report, or is there an expectation that separate paper records are retained by departments.

Two senior managers said:

- We welcome the consolidation of recruitment guidance into one place.
- We are supportive of option two for Permanent Secretary appointments
- The addition of exceptions to include government schemes for the disabled and apprentices is very positive.
- There are a few concerns about commission involvement set at a salary level rather than grade. We discussed this at the Commissioners and HRD liaison group. Whilst there are examples of bad practice where depts. are bringing in PB1s on high salaries to avoid Commission involvement, this is the minority and therefore this revision would impose unnecessary control and some further complexity which does not add value in the majority of cases. For example, in setting out to recruit externally at PB1 and then finding during salary negotiations that the £84k ceiling is reached. This would mean bringing in Commission clearance at a stage where often the deal needs to be done quickly.
- The clarification of what is an exception is very helpful.
- In the drafting, we need to be clear if the ministerial involvement is any Minister or just the Minister in the department, it should be the latter.

A very senior official in the Welsh Government – written response dated 6 March 2014

- I welcome the proposed changes particularly in relation to the additional guidance around recruitment at lower grades. Also the further clarity that has been provided in respect of the essential steps that must be followed to ensure that an appointment is legal

- In response to your request for views on the clarity and completeness of this new section of the Principles, there is nothing on which we specifically wish to comment, simply to confirm that we think the revisions are clearly drafted and easily understood.
- In respect of the revisions to the exceptions, we agree that the suggestions made are sensible, particularly around the arrangements for conversion of temporary staff to permanency.
- On the Secondment exception (the new exception 3), although we are aware that Secondees cannot simply be made permanent, this is not explicit in current Principles and we wonder if now might be the opportunity to make it so.
- I understand and agree with the rationale for the Commission to require prior approval for the use of exceptions for SCS Pay Band 1 appointments where the salary is above the SCS Pay Band 2 minimum. I would suggest though that you reconsider the wording of this proposed change (perhaps as I have expressed above), to make it absolutely clear which appointments require this approval.
- We note the proposed revisions to the Principles in respect of the Civil Service Code, and the need for recruitment panels to assure themselves that any candidate, who has recently been involved in political activity, if appointed, will be able to comply with the Code in terms of impartiality and objectivity. Whilst the proposal is clearly expressed, we are not sure that, in practice, it will be workable. If adopted, further guidance would be required about what level of political engagement the candidate would need to have undertaken in order for them to be tested during the selection process. It would also be helpful, for consistency, if guidance could also be given as to how this would be tested.
- In the context of Head of Department appointments to the Welsh Government, it is essential that the principles are absolutely clear on the role of the First Minister in relation to appointments (or the relevant Welsh Minister to whom the First Minister has delegated responsibility for the matter). The second option seems clearer in this regard, with the panel first deciding whether one candidate is more meritorious than the others and, where that is the case, recommending that candidate to the First Minister for appointment. The ability for the panel to put more than one appointable candidate to the First Minister for consideration, where the panel assesses candidates to be of equivalent merit and with the agreement of the First Civil Service Commissioner, is also clear and logical in the case of a genuine 'tie'. So this proposal gives us no great difficulty, although we note that PASC has come out against it.

A senior manager said:

- Bringing together all the Commission guidance on recruitment into one document brings clarity to what we mean by fair and open competition and selection for appointment on merit along with the principles of selection by which we bring that about.
- I am pleased to see that the Commission will continue with principle based regulation. We have worked successfully with this approach since 2009 and it has given us the flexibility to organise our recruitment activity to suit our business needs while giving us certainty that we are complying with the letter and spirit of the Constitutional Reform and Governance Act 2010.

- However, I am concerned that this revised set of Recruitment Principles, particularly the 'The panel' section, now contains a process and some direction which describes the essential steps to meeting the legal requirement. It is unclear whether this refers to all recruitment or recruitment for senior posts (paragraphs 8 – 13 throughout).
- Departments have worked with Civil Service Resourcing to develop an effective recruitment process for delegated grades that is proven to comply with the Principles and we would like to continue with this and devise our own procedures. For recruitment into senior posts, I agree with the panel proposal.
- Appointment of Heads of Department and other Senior Civil Servants – overall the guidance is clear on the expectations of the Commission, when the Commission should be involved and when and how expectations may be applied. I welcome the continued delegation to Departments. With regard to the tighter parameter for SCS referrals for an exception, it would be helpful if Departments could retain delegation with the additional 'pay band' parameter.
- In terms of my own experience, the appointment of the HMRC Permanent Secretary is not managed within HMRC. However the proposals to involve Secretaries of State and define their remit for selection are clear.
- There are two areas where the guidance could benefit from more clarity – our department is keen to improve representation across the diversity groups at a senior level and would expect to leverage the recruitment process to support that. Under the recruitment principles the panel Chair is required to approve key stages and documents of the recruitment process (paragraph 12 in Meeting the Legal Requirement refers). To improve representation it would be helpful if consideration could be given to extending these approvals to include the diversity attraction strategy which should demonstrate how the recruitment campaign will reach out to diverse groups.
- Some further clarity regarding reserve lists, particularly whether potential for a reserve list should be declared from the outset and whether reserve lists can be shared across the Civil Service where similar roles are to be filled.

