New perspectives: How COVID-19 has shifted sustainability priorities in the mobile sector

November 2020

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This document has been financed by the Swedish International Development Cooperation Agency, Sida. Sida does not necessarily share the views expressed in this material. Responsibility for its contents rests entirely with the author.

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Introduction

The COVID-19 pandemic has brought with it an unprecedented human and economic crisis, affecting all corners of the world. As governments have grappled with responding to the rapidly evolving crisis, the role and expectations on private companies have increased.[1]

Eyes have been on how companies have supported their employees through the crisis whilst managing financial uncertainty and also on how companies have been able to maintain – and in many cases transform – their relationships with their customers.

While stock-markets have nose-dived during the pandemic, large institutional investors and market analysts have noted that ESG[2] indices have outperformed traditional ones, shining a light on the correlation between good sustainability performance and business resilience and crisis-readiness.[3]

In some cases, the pandemic has also allowed employees to connect to their company's purpose in a new, more meaningful way. This has been especially true for essential services such as telecommunications. Connectivity has helped to ensure the functioning of emergency services, enabled separated families and friends to stay in touch, and allowed large parts of the workforce to continue working productively.

In the second half of 2020, it is beginning to become clear that a number of key corporate sustainability and ESG issues have shifted – not just in the immediate crisis – but for the longer term. The people-focused impacts of the crisis appear to have increased the importance of social responsibility issues for the long-term. Employee health and safety, job security, and responsible supply chain management have been pushed to the forefront.[4] At the same time, the connection to the other major crisis facing the world, climate change, has been repeatedly made with an opportunity not only to 'build back better' but also to learn from a global crisis of this magnitude.

> **It has been clear that how companies respond to this crisis can make or break reputations for years to come.**

1 McKinsey, July 2020: Consumer sentiment and behavior continue to reflect the uncertainty of the COVID-19 crisis

2 ESG = Environmental, Social and Governance. ESG indices include companies whose performance and management of these areas is rated highly by independent rankings and research.

3 Bain & Company, April 2020: COVID-19 Gives Sustainability a Dress Rehearsal

4 Investment Executive, April 2020: ESG and COVID-19: Four market trends; Bain & Company, April 2020: COVID-19 Gives Sustainability a Dress Rehearsal; BSR, May 2020: Corporate Sustainability and COVID-19: The 102 respondents named the top issues affected in their sustainability strategy as: supply chains (44 percent), inclusive growth (31 percent), climate action (29 percent), and philanthropy (28 percent).

