



BT Compliance Committee Bulletin 24 | January 2024 Meeting

About us

The BT Compliance Committee (BTCC) is a BT Group plc Board Committee, responsible for monitoring and reporting on BT's compliance with the Commitments and Governance Protocol. This is our 24th Bulletin reporting on our January 2024 meeting.

The BTCC is supported by the Commitments Assurance Office (CAO). Further information about the BTCC and CAO can be found [here](#).

Key topics

Commitments key controls review

The Committee was pleased to hear from the Senior Manager of Communications Regulation Compliance on the control environment that supports the Commitments.

The Committee discussed customer complaints and the workings and interdependencies between BT Group and Openreach in dealing with these, and whether there is anything more that can be done to improve the customer experience in these circumstances.

Culture survey outcome

The Committee heard from the Commitments Assurance Office on the findings of the internal survey which sought to understand both the culture of adherence to the Commitments within BT Group and whether the Commitments are being kept front of mind. The Committee agreed that these surveys provide useful indicators on how the Commitments is embedded and discussed the outputs of the review.

Isabel Hudson

The Committee thanked Isabel for chairing the Committee since its inception.

Regular reporting

The Committee was updated on ongoing monitoring of core processes intended to support the Commitments (financial planning, commercial processes and strategy) and ongoing projects. Processes are running as expected and no significant issues were identified.

Commitments Cases

The CAO Director provided an update on breach CAO-46 where hydra cables were used instead of the Cablelink product. There is evidence that the right controls and processes had not been in place given this is the third time a breach of this nature has been identified. As such, the CAO recommended that breach CAO-46 should be classed as a serious breach of Section 3.5 [The Openreach CFU assets shall comprise the assets of BT's Access Network and BT's Backhaul Network needed to be managed and operated by the Openreach Division in order to provide the products listed in paragraphs 3.2 and 3.3, and including items needed to support those products and assets such as line testing and remote diagnostics] and the Committee was in agreement.

Remedial and consequential action has been taken and this case is now closed.

The CAO presented breach CAO-47, wherein a BT Business Service Desk Analyst (SDA) with a Regulatory Compliance marker (RCM) sent a screenshot via Teams to another SDA who works in the BT Customer Directory Solutions team. This was part of a request for support with a customer enquiry they were dealing with. The recipient did not have and was not entitled to, an RCM. The screenshot showed Openreach Customer Confidential Information (CCI) - including customers' addresses, product details and telephone numbers, although not names. The CAO recommended that breach CAO-46 should be classed as a trivial breach of Section 10.6 and the Committee was in agreement.

Remedial and consequential action has been taken and this case is now closed.

Our next meeting

This is the last meeting of the BTCC, with responsibilities for monitoring adherence to the Commitments transferring to the BT Audit and Risk Committee from April 2024.

Commitments Assurance Office, March 2024