

Derek Jones CB
Ysgrifennydd Parhaol
Permanent Secretary



Llywodraeth Cymru
Welsh Government

Darren Millar AM
Chair - Public Account Committee
National Assembly for Wales
Cardiff Bay
Cardiff
CF99 1NA

6 December 2012

Dear Darren,

You will recall that there was interest from several members at the PAC meeting earlier this week about the convention on Ministerial access to the papers of former Ministers. I thought it would be helpful for the Committee if I set out, for the avoidance of doubt, what arrangements are in place.

It is a long established UK Government convention that Ministers of the current Administration may not generally see documents of a former Administration of a different political party. The convention exists in order to provide a degree of privacy to previous Ministers.

The convention also applies within the Welsh Government, but with modification so as to take account of the existence from time to time of coalition governments here – unlike Westminster where until now coalitions have been rare. This means that the convention is applied when Ministers change and a new Minister is of a different political party to their predecessor. Predecessor means the Minister who previously had responsibility for policy which is now with the new Minister. Contrary to the impression which we gave the Committee at the time, for which I apologise, application of the convention is not in fact dependent on a change of Administration (ie the establishment of a new Government following an Assembly election). Rather, it applies whenever there are Ministerial changes resulting in Ministers being replaced by others from a different political party.

Of course Ministers serving in a coalition administration would normally see papers submitted to other Ministers regardless of party, as part of collective Cabinet responsibility.

The general principle is that new Ministers should not be shown, by access to documents, what advice was given to their predecessors from a different political party or what those Ministers said in response to that advice. Therefore, no submissions or briefings put forward to those previous Ministers should be made available to the new Ministers.

The convention covers documents dealt with by Ministers and not everything held by the Welsh Government. These documents are defined as:

- recorded information which has been prepared for and sent to a Minister, or was prepared by - or explicitly on behalf of - a Minister;
- matters particular to individual former Ministers (e.g. their expenses and diaries); or
- information relating to high profile events and issues which are still of widespread and significant interest.

It is not always obvious whether or not a document is a Ministerial document as defined by the bullets above and so sometimes civil servants have to apply judgement in deciding whether a document is caught by the convention.

An exception to the withholding of those documents defined by the bullets above is where the documents are already in the public domain (either through formal publication or through being issued without restriction outside the Welsh Government).

We recognise that there is a need to reconcile the general principle of withholding access to previous Ministerial documents with practical considerations including, where appropriate, facilitating the continuity of policy. So, where it is necessary to advise Ministers about work undertaken or decisions made by previous Ministers from a different political party, but providing copies of earlier documents is not appropriate, civil servants may consider what information from that earlier documentation should be supplied.

It is appropriate for civil servants to brief Ministers by providing them with a summary of what was at issue, and the action taken, without giving them access to the actual papers. Extracting facts and figures from the earlier documents and presenting them afresh is an appropriate part of this process.

The convention on access to documents of previous Ministers from a different political party by current Ministers also applies to their Special Advisers.

Yours sincerely,

David

RIVER LODGE – PUBLIC ACCOUNTS COMMITTEE ACTION POINTS

10th JULY 2012

GILLIAN MORGAN AGREED TO PROVIDE:

Details on whether senior Welsh Government managers above regional level would have been present for briefings of the former Minister for Enterprise, Innovation and Networks regarding proposals to purchase the River Lodge Hotel.

This is a reference to Briefing MB/AD/0197/07 provided by [REDACTED] to Andrew Davies dated 1st March 2007. It was sent to PS Andrew Davies by email 01/03/07. Normally officials would not be present when a Briefing is read by the Minister and we have no record that any senior official was present when this Briefing was read. Briefings are generally formal paper exercises, not verbal as such, and the Briefing folder would be emailed and sent in hard copy to the PS to the Minister.

A note on whether a deadline has been set to dispose of the former River Lodge Hotel site.

The proposed 12 month Option to Purchase to Betsi Cadwaladr University Health Board will run until 30th September 2013.

A note on the process for evaluating bids for use of the site, including details on any conditions on the construction of a footbridge on the site.