The immediate response by mobile operators

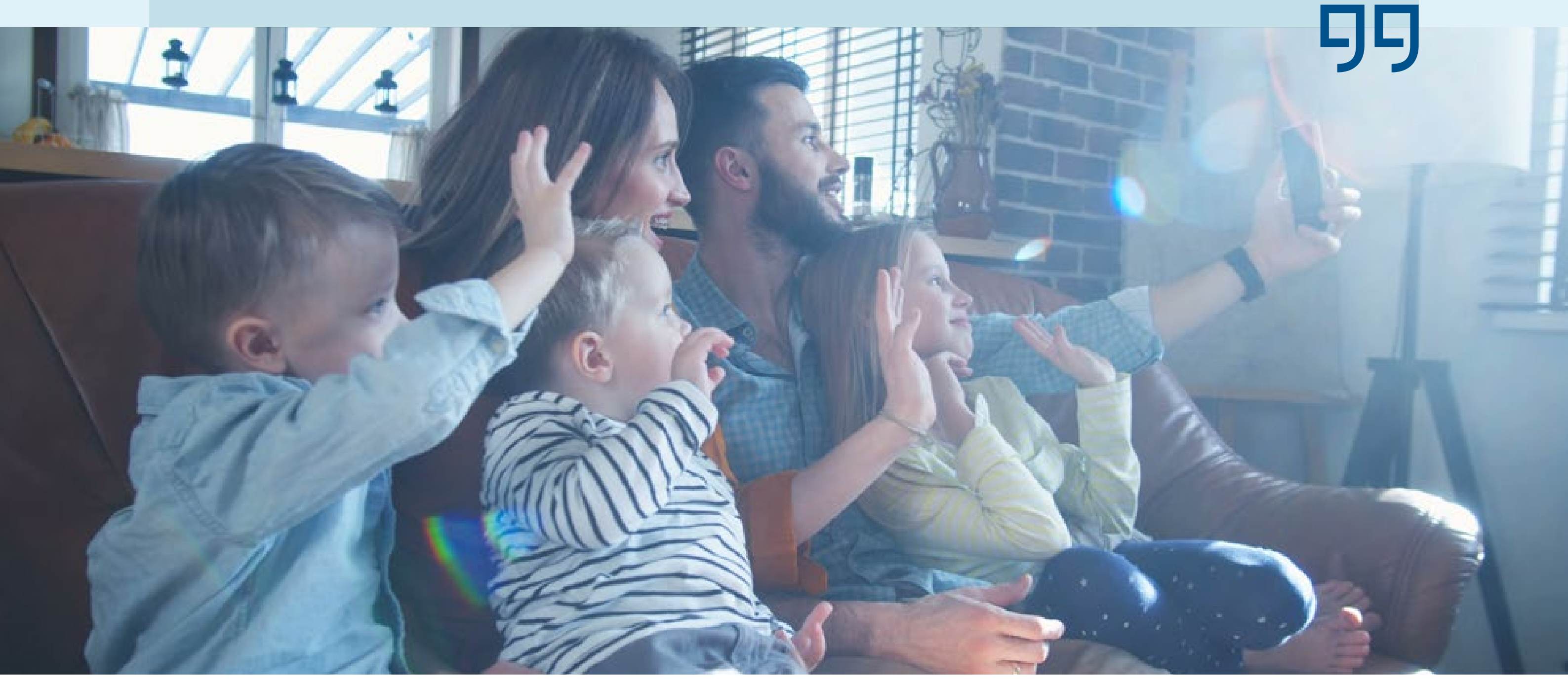
COVID-19 has made evident how fundamental information and communication technologies (ICTs) are to societies and economies everywhere. Mobile operators have and will continue to play an essential role in supporting governments and societies through the pandemic – including supporting remote working; digitalisation of commerce, education and health services; and helping individuals stay connected to family and friends.

When half of the world's population was in lockdown in the first half of 2020,[5] the demand for mobile data increased substantially and moved from city centres to residential areas (especially in countries where fixed residential broadband connections are less common).[6]

New investments and increased human resources were required to manage this sudden change in usage patterns. Mobile networks have proved resilient in the COVID-19 crisis, with network traffic increasing by between 20 and 100 % during COVID-19 lockdowns and global mobile speeds increasing an average of 7%.[7] Many government regulators have supported this effort and have allowed mobile operators to focus on expanding and allocating capacity by, for example, increasing the availability of spectrum in different ways[8] and a number of interviewees in this research also mentioned the temporary easing of some regulatory reporting requirements.

In addition to managing the surge in demand, mobile operators made a concerted effort to understand local situations and needs and how they could support health care, education and commerce to continue to function – as well as support government containment efforts.

The first and most immediate concern was network stability and capacity. There was an instant, massive shift in demand for mobile from city centre offices to residential areas.



5 Euronews, April 2020: Coronavirus: Half of humanity now on lockdown as 90 countries call for confinement

6 Ericsson, September 2020: Ericsson Mobility Report Q2 Update

7 According to Ookla® Speedtest Global Index™ from July 2020

8 GSMA, March 2020: Keeping everyone and everything connected: How temporary access to spectrum can ease congestion during the COVID-19 crisis

Many initial responses by mobile operators were aimed at ensuring their customers – individuals and businesses – could stay connected regardless of their economic situation. These efforts, which in some cases were government coordinated,[9] included operators zero-rating services, removing data caps, providing free roaming for stranded customers, waiving transaction fees and introducing special plans for essential workers and vulnerable groups such as disadvantaged students or the elderly. Small and medium sized enterprises were supported to stay connected but also to digitalise their services. Operators also sought to support their enterprise customers with different mobile working solutions but also video-analytics, thermal imaging or contact tracing that allowed the return of essential workers to factories and offices. [10]

Operators also used their reach to support lockdowns, by, for example, sharing health information; equipping and offering free calls to COVID-19 information centres; and one even dedicated its entire advertising budget to COVID-19 related health messaging.

