



CIVIL SERVICE COMMISSION SUBMISSION TO REVIEW TEAM

1. This submission, from the Civil Service Commission to the Triennial Review team, addresses the issues and questions raised in the published Terms of Reference for the Review, in the initial scoping paper produced by the Reviewer, Sir Gerry Grimstone, and in other exchanges between the Commission and the Review team.

Our functions and responsibilities

2. Our basic purpose is to safeguard an effective Civil Service, serving the democratically elected Government, appointed on merit, and with honesty, integrity, objectivity and impartiality as its core values.

3. A Civil Service, appointed on merit and not through political or personal patronage, is a fundamental tenet of the UK's constitutional settlement, first established in the 19th century, but reaffirmed by Parliament in 2010. The Civil Service Commission continues to provide an important safeguard for this settlement.

4. It is easy to take for granted the importance of a non-politicised Civil Service, appointed on merit. Each year we receive visits from developed and developing nations who are keen to learn how it can be achieved and maintained.¹ While we do not perceive a generalised threat to this model at present, there are alternative models – such as the USA, where there is considerable turnover of political appointees at the top of the Civil Service at each new administration – and some mainstream political voices argue the UK should move in this direction.

5. We believe that Parliament's clear intention in passing the 2010 Act was that the present model of an impartial Civil Service should be protected; and putting the Commission and the Recruitment Principles on a statutory footing was a strong part of this protection. It is our view – based, in particular, on the number of times we have to intervene in the competitions we chair to ensure that they are conducted fairly, openly and with decisions based on merit, fairness and openness – that without the Commission's independent oversight there remains a risk that over time the quality and effectiveness of the Civil Service would be diminished, its values would be eroded, that appointments, particularly at the most senior levels, would be increasingly subject to patronage and, possibly over time, politicised.

6. The 2010 Act, passed with all party support, put into primary legislation two main functions for the Commission.

¹ Over the past five years, we have hosted briefings for officials from 25 countries: Armenia, Bahrain, Bangladesh, Belize, Canada, China, the Czech Republic, Ethiopia, India, Japan, Kazakhstan, Kosovo, Libya, Macedonia, the Maldives, Mauritius, Nepal, New Zealand, Pakistan, St Helena, Singapore, South Korea, Thailand, Ukraine and Zambia. Some of these have returned on a number of subsequent visits as their domestic reform programmes progress. We also host each year a multi-country visiting party from developing democracies organised by Public Administration International.

7. The first is to provide assurance that recruitment into the Civil Service from outside is “on merit on the basis of fair and open competition”. The Commission is the ultimate authority on what constitutes fair, open and meritorious recruitment. We are required to fulfill this function by:

- publishing a set of principles – called the “Recruitment Principles” – setting out how the requirements of merit, fairness and openness are to be satisfied and defining when exceptions can be allowed to meet the needs of the Civil Service;
- monitoring Departmental compliance with the Recruitment Principles (this is currently done, in large part, under a contract with KPMG but the Commission is directly involved in chairing all external competitions at Director, Director General and Permanent Secretary level – about 100 to 130 competitions a year); and
- hearing complaints that Civil Service recruitment has not been in accordance with the requirement for merit, fairness and openness in the 2010 Act.

8. The second function in the 2010 Act is to hear complaints from civil servants about actions that conflict with the Civil Service Code (which defines the Civil Service values of impartiality, objectivity, honesty and integrity).

9. In addition to these two primary functions, section 17 of the 2010 Act enables us to be given – by agreement between the Commission and the Minister for the Civil Service – additional functions in relation to the Civil Service. We currently have three such functions, two of which pre-date the 2010 Act:

- Under an agreement with the Head of the Civil Service, known as the “Senior Appointments Protocol”, Commissioners also chair internal competitions at Director General and Permanent Secretary level (SCS Pay Bands 3 and 4).
- We currently have an additional role in supporting Departments in promoting the Civil Service Code.
- The Commission provides secretariat support to the House of Lords Appointments Commission (HOLAC), the Advisory Committee on Business Appointments (ACOBA) and to the Commissioner for Public Appointments (OCPA).

10. Our remit under the 2010 Act covers only part of the Civil Service of the State – what was previously known as the ‘Home Civil Service’ and the Diplomatic Service.² When we refer to ‘the Civil Service’ in this document it is these groups that we mean. The separate Northern Ireland Civil Service is overseen by our sister organisation, the Northern Ireland Civil Service Commissioners, with whom we maintain regular contact; and the three intelligence agencies are governed by different legislation.

