



Appointments by exception delegated to departments: one year on

March 2026

In November 2024 the Civil Service Commission published a review into appointments by exception permitted by the Recruitment Principles which are delegated to departments.

The review identified a range of good practice and some areas that required improvement. The Commission was largely satisfied with the processes departments had in place to apply, consider and approve exception requests, but made a set of recommendations to support greater consistency and improvements in practice.

## Reviewing progress

A year on, we wrote to all departments to request an update on the implementation of each recommendation.

All 70 organisations within the Commission's regulatory remit responded to the request, demonstrating their strong commitment to the importance of maintaining the integrity of exception usage.

Every department had taken action with 52% of departments providing evidence to show full implementation of the recommendations and 48% providing evidence of partial implementation.

## Progress against our recommendations

Our review recommended:

1. All departments should develop comprehensive exception **approval forms** mirrored on the Commission's published forms for cases requiring its approval.
2. Departments should ensure robust **challenge processes** are in place to ensure the terms of exceptional appointments are strictly applied.
3. Departments should be able to demonstrate in their submissions for an exception **clear justification** as to why it is necessary.
4. Internal documentation detailing the process to appoint by exception should clearly reference the **Recruitment Principles**.
5. Departments should implement clear **multi-stage authorisation processes**.
6. All departments should ensure they have appropriate **tracking mechanisms** in place to manage exception use and support succession planning.

We judged all recommendations to have been implemented in the majority of cases.

The results reveal a near even split between organisations we judged to have 'Fully implemented' the recommendations and those that are currently 'Partially implemented'.

No department received a rating of 'Not implemented', demonstrating every department has made concerted efforts to integrate the recommendations into workstreams.

We saw most positive progress in relation to Recommendation 5 (on multi-stage authorisation and senior-level oversight). Recommendation 1 (the requirement to develop comprehensive approval forms mirrored on the Commission's own templates) received the

lowest percentage of 'Fully implemented' ratings, though we judged it had still been implemented across two-thirds of organisations.

### **Spotlight on good practice**

Several departments demonstrated exceptional commitment to embedding our recommendations.

*Department for Business and Trade*

#### **Recommendation 1: Comprehensive exception approval forms**

DBT has created a dedicated exceptions guidance page on their Intranet. Central to this is a new digital exception request form designed to capture requests for all exception types. The form is structured with mandatory fields that ensures every requester addresses the critical questions required for a strong assessment.

#### **Recommendation 6: Appropriate tracking mechanisms**

The department described a robust centralised tracking system that logs key appointment details, including indicators for when future Commission approval might be required. Logged cases are reviewed by resourcing partners three months prior to expiry, which also provides sufficient time for the department to engage in meaningful succession planning conversations with hiring managers.

*Companies House*

#### **Recommendation 2: Robust challenge processes**

The department has implemented an automated workflow that triggers a direct approval chain to the Head of HR Business Partnering and the Head of Strategic Resourcing for assessment. Approvers are required to evaluate whether the criteria for an exception are genuinely met, confirm that the move away from open competition is valid and ensure the appointment duration is strictly limited to what is necessary.

#### **Recommendation 4: Internal documentation referencing the Recruitment Principles**

The department has integrated the Civil Service Commission's Recruitment Principles directly into its central HR documentation and recruitment policy. They have ensured that all staff involved in the process - from those drafting requests to those granting approvals - are systematically guided to consult the Principles.

*Welsh Government*

#### **Recommendation 3: Strong submissions for exception**

The organisation has amended its submission requirements to ensure every exception is backed by a strong business case. Departments are required to provide a clear explanation as to why a fair and open competition was not possible, including evidence of perceived urgency and the need for highly specialised skills.

#### **Recommendation 5: Multi-stage authorisation processes**

The department has established a thorough multi-stage authorisation process. Business cases require approval from the Director General, Group Resourcing Panel or relevant Head of Profession. A final layer of assurance is provided by the Compliance team for formal recording and ongoing monitoring.

### **Next steps**

The Commission will continue to monitor the appropriate use of exceptions through its audit process, reporting on their use in our annual report. We will also be supporting departments through specialised training and sharing of best practice.