Mobile operators and their employees have also offered support to address critical and immediate needs within their communities beyond connectivity through for example: purchasing and distributing personal protective equipment (PPE); delivering food and medicine to people in need; and supporting mental health services. As an example, America Movíl has, via the Carlos Slim Foundation, provided extensive support to health services from providing hospital beds to funding the development of a COVID-19 vaccine.

> **Our [sustainability] team was focusing on the responses to societal needs: the people who were being left behind, the small business struggling to survive and what support we could provide them.**

Further information about how mobile operators have responded in the immediate crisis is provided throughout Section 3.

Case study

The UN Economic Commission of Africa (UNECA) worked with MTN and other operators in the region to launch the Africa Communication and Information Platform designed to transmit information related to COVID-19 outbreaks between authorities and more than 600 million mobile users.

9 Examples include, the Keep Americans Connected Pledge by the FCC in the U.S.; and three months of zero-rated transfers between bank accounts and mobile wallets by the National Bank of Rwanda (BNR).

10 The support offered by the industry has been at an impressive scale and the examples are too numerous to list here. For overviews of individual operator responses, see for example: Axiata, MTN, Optus, Safaricom, Telefonica, Telenor, Verizon and Vodafone.

Spotlight on supporting the health care sector

Mobile operators have played an important role in supporting health services and workers through the pandemic. Support has ranged from:

- adding or strengthening network capacity at hospitals;
- supporting health helplines (for example Bharti Airtel and Zain in Iraq),
- developing tools for self-diagnostics and supporting virtual health care consultations (for example Vodacom in South Africa); and
- providing unlimited data packages for essential healthcare workers.

Operators have also supported medical research with processing power, for example the Vodafone Foundation's DreamApp and Telefonica's Folding@Home.

In more futuristic scenarios, drones have been used to for example, deliver medicine and to support compliance to government issued health precautions in China.[11] Robots have also been carrying out cleaning and disinfection tasks in hospitals, offices and retail spaces, see for example the work by AT&T.

> The reins were taken off telemedicine during the pandemic and it has helped people learn new ways of using technology. This will be a lasting change that will help accelerate adoption of digital solutions through providing an instantly valuable service.

11 Forbes, March 2020: Robots And Drones Are Now Used To Fight COVID-19

Research objectives and approach

Within this context, the objective of this research was to understand:

- how the material sustainability issues for the mobile sector may have shifted during the pandemic;
- whether there are specific issues that will gain higher (or lower) importance in the sustainability work of mobile operators beyond the immediate crisis;
- what new issues, angles or ethical considerations may have arisen; and
- how sustainability teams have readjusted or re-prioritised their plans or are planning to do so going forward.

This research is informed by GSMA's Guide to Operating Responsibly, a core pillar of GSMA's Sustainability Assessment Framework and wider sustainability work. The Guide to Operating Responsibly identifies a set of corporate responsibility issues that are widely referenced as high priority by mobile operators and assesses the extent to which a company manages and discloses performance within its own operations and its supply chain on these material sustainability issues. These issues range from digital inclusion to privacy and freedom of expression to climate change and e-waste.

The findings are based on interviews with the sustainability teams of 20 mobile operators and industry experts from across the world, desk research on the COVID-19 responses of additional mobile operators, as well as preliminary thought leadership materials on the sustainability trends going forward.

The aim is for the findings to support the sustainability teams of mobile operators to shine a "COVID-lens" on their material sustainability issues, programmes and strategy. The findings can also be used as an input into future materiality assessments (Section 4 provides specific guidance for this purpose).

