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Civil Service Commission

Foreign, Commonwealth and Development Office

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Paid appointment with Vodafone Group Services Limited: Application under the Business Appointment Rules from Dame Deborah Bronnert DCMG, former Director General Europe and Irregular Migration and Senior Responsible Officer for the Germany State Visit at the Foreign, Commonwealth and Development Office.

The Civil Service Commission (the Commission) has considered an application for advice under the Business Appointment Rules (the Rules) from **Dame Deborah Jane Bronnert DCMG**, formerly Director General Europe and Irregular Migration and Senior Responsible Officer for the Germany State Visit at the Foreign, Commonwealth and Development Office (FCDO). The application is for a paid, full-time role as the **Global Corporate Security, Intelligence & Resilience Director** of **Vodafone Group Services Limited (Vodafone)**. Further detail on the content of the application is in the Annex. The Commission's advice is required as Dame Deborah is a civil servant at SCS Pay Band 3. Her last day in a Civil Service post was 31 December 2025, and her last day of service was 30 April 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 with Vodafone should be made subject to the following conditions:

1. Privileged information – Dame Deborah 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 office.
2. Lobbying – For two years from her last day in office, until 31 December 2027, Dame Deborah should not become personally involved in lobbying the UK Government or its arm's length bodies on behalf of Vodafone (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

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

influence policy, secure business/funding or otherwise unfairly advantage Vodafone (including parent companies, subsidiaries, partners and clients).

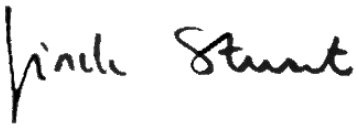
3. Bids and contracts – For two years from her last day in the Civil Service, until 31 December 2027, Dame Deborah should not provide advice to Vodafone on a bid or contract relating to the UK Government or its arm's length bodies.

Vodafone and Dame Deborah confirmed their understanding of, and adherence to, the conditions that apply to Dame Deborah's role.

The Rules set out that civil servants must abide by the Commission's advice. It is Dame Deborah'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.

Dame Deborah 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,



Gisela Stuart
First Civil Service Commissioner

Annex A: The application

1. According to its website, Vodafone Group Services Limited (Vodafone) is a multinational telecommunications company operating across Europe and Africa. The company provides mobile and fixed-line connectivity, alongside digital, cloud, security, Internet of Things, and mobile financial services. It serves as a strategic supplier to the UK government and acts as a major Critical National Infrastructure provider, delivering communications networks, managed cybersecurity services, and public sector contracts across central government departments, defence, and emergency services.

Applicant assessment

2. As Global Corporate Security, Intelligence & Resilience Director, Dame Deborah will lead Vodafone's end-to-end global corporate security and resilience agenda. Her duties will include defining strategy, managing business continuity, overseeing fraud/investigations, and leading engagement on government security, regulation, and geopolitical risk.

3. Dame Deborah stated her role will involve contact with government, including HMG and international authorities, focused on security, critical national infrastructure (CNI) resilience, and geopolitical risk. She stated this contact will primarily be conducted through established standard professional channels, such as industry-government forums, formal meetings, conferences, and briefings, and will not involve seeking UK Government contracts or lobbying ministers or officials on commercial issues.

4. As Director General Europe and Irregular Migration, Dame Deborah was responsible for managing the UK-European diplomatic strategy and overseeing the network of British embassies and staff across the region. She was also responsible for the FCDO's function on irregular migration. In her role as Senior Responsible Officer (SRO) for the Germany State Visit, she stated she had overall oversight and responsibility for the inward visit of German President Steinmeier in December 2025.

5. Dame Deborah also held a role in wider government as the Special Envoy to the Armenia/Azerbaijan Peace Process in part linked to the European Political Community (EPC) Summit at Blenheim, Oxford.

6. Dame Deborah stated she was not responsible for regulatory, funding or any other decisions affecting Vodafone at any time in her last two years in the Civil Service.

7. Dame Deborah confirmed she had no direct contractual dealings with Vodafone Group over her last two years in office. She noted a standard business briefing held with Vodafone's Global Corporate Affairs Director in early 2025 regarding HMG's UK/EU reset objectives, where no commitments were made and no commercial matters were discussed.

