



Business Appointment Rules Audit

A survey of system administration across government

September 2026

Contents

1. Executive Summary	2
2. Introduction	4
3. Findings	6
4. Conclusion	13
5. Annex A - Triggers for the Rules	15
6. Annex B - List of Departments Surveyed	16

Executive Summary

Background to this Audit Report

This audit report is a survey of the systems used across government departments to administer the government's Business Appointment Rules (the Rules)¹ governing the departure of civil servants and special advisers. It is intended to be a source of advice and guidance for those government departments responsible for implementing the Rules. The report does not include analysis of individual cases, or broader consideration of the operation of the Rules themselves. It mirrors the approach used by the Civil Service Commission (the Commission) to review appointments to the Civil Service made by exception by government departments in 2024².

About the Civil Service Commission

The Commission is an independent executive non-departmental public body sponsored by the Cabinet Office. Historically, the primary function of the Commission has been to provide assurance that entry into the Civil Service is on the basis of fair, open and merit-based competition. From October 2025, the Commission also assumed responsibility for elements of the Rules, ensuring that exit from the Civil Service is properly administered for the most senior civil servants at SCS Pay Band 3 and above, and special advisers at Pay Band 4. It is important to note that the Commission is not responsible for those exiting the military or security services, but it does administer senior departures from the diplomatic service. For the first time, this has led to the creation of an end-to-end regulator who oversees the whole working life-cycle of civil servants, at entry into, and departure from Crown Service.

Auditing the Business Appointment Rules

While the independent Civil Service Commission directly administers the Rules in relation to the most senior civil servants and special advisers, individual government departments continue to hold responsibility for administering the Rules in relation to more junior civil servants at SCS Pay Band 2 and below, and special advisers at Pay Band 3 and below. Depending on an individual's seniority, the Rules can apply for up to two years after leaving their role, and individual departments will handle applications from those former employees throughout the relevant period. The Rules are produced by the Cabinet Office which has responsibility for the underlying policy, and it remains formally responsible for them, but historically there has not been detailed central oversight of how they are applied at a departmental-level.

In July 2025, under Section 17 of the Constitutional Reform and Governance Act, the Minister for the Cabinet Office requested that the Commission assume oversight of these processes via an audit function³. This audit function aims to promote both transparency and consistency in the delivery of these important functions across government. The intention is that departments

¹ HM Government, 'Business Appointment Rules for Crown Servants', October 2025

<https://www.gov.uk/government/publications/business-appointment-rules-for-crown-servants/business-appointment-rules-for-crown-servants>

² Civil Service Commission, 'Review into Appointments by Exception', November 2024

<https://civilservicecommission.independent.gov.uk/document/exceptions-review-2024-review-into-appointments-by-exception-delegated-to-departments/>

³ Civil Service Commission, 'Civil Service Commissioner responds to Minister for the Cabinet Office', July 2025

<https://civilservicecommission.independent.gov.uk/2025/07/first-civil-service-commissioner-responds-to-the-minister-for-the-cabinet-office-on-proposed-changes-to-the-role-of-the-civil-service-commission/>

should continue to hold responsibility for managing the risk of exit, with the Commission focussing on an assessment of the framework as it is applied by departments.

In May 2026, the Commission initiated the first audit of government departments. A total of 17 departments were included in the audit, with a range of quantitative and qualitative data collected and reviewed by the Commission. These departments employ more than 74% of the civil servants in the UK and provide a useful sample of systems and processes across government. The audit focussed on evaluating departmental performance across three key functions: awareness raising, application handling, and the provision of advice and conditions.

Summary of Findings

The review found that all 17 departments had processes in place to deliver their key functions in relation to administration of the Rules: awareness raising, application handling, and providing advice and conditions.

Awareness Raising

All departments deliver awareness raising activities to ensure that civil servants and special advisers are aware of the Rules. However, there is a risk that not all leavers are aware of their obligations under the Rules. Only a relatively small proportion of leavers made applications under the Rules in 2025/26 and, while we would expect only a small number of civil servants and special advisers to fall within the ambit of the Rules, this requires further investigation.