The 2020 Mobile Industry Impact Report: Sustainable Development Goals

The 2020 Mobile Industry Impact Report looks at the increased impact the mobile industry has had on achieving the Sustainable Development Goals in the last year. It explores what more the industry needs to do in the next ten years to reach these ambitious goals and also examines the role the mobile industry has played during the COVID-19 pandemic.

www.gsma.com/betterfuture/2020sdgimpactreport

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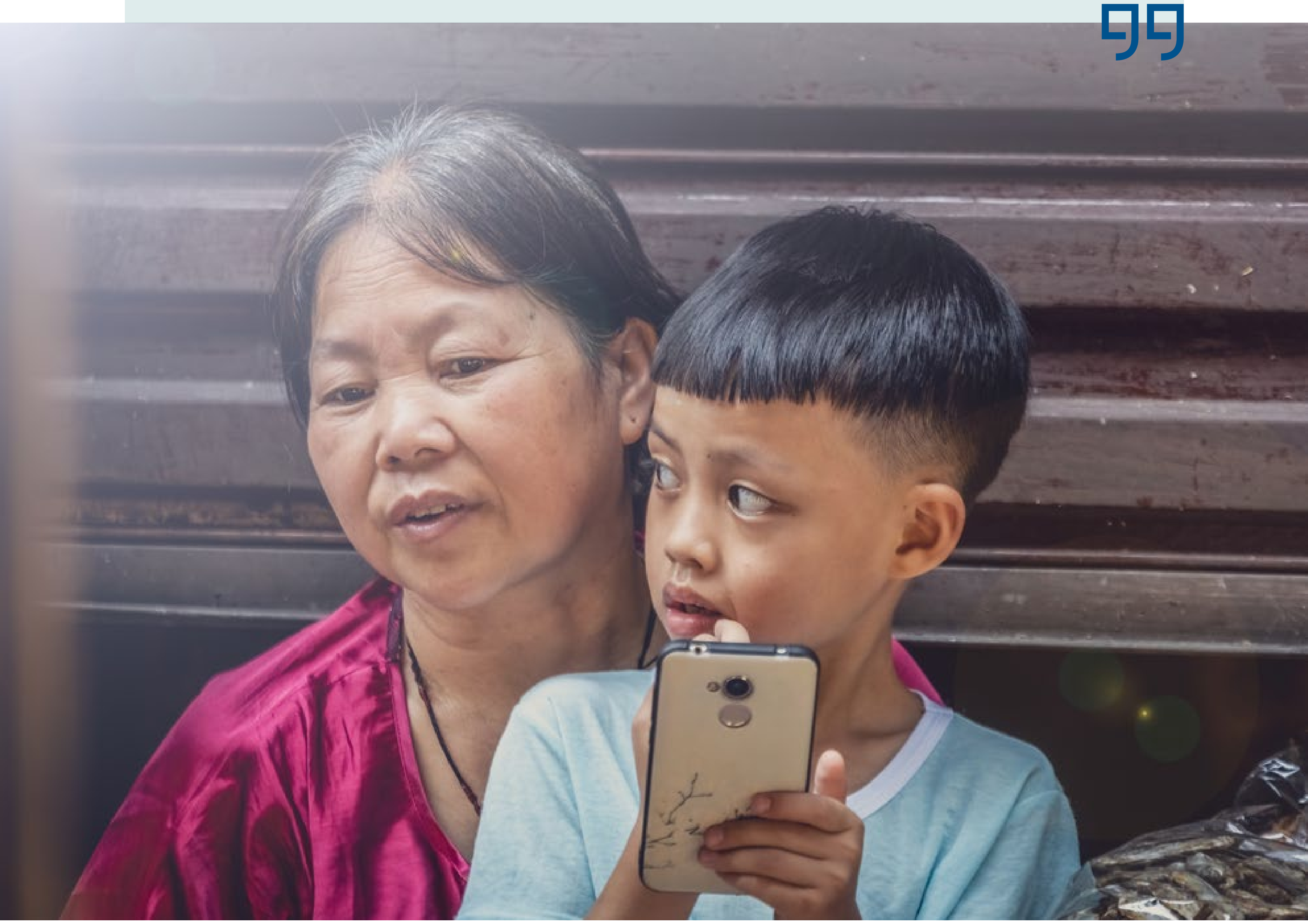
Overview of findings

The COVID-19 pandemic, for all of its tragic consequences, has brought new awareness of the power and potential of a digitally enabled world, highlighting the key role of mobile operators as providers of connectivity.[12]

It is clear from this research that the increased demand and use of digital services, the urgency of the crisis, and steps taken to ensure business continuity have all impacted on sustainability priorities in the mobile sector, in many cases in a more permanent way.

