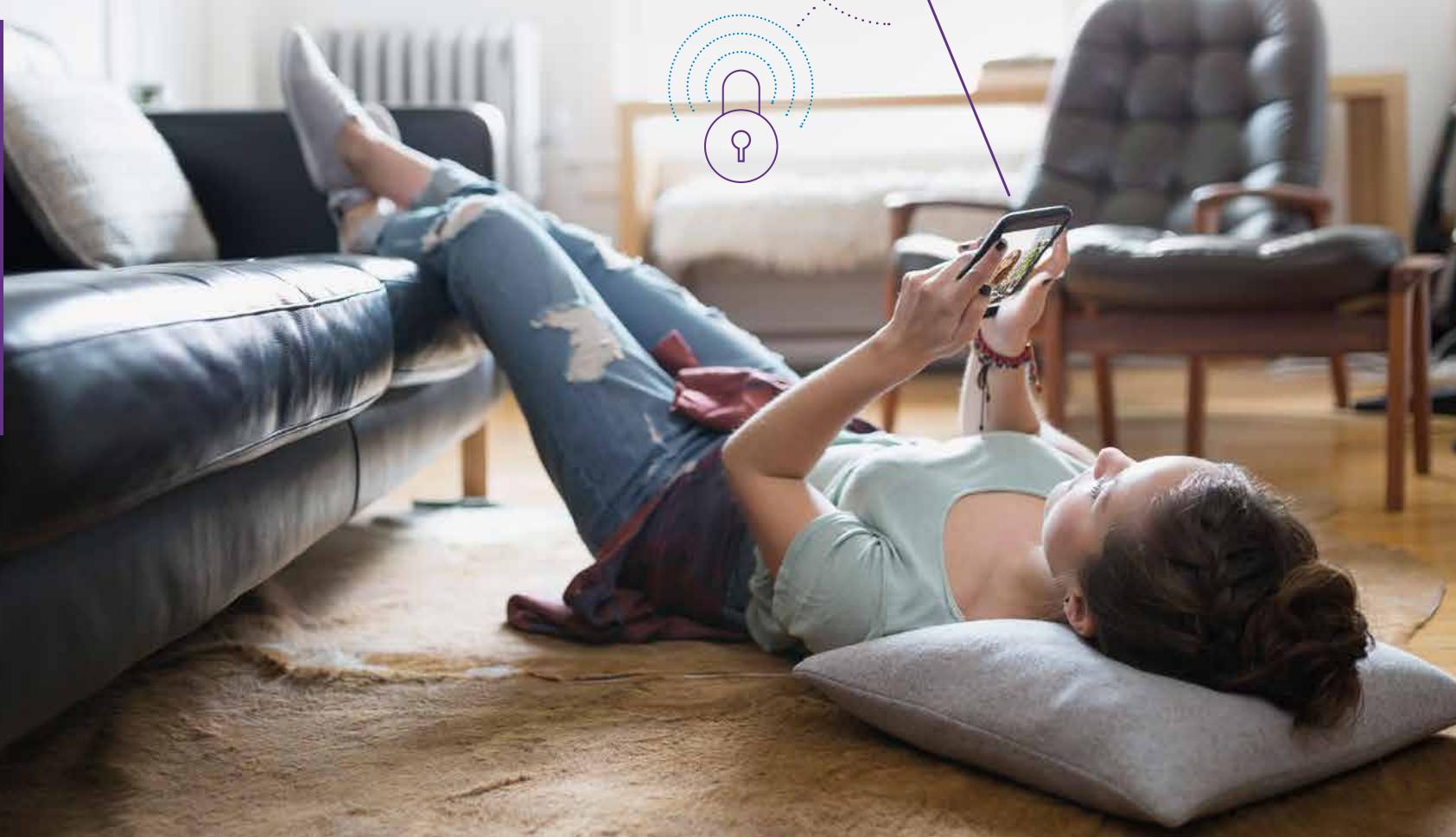


Championing human and digital rights

Everyone's entitled to basic rights and freedoms – both on and offline. We're committed to respecting these rights, partnering to combat modern slavery and helping to drive the conversation on issues like privacy.