Application Handling

All departments have a structured process in place for handling applications with clear roles and responsibilities for leavers, line managers and other participants in the process. Departments reported that the average time taken to process applications ranged from one to 58 days in 2025/26. Timeliness in processing applications is important. Individuals can suffer financial hardship where delays prevent them from taking up future employment. This issue would benefit from further investigation.

Providing Advice and Conditions

Most departments adopt a broadly consistent approach to providing advice for leavers and applying conditions to their subsequent employment. Not all departments write to prospective employers where conditions are applied, and some rely on the leaver to share that information. This approach should be standardised so that departments always write to employers regarding conditions. The review also identified a range of good practice and includes a number of recommendations for departments and for the Cabinet Office.

Conclusion

Overall, the Commission is satisfied that departments are aware of the key functions that they should be delivering in relation to the Rules and have clear processes and procedures in place for delivering them. We will now work with departments and with the Cabinet Office to implement the recommendations of this review, and review their implementation later in 2026/27. We will also deliver routine audits of departmental activity from 2027/28.

Introduction

The Business Appointment Rules

The Rules exist to protect the integrity of government. Any civil servant or special adviser who wishes to take up employment on leaving the Civil Service is subject to them. The Rules aim to avoid any reasonable concerns that a civil servant may have been influenced in their official duties by the potential of reward or may have improperly exploited access to information; they also aim to avoid a perception that an organisation might gain an improper influence through the employment of a former civil servant.

Applicant and Department Responsibilities

Before accepting any new appointment or employment outside the Civil Service, whether in the UK or overseas, civil servants and special advisers must consider whether an application under the Rules is required. If it is required, they should not accept or announce a new appointment or offer of employment before it has been approved. A list of triggers for the engagement of the Rules is included at Annex A.

Government departments are responsible for delivering three key functions in relation to the administration of the Rules for all civil servants below SCS2 and the more junior special advisers:

- *Key Function 1: Awareness Raising* - They must ensure that civil servants leaving the department are reminded and made aware of the Rules (this is an explicit requirement of paragraph 11.2.1.c of the Civil Service Management Code⁴) and know when they have to make an application;
- *Key Function 2: Application Handling* - They are responsible for reviewing applications made by civil servants of the appropriate grade in their departments in a timely manner (this an implicit requirement of the Business Appointment Rules); and
- *Key Function 3: Advice and Conditions* - They are responsible for the provision of advice to applicants and their prospective employers and imposing specific conditions, where required (this is also an implicit requirement of the Business Appointment Rules).

Auditing Departmental Performance

Historically, there was no central oversight of the delivery of these functions. The Advisory Committee on Business Appointments (ACOBA) provided independent oversight of applications made under the Rules by only the most senior civil servants and special advisers. Government departments handled all other applications from more junior staff, including those engaged in key policy-making roles and important commercially sensitive functions.

The risk associated with these applications being handled at a departmental level was identified in the final ACOBA annual report, published in 2024, prior to the body being dissolved. That report stated that ‘little is known about the scale of casework at departmental level’, asking, ‘how many of the roughly 30,000 civil servants leaving office each year should and do seek advice’; ‘how are the

⁴ HM Government, ‘Civil Service Management Code’, November 2026
<https://www.gov.uk/government/publications/civil-servants-terms-and-conditions>

Rules implemented'; and 'what advice do departments provide and why'. It pointed to the 'large element of the unknown' that remained.⁵

On 9 July 2025, the Minister for Cabinet Office wrote to the First Civil Service Commissioner requesting that the Commission assume responsibility for elements of the administration of the Rules. In that letter, and in recognition of the risk raised above, it was also requested that the Commission assume a new audit function in relation to the Rules:

In addition, to further strengthen the rules and improve consistency I would also like to invite the Commission under [Section] 17 [of the Constitutional Reform and Governance Act 2010], from the point of the transfer of functions, to commence regular audits of departmental performance with regard to the applications they administer at the grades below those currently administered by ACOBA.