> **The COVID-19 pandemic has highlighted the essential societal role of mobile operators as providers of connectivity. More voices are speaking of connectivity as a human right. Expectations will only keep rising.**



12 Mobile networks connect 67% of the global population and connect even more people to broadband internet than landline connections.

Material issues

What is clear from this research, is that the pandemic has not resulted in a totally new set of high level, material sustainability issues being identified by operators. Instead the crisis has confirmed that the sector has been broadly focusing on the right issues. COVID-19 has, however, shed new light on some issues already on operators' sustainability agendas (such as child online safety, privacy and cybersecurity) and in particular magnified the inequalities that already existed within society. As a result, some of the issues identified by GSMA[13] as most significant for the sector, have been elevated in importance and new angles and nuances have come to the fore (see Section 3: Evolving sustainability priorities). It is important to note that based on this research, none of the issues previously identified by GSMA as material for the sector have decreased in priority within operator sustainability strategies going forward.

It is still early days in terms of operators completing formal materiality assessments in the timeframe since the beginning of the pandemic, but these conclusions were heard consistently from the mobile operators who participated in this review. Some had carried out their periodic materiality assessment in recent months or were in the process of doing so. At this stage, none of the stakeholder input that operators have been receiving has suggested a complete rethink of sustainability priorities and strategy.

Social responsibility: Mirroring what has been highlighted in much of the existing narrative about COVID-19 and sustainability, the people-focused impacts of the crisis appear to have increased the importance of social responsibility issues also for the mobile sector for the long-term. Five of the six issues where there was overriding consensus on increased priority amongst the participants in this research, are traditionally seen as social responsibility issues. These are: digital inclusion; employee health, safety and wellbeing; supply chain responsibility and supplier capacity development; child safety online and privacy.

Climate change: At the same time, the connection to the other major crisis facing the world, climate change, has been repeatedly made. Based on the feedback from interviewees, climate change was already on an upward trajectory in terms of priority for mobile operators and will continue to be a focus.

> **Our strategy proved to be quite pandemic proof but - knowing that the economies of the markets where we operate will be hit dramatically - we need to look at our current plans and how we can best help people deal with their immediate, day-to-day issues like their health and safety, their kids' education and their connectivity. How can we help position them so that they can recover in the post-COVID world?**

13 GSMA, December 2018: The Journey to Responsible and Sustainable Leadership: A Guide to Operating Responsibly

Collaboration

COVID-19 has brought new perspectives to many collaborations or partnerships. At the same time, the sense of urgency has led to new innovative collaborations between different stakeholders removing many persistent barriers and opening new opportunities (see Mobile Money).

Industry collaboration and multi-stakeholder partnerships will continue to be important in the response to the immediate and long-term impacts of the pandemic. They will be critical in advancing digitisation in the most inclusive manner and in strengthening and demonstrating the value – economic, social and environmental – that the industry brings to society and economies.

The participants in this review have raised that the pandemic has highlighted the importance of each stakeholder focusing on their strengths and expertise to drive impact quickly and efficiently. For mobile operators this means thinking how to best add value to each partnership with connectivity and the industry's unique reach. Participants all recognised that initiatives will require a renewed focus on the vulnerable and excluded groups who have become much more apparent during the crisis – from vulnerable customers to employees and suppliers.

"The pandemic and its priority on life and health has removed barriers from collaboration. This should continue especially from a sustainability perspective. Inclusion will not be achieved by any single operator."

