



## Review into appointments by exception delegated to departments

November 2024

# Summary

## **About the Civil Service Commission**

The independent Civil Service Commission is established by statute to provide assurance that civil servants are selected on merit on the basis of fair and open competition, and to help safeguard an impartial Civil Service. The Commission derives its powers from the Constitutional Reform and Governance Act 2010 (CRaG).

Civil Service Commissioners are appointed through open competition and are independent of the Government and the Civil Service. The Commission is an executive Non-Departmental Public Body sponsored by the Cabinet Office.

## **Summary of findings**

The Commission delegates power to departments to make appointments by exception at certain grades in particular circumstances. Given interest in a number of recent Civil Service appointments by exception, the Civil Service Commission undertook a review of appointments made by exception using delegated powers in July and August 2024 and the departmental processes in place to make such appointments.

The review found that fewer exceptions were made in this period than is typical in a similar length of time. Their usage varied by number and appointment length across Civil Service departments and organisations.

The review identified a range of good practice and some areas that required improvement. The Commission was largely satisfied with processes in place within departments to apply, consider and approve exception requests. Occasionally, appointments were not fully justified according to the terms of the Commission's Recruitment Principles or appeared to lack justification for their length. Some departments appeared to lack central tracking systems. The review identified two 'Technical' breaches of the Recruitment Principles relating to record keeping issues.

The review makes a set of recommendations to support greater consistency and improvements in practice. It does not re-decide any individual appointment decisions. The Commission will work with departments to ensure compliance with these recommendations and will monitor implementation on an ongoing basis through its audit.

## **This report**

This report summarises the results of a review into appointments by exception made by departments in cases where they do not require the prior approval of the Commission. The first chapter provides background on exceptions, their appropriate usage and permissions delegated to departments. The second chapter outlines the findings from the review. The third chapter summarises conclusions and next steps.

# Introduction

## Fair and open competition based on merit

1. The principle that recruitment into the Civil Service takes place 'on merit on the basis of fair and open competition' is enshrined in Section 10 of the Constitutional Reform and Governance Act 2010 (CRaG). Fair and open competition ensures that the best candidates are selected and that the Civil Service has the necessary skills to deliver and serve the government of the day. On appointment, all civil servants are obliged to operate in line with the Civil Service Code.
2. The legislation<sup>1</sup> makes clear that the Civil Service Commission's published Recruitment Principles set the recruitment framework that departments must follow.<sup>2</sup>
3. At senior levels, the Commission's role is carried out by an independent Commissioner personally chairing the recruitment process from start to finish. Recruitment below Senior Civil Service Pay Band 2 (SCS PB2, typically Director jobs) level is delegated to departments. This activity is audited by the Commission.

## Exceptions to fair and open recruitment

4. The Recruitment Principles recognise that, at times, fair and open recruitment may not be possible. Section 12 of the Act outlines that the Commission may "except" appointments from this requirement where it is satisfied:
  - (a) *that the provision is justified by the needs of the civil service, or*
  - (b) *that the provision is needed to enable the civil service to participate in a government employment initiative that major employers in the United Kingdom (or a part of the United Kingdom) have been asked to participate in.*
5. Exceptions, by definition, are exceptional. Yet they can be an important option for departments to ensure they can efficiently deliver for ministers and the public and also contribute to a diverse workforce. An appointment by exception can be an appropriate route through which to fill gaps in periods of short-term urgent need, bring in specialist expertise or experience to tackle specific complex challenges, and support life chances schemes for particular cohorts.
6. The Recruitment Principles outline ten exception categories designed by the Commission to meet the needs of the Civil Service for use where appropriate by departments.<sup>3</sup>

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<sup>1</sup> The Constitutional Reform and Governance Act 2010 states: 'The Commission must publish a set of principles to be applied for the purposes of the requirement in section 10(2). Before publishing the set of principles (or any revision of it), the Commission must consult the Minister for the Civil Service' (11)(1).

