

Question 1: Do you agree with the proposed amendments to the Code?:

BT agrees in principle with the proposed amendments to Section 3 of the Code. BT recognises that with societal changes, there is a need for the Code to evolve and reflect these changes. As a business, we strive to respect human rights in our operations. Our ethos supports freedom of expression whilst not causing undue offence or distress to others.

Question 2: Do you agree with the proposed Code guidance?:

BT agrees in principle with the proposed amendments to the Code guidance for Section 3. However, we would like to raise a concern about how Ofcom will assess complaints under Rules 3.2 and 3.3, which capture hate speech and abusive or derogatory treatment of groups or communities.

As a sports broadcaster, our aim is to bring the atmosphere of live action at sporting events to our viewers at home. Some fixtures can be challenging if there is sectarian or racist chanting by fans. Whilst we implement appropriate risk assessments and contingencies we would like reassurance from Ofcom that the constraints of broadcasting live sports events are taken into consideration when investigating complaints; and that the introduction of these rules would not mean harsh decisions being made. In light of this, it would be useful for all sports broadcasters if Ofcom could issue some additional guidance in this area.