Spotlight on mobile money

In these times of crisis, mobile money has become an instrumental tool for fostering resilience by facilitating safe and efficient money transfer and payments services, easing the cost of living burden.

Fee waivers and remittances: mobile money providers across 23 markets (as per GSMA research) have deployed fee waivers for different mobile money services, for example, Vodafone Fiji in partnership with the Pacific Financial Inclusion Programme.

Social and Humanitarian transfers: GSMA's tracker captures 13 countries across Sub-Saharan Africa, South Asia, and East Asia & Pacific where mobile money providers have supported governments and international organisations by facilitating social and humanitarian transfers to the most vulnerable households, for example, Airtel Africa in partnership with UNICEF.

GSMA and United Nations World Food Programme (WFP) have also announced a partnership to scale up mobile money use for humanitarian assistance.

Over the last few months, several regulators such as those in Rwanda, Ghana, Kenya, and Zambia have created COVID-19 regulatory responses around 'Flexible Know-Your-Customer and on-boarding' and/or 'increased transaction and balance limit limits' permanently paving the way for more such collaborations and policy actions to further promote mobile money's reach and adoption in the developing world.

The role of sustainability teams

Many mobile operators quickly introduced new initiatives directly in response to the challenges arising from the pandemic. The sustainability teams interviewed have, and continue to play a key role in the pandemic response within their organisations. In many cases, they have: been part of crisis response teams; helped bring a sustainability lens to company responses from network maintenance to procurement; managed key relationships with external partners to support education and connectivity of the most vulnerable groups; and importantly brought the perspectives and concerns of these groups into consideration.

However, the sustainability landscape has also shifted for the medium and longer-term and, as operators look ahead beyond the immediate crisis response, they are considering how their strategies and plans may need to evolve going forward. Many companies use materiality assessments to determine the most important sustainability issues for their business and stakeholders. This then informs sustainability strategies, plans and associated reporting. Section 4 of this report provides high-level guidance to support sustainability teams to apply a "COVID lens" to these materiality assessments.

In tackling these issues going forward, mobile operator sustainability teams will not be alone within their companies. The crisis has required different teams to focus on their core contribution to a collective response and interviewees have spoken of a new appreciation by a wider set of internal stakeholders of the value the function can bring.

This, together with a stronger sense of purpose that the COVID pandemic has brought with it, means that this crisis may contribute to driving a more integrated and inclusive approach to sustainability within the sector.

The role of each function has become very clear during the pandemic, including for the sustainability team. This is likely to improve collaboration going forward.

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Evolving Sustainability Priorities – issue specific findings

3.1 Digital inclusion

As dependence on digital services for the functioning of societies from commerce to education has been accelerated, the COVID-19 pandemic has shone a light on how unprepared many parts of society and the economy are for such a transformation.

Half of the world's population is not online,[14] and lack of internet access and use not only excludes individuals and businesses from opportunities to overcome the social and economic impact of COVID-19 restrictions, but also limits the ability of governments to effectively manage the pandemic and its economic fallout.

There is a significant concern that digitalisation of essential services from education to health to civic participation will exacerbate inequalities that already exist by, in effect, rendering invisible the most vulnerable in society. This is a shared concern for participants from across the world, regardless of the current level of connectivity and maturity of digital services. Every country is concerned.

Digitalisation represents a huge opportunity for the mobile operator sector and there is a shared recognition by the participants in this research that the drive towards a more digital society must be inclusive to be successful.

> **COVID-19 has been a driver for digital inclusion, but something like the gender gap in adoption doesn't bridge itself unless it is proactively addressed.**

14 According to the ITU, 53.6% of individuals, or 4.1 billion people were using the Internet at the end of 2019.

Longer-term priorities

As pressure for digital services grows, inclusion will be “a big mountain to climb” in countries where large sections of the populations are already excluded or relying on the most basic devices to access services. Across the globe, 3.4 billion people do not use mobile internet services, while already having access to them – this is referred to as the ‘usage gap’.