1. Land holdings were reviewed in line with Economic Renewal: A New Direction. The property as a former hotel was not considered suitable for conversion to offices or other business premises that would be suitable for the six sectors identified under that policy. On that basis it had been concluded that if the financial pre-condition in the Agreement for Lease could not be satisfied and the Lease not be granted, it was a property that would no longer be required and its value redirected to other priorities, in particular digital infrastructure, in accordance with Economic Renewal: A New Direction..
2. In late August 2011, following service of the termination notice, and in accordance with Welsh Government's '*Best Practice Guidance for the Disposal & Transfer of Land & Property Assets between Public Sector Bodies in Wales*' River Lodge was posted as being surplus and available on the central Government *e-Pims* web based database. This process makes the availability of the property known across the UK public sector. The recommended period for posting of the availability of the property is 40 working days. This period expired on 22nd October 2011.

3. As a consequence of the e pims process no new expressions of interest were received, though Betsi Cadwaladr University Health Board confirmed their continuing interest in the property.
4. In accordance with the best practice guidance an independent valuation is used to determine the open market value, which both public sector bodies agree to accept if the transaction proceeds. This process is designed to avoid lengthy disputes between public bodies and to reduce transaction costs. Consequently on 12th October 2011 the District Valuer quoted terms for undertaking the 'Independent Valuation' on behalf of both the Welsh Government and Betsi Cadwaladr.
5. Since October 2011, Betsi Cadwaladr has been carrying out due diligence on the site in order to identify any abnormal development costs that should be taken into account by the District Valuer in the final valuation figure. These include costs of demolishing the existing vandalised structure, a mains sewer that dissects the site which may have to be diverted and potential access issues over land not in WG's ownership.
6. The District Valuer formally reported to both parties at the end of July 2012 and based on the advice of the District Valuer, who has provided a RICS Red Book Valuation, the BETS' Minister approved on 31st August the granting of 12 month Option to Purchase to Betsi Cadwaladr University Health Board.
 - The Option period enabled the Health Board to complete its public consultation which formally ended on 28 October 2012, to present the outcome to its Board in December and to make a decision on the preferred site, also expected to be in December. The Option period also enabled the Health Board to secure planning consent for its proposals prior to acquiring the site.
 - The Option was for a period ending 30th September 2013.
 - The sale price, based on residential development land values, would be £500,000 if the dilapidated hotel remains on the site or £600,000 if the site was cleared of buildings in the meantime by WG.
7. Footbridge – There has been no discussion between WG and the Health Board regarding a footbridge. However, subsequent to the PAC hearings, information has been obtained that the question of a footbridge was raised during the Health Board's consultation and is not relevant. If a footbridge is required in conjunction with a health centre that will not have a bearing on the property's market value.

Further details on the Welsh Government's Property Leadership Team.

A Property Leadership Team (PLT) has been introduced within BETS. This in many ways resembles a peer review structure, reviewing every single property transaction within the Department (including acquisitions, disposals,

proposals to lease). Each case is considered, it convenes weekly and on the basis of its conclusions a Submission is sent to the Minister recommending transactions for approval which have satisfied this peer challenge process.

PLT meetings are chaired by one of the Head of Property, Head of Market and Policy or Head of Finance and Performance – Property and ICT Infrastructure.

Meetings are organised and managed by the Appraisal and Quality Assurance Manager, a post which was introduced specifically to improve the quality assurance process for property transactions as part of the lessons learned from the River Lodge episode.

Details on how Welsh Government officials in North Wales handled concerns raised by a local Assembly Member in a letter to the Minister regarding the acquisition of the River Lodge Hotel.

Each item of correspondence from Karen Sinclair followed the standard process of drafting by [REDACTED] and sign-off by the regional director (Vanessa Griffiths then Ian Williams - as matters progressed two items of correspondence were subsequently cleared by Sharon Linnard) before returning to Private Office for consideration by the Minister/First Minister. North Wales officials did not liaise directly with Assembly Members

Taking this as correspondence from Karen Sinclair:

Feb 2008 DFM/00351/08 – John Adshead drafted; cleared by Vanessa Griffiths *

July 2008 DFM/01273/08 – [REDACTED] cleared by Ian Williams *

Oct 2008 DFM/01857/08 – [REDACTED] cleared by Ian Williams

Oct 2008 DFM/02080/08 – [REDACTED] cleared by Ian Williams

July 2009 FM/05450/09 – [REDACTED] cleared by Sharon Linnard *

Sep 2009 FM/05828/09 – [REDACTED] cleared by Sharon Linnard *

* denote correspondence which makes specific reference to acquisition of the River Lodge Hotel

RIVER LODGE – PUBLIC ACCOUNTS COMMITTEE ACTION POINTS

8TH OCTOBER 2012

GARETH HALL AGREED TO PROVIDE

Further information on briefings provided to the relevant Minister with regard to the proposals by Clwyd Alyn Housing Association to use the site of the River Lodge Hotel.