This builds on the Commission's experience of delivering similar audit functions across government, including audits of the Civil Service Recruitment Principles. These are widely perceived to be effective tools in promoting compliance and providing assurance, sharing good practice, and developing risk-focussed interventions to improve performance across government. Importantly, the Minister for Cabinet Office's decision has, for the first time, given the Commission responsibility for overseeing the whole working life cycle of a civil servant, from their recruitment through to their departure.

Methodology

Seventeen ministerial departments were subject to this audit, and a list is included at Annex B. Taken together these departments employ 73.41%⁶ of UK civil servants. This first audit is primarily intended to be a benchmarking exercise, providing the Commission with an opportunity to:

- Understand what information is held by departments in relation to the Rules;
- Establish baseline figures for key metrics, such as the number of applications processed by departments, and the number of breaches they identify;
- Increase transparency; and
- Shape the regulatory landscape to ensure consistency across functions delegated to departments.

A pre-audit process preceded the more formal data collection exercise. This involved meetings with representatives from all 17 departments. Those meetings informed the development of an audit questionnaire which collected quantitative and qualitative data. Departments were asked to provide a range of information relating to their internal processes against the Rules in the financial year of 2025/26 in relation to all civil service grades SCS Pay Band 2 and below, and special advisers at Pay Band 3 and below. The audit delivered an overarching assessment of key functions in departments, identified good practice and made recommendations for improvement.

⁵ Advisory Committee on Business Appointments, 'Annual Report 2020-2024', 18 July 2024, assets.publishing.service.gov.uk

⁶ HM Government, 'Statistical Bulletin', October 2025, <https://www.gov.uk/government/statistics/civil-service-statistics-2025/statistical-bulletin-civil-service-statistics-2025#civil-service-headcount>

Findings

Key Function: Awareness Raising

Departments were asked to provide an explanation of the work they undertake to ensure that civil servants are aware of the Rules. Our principal finding is that every department undertook some awareness raising activity.

Departments were also asked to provide evidence of where awareness of the Rules is raised. Although there are reminders at key milestones of a civil servant's career, there is an emphasis on information being provided at the exit phase.

There is no centrally mandated procedure for raising awareness of the Rules with current civil servants or special advisers. However, departments are ultimately responsible for ensuring that civil servants and special advisers are made aware of their obligations under the Rules. Each department determines what activity is reasonable and proportionate to the risk of an individual taking up employment external to their organisation. The audit catalogued the kinds of awareness raising undertaken by different departments, as set out in the following table.

TABLE 1. Examples of Awareness Raising Activities

METHOD	DESCRIPTION	NUMBER OF DEPARTMENTS (17 in total)
Leavers' checklists.	Including information about the requirements of the Rules in official exit checklists that departing individuals and their line managers must complete before leaving the Civil Service.	17
Intranet pages, staff handbooks and internal policies.	Providing searchable digital guidance on departmental intranets.	16
Employment contracts and appointment letters.	Including restrictions under the Rules in initial terms of employment on joining the Civil Service, or on promotion into Senior Civil Service roles.	9
Departure letters and exit surveys.	Sending letters or surveys upon exit that explicitly highlight the individual's responsibilities to seek advice on new employment outside of the Civil Service under the Rules.	8
HR guidance and direct advisory support.	Training departmental HR teams to monitor leavers and act as the first port of call for compliance to check that the Rules are mentioned during the exit interview process.	6

Induction materials and onboarding packs	Including information about the Rules and obligations under the Rules in corporate induction presentations or in new starter packs.	5
Voluntary exit scheme targeted communications	Embedding reminders of the Rules in documents, letters and online resources sent to staff leaving under Voluntary Exit Schemes	3

Awareness raising for the Rules is treated as an offboarding activity by departments, with all 17 departments using a standard 'leavers' checklist' as a way of ensuring that leavers are reminded of their obligations. Only nine departments include restrictions under the Rules in employment contracts, and even fewer departments include the Rules as part of the induction process. This means that there is a lack of proactive education and awareness of the Rules and their implications at the start of a civil servant's career or time in the department, and while they are seeking new employment.