Focusing on these populations and the vulnerable groups who were supported in the initial phases of the pandemic - for example disadvantaged students, the elderly and migrant workers – will continue to be a priority for mobile operators. This is also because the pandemic has disproportionately affected these communities and they will need ongoing support beyond the crisis.

Access: While some countries are pushing universal access as a solution, it is important to underline that lack of available connectivity is rarely the main reason preventing people from accessing digital services.[15] There are other pertinent and challenging-to-solve barriers to digital inclusion and the widespread adoption of essential services such as digital education to permanently take root. While there are optimistic signs that the pandemic will bring new people online – and expand and diversify people’s technology use – significant policy changes are needed to address these barriers.

There are some challenges going forward also for connectivity. Participants in this research raised remote and rural populations as a specific group to pay attention to going forward, including in more mature markets. These are populations who could benefit hugely from different digital services from governments and businesses such as health care and education – require connections that can support these services. If these are not available, there is a risk that access of these populations to basic services will become even more challenging. Meanwhile, the economics of reaching rural populations will be difficult in a challenging financial climate and uncertain economy.

It can cost up to two times as much to deploy new base stations in rural areas than in the urban equivalent and they can be three times more expensive to run & Rural populations in LMICs are 40% less likely to use mobile internet than urban populations. Revenue expectations can be up to 10 times less, limiting commercially viable network deployments in such remote areas.

The usage gap: There are various interrelated reasons why mobile internet use is trailing network coverage. Research by GSMA indicates there are five main barriers:

- Affordability of devices and data
- Digital literacy and skills
- Locally relevant content and services
- Safety and security concerns
- Access to enabling factors, including formal identification, electricity or agent networks

For example, the GSMA’s State of Mobile Internet Connectivity report shows that although the cost of data as a share of monthly GDP per capita decreased by more than 40% between 2016 and 2019, over half of Low and Middle-Income Countries (LMICs) have not yet achieved the United Nation’s affordability target. Even access to prerequisites to subscribe to mobile services such as formal identification and electricity is without reach for approximately 1 billion people.

15 GSMA, 2020: The State of Mobile Internet Connectivity 2020: “The coverage gap – those living outside of areas covered by mobile broadband networks – is now 7%.”

Many individuals lack the digital skills to be online, with currently just 45% of the world population equipped with basic digital skills, while less than 30% have the standard digital skills needed to find and download new software for example. Those coming online for the first time will need the skills to be able to take full advantage of digital services in ways that are useful and safe. This applies equally to the elderly or disadvantaged youth in more mature markets as well as in LMICs.

Relevant content was highlighted by many participants as key for driving digital inclusion. The full innovative power of all stakeholders, including the private sector, should be directed at producing local and relevant content which adds value to the everyday lives of individuals and small enterprises, encouraging those currently excluded to see the relevance of online services for them. This should also be the focus in any education initiatives, where operators would benefit seeking specialist partners who understand specific audiences and local contexts.

If these five barriers are left unaddressed, the inequalities that have persisted in the offline world will simply be translated and aggravated in a world where COVID-19 has accelerated the dependence on digital technologies and services. There may have never been a better time to jointly tackle these barriers to mobile internet adoption, when governments are deciding on economic recovery packages that will shape societies for decades to come. The responsibility for building an inclusive digital society reaches beyond a single sector and collaborative action between mobile operators, other digital players, the development community and governments is paramount.

Immediate industry response

In the first waves of the pandemic, operators focused their support on ensuring that connectivity was maintained and capacity was increased to respond to growing traffic. All operators included in this research supported, in one way or another, vulnerable customers who faced hardship and difficulty with paying their bills and took actions such as zero-rating essential services and information sites and supporting free calls to COVID helplines. Increased or unlimited data packs were offered or data was donated to students,[16] migrant workers and essential workers, such as medical staff. Many operators provided dedicated support to Small and Medium Enterprises (SMEs) whether these were customers or suppliers – in term of payment options or microfinancing (such as Axiata Digital's Aspirasi Assist platform) – but also to support their digitalisation efforts.