Public Administration Select Committee (PASC) Ninth Report – *Latest proposal for ministerial involvement in permanent secretary appointments: PASC's recommendations*
<http://www.publications.parliament.uk/pa/cm201314/cmselect/cmpublicadm/1041/104102.htm>

The Minister for the Cabinet Office, the Rt Hon Francis Maude MP also wrote to the Commission.

2.) Discussions

An individual said:

- Further clarification needed on the difference between a loan and a secondment (Exception 3)

A senior manager said:

- He had discussed the appointment of PB1s and above earning 84k or more with another CO HR manager. They were apparently not clear whether this applied to all PB1 and above appointments or only to those made as exceptions and said it could be read either way.

A senior manager said:

- A Permanent Secretary said that overall he thought the Recruitment Principles and the consultation document were 'admirably clear' and he welcomed the improvements.
- He had particularly wanted to comment on the options for appointing Heads of Department. His own personal preference was for Option 1, but he added that if it appeared that Option 2 was likely to preserve the existing settlement (of appointments on merit, to a Civil Service with impartiality as one of its core values) for longer than he could see it working, with a few modifications – for example: Paragraph 52, adding 'exceptionally' to the text to indicate that the Paragraph 51 route would continue to be the norm; Providing a clearer definition of what 'equivalent/equal merit' meant – he was concerned that a marking band could be quite wide.

Civil Service team discussion

- It was felt by all three representatives present that the document was clear and it reinforced fair and open competition. There was nothing missing or superfluous.
- One representative felt that Paragraph 21 could be made easier to read, since it related to recruitment at a senior level and not roles below pay band 6.
- Paragraph 39 which states, 'The Minister may brief each of the shortlisted candidates.....' also it was not clear that this only related to senior roles. It should be made clear that panel requirements for Administrative Assistant level was not the same for SCS recruitment. It would be helpful if it stated it was not part of the assessment process at this point.
- Paragraph 10 states that the panel must ensure candidates are impartially assessed against the published essential criteria. It was felt by all it would be useful if there was a footnote which explained what was meant by criteria.
- One representative commented that Paragraph 12 refers to the chair of a panel. At their department there were often multiple panels and multiple chairs. There would be an overall chair who would sign off multiple panel reports.
- One representative felt that it was unclear in Paragraph 12 at what point the competition started. All representatives felt a checklist would be useful for the chair to sign off at the end of the recruitment which showed the Recruitment Principles had been followed.
- Paragraph 23, it was felt by the three representatives that this was unclear what was meant by political activity.
- Paragraph 59, it was queried why this had been introduced,

Civil Service team discussion

- Initially the group discussed the impact of the new Recruitment Principles on SCS recruitment.
- In relation to Paragraph 59, one department noted that most external competitions at PB1 and above will be on a salary of £84,000 or more and queried why all such competitions would not be Commissioner led.
- Departments asked for clarification that the £84k is the total remuneration package.
- Departments thought this additional control (para 59) was a good thing.
- Paragraph 39. One department asked whether the intention is that any PB1 meeting held by a Minister with a shortlisted candidate must be attended by a CSC representative.
- Paragraph 23. A short discussion on how panels would satisfy this.
- A number of departments said they found the guidance on the panel and reserve lists very helpful.
- One department asked for more guidance on what constitutes 'open' as they felt there were different interpretations of this and that feedback from KPMG (who carried out the audit) had highlighted this.
- Departments checked when and how the revised Recruitment Principles would be launched. Departments liked the guidance on the role of the Chair and also the exceptions chart at the back.
- Paragraph 18, clarification was sought on whether '20% above the advertised salary' would include 20% above the maximum of a pay band if that was stated in the advert, even if the advert said that 'usually' the department would not pay above a certain point (for example bottom third) of the pay band.
- Departments liked exception 10. One department asked whether there was any chance that this could be increased to include staff at grade EO.
- Departments said the old exception 3 would not be missed as it was so seldom, if ever used.
- New exception 3. One department asked for confirmation as to whether secondments in different government departments would link.
- A discussion followed on the definition of secondment and it was noted that some departments used different (and sometimes incorrect) terms and are unable to distinguish between loans and secondments. Departments said they would like correct definitions of these terms to be included in the RPs.
- One department asked if a link could be provided to the Commission's list of approved NDPBs.