<sup>2</sup> Civil Service Commission, 'Recruitment Principles', April 2018, [https://civilservicecommission.independent.gov.uk/wp-content/uploads/2019/03/02a\\_RECRUITMENT-PRINCIPLES-April-2018-FINAL-.pdf](https://civilservicecommission.independent.gov.uk/wp-content/uploads/2019/03/02a_RECRUITMENT-PRINCIPLES-April-2018-FINAL-.pdf)

<sup>3</sup> Page 11, 'Recruitment Principles'.

*Table 1: Exceptions permitted under the Recruitment Principles*

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|---|
| <p><b>Exception 1:</b> Temporary appointments</p> <p><b>Exception 2:</b> Support for government employment programmes</p> <p><b>Exception 3:</b> Secondments</p> <p><b>Exception 4:</b> Highly specialist skills</p> <p><b>Exception 5:</b> Former civil servants</p> <p><b>Exception 6:</b> Interchange with the Northern Ireland Civil Service</p> <p><b>Exception 7:</b> Transfers of staff from other public bodies</p> <p><b>Exception 8:</b> Transfers of organisations into the Civil Service - non-TUPE<sup>4</sup></p> <p><b>Exception 9:</b> Transfers of organisations into the Civil Service - TUPE</p> <p><b>Exception 10:</b> Conversion to permanency of suitable candidates appointed under Exceptions 1 and 2</p> <p><i>See the Recruitment Principles for an explanation of each exception.</i></p> |
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## Permissions and approvals

7. Approval of a department's intention to appoint by exception depends on the role's seniority, salary and appointment length.
8. The Commission's prior approval is required, in every case:
  - a. for any appointment by exception at SCS PB2 or above or at any grade on a salary at or above the SCS PB2 minimum, pro rata.
  - b. for any extension or variation of any fixed-term appointment previously agreed by the Commission at SCS PB2 or above or on a salary at or above the SCS PB2 minimum.
9. Exceptions approved by the Commission at or above the SCS PB2 minimum are published monthly on the Commission's website. Data and commentary is also published in the Commission's Annual Report and Accounts.
10. **Given the above criteria, individual Civil Service departments and organisations have "delegated authority" to appoint by exception at grades below SCS PB2 with a salary below SCS PB2 minimum for a maximum of two years in most circumstances.** This mirrors rules for appointments through fair and open competition. This review focused on this delegated category of exceptions only.

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<sup>4</sup> Transfer of Undertakings (Protection of Employment) Regulations 2006.

## Exceptions in context

11. Of the 98,328 people appointed to the Civil Service in 2023/24, 91,351 were recruited through fair and open competition and 6,977 were appointed by exception. The total number of exception appointments decreased by 25% from 9,362 the previous year (2022/23). The number of appointments made by exception has decreased in each of the last three years.<sup>5</sup>
12. In 2023-24 the Commission received 403 requests to appoint by exception. Of these, 55% were secondments and 38% were temporary appointments.
13. The majority of exception requests fall under Exception 1 (Temporary appointments) and Exception 3 (Secondments). Most exceptions are straightforward and have a clear need.

Table 2: Examples of appointments by exception

| Exception 1:<br><b>Temporary appointments</b>   | Exception 2:<br><b>Support for government employment programmes</b>  | Exception 3:<br><b>Secondments</b>  |
|---|--|---|
| A short-term, six-month role was required by a department to run a contested <b>wholesale market enforcement case</b> . This was not a permanent opportunity, though this post was needed to bring in additional specialist resources to lead a case. The individual had specific knowledge that enabled them to support the department in this resource-intensive process. | This exception facilitates schemes creating opportunities for individuals whose circumstances, and previous life chances, make it difficult for them to compete for appointments on merit, and on the basis of fair and open competition, without further work experience and/or training opportunities. This includes, for example, the <b>Life Chance scheme for People with Convictions</b> . | A department appointed a short-term <b>Systems Engineer</b> with specialist knowledge in sandboxing and systems running untrusted codes. This expertise was not readily available within existing staff, and the department could not recruit to the role as it was unable to match industry salaries. An exception appointment therefore enabled the department to meet the particular demands of the Civil Service. |

