



Bulletin 30 | November 2025 BT Commitments Monitoring

BT Commitments Monitoring

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

Ofcom attendance at the BARC

The Committee was pleased to welcome Ofcom representatives Natalie Black (Group Director for Communications and Networks), Martin Ballantyne (General Counsel) and Ian Strawhorne (Director of Enforcement) who joined the meeting in person. They discussed Ofcom's views on BT Group's continued compliance with the Commitments and progress against the intended DCR and WFTMR outcomes, based on the finding of Ofcom's Annual Report published in September.

Addition of SAP Analytics Cloud (SAC) Planning to Annex B of the Commitments

As part of a broader programme to develop BT Group's financial planning capabilities, a new shared management information system – SAP Analytics Cloud (SAC) Planning (part of the SAC application) – is being introduced in January 2026 to eventually replace the existing SAP BPC system. This requires an update to Annex B of the Commitments to list the new application. The Committee was happy to agree to this proposed amendment.

Refresh of BT Group Values

The Committee was updated by the CAO Director on plans in progress to refresh BT Group's values. The CAO continues to be satisfied that Commitments risks are being well managed and will continue to monitor as this progresses.

Training and culture

The Committee was updated on two refresher sessions to Internal Comms on the Commitments, which were well-received. Further training with HR teams is planned in Q3.

The Committee also heard of CAO plans to repeat 2023-24's Commitments culture survey in Q3 to provide a temperature check on understanding and general sentiment towards the Commitments across the organisation.

Regular reporting

The Committee was updated on the Medium-Term Plan (MTP 25) financial planning and strategy development processes. Overall, the governance and process continue to be well embedded despite recent organisational changes. The CAO will be reviewing the monitoring process ahead of MTP 26 to ensure the Commitments remain front of mind.

Commitments Cases

One trivial breach and 2 non-conformance cases have been reported by BT Group since the last meeting.

Breaches

CAO-54 Trivial breach of Section 10 – Confidentiality

On 17th June 2025 a Solution Impact Assessment (SIA) relating to use of AI tools to automate Openreach FTTP Provisioning tasks was raised by a Digital Design Manager. Due to an error in the Digital Design Manager's profile, the document, which contained Openreach CI (a high-level breakdown of Openreach's FTTP unit costs), was placed in a queue for Consumer Digital activities.

The CAO recommended that this be classified as a trivial breach, as whilst Openreach CI may have been accessed by Digital team members supporting Consumer who would not have a Regulatory Compliance Marker, those that had access to the document queue were all Consumer Digital Data Privacy Specialists, who do not perform any commercial role in Consumer. As a result, any benefit to BT in seeing the Openreach CI (had the document been accessed) would have been minimal and any potential CP impact therefore negligible.

The BARC agreed with the recommendation that this be considered a trivial breach.

Our next meeting

February 2026

Commitments Assurance Office, December 2025