² The Commission’s remit in relation to the Diplomatic Service does not extend to regulating selection for appointment to Head of Mission posts (Ambassadors, High Commissioners, Governors etc) or the appointment of staff whose duties are solely to be performed outside the UK. For precise details, see sections 1(3) and 10(3)(a) of the 2010 Act.

Our role in Civil Service recruitment

11. The Commission focuses a lot of its effort and resource on improving recruitment practice in Government Departments. Appointment on merit is not about abstract constitutional principles. It is about getting the best people for the job and thereby improving the performance of the Civil Service.

The Recruitment Principles

12. We have greatly changed the way we operate over the last five years, reducing the focus on procedure and process and concentrating on principles and successful outcomes. This can be seen very clearly in the latest version of our Recruitment Principles (published in April 2014), in how we use our compliance monitoring regime (with KPMG) and in our pragmatic approach to using exceptions to fill urgent skill gaps.

13. Our various stakeholders, particularly those in HR Departments who use them every day, have welcomed the clarity and flexibility of the current Recruitment Principles and the way in which they are applicable to recruitment at all levels of the Civil Service. This is an important point for us: although public attention often focuses only on the most senior appointments, for the Civil Service to remain world-class, it needs to attract the best applicants for recruitment at all levels.

14. We will shortly be introducing new rules that allow the Prime Minister (or, in the case of the devolved administrations in Scotland and Wales, the First Minister) to take the final selection decision in the most senior appointments. We are currently consulting on the detail of these changes and expect the new arrangement to come into effect at the start of December.

Recruitment below SCS Pay Band 2

15. The Civil Service appointed over 26,000 staff last year. Our influence on these appointments is indirect (i.e. we set the standards, provide advice and monitor compliance but we do not chair or approve these competitions). Nevertheless, the Commission is actively involved in supporting Departments in this work and in providing public assurance that it is done fairly, openly and with the best candidates being selected. In addition to our ongoing role in advising Departments on merit-based recruitment, we run regular briefing sessions for HR staff and other Departmental staff involved in recruitment, helping them understand the Recruitment Principles and how to ensure they are picking the best people through a fair and open process.

16. We actively encourage greater innovation and flexibility in the way competitions are run, and try to ensure that Departments do not unnecessarily compress their recruitment timetables in a way that militates against more innovative ways of assessing candidates. If the Civil Service is to attract a different type of civil servant, with in-demand digital and commercial skills, it needs to adopt recruitment processes that can identify and 'land' the best candidates in a crowded market. This involves investing time in selling the attractions of working in the Civil Service – it is not sufficient to rely on an assumption that 'everybody wants to work here' – and accepting that working in the Civil Service may only be a short episode, or episodes, in a wider career.

17. These changes in the recruitment market place a greater emphasis on the need for creative recruitment methods, which are possible without compromising merit, fairness or

openness. A formal interview is often the *quickest* way to make an assessment of a candidate, which is why it tends to be the method chosen by Departments who are under pressure to recruit at speed. But we would like to see more Departments developing alternative ways of assessing candidates, making use of a range of evidence – not just that from a single interview – in making selection decisions. We are enthusiastic about working with them to do this, but there needs to be a change of mindset from seeing the time taken as a bureaucratic delay to recognising it as a worthwhile investment in future quality recruitment in an increasingly competitive market for in-demand skills. Conversely, there will be times when recruitment has to be done more on a ‘rolling’ basis, and jobs are offered on merit as candidates are tested, rather than wait to the end of a recruitment campaign.

18. There is no reason why being creative in the way the recruitment is done needs to compromise on the legal requirement for merit, fairness or openness. The Commission’s role is to help Departments design recruitment processes that meet their particular recruitment needs, while still satisfying the legal requirement.

19. Our auditors – currently KPMG – collect and analyse data on recruitment across the Civil Service, enabling us to form a judgement as to where this is being done well, and where there are likely to be problems. This enables us to target our attention at the areas of greatest risk, adopting a proportionate and pragmatic approach to our regulatory role. Our Commissioners and staff are actively involved in review visits to Departments – discussing issues of concern with the HR teams and identifying areas of good practice.

