



BT Commitments

Review of Compliance 2025–26

For the period 1 April 2025 to 31 March 2026

1 Introduction

Nine years after implementation, the Commitments continue to support Openreach's greater independence and equal treatment of communications providers. Across the UK, full fibre availability continued to increase during the year, reaching 78% of residential premises across all network providers. Openreach also continued to expand its own Full Fibre network footprint, passing almost 23 million premises by 31 March 2026. This progress takes place against a broader market characterised by rapid full fibre deployment and increasing infrastructure competition, supporting the DCR outcomes the Commitments were designed to deliver. Looking ahead, Openreach remains focused on further expanding Full Fibre coverage, subject to supportive economic and regulatory conditions.

The BT Board has delegated responsibility for reviewing compliance with the Commitments to the BT Audit and Risk Committee (BARC), which is supported in this work by the Commitments Assurance Office (CAO), led by the Commitments Assurance Director.

2 The BT Audit and Risk Committee (BARC)

This year, the BARC discussed Commitments activity on three occasions, covering:

- Oversight of Commitments risks arising from group-wide initiatives, strategic activity and key processes (strategy development and financial planning)
- Consideration of changes to the Commitments governance framework
- Review of how the Commitments operate in practice including ongoing monitoring and assurance activity
- Review of potential breaches and non-conformances

Overall, the BARC noted that Commitments risks continue to be effectively managed, with governance arrangements operating as intended.

3 Commitments monitoring activities

A key aspect of the CAO's monitoring is assessing how the Openreach Governance Model operates in practice.

3.1 Operation of key processes

Consistent with the Commitments framework, the CAO continued to monitor key processes closely, including strategy development and related governance, financial planning (including the Medium-Term Plan cycle), and relevant commercial and cross-group interactions.

The CAO attended BT Investment Board meetings and monitored the operation of the Commercial Processes Guidance Note. Between 1 April 2025 and 31 March 2026, Openreach approved 111 papers, with two items escalated to BT for decision. The role of the Openreach Board continues to be respected. Processes remain well embedded and operated as intended.

3.2 Organisational, system and governance changes

During the year, the CAO and Communications Regulation Compliance team (CRC) maintained oversight of organisational and system changes with potential Commitments impacts. This included oversight of changes requiring updates to the Commitments framework where shared systems are used across BT Group and Openreach, and ensuring access controls remain aligned to Regulatory Compliance Marker requirements.

The past year saw several important changes to our Board. Sunil Bharti Mittal and Gopal Vittal joined the Board as non-independent non-executive directors on 15 September 2025, both receiving tailored Commitments training on induction. Greg McCall became Chief Security and Networks Officer on 1 January 2026, following his previous role as Chief Networks Officer. Patricia Cobian joins the Board and ExCo as Group CFO later in 2026, with Commitments induction to follow.

Effective 1 April 2026, Katie Milligan became CEO, Openreach (succeeding Clive Selley), and Clive Selley became CEO BT International (succeeding Bas Burger). Openreach's Commitments Monitoring Office (CMO) reviewed the associated arrangements and engagement model following Clive Selley's move to BT Group, to ensure they remained consistent with the Commitments and Openreach's greater independence.

3.3 Monitoring of key BT supplier and customer relationships with Openreach

BT Group acts as a supplier to Openreach across a number of functions. No Commitments concerns were identified by the CAO in relation to BT Group's supplier role in 2025–26.

BT Group's customer-facing units, in particular BT Consumer and BT Business, engage with Openreach as customers. These interactions were regularly monitored during the year and, with the exception of the specific cases summarised below, no concerns were identified.

3.4 Broader monitoring activity

Outside routine process monitoring, the CAO tracked emerging areas of Commitments risk and engaged early with relevant teams. This included continuing oversight of group-wide initiatives where an end-to-end view could create Commitments sensitivities, supported by Commitments guardrails and ongoing monitoring.

The CAO supported the successful implementation of BT Group's brand relaunch and new behaviours programme, working closely with stakeholders across BT Group and Openreach to ensure Commitments considerations were appropriately identified and managed.

4 Commitments culture and awareness

In November 2025, the CAO repeated the Commitments culture survey to evaluate how well the Commitments remain integrated within BT Group and to identify areas where clearer guidance would be helpful. The survey indicated strong baseline awareness and support for the Commitments, and that colleagues feel empowered to raise concerns.

The survey also highlighted that colleagues who interact with Openreach can experience process complexity and expressed a need for clearer, more practical guidance in some real-life scenarios. As an outcome of the survey, the CAO will take forward work to provide clearer, more practical guidance and to review the related training during 2026–27.

5 Commitments compliance

5.1 Information management and enhanced compliance controls

CRC keeps the BARC updated on the management of Openreach Commercial Information (CI) and Customer Confidential Information (CCI), including how information sharing controls operate in practice and where additional clarity is helpful (including around when disclosures should be raised and how requests for CI/CCI are framed). Controls designed to manage information handling and Openreach independence continued to be monitored through CRC assurance and monitoring activity and reported via established governance routes.

5.2 Complaints

No formal complaints were received in 2025–26.

5.3 Cases decided: breaches and non-conformance with process

During the year, the BARC considered the following cases:

- A trivial breach relating to a document containing Openreach CI being inadvertently placed in an incorrect compliance workflow queue, meaning that it was accessible to a compliance professional who may not have had an RCM.

- A serious non-conformance relating to an internal communication promoting BT Consumer colleague offers that was distributed to Openreach colleagues without the required Commitments review and approval process. The issue was identified and corrected through follow-up communications.
- Three trivial non-conformances involving low-level process failings, which were quickly addressed with no evidence of inappropriate access, information sharing, or competitive harm.

The number of cases this year remains low and continues the downward trend seen since 2018. Details of the trivial breach and serious non-conformance are included below.

Type	Nature of breach	Actions taken
Trivial breach	An SIA containing Openreach Commercial Information (CI) was incorrectly raised in the BT Compliance Governance Platform, making it accessible to users without the appropriate Regulatory Compliance Markers. The issue was identified and corrected before any unauthorised access to the information occurred.	The SIA was removed and deleted. Investigation identified a control gap relating to system access and profiles, and corrective actions were taken to address the root cause and reinforce proper platform use.
Serious non-conformance	An internal communication promoting BT Consumer colleague offers was distributed to approximately 6,000 Openreach colleagues without the required Commitments review and approval process. The communication was issued under the name of a BT Group executive and encouraged recipients to act as “brand advocates” for the offers.	A corrective communication was issued and the circumstances reviewed. Follow-up actions were taken to reinforce the requirements for Commitments review and approval of communications with Openreach audiences.

6 Engagement with Ofcom

During the year, Ofcom representatives attended a BARC meeting in connection with discussion of the OMU Annual Report and related monitoring activity.

BT and the OMU continue to engage through regular meetings, as well as broader interaction across the annual reporting cycle.

7 Looking forward to 2026–27

The BARC will continue monitoring to ensure BT adheres to the Commitments in both letter and spirit. In addition to standard monitoring activities, areas of focus will include ongoing risk-based assurance activity across key processes, continued attention to Commitments understanding and awareness indicators, and ensuring the Commitments framework remains fit for purpose as systems and organisational arrangements evolve.