## Oversight

14. Adherence to elements of the Recruitment Principles delegated to departments is monitored through the Commission's audit programme. This process includes appointments made by exception not requiring the Commission's approval.
15. In each departmental audit, a sample of appointments made by exception is reviewed in full. Checks include whether the exception has been used in accordance with its purpose as outlined in the Recruitment Principles and whether the department has followed relevant rules around its usage. The audit also reviews a department's overall use of Exception 1 (Temporary appointments) to ensure it is in line with the organisation's size and complexity.

<sup>5</sup> The number of appointees through fair and open competition has remained consistent for the last two years.

16. The Commission can issue “breaches” of the Recruitment Principles. There are three tiers of breaches: **Technical**, for minor breaches which have no or minimal impact on the legal requirement that recruitment into the Civil Service is fair, open and based on merit; **Serious**, for breaches which have a material impact on the legal requirement; and **Fundamental**, where there has been egregious or wilful non-compliance with the Recruitment Principles or the direction of the Commission.
17. Most breaches relating to exceptions are Serious breaches. They typically occur due to the department not receiving prior approval from the Commission ahead of appointing by exception where required, or substantively changing an individual's exception conditions without consultation with the Commission. Identified breaches are summarised in the Commission’s annual report.
18. The Commission also collects quarterly data from departments to inform its compliance activity and analysis. This includes gathering data on exception use to monitor trends.
19. The Commission has a range of escalation routes in the event of continued poor practice, for example through engagement with a department’s senior leadership via Link Commissioners, triggering audits and increased oversight of appointments. Ultimately the Commission can also amend or withdraw delegation.

### **Civil Service Code**

20. All appointees, whether by exception or through fair and open competition, are civil servants and bound by the Civil Service Code and the values of impartiality, honesty, objectivity and integrity that underpin it.
21. In the event that a current civil servant has concerns relating to another civil servant’s conduct under the Code, they can raise this with their department in the first instance and, if concerns persist, bring that complaint to the independent Commission.<sup>6</sup>

### **Background checks**

22. There is no bar on individuals who have previously worked for political parties or made political donations becoming civil servants. Whether the appointment is approved by the Commission or the department, the department – as the employer – is responsible for carrying out background checks on individuals who may be appointed by exception. The department is also responsible for addressing any potential propriety matters. The Commission expects these checks to be carried out thoroughly prior to an exception’s proposal and approval.

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<sup>6</sup> Civil Service Commission, ‘The Code’, <https://civilservicecommission.independent.gov.uk/code/the-code/>.

# The review

## Background and objectives

23. The first two quarters of departmental audits for 2024/25 have now been completed and moderated. These audits include an assessment of exception use, though appointments made in the period in the scope of this review will not be assessed for some time.
24. As a result, given interest in a number of recent Civil Service appointments by exception and the importance of public trust in these appointments, on 30 August 2024 the First Civil Service Commissioner wrote to the 70 departments and organisations which fall within the remit of the Commission's current regulatory scope.<sup>7</sup>
25. The objectives of this review were to examine whether departments have:
  - a. **Clear processes for considering, challenging and approving appointments by exception;**
  - b. **Sound understanding of exceptions, how to use them under their delegated authority, and where Commission involvement is required; and**
  - c. **Reliable processes for tracking and managing exception use.**

