

# Speak Up FAQs

## General Questions

### What is Speak Up?

Speak up is BT's confidential hotline, where people working for or on behalf of BT can share any concern or suspicion related to ethical or compliance related wrongdoing in BT.

### Who can use Speak Up?

Anyone can use Speak Up to report suspected ethical or compliance related wrongdoing in BT. We receive most reports from BT employees, agency people and sub-contractors, but it is also available to suppliers and other third parties.

### Why should I report to Speak Up?

At BT, we want to be a place where our people take personal ownership to do the right thing in line with our ethics code, in everything they, and we, do. To do that, we need to make sure our people feel comfortable and safe to speak up and challenge. Speak Up offers you a safe and confidential way of protecting BT, protecting yourself, and living our values. We can't act on your concerns if we don't know about them.

### What sort of issues does Speak Up deal with?

You can report any concern or suspicion about ethical or compliance related wrongdoing (\*) by a BT person, or anyone working on behalf of BT. Examples of concerns that we deal with are bribery, corruption, fraud, unethical sales practices, conflicts of interest, human rights, substance abuse, threats, theft or misuse of BT resources (including time).

Where a concern relates only to your own circumstances, e.g. if you feel that you are being bullied, or treated unfairly, then this is best managed via the HR grievance process. The grievance process has checks and balances to ensure that your complaint is managed independently and fairly. If you raise issues like these on Speak Up, then it is likely that we will re-direct you to HR for advice on the grievance process.

(\*) In some countries, there are specific restrictions on the type of issue that you can report through Speak Up. When you phone Speak Up, or use the Speak Up web interface, you will be advised about any restrictions in your country. It is then your responsibility to adhere to these restrictions.

### How can I contact Speak Up?

You can contact Speak Up [on the web or by telephone](#). We encourage you to use our online or telephone Speak Up service because it means we can communicate with you during your case, even if you've chosen to remain anonymous. However, if you would prefer to use the post, please write to 'Speak Up Service', Ethics and Compliance Director, Three Snowhill Snowhill, Queensway, Birmingham, B4 6GA

### Do you need to know my name?

No, in most countries we don't (\*) – but, in many cases, it does help. If you do provide your name, we promise that we will respect your confidentiality.

Whether you decide to report anonymously or leave your name, it really helps us if we are able to contact you after you've made your report so that we can find out more details that are relevant to the investigation. If you feel able to leave your contact details that's ideal. If you prefer to make an anonymous report it will really help the investigation if you're able to check the system every so often to see if we've asked for any further details.

\* In a few countries, local law prohibits anonymous reporting. The Speak Up phone and web systems will advise you if this is the case in your country.

### What sort of information do I need to supply?

As much information as you can, and feel comfortable with. Obviously it will depend on the nature of the concern, but names, OUCS / UINs, dates, times, places, photographs, witnesses and documentation can all be relevant and valuable in bringing a case to a satisfactory conclusion.

### How can I be sure that my concern will be treated confidentially?

To ensure confidentiality (and anonymity where requested), Speak Up is managed by an independent third party. All of the details that you share are sent to the Ethics & Compliance team, who manage the reports from beginning to end. The Ethics & Compliance team sits within the Risk, Compliance and Assurance function in Group Finance & Business Services and is based in the UK. Group Compliance engage with specialist reviewers and investigators on a need-to-know basis, and all reviewers and investigators are fully aware of the need to maintain confidentiality.

### What other channels can I use to report an ethical concern?

You can always share your ethical and compliance concerns with your line manager (or 2<sup>nd</sup> line manager) if you feel comfortable to do so. Speak Up is here for when you feel that usual channels such as these are inappropriate, or where you do not feel comfortable in using them. You could also visit the Ethics team's [Tell Us](#) page to find other reporting channels, or you could discuss your concern with other managers who you know and trust, outside your line management chain.

### I'm really not sure that my suspicion is correct - should I wait until I'm sure and then contact Speak Up? What if I'm wrong?

Please don't wait. Any suspicion of a breach of BT's ethics and compliance policies should be reported to Speak Up, and will be checked out discreetly. If the person you suspect is truly acting ethically, then there will be no evidence to find, and the case will be closed. Your report will be kept confidential. It takes courage to speak up and we appreciate all reports made in good faith.