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Protecting people's rights on and offline

Human rights are important for everyone – society, government and business. We use the UN Guiding Principles on Business and Human Rights to shape our approach.

We're committed to respecting human rights in our own business (see box) and our supply chain. And we're taking a lead on modern slavery, including partnering with others to unlock the power of technology in combating this crime.

We have strong safeguards in place to protect customers' data against cyber-attacks and protect their privacy and free expression. Issues like online freedoms and privacy are evolving as people spend more time online. We're helping the UK Government think about the changing nature of these complex issues.

We're also responding to other emerging issues relevant to our industry, such as artificial intelligence and human rights in sports broadcasting (see page [17](#)).

Respecting human rights in our business

We're committed to respecting the dignity, liberty and equality of everyone we work with. This is part of the BT ethics code that everyone at BT must follow.

This year, we launched an overarching [human rights policy](#). It brings together existing policies in one place to explain the human rights we are more likely to affect and how we're addressing these risks.

Our due diligence processes help us identify and manage potential human rights risks in our operations. The *Digital Impact & Sustainability Committee*, a Board committee, oversees our human and digital rights programme worldwide.

All of our people must complete training on human rights as part of our mandatory annual training on the BT ethics code. We provide additional training for the teams who are involved with higher risk areas.

We encourage our colleagues, contractors and suppliers to report concerns, including through our confidential Speak Up helpline (see page [28](#)).



Respecting human rights is fundamental to the way we work and we want to partner with suppliers who share this commitment.

We spent around £13.4bn this year with more than 16,000 direct suppliers in nearly 100 countries. To work with us, they must commit to meeting our requirements on [Sourcing with Human Dignity](#) and other fundamentals like our [standards](#) on ethics, health and safety, environment, product stewardship and climate change (see page [22](#) for more on our work with suppliers to cut carbon emissions).

We work with our suppliers – and their suppliers – to check they meet these standards. We're also improving the process we use to evaluate potential suppliers on social and environmental criteria. We're introducing a new pre-qualification questionnaire which will flag potential risks or early-warning signs before we decide to work with a supplier. We're especially alert to the risk of modern slavery in our supply chain (see page [15](#)).

Sourcing with human dignity

If we find an issue, we assess the risk and how best to deal with it. We identified 368 high and medium-risk suppliers this year, and followed up with all of them within a three-month period to request more information, we then decide whether we need to take any further action. This may include an audit – we conducted 53 on-site assessments this year. We track progress monthly to check we're dealing with high and medium-risk suppliers effectively and that improvements are being made. If they don't show any commitment to improve, we may stop working with them.

Supplier assessments on social and environmental criteria

	2017/18	2018/19
Self-assessments by new or renewed contract suppliers	917	782
Suppliers identified as high or medium risk	269	368
% of high or medium-risk suppliers reviewed within three months as follow-up	100%	100%
On-site assessments (Tier 1 and Tier 2 suppliers)	52	53

Looking deeper in the supply chain

Our supply chain is large and complex. We're looking beyond our direct (Tier 1) suppliers to check that their suppliers (our Tier 2) also comply with our standards. This year, we audited 33 Tier 1 and 20 Tier 2 suppliers, focusing on the suppliers identified as highest risk.

Sourcing with human dignity continued

We've started mapping the supply chain of two of our consumer products, our DECT phone and our Smart Hub. We now know who supplies many of the components of these products as far as Tier 4 of the supply chain so we're better able to understand potential risks.

We're members of the Responsible Business Alliance (RBA), a business coalition for responsible supply chains. This gives us greater visibility of the lower tiers of our supply chain by giving us access to audit information shared by others in our industry. We're using the RBA's shared supplier database to check suppliers' performance and take action if necessary.

Checking for conflict minerals

Electronic devices may contain tantalum, tin, tungsten and gold. These are known as conflict minerals if they are sourced from war-torn or politically unstable places such as the Democratic Republic of Congo, that have a heightened risk of human rights abuses.