MB/DFM/0016/10 dated 15th January 2010 set out to inform the DFM of the terms which had been discussed with Clwyd Alyn Housing Association to secure refurbishment of River Lodge and the agreement to lease in order to deliver the Powys Fadog Social Enterprise Project in Llangollen. The Briefing was withdrawn on 22nd January at the behest of Sharon Linnard who notified Gareth Hall.

It was intended to replace this with Submission SF/DFM/0025/10 which sought DFM approval for the proposed arrangements with Clwyd Alyn. However this was withdrawn prior to being submitted to the DFM, in the light of concerns over legal and value for money aspects of the proposed transaction.

MB/DFM/0210/10 in response to an FoI request mentioned that the possibility of leasing the property to Powys Fadog via Clwyd Alyn was on hold pending legal advice (March 2010).

Also MB/DFM/0047/11 January 2011 advised that the application for Environmental Improvement Grant by Clwyd Alyn was not determined and no formal offer of grant made, in light of the internal review of the River Lodge situation. However it would be open to Clwyd Alyn or Powys Fadog to re-apply.

MB/DFM/0209/11 April 2011 concerned the request for an extension of the time limit under the lease agreement by Powys Fadog to 17th September 2012, concluding that officials considered it inappropriate to grant any extension. Included in that Briefing was information that a project appraisal and analysis was underway to assess both the Powys Fadog project and that from Clwyd Alyn. This Briefing was not however considered by the DFM as the matter was considered to fall within the scope of pre-election protocols.

MB/EH/0284/11 re-iterated to the BETS Minister the information contained in MB/DFM/0209/11.

SF/EH/0252/11 recommended the Minister refuse two requests from Powys Fadog, which she agreed on 22nd June 2011:-

(i) that the Welsh Government provide 100% grant funding for their project;
and

(ii) that the alternative proposal from Clwyd Alyn for approximately 70% grant funding of their project, grant of a head lease and an under lease with Powys Fadog, be determined. (Subsequently Clwyd Alyn proposed an underlease with Powys Fadog).

Clarity on whether there had been other examples of the Welsh Development Agency / Welsh Government failing to conduct an independent red book valuation for land acquisitions.

Treasury Green Book, Managing Public Money and OGC all require that valuations are to market value as defined by the RICS Appraisal and Valuation Manual (otherwise known as the Red Book). In addition to defining market value the manual gives guidance on what are acceptable assumptions for a valuer to make and also how to value when a property has the prospect of a higher value use than that which is at the time of the valuation permitted under town planning.

Chartered Surveyors are bound by the Red Book in any Valuation they undertake, whether reported in a full red book report or not.

In every case we require valuations to be conducted by a chartered surveyor who is independent of the case officer, though that valuer can be employed by an external adviser or be a member of staff. We also require that valuations are on the basis of market value as defined by the Red Book.

The RICS have recently introduced a new Quality process in that all valuers producing a report that will be relied upon must in addition to being a Chartered Surveyor be a "Registered Valuer" with the RICS. We will be reflecting this change in our guidance.

Clarity on when the compliance review was commissioned

It was initiated on 29th June 2009.

An email received from Amanda Brewer's line manager, outlining the nature of her role on the board of Powys Fadog and assurances that the conflict of interest was being managed effectively.

An email was sent by Vanessa Griffiths 28/02/07 to Gareth Hall and other members of management re River Lodge, "Have now had a chance to investigate this with the team and just wanted to reassure you that there is no need to worry about this one – everything has been done in absolutely the appropriate way, the right processes and protocols have been followed and no conflict of interest – [REDACTED]

The Briefing referred to was MB/AD/0197; its purpose was to brief the Minister that he was likely to be approached by Karen Sinclair AM expressing concern over the perceived adverse impact of the River Lodge project on the locality, arising from comments made by a local councillor on behalf of businesses in

the town. The concerns related to the decision to acquire the building in preference to other (unspecified) projects in the town, the proposed nature of the activities to be undertaken by Powys Fadog, and the involvement of a member of the EIN staff as a Director of Powys Fadog.

