

# Championing responsible tech and human rights.

**Ed Petter**  
Corporate Affairs Director  
(executive sponsor,  
responsible technology  
and human rights)



As we move into the future, we're taking a bold and open approach to harness the opportunities and respond to the risks of emerging technologies. Getting this right matters. It will reduce risk, enable commercial growth and innovation, and help us realise our ambition of being the world's most trusted connector of people, devices and machines.

We have a strong legacy of leadership in respecting human rights across our business and supply chain. We're taking a responsible approach to tech that respects people's fundamental rights and freedoms.

## Our progress

Strengthened **human rights** governance and due diligence processes

Began a citizen engagement programme to understand the role of responsible tech in future growth and innovation areas

Established new **responsible tech strategy** and principles, and tested them through our new responsible tech steering group

Mapped supply chains down to tier 4 for all BT, EE and Plusnet branded products

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## Respecting human rights through a responsible approach to tech

We're committed to respecting and supporting the human rights and freedoms of all those touched by our business – our colleagues, customers, supply chain workers and wider communities. And we're thinking deeply about how we develop, use, buy and sell technology in a way that benefits people and minimises harms.

### Human rights governance

We follow the UN Guiding Principles on Business and Human Rights, and we were an early signatory of the UN Global Compact. Our Human Rights Policy ([bt.com/humanrights](https://www.bt.com/humanrights)) sets out how we protect human rights within our business and through our wider relationships.

Respecting human rights is part of our ethics code ([bt.com/ethics](https://www.bt.com/ethics)) that all colleagues must complete training on every year. We provide additional guidance and support to teams most likely to face human rights risks. This year, we made training on modern slavery mandatory for all our procurement colleagues, and offered additional human rights support for key colleagues in our Asia, Middle East and Africa regions.

We've strengthened our governance of human rights following a review and recommendations from BSR ([bsr.org/en/](https://www.bsr.org/en/)).

Our chief executive has formally delegated authority for decisions about human rights risks to our corporate affairs director, who chairs our new responsible tech steering group (see next page).

We've also enhanced the integration and visibility of human rights risks within our group risk management framework.

Our updated sales due diligence process helps to identify and address the potential human rights impacts of our products and services. We look at what we're selling, who the customer is, and whether our product is likely to directly or indirectly support high-risk activities like military, security or law enforcement applications.

Based on what we find, we may decide to conduct a more detailed human rights impact assessment, sometimes with external support. In the last two years, we asked external experts to support two impact assessments related to sales to customers identified as potentially higher risk. Their recommendations informed a responsible approach to these sales that incorporates mitigation measures to address identified risks.

### Open engagement on human rights

Listening to and engaging with stakeholders within and outside the business is central to our approach to human rights issues. We advocate for a collaborative approach, and partner with other companies, government and civil society.

This year, we engaged in EU policy work on mandatory human rights due diligence and artificial intelligence. We joined the Council of Europe's Partnership with Digital Companies. And we continued to support the development of best practice and smart regulation through collaborative initiatives like techUK's digital ethics working group, Digital Catapult's artificial intelligence industry working group and our regular engagement in BSR's Human Rights Working Group.

We're also part of the debate on human rights issues in the world of sport through the Centre for Sport and Human Rights.

We encourage anyone with concerns about human rights in our operations or value chain to contact our confidential Speak Up [helpline](#) or our human rights team. Colleagues can also ask a question using our internal website.

## Human Rights Day 2020

Recover Better – Stand Up for Human Rights. That was the theme of the UN's annual Human Rights Day in December 2020.

We took the opportunity to share reflections with colleagues on tech and human rights issues in the context of Covid-19. We encouraged them to think about some of the key human rights issues we can affect as a business – including inclusion, equality, privacy and free expression. For example:

- Has 2020 changed the way you think about your human or digital rights?
- What are the most important human rights issues we face as a company? And as a society?
- Looking ahead, how can we help our communities recover better and stand up for human rights?

The pandemic has shone a spotlight on the vital role technology and data can play in improving people's lives. It's also brought issues like privacy and free expression to the fore, reinforcing our focus on responsible tech.

## Our responsible tech strategy

Tech is rapidly transforming the way people interact with each other and the world. The use of tech, sensors and data will continue to change the world around us – the ways we live, work, travel and stay healthy.