Our conflict minerals policy explains how we're managing this risk and we report progress in our annual [conflict minerals disclosure](#). We're also members of the Responsible Minerals Initiative which is helping us review and compare our approach against industry standards.

More than 40m people around the world are thought to be in some form of slavery. Much more needs to be done to stamp out this crime and we're working with partners to look at how technology can help.

Leading change in business and society

Forced, bonded or child labour is never acceptable. We have systems in place to help us prevent any form of slavery in our own business or our supply chain. Our [Modern Slavery Act statement](#) explains how.

We believe technology can help combat modern slavery and we're exploring how through Tech Against Trafficking, a coalition of organisations including Amazon, AT&T, Microsoft, Nokia, Vodafone, Salesforce.org and anti-trafficking experts. This year, the group began mapping ways that technology is already combating slavery around the world, identifying over 200 solutions so far. Each solution was assessed to determine the potential to scale up their impact with the help of the group. Our plan is to collaborate on high potential solutions to support the fight against slavery.

Tackling modern slavery

National
Anti-Slavery
Day



On National Anti-Slavery Day in October 2018, we lit up the BT Tower with modern slavery messages, visible to thousands of people across London. This included highlighting the modern slavery helpline and smartphone app.

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It is only by a close partnership between committed stakeholders that we can begin to effectively combat and ultimately prevent modern slavery. The partnership of BT and Unseen is an exemplar of this and we encourage others to partner and collaborate to end slavery.”

Andrew Wallis
CEO, Unseen

Tackling modern slavery continued

We're also working with the UK Government and other businesses to champion best practices through the Home Office's Business Against Slavery Forum. This year, we funded the development of a digital platform to support Bright Future, a programme started by a fellow member of the Home Office's Business Against Slavery Forum, the Co-operative Group. The programme aims to help survivors of human trafficking and modern slavery find secure work. City Hearts, the charity operating the scheme, will be able to use the new digital platform to post opportunities and match suitable candidates against paid work placements across the UK.

Raising awareness

No country is immune to modern slavery. In the UK, tens of thousands of men, women and children are believed to be victims. But public awareness remains low.

We partner with the charity Unseen to raise public awareness of slavery in society and provide communications services, equipment and consultancy to support the UK modern slavery helpline it runs. The helpline provides access to information and support on a 24/7 basis for victims of modern slavery, businesses, authorities and the general public. Since its launch in October 2016, it has received many thousands of contacts indicating over 13,500 potential victims.

This year, we developed an app with Unseen to make it even easier to report suspected cases of modern slavery. It also offers tips on how to spot the signs of slavery.

Protecting privacy and freedom of expression

The rights people have offline must also be protected online. We work hard to protect our customers from online harms and safeguard their privacy and security, supporting their right to free expression.

But our customers' right to privacy is not absolute. Governments can request access to information that could help to fight serious crime or terrorism, and the law requires us to provide it. We take this issue very seriously. We have due diligence processes for dealing with such requests and are transparent about our approach.

Protecting customers' privacy

Customers expect us to keep their information safe and private. We must – and do – protect our customers' personal data (see page [17](#)). And when we design a new product or service, we consider privacy from the very start. We call this privacy by design.

In May 2018, new EU data protection regulations came into force that enhance privacy rights for individuals. We welcomed these changes and took steps to ensure compliance. We simplified the language of our [privacy policy](#) and added more detail on how we're using our customers' data. We used training, posters, videos and quizzes to alert colleagues of their duty to keep data secure – and what to do if there's a breach.

Balancing privacy and government investigatory powers

In some situations, authorities can legally override the right to privacy because they need access to people's communications and data to help stop serious crime and terrorism. This can be vitally important to national security and we've a legal obligation to provide this information.

The government has to find the right balance between protecting people's security and their privacy and free expression. We assess any requests in line with our process, and we will ask for clarity if we need to. We have strong internal governance in place and our *Investigatory Powers Governance Committee*, a Board committee, oversees all our activity in this area. The [BT Privacy and Free Expression Report 2019](#) lays out how we respond to these requests in the UK and 20 other countries.

