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Civil Service Commission

Cabinet Office
Foreign, Commonwealth and Development Office

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**Unpaid appointment with the PDA Society: Application under the Business Appointment Rules from Ms Anna Clunes, former Prime Minister's Special Envoy for Migration at the Cabinet Office.**

The Civil Service Commission (the Commission) has considered an application for advice under the Business Appointment Rules (the Rules) from **Ms Anna Clunes**, formerly Prime Minister's Special Envoy for Migration at the Cabinet Office. The application is for an unpaid, part-time role as a **Policy Volunteer at the PDA Society**. Further detail on the content of the application is in the Annex. The Commission's advice is required as Ms Clunes is a former civil servant at SCS Pay Band 3. Her last day of service was 31 August 2026.

The purpose of the Rules is to protect the integrity of the government. They aim to avoid any reasonable concerns that: a civil servant may be influenced in their official duties by the risk of reward; a civil servant may improperly exploit access to information; and an organisation may gain an improper influence through the employment of a civil servant.

The Commission's advice[1] is that the appointment should be made subject to the following conditions:

1. Privileged information – Ms Clunes should not draw on (disclose or use for the benefit of herself or the persons or organisations to which this advice refers) any privileged information available to her from her time in the Civil Service.
2. Lobbying – For two years from her last day in the Civil Service, until 31 August 2028, Ms Clunes should not become personally involved in lobbying the UK government or its arm's length bodies on behalf of the PDA Society (including parent companies, subsidiaries, partners and clients). She should also not use, directly or indirectly, her contacts in the government and/or Civil Service to influence policy, secure business/funding or otherwise unfairly advantage the PDA Society (including parent companies, subsidiaries, partners and clients).
3. Bids and contracts – For two years from her last day in the Civil Service, until

[1] See Advice under the Business Appointment Rules for details applying to all advice issued by the Civil Service Commission.

31 August 2028, Ms Clunes should not provide advice to the PDA Society on a bid or contract relating to the UK government or its arm's length bodies.

The Rules set out that civil servants must abide by the Commission's advice. It is Ms Clunes' personal responsibility to manage the propriety of any appointment and to understand any other rules and regulations she may be subject to in parallel with the Commission's advice.

Ms Clunes must seek advice if she proposes to extend or otherwise change her role with the organisation. Once this appointment has been publicly announced or taken up, the letter will be published on the Civil Service Commission's website.

Yours sincerely,



**Kate Owen**
Chief Executive

## Annex A: The application

1. According to its website, the PDA Society is a charity which aims to improve the lives of children and adults with Pathological Demand Avoidance (PDA)[2] and their families. They do this by conducting research into PDA, raising awareness of the condition, and providing advice through their support service.

Applicant assessment

2. As a Policy Volunteer, Ms Clunes stated she will take part in advocacy on policy regarding children and young adults with PDA.

3. Ms Clunes confirmed her role will not involve contact with, or lobbying of, government.

4. As the Prime Minister's Special Envoy for Migration at the Cabinet Office, Ms Clunes was responsible for negotiating a new three-year deal with France for cooperation on illegal migration and small boat arrivals. Ms Clunes was the Acting Deputy National Security Adviser at the Cabinet Office between August and December 2025, and the UK Ambassador to Poland at the Foreign, Commonwealth and Development Office until August 2025.

5. Ms Clunes stated she has not been responsible for regulatory, funding or any other decisions affecting the PDA Society at any time in her last two years in the Civil Service.

The Commission's analysis

6. *Application level.* As a Level 1 application for an unpaid role, the Commission's analysis applies the principle that this category of appointment poses a lower risk to government integrity.

7. *Risk of reward.* Ms Clunes was not involved in policy, regulatory, or contractual decisions affecting the PDA Society during her time in post. The risk of the appointment being a reward for decisions made in office is therefore low.

8. *Access to information.* As the Prime Minister's Special Envoy for Migration at the centre of government, Ms Clunes would have been exposed to some

[2] Pathological Demand Avoidance (PDA) is a persistent and marked resistance to demands experienced by and observed in some autistic people. It can impact essential needs like eating and sleeping, and expectations such as going to school or work.
https://www.autism.org.uk/advice-and-guidance/behaviour/demand-avoidance

privileged information about the government's legislative and policy programme. The standard privileged information ban mitigates any risks around her access.

9. *Improper influence.* As the Prime Minister's Special Envoy for Migration, Ms Clunes would have a network of contacts in government that could provide an unfair advantage to the PDA Society. She has stated there will be no contact with government in her proposed role. Any remaining risk is mitigated by the standard conditions.