## Methodology

26. The First Civil Service Commissioner's correspondence requested:
  - a. High-level details of the exceptions granted by departments made between 1 July and 31 August 2024 (inclusive) which did not require the Commission's prior approval; and
  - b. Details of the process by which they grant those exceptions which do not require the Commission's approval.
27. Additional information was requested where required across September, October and November 2024.
28. When reviewing this information considerations included:
  - a. What type of exception is being requested? Does the reasoning fit the exception?
  - b. Will the appointee's role be that of a civil servant?
  - c. Is there a clear and detailed business case?
  - d. What will the total exception length be?
  - e. Why can a fair and open competition not be run?
  - f. How was the person identified?
  - g. What is the skillset of the proposed individual?
  - h. What are the succession plans?
29. The Commission also considered departmental processes against what is considered good practice. This includes:

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<sup>7</sup> Letter from the First Civil Service Commissioner to all Heads of Department, 30 August 2024, <https://civilservicecommission.independent.gov.uk/wp-content/uploads/2024/08/2024-08-30-Letter-from-FCSC-to-HoD-final-version.pdf>.

- a. **Business case forms.** The Commission's published forms<sup>8</sup> have been iterated over time and are designed to solicit appropriate information on an appointment.
  - b. **Trackers.** For appointments in its approval scope, the Commission uses a tracking system to monitor individual appointments and trends.
  - c. **Sign-off.** The Commission has a multi-tiered clearance process for exceptions approvals which is dependent on the seniority of the role.
30. The 70 organisations in scope of this review vary considerably in size, remit and complexity, including in their recruitment requirements and pressures. Headcount sizes range from less than 100 to over 90,000. Recommendations are presented with that in mind, acknowledging that they may not be appropriate for all types of departments.
31. Although further detail was requested where required, this process review relied on the accuracy of departmental returns. Given the timeframe in scope of the review, it did not capture the majority of breaches normally identified in relation to exception use, which principally concern issues with extensions to approvals. The majority of these appointments have not yet reached this stage.
32. Recognising its remit, conclusions from this review should be considered alongside the Commission's wider policy and compliance activity, including its audit programme and annual report.

## Results

33. Every department and organisation under the Commission's regulatory remit cooperated fully with the review.
34. In total, departments approved 550 appointments by exception in this period. This is considerably lower than might have been expected based on data from previous years.<sup>9</sup>
35. As would be expected, the number of exceptions used by departments varied depending on their size. Some smaller organisations did not use any exceptions at all during the period in scope of the review. Departments of greater size and complexity typically used more. For example, some larger departments use exceptions to appoint to summer internship programmes they run.
36. The length of the appointments by exception ranged from four weeks to the maximum time period delegated to departments of 24 months. This means some appointments have already concluded.
37. The review identified two breaches of the Recruitment Principles, outlined below.
38. The most frequent exception used in this period was Exception 1 (Temporary appointments). This is not unusual and aligns with requests requiring Commission approval in this period and in other years. It is important to note that these appointments

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<sup>8</sup> Civil Service Commission, 'Exceptions forms',

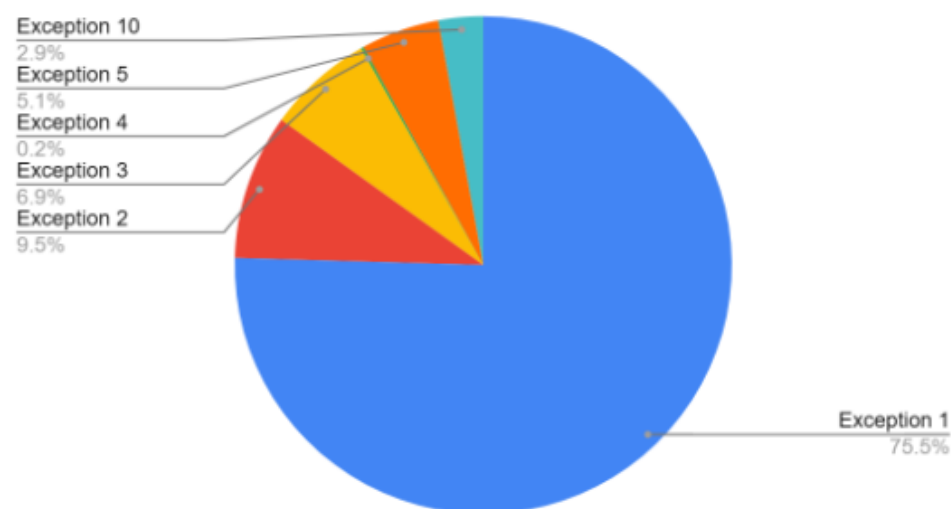
<https://civilservicecommission.independent.gov.uk/recruitment/exceptions-forms/>.