We've joined the Global Network Initiative – an organisation at the forefront of the debates on privacy and freedom of expression – to keep our approach in line with best practice.

Blocking illegal content

We believe everyone should have access to any content online as long as it's legal. So we won't block access to material on the internet except in a very specific set of circumstances (see our [BT Privacy and Free Expression Report](#)). This includes images of child sexual abuse flagged by the Internet Watch Foundation. We also offer parental controls and work with Internet Matters to make the internet safer for children (see page [09](#)).

Filtering helps to block access to harmful content online. But illegal content spread on social media is beyond our control. We don't think internet providers like us should be making judgement calls about what content is and isn't acceptable. But we think someone should. In September 2018, we joined other broadcasters and media providers in an urgent call for an independent watchdog to regulate the industry and make the internet safer for everyone.

Strengthening security

Security is fundamental to protecting our customers' privacy. By keeping our networks secure, we're helping to keep their personal information and private communications safe from increasingly sophisticated cyber-crimes like phishing, malware and hacking.

We're taking a leading role in the fight against cyber-crime and we're empowering our customers to protect themselves too.

Bolstering our defences

Our security council is responsible for managing cyber security risks. It reports to our *Executive Committee*. Automated systems and the BT Security team, of over 3,000 colleagues around the world, monitor customer and BT devices at all times. Between October and December 2018 they blocked an average of 135m connections to malware sites each month, protecting our systems and keeping our customers' data safe.

We publish the number of phishing attacks, scams and malware sites we're detecting on our new [Cyber Index](#) website. We've done this to be more transparent, raise awareness of the risks and show what we're doing behind the scenes to protect our customers.

Many of our products are moving to the cloud to give our customers flexibility and greater security. We carry out due diligence on our cloud providers to check they meet the latest industry security standards.

We're investing in research, innovation and training to ensure we stay one step ahead of the criminals.

This year, 175,000 hours of training helped to equip our teams with the skills they need to protect BT and our customers against cyber-attacks. Sixteen apprentices joined our team this year and we will welcome more next year as we build essential skills for the future (see page [10](#)).

Empowering our customers

We offer customers advice and tools to help them protect themselves online too. In 2018, we ran a campaign to encourage people to fortify their homes against cyber-criminals. Our [website](#) offers practical tips on how to choose strong passwords, spot scams and protect digital files like photos.

Customers can also use our free software to help keep their data safe. Products like BT Protect are designed to detect viruses, malware and spyware.

Working together

We're working with others to help combat cyber-crime. Last year, we became the first telecommunications provider in the world to start sharing information about malicious software and websites with our peers. This builds on our existing data-sharing agreements with the National Cyber Security Centre and law enforcement organisations such as INTERPOL. We're calling on other UK broadband providers to follow our lead and share this type of data too.

Shaping the agenda on emerging issues

Human and digital rights risks are constantly evolving. We're working with others to understand these risks and shape the agenda on emerging issues relevant to our business.

Exploring the ethics of artificial intelligence

Artificial intelligence (AI) has a lot of useful applications. But there are challenges. The criteria it uses to make decisions must be clear and the data it uses must be high quality – which means correct, complete, and bias-free to avoid discrimination. That's why respecting human rights is at the heart of our approach as we explore further uses for AI.

We're drawing on all of our experience in AI research to contribute to the emerging debate on the ethics of this technology. We responded to the UK Government's consultation on the new Centre for Data Ethics and Innovation this year. We're also part of techUK's working group on digital ethics.

Protecting human rights in sports broadcasting

Sport has the power to be a uniting force for good in society. But more work needs to be done to fully align the world of sport with the fundamental principles of human rights.

We're on the advisory council of the Centre for Sport and Human Rights that launched in June 2018. Through this stakeholder alliance, we work with governments, civil society, sports bodies and other broadcasters and sponsors to navigate the risks and take action.

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BT has been a critical partner of the Centre from its inception through to today. From playing a key role in developing tools to help broadcasters embed human rights into its operations, to leading the broadcast voice into discussions around collective action, BT has proven itself invaluable to our work.”

Mary Harvey
CEO, Centre for Sport and Human Rights