This offers a wealth of exciting opportunities to unlock the positive role of tech. But we know people are also worried and sometimes scared about the possible consequences. Six in ten<sup>1</sup> Brits worry that the pace of change in technology is too fast and almost three in ten<sup>2</sup> tech workers are worried about the work they do having negative impacts.

How we use data will determine whether our customers trust us – and we know that 92% of customers are more likely to trust companies that give them control over the information they share<sup>3</sup>. That's why trust is central to our mission, and being a visible leader on responsible tech is part of our new corporate strategy.

Our responsible tech approach will support commercial growth and innovation by leveraging trust as a differentiator of existing solutions and enabling us to take a lead in future growth areas – including connected homes, smart cities, workplace automation, healthcare tech and security.

The objective of our new responsible tech strategy is to ensure that we consistently develop, use, buy and sell technology in a way that benefits people and minimises harms.

Many of the decisions our colleagues take every day raise questions that require careful thought – like balancing potential benefits of tech with privacy and fairness. The answers aren't always black and white, so we're empowering our people to make responsible decisions using four simple but important principles (see box).

## Our responsible tech principles

- **For Good:** We design and deliver tech to empower people and improve their lives.
- **Accountable:** We are accountable for our actions and take care to avoid and protect against tech misuse.
- **Fair:** We work hard to ensure everyone is treated fairly and with respect.
- **Open:** We listen, collaborate and are transparent about our actions.

The principles build on our purpose, values and commitment to human rights. They draw on the UN Guiding Principles on Business and Human Rights, and learning from peers and experts.

We designed the principles to apply to all aspects of our business and value chain, regardless of the type of technology. This will help us stay flexible and respond to new innovations and issues as they come up.

We've already thought about how to apply our principles to artificial intelligence. This includes being open about how we use it and explaining how it works, taking care to prevent improper use, and promoting inclusive and fair outcomes by avoiding any built-in bias.

## Creating a responsible tech culture

We're engaging with people across the business to explore what our responsible tech principles mean in practice for the way we develop, use, buy and sell technology – and to consider the potential benefits or harms that could spur from tech-related decisions. We're looking across our whole value chain – from who our suppliers might be working with through to risks and benefits of our products for consumers.

We've set up a new responsible tech steering group, which includes leaders from our customer-facing units and corporate functions, and reports to our *Executive Committee* and provides updates to our *Digital Impact & Sustainability Committee*. The group's remit is to set strategic direction, drive consistency in decision-making across the business, stay on top of emerging trends and resolve escalated issues. It has already started road-testing our responsible tech principles in the context of real use cases and ethical issues (see box).

To help us make informed decisions, we also listen to the people who could be affected by them as part of our open culture. Together with think tank Demos ([demos.co.uk](https://demos.co.uk)), we surveyed members of the UK public to help us understand their views on personal data being used to improve public health or being tracked in public spaces, their relationship with their devices, and their expectations of transparency and privacy.

The findings show that people evaluate the benefits and risks of tech and data differently, but they share concerns about the future, and hold similar views on the need to empower tech users so they can be in control of their data and understand the potential impacts of tech.

## Tackling tough tech questions

Rapidly evolving technology brings with it huge potential for positive impact. But there could be negative effects and trade-offs too. How might different groups of people – and their rights – be affected? What unintended consequences might there be? And how can we make sure that tech skills, governance and standards keep up with the pace of change?

Asking these kinds of tough questions is essential to ensure we connect for good, with tech that benefits people and minimises harms. Our new responsible tech steering group helps us dig deeper into the ethical implications of applying new technologies to pressing societal challenges.

In the steering group's inaugural workshop, they focused on the use of tech such as artificial intelligence, advanced data analytics, and the Internet of Things in the areas of healthcare, home care and public health.

It also served to test and refine our new responsible tech principles (see box) in a healthcare context. Steering group members discussed potential benefits like more effective targeting of interventions for positive health outcomes. And they thought through potential concerns, including implications for people's privacy.

<sup>1</sup> Edelman Trust Barometer – Insights: Tech and trust.

<sup>2</sup> Doteveryone: [doteveryone.org.uk/work](https://doteveryone.org.uk/work).

<sup>3</sup> KPMG research – Building technical trust.