20. We also periodically carry out thematic reviews of various aspects of recruitment. Last year, for example, we looked at the arrangements for recruiting people to the Civil Service graduate Fast Stream.

Recruitment at SCS Pay Band 2 and above

21. Our direct involvement in recruitment affects only a fraction of those 26,000 appointments. Our Commissioners chair the selection panels for competitions at SCS Pay Band 2 and above. There were 100 open competitions last year (2013-14), though the number fluctuates year on year, and seems likely to increase as a result of the Government’s announcement, in the recent *Civil Service Reform: Progress Report*, that there would in future be a presumption in favour of open recruitment for SCS posts.

22. The problem of compressed recruitment timescales, referred to above, can be most acutely felt at senior levels. We regularly have to intervene to ensure the competitions are fair and genuinely open; and to encourage Departments to invest sufficient time in the exercise to ensure it is not merely cosmetic. If the Civil Service is to be successful in persuading people, particularly those in highly specialist fields or at senior levels, to make a significant career switch, often for a cut in salary, it is essential that the Civil Service and, for the most senior posts, Ministers are willing to devote sufficient time and resources to finding and wooing those candidates and persuading them to consider a Civil Service role.

23. We also challenge the tendency towards risk aversion – on the part of both Ministers and the Civil Service leadership – who often want a candidate who has proven experience within Whitehall, particularly for the most senior roles. Few external candidates will be able to match those from inside in these areas; but they may bring a fresh perspective and leadership capability which, in the longer term, would strengthen the Civil Service.

Complaints about recruitment

24. We also have a responsibility, under the 2010 Act, for hearing complaints that an appointment has been made in a way that is not consistent with the requirement for merit, fairness and openness. Complaints can be brought by anyone. This can be time-consuming and resource-intensive work, but we believe it is important as a means of addressing problems that may occur and in improving standards for future recruitment.

25. We have received 54 complaints about recruitment to the Civil Service since April 2013. We additionally received 16 complaints that were out of scope because they did not relate to Civil Service recruitment (in most cases these related to internal vacancy filling within the Civil Service, which is outwith the Commission's remit). Of the 54 complaints, the vast majority are referred back to the Department of origin as they had not yet been considered by the Department. 10 have been investigated, and one investigation remains ongoing at the time of writing.

26. Only one of the ten investigated complaints has been upheld. It related to Crown Office and Procurator Fiscal Service's decision to withdraw a job offer in light of the candidate's historic criminal convictions. We found technical breaches in two areas: failure to follow the Department's own published procedures for dealing with disclosed convictions and a failure to keep adequate records for two years, as required by the Recruitment Principles.

Recruitment without fair and open competition

27. The Recruitment Principles set out a number of circumstances in which it is possible for Departments to appoint people to the Civil Service without complying with the legal requirement of selection on merit, following fair and open competition. We refer to these as 'exception' appointments. For the most senior appointments (those at SCS Pay Band 2 or above, or on an equivalent salary), the Commission's prior approval is required before such an appointment is made. For more junior appointments, Departments have delegated authority to use the exceptions and we monitor their use of these in our compliance monitoring audit.

28. The Commission believes it is important to be pragmatic in responding to requests for approval for exception appointments. The 2010 Act clearly envisages that there will be circumstances in which it is not possible or desirable to go through a fair and open competition in order to select on merit, and our Recruitment Principles and our approach to individual cases have always reflected this.

29. We treat each request individually and weigh the particular circumstances that pertain to it, and reach a judgement on whether making this appointment *by exception* is necessary in the interests of the Civil Service (the test in the 2010 Act, which we are obliged to apply). In particular, it is clear that, for areas of acute skill shortages or for very short-term posts, the effort involved in a full open competition may be disproportionate. In those cases, we have been content to approve requests for exception appointments: that is precisely the sort of circumstances for which the Act and the Recruitment Principles make these provisions. Where we are less sanguine is when a Department seeks to appoint by exception simply because, through poor planning, they have left things too late to run an open competition. Those are avoidable situations and not, in the Commission's view, the type of circumstance that Parliament envisaged when providing that there could

be exceptions to the legal requirement of selection on merit following fair and open competition.

30. We have noticed, however, that appointments made by exception are markedly less diverse than those made through fair and open competition. As we observed in our Annual Report last year, there may be legitimate reasons for this – for example, because many of the exception appointments related to the need to meet skill shortages in areas where the industry is male dominated. But it is nevertheless a troubling finding, and strengthens our view that Departments should, wherever possible, recruit using open competition rather than by exception, including at the most senior levels.