Awareness raising activities tend to be passive, largely relying on leavers and their line managers taking action on information that is made generally available to them, such as information on a departmental intranet. Only six of the 17 departments train HR teams to ensure that leavers are monitored and that the Rules are mentioned during exit interviews. Further, only eight departments provide leavers with a letter or survey to remind leavers of the Rules. As such, for most departments, there is a reliance on following set static systems rather than more proactive engagement. This is a potential weakness. The risk is that some individuals who should have made an application under the Rules were not aware of that requirement when an application should have been made.

Overall, departments receive only a relatively small number of applications under the Rules. Of course, not every civil servant leaving a department will go on to seek employment outside the Civil Service; some will retire, and others will remain within the Civil Service but will move to other departments. Many of the civil servants going on to seek other employment will not trigger the Rules, because their future role is not adjacent to the work they did while in government. As a result, our expectation is that only a limited number of departing civil servants would trigger the Rules. For the moment, the precise size of this 'small number' remains unknown - we cannot make an assessment of the effectiveness of departmental procedures without additional information. Future audits of the Rules will seek to explore this further.

Good Practice 1: Departments may consider embedding active engagement with leavers as part of their 'offboarding' processes, proactively prompting them to consider whether they should make an application.

Good Practice 2: Departments may consider taking steps to raise general awareness of the Rules across HR teams, particularly those with responsibility for processing leavers and for designing and implementing exit policies.

Good Practice 3: Departments may consider requiring written confirmation from line managers that they are satisfied that the Rules have been considered as part of staff exit management processes.

Recommendation 1: Departments must proactively send all leavers a written reminder of their obligations under the Rules.

Recommendation 2: Departments must ensure that induction materials for new starters refer to the Rules.

Recommendation 3: Departments must review the numbers of applications that they receive, assuring themselves that their awareness raising activities are adequate, and that no civil servant leaves unaware of the Rules.

Key Function: Application handling

Departments were asked to explain how they handled applications made under the Rules by civil servants and special advisers. Our principal finding is that every department demonstrated a clear, structured and documented process for handling applications under the Rules.

The quality of individual applications or responses to those applications was not assessed as part of this audit process. This is an issue that merits further investigation in future audits, and may include a 'dip test' of applications and responses to ensure that they are of sufficient quality.

Policy and Process

Different departments have different processes in place; there is no centrally mandated approach to handling applications. This report focusses on promoting good practice so that departments can choose how best to administer the process. Departmental boards in turn are required to assure themselves that they are managing the risks associated with their department's administration of the Rules.

For 11 of the 17 departments the following process applies:

1. An individual who is leaving the department identifies that they are moving into a role that is likely to trigger the Rules and submits a formal Business Appointment Rules application form to their line manager.
2. Their line manager reviews and approves that form, with a focus on ensuring that it contains all of the relevant information.
3. The content of the form is evaluated by a specific central department team charged with handling all Rules applications which determines whether the individual should be subject to conditions, and if so, what conditions to impose.
4. A separate person, normally a Senior Civil Servant at Director or Director General level (SCS Pay Band 2 or 3), will review the application and the response and provide final authorisation.

In the other six departments there were some variations in approach:

- In two departments the central departmental team received applications directly from individuals for review, risk analysis and response prior to it being shared with the relevant line manager.
- Three departments did not include the line manager at all in the process.
- In one department all applications made by civil servants at Grade 6 and below were only evaluated and responded to by that person's line manager before being signed off by a more senior person within the department - only applications from Senior Civil Servants went forward to a central team for review and evaluation.

Our conversations with departments tended to indicate that the differences in approach were risk-based and the result of the volume of applications received and the resources available to deal with those applications in a department.

Across every department, it is common for Directors (Senior Civil Servant Pay Band 2) to provide final authorisation for advice made to junior civil servants. Directors General or Permanent Secretaries (Senior Civil Servant Pay Bands 3 and 4) are the final decision maker for senior civil servants and special advisers.