### What if someone tries to retaliate against me because of my Speak Up report?

We know it takes courage to speak up. We'll do whatever we can to support and protect you and we won't permit anyone to retaliate against you for reporting your concerns. If someone tries to deter you from speaking up that's a disciplinary offence and we'll deal with it seriously – including dismissal if appropriate – at any level of our organisation.

### How do I know that I'm not breaking any laws in my country by reporting a concern to Speak Up?

When you phone Speak Up, or use the Speak Up web interface, you will be advised about any restrictions in your country. It is then your responsibility to take these restrictions into account when making your report.

### I reported my concern to my manager, but feel nothing has been done. What can I do now?

You can share your concern with Speak Up, and we will review. However, in some cases and depending on what your concern is about, it may be difficult for us to progress any investigation without speaking to your manager. Please do consider this when you contact us, and let us know if you'd prefer us not to contact your manager.

### What if I don't have all the information that you ask for, can I still use Speak Up to raise my concern?

Yes you can still use Speak up even if you just have a suspicion or a concern. You don't need to provide a lot of evidence although the more evidence or examples you're able to give, the easier it will be for us to investigate. It doesn't matter if your suspicion is incorrect. Any suspicion of a breach of BT's ethics and compliance policies should be reported to Speak Up, and will be looked into discreetly. If the person you suspect is truly acting ethically, then there will be no evidence to find, and the case will be closed. Your report will be kept confidential. It takes courage to Speak Up and we appreciate all reports made in good faith.

### Can I send my report by post?

We encourage you to use our online or telephone Speak Up service because it means we can communicate with you during your case, even if you've chosen to remain anonymous. However, if you would prefer to use the post, please write to 'Speak Up Service', Ethics and Compliance Director, Three Snowhill, Snowhill, Queensway, Birmingham, B4 6GA

## What should I expect when I make a report to Speak Up?

### What happens when I phone Speak Up?

Speak Up is hosted by an external third party, so you can be confident that it's independent and confidential. When you phone Speak Up, you will first be asked to identify what country you are reporting from. A translator will be brought onto the call if you need one. You will also be given any advice on local restrictions for using Speak Up, which you must adhere to when making your report. You'll then be able to give the telephone operator the details of your concern.

### What happens when I use the Speak Up web interface?

When you use the web interface, you will first be asked to identify what country you are reporting from. You will then be given any advice on local restrictions for using Speak Up, which you must adhere to when making your report. You'll then be able to fill in a simple web form giving details of your concern.

### So I've given the details of my concern – what happens next?

Once you make your report, you will be given a reference number ("report key"), and asked to choose a password to enable you to phone back, or revisit the web system, to review any

responses. **Please make sure that you make a note of your report key and password, as you will need this to access your report again, and it cannot be retrieved if lost.**

Your report is then sent to the Speak Up Team in BT Ethics and Compliance. The Speak Up team will add an acknowledgement of your report to the system, usually within 3 working days. The Speak Up team will review your report and will decide on next steps. This will usually be to direct your report to one of a number of specialists (e.g. in Security, HR Services Employee Relations Case Team, or Legal), who will review using the information that you have provided.

Sometimes, there is a more appropriate process for your concern, e.g. the grievance process, in which case the Speak Up team will respond on the system to advise you to use this process instead.

### Why do I need to phone back or log back onto the system?

The specialist reviewer may need more information in order to fully look into your concern. If so:

- for an anonymous report, the Speak Up team will respond to your report on the system, to request more information, or to offer you an opportunity to speak to the reviewer directly and in total confidence.
- if you have left your contact details, then the reviewer may contact you directly and discreetly to discuss further. If you don't hear from us, then please log back on to check, as we may have been unable to reach you.

### It seems to be taking a long time for anything to happen – why might this be?

Some reviews take longer than others. Please be patient. In the case of a long-running case, the Speak Up team will aim to update the system at least once per month.