Our role in hearing complaints under the Civil Service Code

31. The Civil Service Code³ describes the standards of behaviour expected of individual civil servants against the four core values: honesty, integrity, objectivity and impartiality. If a civil servant is asked to do something that conflicts with the values in the Code, or is aware that another civil servant is acting in conflict with the values, the Code encourages them to raise the matter within their Department. If they remain dissatisfied with the Department's response, they may bring a complaint to the Civil Service Commission. We can also take a complaint direct if we judge it is appropriate to do so. Under the 2010 Act, we have the power to investigate such complaints and to make recommendations about how the matter should be resolved.

32. Since April 2013, we have received six Code complaints that required investigation. We also received 24 complaints that were outside our remit, primarily because they related to HR matters (which are specifically excluded from the Code) but in eight cases because they had been raised by someone who was not a civil servant – the Commission only has the power to investigate complaints brought by civil servants. The Commission's decisions are summarised in our Annual Reports and (from 2013 onwards) the full decision notices of investigated cases are published on our website.

33. Of the six complaints that required investigation, we upheld the complaint in one case, which related to the presentation of information relating to consultancy contracts by the Serious Fraud Office in 2010. The Commission concluded that the provision of partial and incomplete data, and the failure to correct this swiftly once the problem was identified, contravened the requirements for integrity, objectivity and honesty in the Code.

34. We did not uphold the complaint in three other cases – these related to impartiality in the production of a press article (Cabinet Office); the provision of advice to Ministers (HM Treasury); and the accuracy of information provided to Parliament (Insolvency Service). Two Code complaints remain under investigation at the time of writing.

35. 'Whistleblowing' in public services has become an increasing topic of public and Parliamentary debate, especially in light of the Francis Report into the mid-Staffordshire NHS Foundation Trust. The National Audit Office has published a number of studies into

³ The Civil Service Code applies to civil servants working for the UK Government, for the Welsh Government and in the Diplomatic Service. There is a similar Code that applies to civil servants serving the Scottish Government. The Commission has the same role in hearing complaints under both of these Codes. The Northern Ireland Civil Service Commissioners hear complaints under the Northern Ireland Civil Service Code of Ethics.

Whistleblowing arrangements in central Government, with more to come. The Public Accounts Committee also published a report earlier this year.

36. The existence of the Civil Service Code, and the provisions that allow concerns to be raised within Departments and with the Commission without the complainant suffering any recourse, should – if used properly – remove the need for civil servants to ‘blow the whistle’ outside the Civil Service since there is already a channel for such concerns to be dealt with properly. We expect there will be renewed emphasis on the importance of robust procedures across the public service to allow concerns to be raised, and the Civil Service Code will continue to be an important part way of identifying improprieties and inefficiencies and in driving improvement.

37. The majority of Code complaints and concerns are dealt with within Departments without ever coming near the Commission. However, we see continued value in there being an independent, external authority that can investigate a complaint where a Department has failed or is unable to do so. This is an important safeguard for the Civil Service, for the Government and for the general public.

Our additional functions

(i) Chairing senior internal competitions

38. The involvement of Commissioners in chairing panels for the most senior internal competitions was agreed with the Cabinet Secretary in 2007, to provide the same rigour for internal Civil Service competitions as for external competitions. We were involved in chairing 16 internal competitions during 2013-14 – as with open competitions, the numbers vary year on year.

39. The value of ensuring selection on merit through a fair process is also important for internal competitions, which may be the reason that some people have suggested that the Commission might take on a wider role in overseeing promotion at other levels within the Civil Service. Given the degree of influence of those appointed, over significant sums of public money, we think it would be a retrograde step for there to be no external assurance that appointments at these very senior grades are made fairly and on merit.

(ii) Promoting the Civil Service Code

40. Our role in supporting Departments to promote the Civil Service Code arose from a recommendation from the Committee on Standards in Public Life (CSPL) in 2003, as little was being done by Departments at that point. This function sits well with our statutory role in hearing complaints under the Code, but since it is the Civil Service’s (not the Commission’s) Code, there is no absolute reason why the Commission should be involved in promoting it, and it was not included as one of the Commission’s functions on the face of the Act.