Civil Service team discussion:

- One comment was on Paragraph 23 of the RP's and how to record that appointees are able to comply with the Civil Service Code. It was agreed that questions would be asked as part of the normal interview process and recorded accordingly. The Department said that they always recorded conflicts in senior appointments in a register.
- There was a general comment on how they felt that the draft Recruitment Principles were laid out in a clear and logical way and would be helpful to the central HR team as more responsibility is shifted to hiring managers and the central HR team are downsized. The draft Recruitment Principles would provide more comprehensive

guidance to hiring managers, where the central HR team do not always have oversight.

- One comment was on how it was sometimes difficult to be specific in job advertisements with regard to allowances in addition to salary, and that allowances were often tailored to individual personal circumstances. The Commission explained that this had been included in the Recruitment Principles to avoid situations where allowances made a significant difference to the salary advertised and it was possible that a different field of candidates would have applied for the role had this been more transparent.
- There was a general comment on exceptions, that there was nothing that seemed unreasonable, and the exceptions table was clear and logical. There was particular interest in Paragraph 53 of the Consultation Document and the ability to make apprentices permanent. (This is currently missing in the revised RP's)

Civil Service team discussion:

- There was a comment on Exception 1 and the fact that projects often went beyond 2 years, and there was a need for repeated exceptions. There was a discussion on the importance of planning and that a department would need to come to the Commission with a business case for the exception extension in advance, and that this could generally be turned round quickly (within 5 working days).
- There was a discussion about Paragraph 23 of the consultation document, and government programmes to assist the unemployed and people with disabilities, we provided some clarification on what these were and that the process of converting staff recruited under Exception 10 should now be up to the Department.
- There was some discussion about Exception 5 and how it was not a 'right' for a former civil servant to be re-appointed, but was up to the Department. Someone pointed out that this should form part of the discussion when a civil servant is made redundant, and it was agreed that further clarification on this area was not needed in the revised Recruitment Principles.
- In relation to Heads of Department competitions there was a preference towards Option 1 in the revised Recruitment Principles, and it was agreed that this was clear.
- There was a comment about the make-up of the Panel and the suggestion that there should be something in the revised Recruitment Principles about ensuring diversity in panel make-up.

Civil Service team discussion:

- There was a comment on the new exception 3 and the need for clarification of the words 'other employers'. The Department has no central overview of secondments therefore feel that it is important that this exception is very clear as to who can be seconded into the Civil Service. There has been confusion amongst HR business partners as to the difference between secondments and loans.
- A comment was raised in relation to secondments and the issue of transparency. Often staff are unaware of the process of applying to the Commission for an exception and believe that when a senior member of staff is appointed through exception, they have in effect been 'parachuted in' which causes resentment. Hopefully, now that

exceptions are being published on the CSC website, this should help with these concerns.

- There was an explanation of the pay ceilings and the fact that the Commission were proposing that departments would have to come to the Commission for exceptions where the salary was 84k plus, rather than PB2 and above. One person in the Department suggested that this amount was too low and that perhaps 100k was a more realistic figure.
- A comment was made regarding the proposal that if a department was considering paying more than 20% of the advertised salary, they should obtain the permission of the Commission before making an offer. It was pointed out that this had always been the case in the senior civil service. The department said that they had their own internal governance in place on this issue and that the need to go to the Commission was just an extra layer. The comment was made that this would perhaps become an issue as the market and economy changed.
- The department made a comment on the issue of Heads of Department competitions.
- There was a comment on the issue of testing aspects of the Code, including political impartiality, at the interview. The department agreed that this should be tested and recorded at the interview stage and that it would be proportionate depending on the role/grade etc.
- The department commented on the fact that operationally there may be problems differentiating between exceptions 8 and 9 as currently the department has no way of distinguishing between TUPE and COSOP.
- The department asked why there was no option to appoint from a non-accredited NDPB, which there used to be in the Recruitment Principles. It was pointed out that departments still had the option to do this with the approval of the Commission.
- The department asked if the list of accredited NDPB's held by the Commission was up to date, and that they would welcome the publication of the list as it was difficult to keep track of organisational changes.
- There was a discussion on the impact that a Scottish vote for independence would have on the role of the Commission.
- The department commented on Paragraph 31 of the revised Recruitment Principles, where the Commission may decide that a Commissioner should chair any competitions following the result of the compliance audit. This addition was welcomed.
- There was a comment from the department on head-hunters and whether the Commission should accredit them, or come up with an industry standard in terms of diversity.