Departments provided significant detail about the methodologies they rely on to identify risk and determine conditions, including:

- A straightforward comparison between the applicant's role in the department and their prospective role with a new employer.
- A focus on whether the applicant has been directly involved in the development of government policy concerning the new employer.
- Reviewing whether the applicant has had access to sensitive, commercial, or unannounced information relevant to the new employer.
- Considering if the applicant has had specific dealings with the prospective employer in office, particularly any commercial dealings.
- For special advisers specifically, checks may extend to checking diaries for previous correspondence, engagements and meetings.
- Conducting open-source internet searches and reviewing publicly available information to test statements made by the applicant.
- Consulting internal stakeholders including line managers, HR Business Partners, procurement and communications teams.

Several departments mentioned that potential applicants could contact Business Appointment Rules teams or HR with questions about the process, and to clarify whether an application was necessary. However, only one department noted that it had a dedicated functional inbox, allowing speculative or informal queries to be answered in confidence.

Recommendation 4: Departments must consider adopting a risk-based, rather than grade-focussed, approach to obtaining final approval for advice to applicants, with riskier cases being escalated to the Permanent Secretary.

Recommendation 5: Departments must ensure that they have a dedicated, functional mailbox for enquiries about the application of the Rules.

Timeliness

The speed with which departments process applications from leavers is important. Those subject to the Rules should only take up roles once they have received advice from their department. This means that if that advice significantly post-dates their departure from the Civil Service, they may suffer financially. Similarly, a perception that leaving the Civil Service is a slow process may dissuade individuals from exploring professional opportunities in the Civil Service, or returning after a period in another sector.

The audit has revealed that departments do not routinely record how long it takes them to process applications with over a third of departments stating that they did not capture this statistic at all. Where departments do capture some or all of this information, they all use different measures. As a result, there is significant variation in the average time taken by departments to process applications- from 1 day to 58 days. It is important to note that because these statistics relate to different measures, they are not directly comparable.

A number of factors may influence timeliness, including availability of resources and the size of the responsible team. For example, conducting due diligence and assessing risk can be time consuming. In the case of 'high risk' cases, faster is not necessarily better. A risk-based approach, with faster processing for roles where there is minimal overlap, and a slower, highly deliberate process, is an absolute necessity for Senior Civil Servants and senior special advisers, where the potential for conflicts of interest is much higher.

Recommendation 6: Departments must track the time taken to process applications from the point that the department receives an application through until advice is issued to a leaver. They must also set performance targets for processing applications.

Key Function: Advice and Conditions

The audit has confirmed that all departments have a broadly similar approach to producing advice and applying conditions to applicants under the Rules.

The imposition of conditions on an applicant is the primary way that the department can manage risks identified in response to their application. These conditions may include a restriction on the kinds of activities that they can undertake for their new employer, for example, limiting their ability to lobby the government directly, and/or explicitly prohibiting an applicant from using official government information for their new employer.

10 of the 17 departments reported that they rely on a standard set of conditions as a baseline for their responses to all applications. Six departments consider each application on its own merit, reviewing mitigations specific to the individual's responsibilities in office against their prospective

employment, but still tend to impose what amount to a standard set of conditions. Only one department reported routinely applying a novel set of conditions in response to each application.

Only three departments explicitly mentioned using their record of conditions imposed on previous applicants to ensure that advice was fair and consistent.

It is important that similar types of roles are subject to similar conditions, and that there is consistency between departments. This promotes assurance that the relevant risks are being managed well, it ensures fairness, and it ensures that applicants can have a set of reasonable expectations about how their application is going to be handled. There is the risk that if there is departmental variation of the conditions applied, that individuals moving into roles with similar risk profiles are receiving uneven and disproportionate restrictions.

A sample overview of the types of conditions applied by departments and the risks they intend to manage is included below.