41. Over the past few years the Commission has taken both a ‘soft’ and a ‘hard’ approach to this role. ‘Hard’ activities have been self-assessment audits in 2009, 2011 and 2013, where we assess and feedback observations on Code policies and practices, plus also the inclusion in the Civil Service Annual Staff Survey of questions on the Code. ‘Soft’ activities’ have included: working with nominated officers, providing some input to their training; sponsoring an award at the Civil Service Awards which had the values as part of the judging criteria, 2005-2011; holding ‘Question Time’ sessions at Civil Service Live

events; and, sponsoring a Civil Service art competition where civil servants were invited to submit art illustrating the values. We also use the opportunity of our online Open Week to address questions about the Code and increase awareness of its purpose and significance.

42. There is good evidence that the lack of promotion noted by CSPL in 2003 has now been addressed. We currently devote little resource to this responsibility on a regular basis, mainly because knowledge of the Code across the Civil Service has increased steadily and significantly in recent years, as demonstrated by the responses to the annual Civil Service staff survey.⁴

(iii) Providing secretariat support for HOLAC, ACOBA and OCPA

43. The provision of secretariat support for HOLAC, ACOBA and OCPA is simply an administrative convenience, providing economies of scale, flexibility and efficiency and reduced costs to the taxpayer in the provision of advice and support to these bodies and to the Commission. The arrangements, which are a continuation of those that applied prior to the Commission becoming an NDPB in 2010, work well and it is unlikely that the same level of support could be provided as efficiently through any alternative model. Since 2011, the Government has chosen to appoint the same individual, Sir David Normington, as both First Civil Service Commissioner and Commissioner for Public Appointments.

An expanded or amended role for the Commission?

44. The Review's terms of reference include considering the case for extending or amending our role.

45. Although the Commission's formal status – becoming a statutory NDPB – changed following the 2010 Act, our functions have been largely unchanged for the past decade. Before that, the Commission had a considerably more extensive role. Originally the Commission was responsible for carrying out Civil Service recruitment – advertising vacancies, setting and marking entrance exams; (later) conducting recruitment interviews; offering successful candidates posts and allocating them to Departments. Over time, central recruitment came to be seen as somewhat inflexible and unresponsive and responsibility was increasingly devolved to Departments, particularly from 1982 onwards, with the Commission's role becoming more regulatory. A formal separation between the executive and regulatory role, at all grades, was finally put in place in 2005.

46. We believe there are great advantages in our present remit: it is clear, it is tight and it is well-established. Currently, resources are very limited and a further 8 per cent reduction in budget is expected in 2015-16.

47. We are therefore not actively seeking to expand our role and would be cautious about any change which would diminish our capacity to fulfill our current statutory functions. In our opinion, changes which reduced or removed the Commission's present role would only be possible as part of a revised constitutional settlement and they could be highly controversial.

⁴ As we reported in our Annual Report, 89% of civil servants in 2013 were aware of the Civil Service Code (up from 75% in 2009), 64% were aware of how to raise a concern under the Code (up from 44% in 2009) and 67% were confident that, if they raised a concern, it would be investigated properly (58% in 2009).

48. At the same time, we are prepared to look with an open mind at proposals for new functions. We would approach any proposals with the following considerations in mind:

- we would want to be clear that there is a problem to solve and that the Commission could make a real difference, and was better placed than any other body to do so;
- we should remain as a regulator. We do not think we should or could take on executive functions from the Civil Service – for example, responsibility for performance management of Permanent Secretaries;
- we would need to be given sufficient extra resource to enable us to fulfil any new functions – or, indeed, to deal with any significant increase in our existing workload, for example as a result of the (otherwise very welcome) decision recently announced by Government that there would be a presumption in favour of open competitions for SCS posts. We have very little spare capacity to take on more within existing resources, which are already stretched.

49. We would also want to consider carefully the way in which any new functions were given to us – that is to say, whether they were changes to the face of the 2010 Act or ones conferred by mutual agreement under section 17. An arrangement whereby the organisation being regulated can unilaterally withdraw from the agreement if it does not like the way in which we were regulating them, would not allow the public to have confidence that the regulation was providing robust assurance.