RIVER LODGE – PUBLIC ACCOUNTS COMMITTEE ACTION POINTS

23RD OCTOBER 2012

JEFF COLLINS AND JAMES PRICE AGREED TO PROVIDE

Further information clarifying whether Welsh Government officials had responded to correspondence sent by the solicitors of Powys Fadog

WG received a pre-action letter on 3 May 2011 from Allington Hughes solicitors, acting for Powys Fadog, threatening judicial review proceedings. WG responded on 17 May 2011 setting out clearly why their claims were either not amenable to judicial review or – if they were – why their claims were unfounded.

Commercial Legal Services received correspondence in February 2010 asking for a synopsis of the overall position regarding Powys Fadog taking an under lease of the premises from Clwyd Alyn. WG did reply to this setting out that we did not yet have instructions regarding this matter and suggested they contact their client directly or the previous solicitor.

There had been a great deal of earlier correspondence with Powys Fadog's previous solicitors prior to exchange of Agreement for lease in 2009.

In relation to the general question about whether Welsh Government officials have responded to correspondence sent by solicitors of Powys Fadog it should be noted that there was correspondence in July 2010 involving Allington Hughes and Gareth Hall. The correspondence followed the meeting which took place between Gareth Hall, Welsh Government Legal Director and Powys Fadog members. The relevant correspondence comprises:

- Letter from Allington Hughes to Gareth Hall dated 10 June 2010
- Letter from Allington Hughes to Gareth Hall dated 18 June 2010
- Letter from Gareth Hall to Allington Hughes dated 24 June 2010

There is also email correspondence involving [REDACTED] [REDACTED] [REDACTED] and both Gareth Hall and the Permanent Secretary between August and October 2010. All of the emails from [REDACTED] were the subject of replies.

In relation to the comment made by Aled Roberts that a solicitor had returned documentation to the Welsh Government but had been unable to obtain any response we believe that this is an inaccurate recollection of evidence provided by Mr Wong in Llangollen. WG does not recall any suggestion being made in Llangollen that it had failed to respond to solicitors correspondence. Mr Wong did, in his evidence, make reference (paragraph 100) to a proposed tenancy agreement under which he would have been permitted to occupy a flat contained within the River Lodge complex. He refers to a negotiation over 6 months, to him having signed and witnessed the tenancy agreement, but the Welsh Government failing to return the document - "I chased it up for 6

months or so, but, in the end, I could not get any sense from anybody, so I just left it". Aled Roberts AM did ask Mr Wong whether it was he or his solicitor who sent the lease back to the Welsh Government and Mr Wong confirmed he did this personally. The tenancy agreement in question would have permitted Mr Wong to occupy the premises rent free. The agreement was signed by Pol Wong but was not completed due to the flat not being in a satisfactory state of repair and condition to occupy on health and welfare grounds, for example it was served by the building's main central heating boiler which was dilapidated and not in working condition at the time of our acquisition. We believe Mr Wong was informed by WG staff at the time that his continued occupation of the flat would not be possible.

Further information on how Welsh Government officials came to the decision to deem the River Lodge Hotel site surplus to requirement.

In the context of a review of our land holdings in line with Economic Renewal: A New Direction, this property, as a former hotel which was not considered suitable for conversion to offices or other business premises that would be suitable for the six sectors that had been identified under Economic Renewal: A New Direction. The review therefore identified that there was no economic policy fit for the site and therefore there was a need to explore alternative public sector uses or offer the site for sale. The property was no longer required and it was decided that its value should be redirected to other priorities.

23rd OCTOBER 2012 – PRIVATE MEETING

Members requested further details on whether there was any formally binding legal agreement for Pol Wong to live in the River Lodge Hotel

The property was acquired subject to a tenancy at will in favour of Pol Wong relating to Flat 21 and an assured shorthold tenancy agreement in favour of ██████████ relating to the Gatehouse. The assured shorthold tenancy to ██████████ was terminated by Welsh Government in April 2007 with her agreement.

As there was no written tenancy agreement in respect of Pol Wong's occupation it was proposed to document the tenancy formally and a draft tenancy at will was prepared in March 2007. The rental figure was left blank in the draft with the intention that it was completed once the rental was agreed with Mr Wong.