Civil Service team discussion:

- There were comments about apprenticeship programmes, from a variety of schemes across the public sector, and how the ability to convert to permanency would be beneficial. The majority of these schemes were at AA / AO level but some, described as 'Fast Track', were at EO level.
- There was also discussion about graduate intern schemes. Some of these interns were recruited via exercises that may not be considered to be 'fully open'. However, some interns had an exemplary track record and it would be helpful to have the

ability to convert them to permanency. All of these schemes were government sponsored.

- There was discussion around delegation to Departments to apply exceptions by grade. It was noted that pay ranges could be widely overlapping. For example a PB1, for whom a Department had delegated authority, could be paid more than a PB3 in some cases, where the Department did not have delegated authority.

Civil Service team discussion:

- The first area of concern for the Department was exceptions and delegation to Departments. The view was that the 84k ceiling was too low and would be a real restriction. The Department commented that it was a struggle to attract certain professions and that the pressure to get specialists into government quickly was adding to the pressure on salary. The feeling was that this was a very complicated issue and imposing this salary limit would not change behaviour but may mean that the Commission are inundated with business requests.
- Overall the 'essential steps' were laid out clearly and were helpful.
- There was a comment on the use of psychometric tests and their usefulness as part of the selection process. It was explained that the Commission did not think they should be mentioned in the revised Recruitment Principles as their usefulness and relevance would depend very much on the role.
- There was a comment on the role of the chair in ensuring that a diversity strategy is in place, particularly at SCS levels and that this should be included in the revised Recruitment Principles.
- There was a question on reserve lists and whether staff on a reserve list could be shared across departments, in similar roles. The Department commented on how this would be particularly useful, particularly in specialist areas such as digital and would also help with the salary issue as Departments could collectively agree on salary levels depending on the type of role.
- The Department agreed on the importance of testing applicant's ability to adhere to the Civil Service Code, and that this should be proportionate.
- Heads of Department – the Department did not express preference for either option but did comment that both options were 'good' in that they maintained the principle of merit.

Civil Service team discussion:

- What we state in our external adverts, in paragraph 10, as being 'essential' to the job - the essential criteria - must be tested at each stage. This is clearly stated. For mass recruitment with a number of panels operating as part of, and feeding into the selection process, it is confusing to state that the panel 'must take the final decision on which candidate....' For this paragraph to encompass individual and bulk recruitment it would be appropriate to replace this with 'must make its decision based on'.
- Reference is made in paragraph 12 to the chair of the panel having overall responsibility for ensuring that the selection process is compliant with the Recruitment Principles. In our experience the panel chair and the vacancy holder are different people. It would avoid confusion/clarification in the guidance if the word

'approve' was replaced by 'ensure compliance with'. We would appreciate clarity over the wording and have discussed the possibility of including 'an assessment of evidence' rather than competition. A suggested wording for this would be:-

“The chair of the panel has responsibility for ensuring that the selection process is compliant with the Recruitment Principles. Before an assessment of evidence takes place, the chair must therefore be satisfied that the essential criteria are compliant.”

- We do not currently require the processes outlined in paragraph 13 to happen. We will have to introduce the requirement in the selection guidance and have checklists etc.
- We do not currently require the processes outlined in paragraph 13 to happen. We will have to introduce this requirement in the selection guidance and have checklists etc.
- Information about the role and the appointment process - We agree with the need to ensure that CSR provides all potential applicants with a link to the Civil Service Code referenced in paragraph 14.
- We will need to ensure that CSR has this included guidance in paragraph 17 in its templates and e-mails.
- We may need re-wording of paragraph 21 to ensure absolute clarity because of the content of paragraph 39 which talks about "briefing" yet describes part of the assessment process - so the distinction between "briefing" and "assessing" could be helpfully clarified. If the 2 processes are distinct they do not appear to be so distinct in relation to Ministerial involvement specifically.
- Regarding candidates being assessed on merit, in paragraph 22, the question for Departments will be around how this is worked in practice. How does a panel realistically test this at a level beyond superficial questioning? Whilst the role of the Commission would not necessarily set out the "how", this is something which requires consistent guidance across Departments on how this can be robustly and sensitively done in a way that ensures that an applicant is treated fairly in line with the principles.
- A suggestion would be to have a foot note attached to this paragraph. I recommend this approach but also feel that the wording needs to be revised:-