TABLE 2. Sample Restrictions

Condition	Scope of Restrictions	Trigger
Privileged Information	A ban on using, drawing on, or disclosing restricted, sensitive, or unannounced policy data from their time in office.	Access to unannounced, sensitive, or secret government policy and data.
Lobbying Restrictions	Prohibits personal contact with Ministers, special advisers, or civil servants to influence decisions or gain financial or policy advantages on behalf of the employer.	Risk of using an official government network to achieve an unfair competitive advantage.
Bids and Contracts	A complete restriction on advising, working on, or developing competitive bids for funding or commercial contracts with the UK government.	Previous involvement in procurement, commercial decision-making, or oversight of suppliers.
Official Channels Only	Mandates that any communication with the former department must occur exclusively through open, recognised corporate pathways.	General relationship-building or official dealings with an external firm while employed

In order to manage the risk once an individual has taken up a role outside of government, 10 of the 17 departments write directly to the prospective employer. The employer is provided with a formal outcome letter, setting out conditions and restrictions imposed. The other seven departments issue a formal outcome letter to the employee with an explicit requirement to pass it on to their new employer before starting work. If employers are aware of an employee's obligations under the Rules, and have agreed to conditions applied, there is a reduced risk of non-compliance.

This audit did not review the specific conditions imposed on individual applicants, or include a comparative assessment of the consistency with which conditions are imposed on applicants either internally within departments or externally, across different departments. A failure to consistently apply conditions potentially presents the biggest risk both to effectiveness and integrity of the Rules across government and may serve as the focus of future audits.

In more general feedback provided as part of the audit process, departments indicated that they would benefit from training, better guidance and a cross-government network for sharing good practice and consistency checking. In order to achieve a level playing field, departments would like to better understand how their peers handle applications.

Recommendation 7: Departments must ensure that they retain a record of the way that conditions have been applied to historic cases, and ensure that this is made available to those responsible for issuing advice under the Rules.

Recommendation 8: Departments must write directly to prospective employers to inform them of any conditions imposed in response to applications made under the Rules.

Recommendation 9: The Cabinet Office must consider establishing a cross-government BARs practitioners network to promote information sharing and consistency in decision-making, and consider standardised training for all staff administering the Business Appointment Rules in departments.

Monitoring Conditions

Some departments had implemented interesting examples of systems for monitoring compliance with conditions applied through the Business Appointment Rules process. Some reported sharing 'tracker' spreadsheets with commercial and contracts teams so that they are aware of conditions that have been imposed on former civil servants who are bound by the Rules. One department reported that it formally tracks its former employees who are subject to conditions through their Audit and Risk framework.

Good Practice 4: Departments may consider whether there are opportunities to share information about leavers and any conditions they are subject to, with key internal stakeholders, including commercial functions.

Transparency

Departments are required to publish quarterly transparency publications⁷ detailing advice provided in response to applications and any conditions imposed for SCS Pay Band 2 and SCS Pay Band 1

⁷HMGovernment, 'Business Appointment Rules Collection', October 2025
[https://www.gov.uk/government/collections/business-appointment-rules#the-advisory-committee-on-business-appointments-\(acoba\)](https://www.gov.uk/government/collections/business-appointment-rules#the-advisory-committee-on-business-appointments-(acoba))

(or equivalent) officials. There is currently no requirement for them to report on other applications under the Rules. In the interests of transparency it would be helpful for this reporting requirement to be extended to include information about applications received from and advice issued to all staff in the department.

Recommendation 10: The Cabinet Office must amend the relevant reporting requirement for departments relating to the Rules so that it extends to include all staff, not just Senior Civil Servants.

Conclusion

Overall, our review showed that all 17 of the departments audited are delivering their key functions. Government departments are aware of their responsibilities in relation to the Rules and treat them seriously.

There are opportunities to improve processes in the majority of departments and the examples of good practice identified through the audit process, and recommendations made as part of this report, are intended to provide an effective set of next steps for departments to consider. These are summarised below. We will review progress made by departments in responding to the recommendations later in 2026/27.

There are also opportunities for the whole system to be improved and a number of the recommendations (below) are directed at the Cabinet Office, with the intention of providing the centre of government with an opportunity to take practical steps to improve consistency in the application of its Rules across government.

The Civil Service Commission is also preparing a separate strategic review of the Business Appointment Rules for civil servants and special advisers, which makes higher-level recommendations about the way that the Rules should be framed and implemented in the future.