Subsequently instructions were given to issue a tenancy agreement in respect of the Gateway Flat rather than a tenancy at will and this was issued to Mr Wong for signature in 2009. The tenancy agreement was returned by Pol Wong but it was never executed by Welsh Government. This was due to the reasons outlined in the response to the first request for information under 23rd October above.

3rd DECEMBER 2012

A copy of the Welsh Government's internal compliance review, showing tracked changes to illustrate amendments to the document between 12th February 2010 and the final version of the document

The response to this question is shown in the attached paper, Annex 1 and Annex 2.

Response to PAC

PAC Request

1. Members of the PAC have requested “A copy of the Welsh Government’s internal compliance review, showing tracked changes to illustrate the amendments to the documents between the 12 February 2012 and the final version of the document”.
2. The committee secretariat in conveying this request has explained that members want to understand why and how the report changed. Furthermore it is understood that members have indicated that if it isn’t possible to be provided with a version of the report showing tracked changes from February 2012, it would still be helpful if a summary could be provided of what changes were made, and why they were made (but members’ preference is to be provided with a report with track changes).

Response

3. The author of the internal review conducted his investigations over a period between July 2009 and 26 February 2010. Throughout this period there were various working drafts of the report which were very much developing work in progress. The investigations and report writing were continuing in parallel throughout the month of February 2010 and there is an existence no track change document showing the changes made during the month.
4. In his evidence to the committee Gareth Hall advised that “Chris Munday’s report was put in a final draft form, but quite a lot of representations were made by Mike Clarke from Legal Services, which resulted in changes”. On the 26 February 2010 Chris Munday, the author of the report, circulated to Legal Department and others a draft report for comment and advice. Mike Clarke of the Legal Services department provided that advice in the form of comments and proposed track changes to the draft report. Having regard to that legal advice, his own findings and input from others Chris Munday issued his final report on the same date.
5. Legal advice is provided to officials and to Ministers on a confidential basis and it is not considered appropriate to disclose the contents of the track changes made by Mike Clarke as these constitute as legal advice.
6. The issue raised by PAC was covered within the witness statement submitted by Mr Munday to the employment tribunal convened to determine Mrs Brewer’s claim of unfair dismissal. To provide the committee with a clear understanding of how and why the report was changed the relevant extract from that witness statement is attached at Annex 1.
7. Similarly to facilitate the committee’s understanding of the differences between the 12 February working draft and the final issued report Annex 2 sets the relevant sections side by side, clearly illustrating the very different conclusions reached as a consequence of the additional evidence that came to light during February 2010.

ANNEX 1

1. A Draft Ministerial Briefing [REDACTED] includes reference to the key findings of my review. These key findings appear to contradict or to be significantly “watered down” versions of the conclusions I ultimately reached in my review report, particularly in relation to the breach of the ICT Usage Rules. The explanation for this is that the key findings included in the Draft Ministerial Briefing prepared by John Adshead were not based upon my final concluded report, rather on an earlier version which continued to be a work in progress.
2. My finalised report was submitted on 26 February 2010. In the period between 17 February 2010 and 26 February 2010 my investigations escalated as I had been given a deadline of the end of February within which to submit my review report. During this period I circulated working versions of my report for input from others. In response to this I received further information which I subsequently inputted into the report.
3. In relation to Ms Brewer’s e-mail usage I had only initially been provided with a snapshot of the e-mails sent from Ms Brewer’s account. These examples were provided by Ms Brewer herself. Subsequent to 17 February 2010 I was made aware of further examples of the e-mails Ms Brewer had been sending from her Welsh Government e-mail account. The volume of these personal e-mails was considerably greater than I had initially appreciated.
4. I was also made aware of direct contact Ms Brewer had, had with the Welsh Government Legal Service Department most notably a series of telephone conversations Ms Brewer had with [REDACTED] on 10 March 2008 and the subsequent concerns raised by [REDACTED] about such contact. In my view the fact that Ms Brewer had been chasing Legal Services directly for the Powys Fadog lease was a serious issue. For Ms Brewer to have contacted the Welsh Government’s legal team directly, circumventing [REDACTED] [REDACTED] was in direct contravention of established protocol. I felt in doing so, Ms Brewer had blurred the line between her involvement on behalf of Powys Fadog and as a Welsh Government officer. Ms Brewer, as Director of Powys Fadog had no business in dealing directly with the legal advisers of the landlord who was granting the lease, such negotiations should have gone through the appropriate legal channels.
5. Prior to producing the final consultation draft I reviewed the evidence to ensure that my findings were evidence based and took account of all aspects of the project. I also wished to ensure that because the evidence had been gathered over a period of some 5 months I had taken a full account of all relevant issues.
6. As a result of this additional information I amended my final conclusions to those which are contained in the final version of the report. The finalised report obviously superseded any previous working documents and the conclusions contained within them. I submitted my finalised report to Sharon Linnard on 26 February 2010.

