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Civil Service Commission

Cabinet Office

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Unpaid appointment with the University of Cambridge: 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 **Visiting Fellow, Baltic Programme, Geopolitics Centre at the University of Cambridge**. 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 University of Cambridge (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 University of Cambridge (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 University of Cambridge 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 Clune's 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. The University of Cambridge is a public research university. According to its website, the Baltic Programme at the Centre for Geopolitics is designed to promote research and understanding regarding the geopolitics of the greater Baltic Sea Region and the UK's role in this area.

Applicant assessment

2. As a Visiting Fellow, Ms Clunes stated she will support the Centre in deepening links with Poland and other Baltic states to develop research and policy papers on the region's history and geopolitics. She will also deliver seminars and conferences with Baltic academics and policy officials, and support fundraising for the programme.

3. Ms Clunes confirmed her role will involve contact with government. She stated she would contact members of the Europe team in the Foreign, Commonwealth and Development Office (FCDO) and British Embassies in the Baltic region with a view to involve them in the work of the Baltic Programme.

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 FCDO until August 2025.

5. Ms Clunes stated she has not been responsible for regulatory, funding or any other decisions affecting the University of Cambridge 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, academic 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 University of Cambridge 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 privileged information about the government's legislative and policy programme. The standard privileged information ban mitigates any risks around her access.

9. *Improper influence.* Ms Clunes has stated that her proposed role will involve contact with FCDO and Embassy officials to involve them in the work of the Baltic Programme. The Commission recognised that, particularly given Ms Clunes' former role as UK Ambassador to Poland, this creates a perceived risk of improper influence or lobbying. However, the Rules allow for communication as a routine part of a role where such activity would not be improper. The lobbying ban serves to remind Ms Clunes that, while she may use formal channels to contact government, she must not use her privileged access to senior contacts to influence policy or secure funding outside of these established routes. Furthermore, the Commission considered it significant that both Ms Clunes and the University have confirmed their intention to fully comply with the lobbying ban that applies to her.