The intention is now for the Commission to transition into more routine audits of departmental activity in relation to the Rules. Audits will be delivered in 2027/28 and 2028/29 with the intention of examining key areas of risk around delivery in more detail. Audit reports produced as part of this process will be published on the Civil Service Commission website.

TABLE 3: Summary of Recommendations and Good Practice

Recommendation 1: Departments must proactively send all leavers a written reminder of their obligations under the Rules.

Recommendation 2: Departments must ensure that induction materials for new starters refer to the Rules.

Recommendation 3: Departments must review the numbers of applications that they receive, assuring themselves that their awareness raising activities are adequate, and that no civil servant leaves the civil service unaware of the Rules.

Recommendation 4: Departments must consider adopting a risk-based, rather than grade-focussed, approach to obtaining final approval for advice to applicants, with riskier cases being escalated to the Permanent Secretary.

Recommendation 5: Departments must ensure that they have a dedicated, functional mailbox for enquiries about the application of the Rules.

Recommendation 6: Departments must track the time taken to process applications from the point that the department receives an application through until advice is issued to a leaver. They must also set performance targets for processing applications.

Recommendation 7: Departments must ensure that they retain a record of the way that conditions have been applied to historic cases, and ensure that this is made available to those responsible for issuing advice under the Rules.

Recommendation 8: Departments must write directly to prospective employers to inform them of any conditions imposed in response to applications made under the Rules.

Recommendation 9: The Cabinet Office must consider establishing a cross-government BARs practitioners network to promote information sharing and consistency in decision-making, and consider standardised training for all staff administering the Business Appointment Rules in departments.

Recommendation 10: The Cabinet Office must amend the relevant reporting requirement for departments relating to the Rules so that it extends to include all staff, not just Senior Civil Servants.

Good Practice 1: Departments may consider embedding active engagement with leavers as part of their 'offboarding' processes, proactively prompting them to consider whether they should make an application.

Good Practice 2: Departments may consider taking steps to raise general awareness of the Rules across HR teams, particularly those with responsibility for processing leavers and for designing and implementing exit policies.

Good Practice 3: Departments may consider requiring written confirmation from line managers that they are satisfied that the Rules have been considered as part of staff exit management processes.

Good Practice 4: Departments may consider whether there are opportunities to share information about leavers and any conditions they are subject to, with key internal stakeholders, including commercial functions.

Annex A: Triggers for the Rules

An application for a new appointment or employment at SCS2 and below is only required if the individual's circumstances match one or more of the triggers set out at paragraph 13 of the Business Appointment Rules:

- I. They have been involved in developing policy affecting their prospective employer, or have had access to unannounced government policy or other privileged information affecting their prospective employer, at any time in their last two years in the Civil Service.
- II. They have been responsible for regulatory or any other decisions affecting their prospective employer, at any time in their last two years in the Civil Service.
- III. They have had any official dealings with their prospective employer at any time in their last two years in the Civil Service.
- IV. They have had official dealings of a continued or repeated nature with their prospective employer at any time during their Civil Service career.
- V. They have had access to commercially sensitive information of competitors or their prospective employer in the course of their official duties.
- VI. The proposed appointment or employment would involve making representations to, or lobbying the government on behalf of a new employer.
- VII. The proposed appointment or employment is consultancy work, either self-employed or as a member of a firm, and they have had official dealings with outside bodies or organisations in their last two years in the Civil Service that are involved in their proposed area of consultancy work.

In cases of doubt, departmental Human Resources functions are able to advise individuals on whether or not an application is required.

Annex B: List of Departments Surveyed

Cabinet Office

Department for Business and Trade

Department for Culture, Media and Sport

Department for Education

Department for Energy Security and Net Zero

Department for Environment, Food and Rural Affairs

Department for Science, Innovation and Technology

Department for Transport

Department for Work and Pensions

Department of Health and Social Care

Foreign, Commonwealth and Development Office

HM Treasury

Home Office

Ministry of Defence

Ministry of Housing, Communities and Local Government

Ministry of Justice

Northern Ireland Office