

Bulletin 25 | July 2024 BT Audit and Risk Committee Meeting

About us

The Audit and Risk Committee is the BT Group Board Committee responsible for monitoring BT Group's performance in delivering the Commitments and the supporting Governance Protocol. The Audit and Risk Committee is supported by the Commitments Assurance Office (the CAO). Further information about the Audit and Risk Committee and the CAO can be found [here](#).

Key Topics

Annual Commitments report

The Committee was pleased to hear from the Director of the CAO on the annual Commitments review paper, which is published [here](#). The report covers the activities of the BT management and the BTCC during 2023/24.

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.

Openreach HQ

Following the move of Openreach's headquarters from Judd Street to 6 Gracechurch Street in May 2024, the Committee was pleased to hear from the CAO on CMO monitoring of Openreach people attendance at One Braham, to assure that the closer proximity to One Braham and smaller working environment does not weaken information sharing and independence boundaries.

Systems separation

The Committee was informed of a minor variation to the Commitments regarding how BT and Openreach will keep certain systems separate. This is to ensure the Commitments remain fit for purpose as increasingly more systems migrate to the cloud and to enable BT's migration of our IT systems to cloud based architecture, whilst still ensuring there is no lack of clarity about whether such solutions comply with the Commitments. The new version of section 13 came into effect on 12 August 2024 and can be found [here](#).

Regular reporting

The Committee was updated on oversight of the Medium-Term Plan (MTP) financial planning and strategic development processes for 24/25, which has not identified any concerns and differences in approach for Openreach as compared to other BT units.

Commitments Cases - Breaches

The Committee considered the following breach cases.

CAO-48 Business inappropriate contact with Openreach (January 2024)

A Business Project Professional contacted an Openreach Patch Manager via email to help to expedite an urgent job. He obtained the contact details of the Openreach Patch Manager from a previous compliant conversation via Teams. His request was refused and reported to the CRC.

The BARC agreed with the CRC's assessment that this was a **trivial breach** as there was no intent to breach our Commitments and no CP was advantaged or disadvantaged.

CAO-49 Openreach CI sharing (March 2024)

An Openreach AI 'use case' was presented at a session, of which one slide contained Openreach Commercial Information (CI). A Data Regulation and Compliance Director present in the session asked for the slide to be taken down from screen sharing immediately and reported this to CRC to investigate.

The BARC agreed with the CRC that this was a **trivial breach** due to the information being presented momentarily and with no intent, with immediate remedial actions identified and taken by those present in the session.

CAO-50 - Sharing of Openreach CI with Consumer CIO (May 2024)

A Digital Transformation Director sent and immediately recalled an email containing Openreach Commercial Information (CI) to a number of senior colleagues. The Openreach CI consisted of detailed financial impacts of proposed changes to timelines and plans, All-IP customer migration timescales not in the public domain and activities relating to Openreach CPs and their customers.

The BARC agreed that this was a **trivial breach** as whilst the Openreach CI and context of the content of the attachment of the email was highly confidential, it was not seen by the recipients. Evidence of the email recall supports this.

Our next meeting

November 2024

Commitments Assurance Office, September 2024.