“All appointees to the Civil Service must comply with the Civil Service Code. Where there is evidence that a candidate has previously engaged in political activity, the panel must satisfy itself that the candidate will, if appointed, comply with the Civil Service Code requirement for impartiality and objectivity. It must record that it has done so.”*

** Political activity is[a foot note to explain what is meant here]*

- Taking the decision - it would be appropriate to refer to 'all of the essential selection criteria' in paragraphs 25 and 26, as with paragraph 10 above
- Reserve lists - It would be helpful to clarify whether the intention to hold a reserve list has to be specified at the outset or whether it can be done in all circumstances - with or without that initial specification.
- Competitions chaired by Civil Service Commissioners - It is worth considering whether Commission involvement in panels should remain governed by Payband

when its involvement in exceptions is now to be governed by salary level. This could potentially be confusing.

- The Involvement of Ministers - The appointments of Heads of Department, in paragraph 40, relates to the earlier point on paragraph 21 about Ministerial involvement. It does need to be clearer what the role of the Minister is. In paragraph 40 there is an approval involvement which is in effect a decision about (assessment of) suitability and this can cause confusion about the role here. It is potentially difficult to articulate and may be helped by working through some potential scenarios. When the panel and the Minister agree it is straightforward of course, but less easy to articulate where there is a difference of opinion.
- Head of Department competitions - On Heads of Department recruitment the wording for option 2 is probably the most robust. There is, however, still some scope for confusion about the input to the process.
- If there is just one appointable candidate following a competition (panel's selection process) then presumably the issue is straightforward - i.e. that one person is put forward to the PM and, in discussion with the Secretary of State there is either an agreement with the panel or a decision not to appoint anyone - and start again.
- If, for example, there are 2 or 3 appointable candidates who all (but for different reasons) get an overall rating of B at the panel (using the Commission's scoring framework) - all 3 should be put forward for PM and S of S consideration. The panel will usually have an order of preference for those 3 candidates.
- If it is the case that the 3 candidates (having all scored "B") are regarded as "equally meritorious" regardless of the panel's order of preference - such that the PM and S of S are effectively making a choice amongst 3 "equally meritorious" candidates then that should be made more specific in the guide. If not there is potentially a cause for confusion because amongst the 3 the panel would have a view on which one is the "most meritorious" but the outcome may be that their 3rd preference may get appointed (who would not therefore be the "most meritorious"). - if the panel's role is not to determine a preference order then this could helpfully be made much clearer so that no preferences are given and it is the PM and S of S who determine which of the 3 candidates is the "most meritorious".
- Exceptions - The first few paragraphs of the Annex are a bit confusing. If the message is that Departments have delegated authority to make exceptions under all categories unless the appointment involves appointment to an EMO or to an above £84k appointment then the wording used could be clearer here. If that is not the intention of the first paragraph then it demonstrates how the wording as it is can lead to a misunderstanding.
- The issue about redefining the exceptions on which the Commission is consulted by salary rather than by grade is appreciated because of the overlaps of salary levels across the grade bands. However, when people are brought in under exceptions the salary is often not known at the outset. For example, for Payband 1 posts we might have a figure of circa £82k in mind in order for us to attract the person we have in mind (we often advertise PB1 posts at this salary level when doing fair and open competition in the external market) but when salary is negotiated when the appointment is agreed it can easily exceed the £84k (the new threshold for Commission involvement.) There is therefore a question of - is the need to involve the Commission in exceptions governed by the "circa" salary that we have in mind (pre-negotiation) or is it determined by the potential salary level which might result from negotiation (this can add several thousands of pounds in order to secure the person). (It would not, of course, be appropriate to discuss the specifics of salary with an individual before we had Commission approval for the appointment)
- It needs to be clear whether it is the circa salary in mind at the outset or potential salary of appointee following negotiation that determines Commission involvement and deciding the latter will potentially increase the workload of Commissioners.

- If it is the former, the Commission would have the potential issue of Departments agreeing to exceptions in which they don't initially exceed the £84k salary threshold but which may, on negotiation, exceed it.
- It would also be helpful to have clarity on the following issue: when decisions are delegated to Departments is there a minimum level of delegation with which the Commission would be content? - This might for example be Permanent Secretary or, potentially, Director General level.
- Compliance - I would recommend a less prescriptive emphasis using 'may' instead of 'will' in paragraph 63.
- Complaints - I would recommend a stricter emphasis of 'must' instead of 'should' in paragraph 66.
- Annex A – Exceptions - Secondments, in exception 3, suggests that the department should be ensuring that outward secondments are monitored in line with the principles and limited to 2 years. This needs to be clarified.
- It would be useful to have EMO, in exception 4, incorporated.
- The summary table is immensely helpful.