ANNEX 2

Comparison of Working Draft and Final Report

Working Draft 12 th Feb 2010	Issued Report 25 th Feb 2010
<p>Summary Findings</p> <p>I conclude that there has been no compliance breach in the acquisition and letting of the property. In accordance with The DE&T Guidelines on the Acquisition and Disposal of Property as they relate to transactions by private treaty, the property values have been verified by independent valuations. Whilst the valuation for the acquisition was not obtained prior to the formal approval of the acquisition it was nonetheless provided prior to legal completion and I regard this breach of paragraph 27.0 of the guidelines not be material</p>	<p>There has been a clear, and potentially substantial, breach of ICT Usage Rules by Mrs Brewer. The nature and extent of her personal use of her Assembly Government e-mail account in relation to the business of Powys Fadog had the potential to mislead or, at best, be an embarrassment to Assembly Government. Management and Human Resources should consider whether any disciplinary proceedings need to be taken as a consequence of this breach.</p>
<p><u>Conclusions</u></p> <p>7.4 In all but one of the e-mail communications recorded on the files from Mrs Brewer which were sent in her personal capacity, but which utilised the Assembly e-mail system, she complied with the use of electronic mail (official and personal guidelines). 12.7 of these guidelines “generally, you should not use a disclaimer for work related e-mails, though the business needs of individual departments may require one. However a disclaimer must be included for all personal (non work related e-mails)”. For Assembly Government staff the wording of the disclaimer is “any of the statements or comments made above should be regarded as personal and not necessarily those of the Welsh Assembly Government, any constituent part or connected body”. The disclaimer contained within the copy e-mails on the file exactly replicate the required disclaimer.</p>	<p>7.7 The ICT Usage Rules are very clear in that Assembly e-mail system can be used in very limited circumstances for personal use but such usage may not be associated with any activity on behalf of an external organisation. The rules further require that on those limited occasions when the e-mail system is used for personal use that an appropriate disclaimer is included. It is clear that whilst in this case Mrs Brewer has included the required disclaimer, the nature and extent of her usage of the ICT system on behalf of the business of Powys Fadog is a breach of the rules in so far as they relate to personal e-mail.</p>

7.12 In using the Assembly Government e-mail system for personal use, Mrs Brewer has complied with the requirements of staff guidelines and in particular has complied with the requirement, with one exception, to include a disclaimer. In that one exception she did make it clear in the body of the text that she was writing to Denbighshire County Council in both her personal and professional capacities.

7.8 I am aware that in correspondence with the First Minister, Karen Sinclair AM has raised concerns about the use by Assembly staff of the e-mail system for personal use. Specifically she claimed that an e-mail from Mrs Brewer had been sent to WEFO from her Assembly Government e-mail address. I am not aware to which specific e-mail Karen Sinclair AM may be referring to, but Mrs Brewer has provided me with copies of various e-mails she sent from her work e-mail address to WEFO and other people within the Assembly. I also noted from the Legal Services files that there was a considerable volume of correspondence from Mrs Brewer from her Assembly Government e-mail address to WEFO and others.

7.9 In view of the volume of personal e-mails and the resultant embarrassment to Assembly Government, I recommend that Senior Management and the HR Advisor Team should consider whether this breach of ICT Usage Rules should give rise to appropriate disciplinary proceedings.

Welsh Government, Response to action points at Public Accounts Committee meeting of 19 November 2012

There are currently approximately 103 members of staff that hold board membership or are senior management of external bodies. These are broken down by Directorate General area as follows:

- *Business, Enterprise, Technology and Science - 33*
- *Central Services (Permanent Secretary's Division, Legal Services, Strategic Finance and Performance and People, Places and Corporate Services) - 11*
- *Health, Social Services and Children - 12*
- *Sustainable Futures - 2*
- *Local Government and Communities - 17*
- *Education and Skills - 28*

Most departments collate the information annually so some positions may no longer be held, hence the approximate figures.