### What will happen when the review is complete?

When the review is complete, the Speak Up team will add a final response to the system. However, this will usually be at a high level, respecting the confidentiality of others as well as yourself. It will advise either that action has been taken, or that there was insufficient evidence to take further action. It will not usually go into more detail.

## Is my concern right for Speak Up?

### I just have a question about ethics and compliance - can I submit it to Speak Up?

We accept queries on Speak Up, but you could also ask the ethics team a question [here](#).

### I think I might have a conflict of interest, but I'm not sure - should I submit it to Speak Up?

You are welcome to use Speak Up, but there is a better route – you can contact the [Register of Interests](#), where you can get specialised advice on any potential conflict of interest.

### How can I decide whether to raise a grievance or contact Speak Up?

If you are in doubt, then it is worth speaking confidentially to your HR business partner about the grievance process in the first instance. For example:

- if you have an issue with how your manager is applying the performance management process, then that is more likely a grievance than a Speak Up case.

- If you feel that you are being bullied or harassed by a colleague, or by your manager, it is likely that this will also need to be managed through the grievance process.
- If you believe that someone else is being bullied or harassed, then you can either raise this with HR directly, or raise a Speak Up case.
- If you feel that you are being treated unfairly, or in a way that conflicts with your terms and conditions of employment, this is also best managed through the grievance process.

## Examples

One of my colleagues behaves inappropriately and swears a lot in the office - can I report this to Speak Up?

We would suggest that you should take up local concerns such as these with your line management, or with your HR business partner.

I've observed people "tailgating" when entering my office building - should I report this to Speak Up?

For security incidents such as this, we would recommend reporting to the [Security Control Centre \(SCC\)](#)

## Responses and Outcomes

Will I be informed of the outcome of the review that takes place as a result of my report to Speak Up?

When the review is complete, the Speak Up team will add a final response to the Speak Up report on the system. However, this will usually be at a high level, respecting the confidentiality of others as well as yourself. It will advise either that action has been taken, or that there was insufficient evidence to take further action. It will not usually go into more detail.

If I report anonymously, how can I find out what happens to my report?

When you report to Speak Up, either using the phone service or the web interface, you will be given a reference number, and asked to enter a password. Please take a note of these details, as you will need these to phone back, or revisit the system, to review any responses. These details cannot be retrieved if lost. It really helps us if you can check back occasionally either by phone or on the web as we may like to ask you for further details to help us in our investigation of your report.

If I leave my name and contact details, do I need to check back on the system for a response, or will someone contact me directly?

In general, you will be contacted directly. However, you will be given a reference number, and asked to enter a password when you are submitting your report. With these, you can phone Speak Up, or log back onto the system and check for responses. These details cannot be retrieved if lost. This is worth doing if you don't hear from us, as your contact details could be incorrect, or we may have trouble reaching you discreetly.

What might prevent my report from being thoroughly looked into?

The most common reason why we cannot look into a Speak Up concern thoroughly is lack of information and facts. It's helpful if you can submit as much relevant information as you feel

comfortable with. Obviously it will depend on the nature of the report, but names, OUCS / UINs, dates, times, places, photographs, witnesses and documentation can all be relevant and valuable in bringing a review to a satisfactory conclusion. It's helpful if you can read back through your report before submitting it, and consider whether there is anything else you could share that would help us to investigate successfully. If you think of more information after submitting your report, you can log onto the system using your reference number and password to add it.

## Troubleshooting

I tried to phone the Speak Up telephone number on the posters displayed in my location and it doesn't work - what should I do?

You can check the local access number for your country [here](#). Or you can use the [web interface](#) to make your report. Please do include in your report any details of access problems that you've had.

If you still cannot access Speak Up, please consider letting us know by emailing [speak.up@bt.com](mailto:speak.up@bt.com) including your country and the phone number that you tried to use.

I want to report anonymously, but when I contacted Speak Up, I was informed that it's against local law for me to do that. I'd like to report my concern, but don't want to leave my name. What can I do?

There are a few countries where anonymous reporting is against the law. We would like to reassure you that, even if you need to leave your name, we will respect your confidentiality and will not divulge your name to anyone other than our expert reviewer. However - as an alternative, you could contact your regional compliance team or a trusted senior manager in your area, and speak to them in confidence.