## Sourcing with human dignity

Our suppliers provide the products and services that keep our business running. This year, we spent around £13.1bn with more than 1,100 direct suppliers in nearly 100 countries.

Any supplier that wants to work with us has to commit to our [Sourcing With Human Dignity](#) labour standards or equivalent – as well as other standards on climate change, environment, ethics, health and safety, and product stewardship.

We use a risk-based approach to assess suppliers' performance. This starts with questionnaires to understand the level of risk when a supplier first comes on board or renews their contract with us. One of the factors that determines the level of risk is where a supplier operates. This year, we've increased the number of countries considered high risk for human rights issues to align with the Responsible Business Alliance (RBA) risk maps.

If we assess a supplier as medium or high risk, we ask for more information and follow this up with an on-site assessment if needed. If we find a supplier is having any issues with meeting our standards, we work together to try and resolve these issues. But if they don't show a commitment to improve, we'll stop working with them.

This year, we identified 51 medium and high-risk suppliers. Covid-19 lockdowns and travel restrictions meant we carried out fewer on-site assessments than usual – 33 in total – and we conducted five remote assessments via video call for high priority cases. We found issues around increased use of temporary labour and excessive working hours or overtime, likely as a result of impacts from Covid-19, and we worked with suppliers to help them improve.

### Supplier assessments on social and environmental criteria

	2019/20	2020/21	
Self-assessments by new or renewed contract suppliers	340	122	
Suppliers identified as high or medium risk	95	51	
% of high or medium-risk suppliers reviewed within three months as follow-up	100%	100%	
On-site assessments (Tier 1, 2 and 3 suppliers)	Tier 1	15	14
	Tier 2	33	18
	Tier 3	5	1
	<b>Total</b>	<b>53</b>	<b>33</b>

### Looking deeper into the supply chain

This year, we harnessed the power of artificial intelligence to map the supply chains for all BT, EE and Plusnet branded products and identify associated human rights risks, including risks of modern slavery (see box). The initial findings revealed nearly 1,800 supplier relationships across Tiers 2, 3 and 4. Some suppliers appeared over 20 times.

Membership of the RBA gives us access to in-depth assessments of shared suppliers at all levels of our supply chain.

Our updated [Human Rights Policy](#) describes how we prevent raw materials associated with the risk of funding armed conflict (known as conflict minerals) – or with other issues such as working conditions and child labour – from being used in our products. These materials include cobalt, gold, tantalum, tin and tungsten. See our Modern Slavery Statement ([bt.com/modernslavery](https://bt.com/modernslavery)) for more on our approach and findings this year.

### Supporting our suppliers

We've reached out to suppliers to help them through the Covid-19 crisis this year. We checked in with our most critical suppliers to anticipate any potential financial stress or difficulty meeting orders, and discuss contingency plans if needed.

We support the Government's Prompt Payment Code programme in the UK. In 2019, British Telecommunications plc was suspended from the Code, but has since worked to monitor and improve supplier payments, and was subsequently reinstated. This year, we paid 95% of supplier invoices in line with the terms we'd agreed with them. We also announced we'd pay our 4,500 small business suppliers within 30 days, as part of our Small Business Support Scheme ([bt.com/smallbusinesssupport](https://bt.com/smallbusinesssupport)), whilst recent reforms to the Code require us to pay 95% of invoices from smaller suppliers in 30 days – we're on target to do this by July 2021.

This year, we've also developed a plan to collaborate with and encourage our suppliers to meet and mirror our commitment to diversity and inclusion.

## Tackling modern slavery

We're calling for better use of tech and data to help combat the risks of human trafficking, forced or compulsory labour in our supply chain and beyond.

This year, the Tech Against Trafficking ([techagainstrafficking.org](https://techagainstrafficking.org)) coalition that we're part of launched the first published global analysis of how different stakeholders, including law enforcement, civil society, businesses and academia, can take advantage of technology to advance the fight against human trafficking.

To mitigate risks in our supply chain we used machine learning techniques to improve our visibility and simplify the complexity of managing supply chain risks for all BT, EE and Plusnet branded products.

Our funding and technology helps the UK's Modern Slavery and Exploitation Helpline, run by Unseen, provide 24/7 advice and support to anyone who calls.