50. A number of suggestions have been made for extending our role in recent times. These have included:

- **taking on responsibility for regulating internal appointments and promotions within the Civil Service.** This might be seen by some as a natural extension of our current role, particularly given our involvement in the Senior Appointments Protocol. It was discussed during the preparation of the 2010 Act, but opposed by the then Government on the grounds that it would bring the Commission too much into the internal management of the Civil Service. It would be a significant new chunk of work for which new resources would be needed, although the *nature* of the work would be similar to our existing role. We would need to be clear what problem needed to be tackled and what would be our success criteria;
- **responsibility for talent management:** some of the same issues arise, although in this case the nature of the new role would be rather different from our existing one and would begin to involve the Commission in executive rather than regulatory work. It would seem odd for talent management not to remain the responsibility of the Civil Service leadership (who have made great improvements recently); and we would need to be clear that there were benefits in us overseeing that, that we had the expertise to do it and that there was no risk of conflict with our regulatory role of ensuring selection for appointment on merit. The First Commissioner already sits on the Senior Leadership Committee and has a chance to feed in the Commission's views and comments.
- **hearing Civil Service Code complaints from MPs or the general public,** rather than just civil servants. This has been raised periodically by the Public Administration Select Committee. It could be argued that it is a natural extension of

our existing functions. However, the risks of this would need to be assessed. We could be plunged into a series of politically controversial issues, which would be damaging to the Commission and of limited value to the public interest. There is a danger of a huge increase in complaints, which we are not resourced to take on. There is also potential for overlap with the three Parliamentary and Assembly Ombudsmen who already exist to hear complaints about maladministration.

51. Whereas the above proposals derive from our existing role, there have also been suggestions for going much further, for example, that the Commission should take on wider responsibilities for reviewing leadership and capability issues in Government Departments; or that the First Commissioner should be responsible for the performance and (if necessary) the exits of Permanent Secretaries on the model of the State Services Commissioner in New Zealand. These would involve a substantial remodeling of the current constitutional settlement and would take the Commission further from its core purpose.

52. We are ready to discuss and explore any ideas for extending our role with an open mind, but equally we do not have an expansionist agenda. For us the key will be whether we think we can make a difference in improving the effectiveness of the Civil Service and how it will sit with our core role of safeguarding appointments on merit to a Civil Service with the values of impartiality, objectivity, honesty and integrity.

The Commission's composition and corporate governance

53. The Commission is currently an independent NDPB. We believe that the Commission passes both the second and third tests for being an NDPB. Our regulatory functions – hearing complaints under the Civil Service Code and regulating recruitment to the Civil Service – need to be carried out with absolute political impartiality and by an organisation that is independent of Government, because it is Government bodies that are the subject of our regulation.

54. Under the terms of the 2010 Act, Commissioners are appointed by the Queen on five-year non-renewable terms. There are currently ten Commissioners, all of whom were selected on merit, following a fair and open competition. Of these, the majority (six) have a private sector background, one is from local government, one is from the third sector and two previously worked in or closely with the Civil Service. Our Secretariat is made up of seconded civil servants, drawn from a range of Departments.

55. Since 2011, the First Civil Service Commissioner has also served as Commissioner for Public Appointments, realising a saving of around £100,000 compared to the combined salary of his two predecessors. His work for the Civil Service Commission (excluding OCPA) is approximately 0.3 whole time equivalent (WTE). The other nine Commissioners are also engaged on a part-time basis. Their collective workload in 2013-14 amounted to around 2.8 WTE. Again, the number of Commissioners has reduced in recent years; until 2009-10 there were 15 Commissioners in addition to the First Commissioner.⁵

56. We currently have 18.6 WTE staff within the Secretariat (20 individuals), of which 11.3 WTE is involved in supporting core Civil Service Commission work and the remaining 7.3 WTE supports HOLAC, OCPA and ACOBA. We achieved substantial (30%) reduction

⁵ One of these 15 was also the Commissioner for Public Appointments, who was ex-officio a Civil Service Commissioner but did not chair any Civil Service recruitment competitions.

in staff costs in 2011 when we merged secretariats (previously each of the four institutions – the Commission, HOLAC, ACOBA and OPCA – had its own dedicated secretariat).

57. Our net expenditure for 2013-14 (excluding expenditure on HOLAC, ACOBA and OPCA, for which those institutions are responsible) was £1,328,000.

58. We regularly review our corporate governance arrangements, against the best practice standards issued by the Cabinet Office, and publish our Standing Orders on our website. We report on our work, regularly through our website and to Parliament through our annual reports.

**Civil Service Commission
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