Correspondence with Vodafone

8. Vodafone confirmed its understanding of, and adherence to, the Commission's advice and the conditions imposed on Dame Deborah's appointment.

Departmental assessment

9. The FCDO verified Dame Deborah's account of her official interactions with Vodafone Group and the wider sector. The department confirmed that it holds four active contracts with Vodafone worth approximately £12 million, set to expire in late 2026 and early 2027.[2] The FCDO clarified that while Dame Deborah was involved in awarding contracts to telecommunications companies as Chief Operating Officer and Chair of the Operations Committee between 2014 and 2016, decisions were made on a consensus basis by a shared committee. The department emphasised that her direct commercial role ended nearly ten years ago and that her recent contact with Vodafone were standard official briefings conducted in her official capacity. Consequently, the FCDO assessed the risk of this appointment being perceived as a reward for past decisions or actions in office as low.

10. Regarding access to sensitive information, the FCDO noted that Dame Deborah has not had direct commercial dealings with the telecommunications sector since around December 2024, when she was involved in high-level policy discussions regarding the UK/EU Security and Defence Partnership and undersea cabling. The department stated that given the broad policy nature of those discussions and the passage of time, the risk of competitors objecting or of Dame Deborah possessing commercially valuable or sensitive competitor information is low.

11. The FCDO highlighted that as she has not been actively involved in awarding departmental contracts since 2016, it is unlikely she holds information that could provide Vodafone with an unfair commercial advantage. To safeguard the appointment against potential criticism surrounding Vodafone's active departmental contracts, in addition to the standard conditions, the FCDO

[2] Covering telecommunications services including conferencing, SIMs/tariffs, firewalls/VPNs, and maintenance support

recommended that Dame Deborah be subject to a specific condition prohibiting her from engaging in any direct contract discussions with the FCDO on behalf of her new employer.

The Commission's analysis

12. *Risk of reward.* The Commission noted that Dame Deborah has not been involved in regulatory or contractual decisions affecting Vodafone within her last two years in office. The Commission therefore agreed with the department's view that the risk that Dame Deborah was offered this role as a reward for decisions or actions taken in office is low.

13. *Access to information.* As former Director General Europe and Irregular Migration, Dame Deborah had access to high-level strategic policy and international diplomatic insights. Given the focus of her new role on geopolitical risk, corporate security, and CNI resilience, there is a general overlap with her background in national security and European affairs. However, she held no specific commercial information regarding Vodafone's competitors. The broad policy nature of her former duties, alongside the passage of time since her departure from government, limits the currency and commercial value of the information she retains. The Commission agreed with the FCDO that the standard privileged information condition is sufficient to manage the risks associated with her access to information.

14. *Improper influence.* Dame Deborah will retain a significant network of contacts within government from her time at the FCDO which could offer Vodafone an unfair advantage, whether real or perceived. Given her senior profile, the Commission recognised that her proposed contact with government creates a potential risk of improper influence. However, the Commission placed significant weight on the fact that Dame Deborah confirmed her engagement with government will be conducted through established industry-government forums and official channels, focused on CNI resilience, security threats, and crisis preparedness, and will not involve seeking UK Government contracts or lobbying ministers or officials on commercial issues. The lobbying ban serves to remind Dame Deborah that while she may participate in routine operational dialogue in the normal course of business, she must not draw on her privileged access or senior contacts to influence policy, secure funding, or gain an improper commercial advantage for Vodafone. Furthermore, the Commission considered it significant that both Dame Deborah and Vodafone have confirmed their intention to fully comply with the lobbying ban that applies to her. The Commission agreed that the standard conditions are sufficient to mitigate the risks.

15. *Duration of conditions.* The Rules apply to all former civil servants for two years from their last day of paid service, meaning Dame Deborah remains subject to the Rules until 30 April 2028 and must submit an application for any new appointment or employment taken up prior to this date. However, having only engaged in general work supporting training and the international academy, which was entirely internal, involved no representative or FCDO policy discussions, and would not advantage Vodafone, the Commission determined it proportionate for the specific conditions imposed on this role to run for a two-year period from her last day in post on 31 December 2025. These conditions will therefore apply until 31 December 2027.