<sup>9</sup> In 2023/24 there were 6,977 appointments by exception, of which 402 required Commission approval. This equates to around 548 a month, meaning 1,096 in two months. This is considerably higher than the 550 approved in this period. For further context, there were 1,889 appointments by exception in quarter 2 (July, August, September) of 2023/24 (a three month period). Data has also been tested going back a number of years.



do not require the appointee to have a unique or specialised skill set – instead the emphasis is on the urgency or short-term nature of the role.

*Chart 1: Exception types used by departments with delegated powers, July-August 2024*



39. Most Exception 1 (Temporary appointments) usage involved straightforward cases where teams required resource to complete a short-term project or piece of casework. For example, one department used Exception 1 (Temporary appointments) to support its contribution to a public inquiry. Running an open and fair competition was not possible as the role was a short-term solution and would not require a full-time appointment.

40. Typical job titles recruited to using Exception 1 (Temporary appointments) included:

- a. Senior Research Fellow
- b. Summer Intern
- c. Driving Examiner
- d. Technical Staff

41. The next most common exception used was Exception 2 (Support for government employment programmes).

## Findings

42. The following section summarises findings of the review of departmental processes and highlights specific areas of good practice.

### *Business cases*

43. Vacancy holders were typically required to use business case forms to justify their internal case for an appointment by exception. Clear business case templates ensure departments have a clear record of decision making and vacancy holders are actively considering issues which prompt breaches, for example around contract length and whether the individual has been appointed by exception within the last 12 months.

**Good practice:** Some departments used detailed exception approval forms similar to those found on the Commission website for exceptions requiring its approval.

**Recommendation 1:** All departments should develop comprehensive exception approval forms modelled on the Commission’s published forms for cases requiring its approval. These should include: why the appointment fits the specific exception used; why it is not appropriate to run a fair, open and merit-based competition; succession plan for the role; and sufficiently thorough conflict of interest consideration.

*Decision making*

44. Most departments had processes in place to ensure the exception was the right way to appoint to the role, including through full assessment of whether existing resource could be repurposed. There was also evidence of departments fully considering the skills the individual would bring to the department and analysis of how this may be challenging to find elsewhere in the Civil Service.

**Good practice:** One department used a “skills match hub” to evaluate whether existing staff can be re-deployed prior to making approval by exception. Advice offered built on previous discussion and advice sought from the Commission.

45. Returns showed evidence of departments considering “conflicts of interest” for the relevant appointee. This included use of an active conflicts of interest policy that required individuals to declare real or perceived conflict to their Director and agree to the necessary mitigations.
46. A small minority of departments demonstrated a less well developed understanding of the purpose of exceptions. A small number of appointments used reasoning covering HR justifications such as financial resources. There were also examples where a department’s reasoning lacked detail on why a fair and open competition could not be run or why the person was chosen to do the role. This also included examples where departments requested the maximum approval length delegated to departments (two years) without explaining why a fair and open competition could not be run sooner.
47. Some business cases contained a low level of detail justifying the appointment. Even if this has been discussed and agreed locally, this should be recorded in full in a written format. The Commission will expect to see full justification documentation in future departmental audits and reviews on exceptions usage.
48. If an exception is required, the process to identify the individual should be as open, fair and merit-based as possible. Where prompt changes in resourcing mean appointments by exception are deemed appropriate, appointments should ideally be short-term and ultimately filled through full competition as soon as possible.