“Despite a seemingly impossible task, all Helpline operations were moved to remote working in April 2020, with the Helpline Team being set up to take calls and answer online enquiries and concerns from home, which we continue to do. This was only possible through the resiliency of the BT telephony and cloud-based system the Helpline utilises.”

Unseen Modern Slavery and Exploitation Helpline, Annual Assessment 2020 ([unseenuk.org](https://unseenuk.org))

See our Modern Slavery Statement ([bt.com/modernslavery](https://bt.com/modernslavery)) to find out more about our approach and performance this year.

## Protecting privacy and free expression

Privacy and free expression, both fundamental human rights, are closely connected. Protecting our customers' information also enables them to communicate freely.

We secure customers' data on our networks – and help them protect themselves online – as part of our strategy to create standout customer experiences (see our [Annual Report 2021](#)). And our privacy impact assessment tool helps us make sure we build privacy into the design of new products and services to protect our customers and their data.

Challenges around tech, privacy and free expression are continually evolving. We work with other tech companies and human rights organisations to respond through our involvement in the Global Network Initiative (GNI) ([globalnetworkinitiative.org](http://globalnetworkinitiative.org)). We support the GNI's Principles on Freedom of Expression and Privacy and this year we presented a self-assessment of our performance against the principles to the GNI board. We identified several areas where we could improve and we're strengthening our policies, processes and governance structures in advance of an independent external assessment in the coming year.

This year, at the UK Government's request, we provided limited anonymised network data – such as general patterns in the movement of people – to help plan the public health response to the Covid-19 pandemic. The Government has subsequently begun paying for this information following a formal competitive tender. No personal data is involved and individual users can't be identified. Safeguards include scheduled reviews, additional security and measures to ensure data remains anonymised (see our website ([bt.com/about/coronavirus/our-customers](http://bt.com/about/coronavirus/our-customers)) for more).

Sometimes authorities can legally request access to data or communications to help tackle serious crime or protect national security. In these cases, a government overrides individuals' right to privacy to protect the security of its citizens. We're obliged by law to provide information requested under these investigatory powers, but we have processes in place to assess each request carefully. We ask for more information if we have questions about what we're being asked or want to check the legality of the request.

See the [Appendix](#) for a summary of lawful interception and data disclosure requests received in 2020 by country. Our Privacy and Free Expression Report 2019 ([bt.com/privacyandfreeexpression](http://bt.com/privacyandfreeexpression)) explains our approach to privacy and free expression in more depth.

## Addressing online harms and illegal content

Recent research from Demos, funded by BT, found that there's a high level of concern among the British public about the potential for online harms. Views varied on the right balance between tackling online harms and protecting online freedoms, and how to strike that balance. But there was a clear desire for shared responsibility on this by the UK Government, online platforms and providers, and individual internet users.

In another study with the Good Things Foundation, we found that certain groups face greater risks than others and most people don't know where to find help. There's also a gap between knowledge and actual behaviours when it comes to staying safe online.

We empower people to keep themselves safe online by offering free tech tools like parental controls for our products. And we support online safety awareness and education through our Skills for Tomorrow programme and our partnership with Internet Matters (see [page 12](#)).

We also support wider efforts to keep people safe online while respecting personal freedoms. We provided input to the UK Home Office Select Committee Online Harms Inquiry and welcomed the resulting Government Online Harms White Paper response. We also welcome the forthcoming Online Safety Bill, which we expect to be a significant step forward.

The rise in misinformation circulating online is drawing increased attention to the issue of balancing freedom of expression while limiting potentially negative impacts. People have a fundamental right to express themselves, but we will block access to illegal content – including malicious traffic, intellectual property violations and images of child sexual abuse flagged by the Internet Watch Foundation. See the [Appendix](#) for data on the material and sites we've blocked in the UK this year.

We partner with the Marie Collins Foundation ([mariecollinsfoundation.org.uk](http://mariecollinsfoundation.org.uk)) to support children who have been harmed or abused online (see quote). Since 2015, its CLICK: Path to Protection programme has trained over 7,000 frontline professionals to help them provide better support for victims and their families.



**Victoria Green**  
Director of services,  
Marie Collins Foundation

We cannot emphasise enough how important the support BT has given the Marie Collins Foundation over the years has been in the development of training, resources and new partnerships. Its funding has enabled us to reduce the impact of online child abuse and harm to children and their families – not just in the UK, but internationally.