**Recommendation 2:** Departments should ensure robust challenge processes are in place to ensure the terms of temporary appointments by exception are strictly applied, including to ensure they are used only for time periods where it is not possible or impracticable to run full fair, open and merit-based competitions.

**Recommendation 3: Departments should be able to demonstrate in their submissions for an exception clear reasoning why a fair, open and merit-based competition could not be run, how the person was identified, reasoning behind the length of the appointment and full succession planning.**

*Understanding of the Recruitment Principles and the Commission's role*

49. Many departments demonstrated good understanding of the Recruitment Principles and when exceptions needed to be escalated to the Commission. This included sharing material within business case forms relating to the Principles and their application.
50. We identified appropriate use of Exception 2 (Support for government employment programmes) and the linked Exception 10 (Conversion to permanency of suitable candidates appointed under Exceptions 1 and 2) process.

**Good practice:** The use of recruitment 'experts' with a role to safeguard approval processes and provide guidance on the Recruitment Principles and their application to the rest of the department.

51. Departments also referenced where previous advice sought from the Commission had been consolidated centrally and distributed appropriately. This can prevent common breaches due to misunderstandings of the Recruitment Principles, for example that the Commission's prior approval is required where the salary for a secondee (Exception 3) is at or above the SCS PB2 minimum, irrespective of who pays.
52. The review found only two breaches, which fit the least serious category of "Technical". These concerned record keeping around two appointments at the Foreign, Commonwealth and Development Office. These will be followed-up and further information will be reported in the breaches section of the Commission's 2024/25 annual report.

**Recommendation 4: Internal documentation detailing the process to appoint by exception should clearly reference the expectations and rules of the Recruitment Principles.**

*Appointment length*

53. Many appointments had short lengths aligned to the duration of a project or the time taken to run a full campaign.
54. Some departments appeared to overuse the maximum approval length delegated to departments. There were some cases where exceptions were used for the maximum term, with no clear reason provided why the full two years was required (for example, why a full fair, open and merit-based competition could not be run sooner). This could be due to a lack of understanding by departments as to their ability to grant shorter exception periods or the exceptional circumstances these appointments should be used in. Expectations on this point will be outlined in future Commission outreach to departments.

*Clearance processes*

55. Most departments had established processes for approving appointments by exception, including involving senior sign-off. The exact clearance routes used depended on departmental size and complexity, but the majority of departments had an independent (normally HR) individual sign-off exceptions, and frequently a member of the Senior Civil Service.
56. In contrast, poorer practice involved only the hiring manager and a single HR contact assessing the case. Mirroring the Commission's processes, departments should adopt clear multi-stage authorisation processes which are commensurate with the role's grade.

**Good practice:** Some departments have established 'clearance committees' made up of individuals from HR, finance and strategy teams as well as Senior Civil Servants. These committees are used to ensure decisions to appoint via exception are appropriate.

57. Departments showed a strong understanding of the need for exception use to have approval from senior members of the department, mirroring the clearance process used by the Commission for appointments requiring its approval. For instance, all appointments at SCS PB1 (typically Deputy Director roles) by exception required consideration and clearance from the department's Permanent Secretary or the organisation's Chief Executive Officer.

**Recommendation 5: Departments should implement clear multi-stage authorisation processes for appointments by exception, including through ensuring SCS/senior review and the use of committees that engage in shared decision-making where appropriate.**

#### *Tracking systems*

58. There were some varying accounts of how departments monitor exceptions, with only a few departments explicitly mentioning the use of a tracking system to monitor their exception use in the round. This is, of course, less of a risk area for departments who make minimal use of exceptions.
59. While tracking systems are not a requirement under the Recruitment Principles, these can ensure departments are managing the risk of potential breaches and proactively considering the future of a role and succession planning.

**Good practice:** Some departments hold monthly reviews of exception applications and existing appointments.

60. Tracking systems tend to work most effectively when departments use centralised teams to manage these processes. These ensure recruitment flows through a singular process and records are maintained.

**Good practice:** Departments specifically mentioned the use of a tracking system to flag when exceptions need to go to the Commission for approval (for example, when requiring an extension or change of role approval).

**Recommendation 6:** All departments should ensure they have appropriate tracking mechanisms in place to manage exception use and support succession planning. These may work most effectively when overseen by a central team.

# Conclusions and next steps

## Conclusions

61. The review identified a range of good practice and some areas of required improvement. Conclusions on the three focus areas of the review are summarised below.

(i) Clear processes for considering, challenging and approving appointments by exception.

62. Departments appear to have clear processes implemented to consider and approve exceptions. The review found evidence of multi-layered clearance processes that included senior sign off and, in some instances, multi-disciplinary assessment processes. We found some examples where the scope of an exception appointment could have been refined further. This was highlighted by departments approving exceptions for the maximum period before requiring Commission approval (i.e. two years). In some cases there was little evidence as to why an exception was needed for two years.

63. The Commission found good practice in place for considering and approving appointments, though some departments would benefit from implementing robust processes to challenge the parameters and details of appointments made.

(ii) Sound understanding of exceptions, how to use them under departmental delegated authority, and where Commission involvement is required.

64. There was reasonable evidence of departments making reference to the expectations of the Recruitment Principles and some good practice for consolidating and distributing advice received by the Commission. Only two breaches of exception rules were found.

65. In justifying their exception use, some departments showed good practice in detailing why a fair and open competition could not be run, why a specific exception was used, the skills individuals were bringing in and the future plans for the role. Other departments focused on budgetary constraints or headcount reasoning, matters which are unlikely to be relevant to a requirement set out under any of the exceptions. The Commission will provide continued guidance on these points in subsequent department engagement.

(iii) Reliable processes for tracking and managing their exception use.

66. There was varied evidence of departmental tracking systems to monitor exception use. These are important for monitoring trends, challenging overuse and managing instances where escalation to the Commission may be required.

## Next steps

67. We expect departments to consider the findings of this review in full, adapt their processes accordingly, and update the Commission on changes made.

68. The Commission will also engage individually with teams and departments through regular outreach work to discuss the findings and suggested recommendations from this

review. This will include supporting departments to develop solutions appropriate to their recruitment volume and complexity.

69. The Commission will monitor take-up of the review's recommendations through its annual audit. Having conducted audits of all departments and organisations within its scope across the 2024/25 audit year, the 2025/26 compliance period will adapt to focus on areas of strategic focus and risk. This will also be reflected in training programmes and wider outreach.
70. The Civil Service Commission has a small number of expert staff with responsibility for a wide range of complex functions. In order to deliver robust oversight and support to 70 departments on the scale required to provide complete assurance, additional resources are required.

*Final list of recommendations*

**Recommendation 1: All departments should develop comprehensive exception approval forms mirrored on the Commission's published forms for cases requiring its approval. These should include: why the appointment fits the specific exception used; why it is not appropriate to run a fair, open and merit-based competition; succession plan for the role; and sufficiently thorough conflict of interest consideration.**

**Recommendation 2: Departments should ensure robust challenge processes are in place to ensure the terms of temporary appointments by exception are strictly applied, including to ensure they are used only for time periods where it is not possible or impracticable to run full fair, open and merit-based competitions.**

**Recommendation 3: Departments should be able to demonstrate in their submissions for an exception clear reasoning why a fair, open and merit-based competition could not be run, how the person was identified, reasoning behind the length of the appointment and full succession planning.**

**Recommendation 4: Internal documentation detailing the process to appoint by exception should clearly reference the expectations and rules of the Recruitment Principles.**

**Recommendation 5: Departments should implement clear multi-stage authorisation processes for appointments by exception, including through ensuring SCS/senior review and the use of committees that engage in shared decision-making where appropriate.**

**Recommendation 6: All departments should ensure they have appropriate tracking mechanisms in place to manage exception use and support succession planning. These may work most effectively when overseen by a central team.**