The elderly emerged as a key group at risk of digital exclusion in more developed markets. Operators targeted the elderly through more traditional media to offer dedicated data packs and technical helplines while some created dedicated mobile services for the elderly. Telia Company in Sweden worked with care homes to install "phone booths" to allow residents to connect with families remotely. Similarly, Telefonica in Germany partnered to provide mobile phones and tablets to nursing homes so they can stay in touch with friends and family and receive relevant information.

"Digital inclusion has usually been understood to be a concern of mobile operators working in emerging markets but with COVID this has changed. It is about access and skills and this impacts every country."

16 For example, Optus expanded its 'Donate Your Data' support to students.

3.2 Children online – education and safety

At the height of the pandemic, over 90% of school children worldwide saw their educational institutions close[17] and although for many learning moved online, remote learning remains out of reach for at least 500 million students[18] (see Spotlight on Education).

As over 1.5 billion school children across the world moved to distance learning practically overnight, it was immediately clear that some children were in a better position than others. Home schooling has been a deeply unequal experience for children in terms of content, connectivity, skills and devices – and the availability of adults to support them. When learning went online, it also became clear that many schools and teachers were unprepared in terms of ICT equipment and the digital skills necessary to support their students.[19] Mobile operators have introduced many initiatives to try to tackle these challenges (see *Immediate industry response*).

Given strict restrictions to extra-curricular activities and socialisation, also social interactions and play moved online.[20] This increased time spent by children online further and heightened the concerns of parents and others regarding the risks that children may face online.

Another issue of concern has been the potential impact of the pandemic on child sexual abuse online. Reports of child sexual abuse material have doubled in some countries and more of such materials have been found on the open web.[21] Law enforcement agencies and organisations working to combat child sexual abuse online are reporting that the increased presence of children online has been noted by those seeking to harm them.[22]

> **Education was hurt the most during COVID – the gap definitely widened. There are those who can afford to have handsets and laptops, and there are children who have nothing. How do you drive greater inclusion in this space is a massive question going forward.**

17 UNESCO statistics show that at the height of the pandemic in April 2020, over 1.5 billion children were affected. In September 2020 that figure was still over 800 million.

18 UN Department of Economic and Social Affairs: SDG 4 overview and progress

19 “Only half of teachers in OECD countries frequently used ICT as part of their teaching; 60% of teachers had received ICT related skills training in the year preceding the pandemic; and 18% of teachers surveyed highlighted ICT as a high need for their professional development.” (OECD, July 2020: The Impact of COVID-19 on Education). A survey of nearly 5,000 teachers revealed that for 70% of respondents this was the first experience with online learning (School Education Gateway, June 2020: Survey on online and distance learning)

20 T-mobile reported 85% increase in game traffic, and 135% increase in use of education tools. ISFE – the European Video Games industry association reported that online play increased average 1.5h per week during lockdown.

21 The Internet Watch Foundation saw an increase of 50% in reports between 2019 and 2020 in the UK while the country was under lockdown.

22 Discussions among offenders have been reported by e.g. by UK and Canadian law enforcement.

Longer-term priorities

The majority of the companies consulted for this report agreed that child online safety has and will continue to gain importance within their sustainability activities, even if mature programmes are already in place.

Focus on vulnerable children: Participants spoke of an increased awareness of vulnerable children who may have less parental supervision or who may be coming online for the first time. With so many of life's interactions becoming digital, there is also an increase of interactions between adults and children – interactions which always merit safeguards – in the online space. UNICEF has called for the digital sector to ensure new online spaces are safe and to pay particular attention to protection of children's data and privacy.[23] This should be in focus in any school outreach programmes.

Also in the area of education, going forward it will be important to work in partnership with governments and dedicated experts for local content, but also to reach solutions that balance online and offline learning and that take into account the different means – connections, devices and other support – that children have to access content.[24]

Screen time: Many respondents noted the significant increase in children's screen time is a concern for some families and has become a topic of public debate (although this has still taken a back-seat for the moment in many geographies heavily focused on responding to the pandemic and its economic impacts).

> **Online safety risks have now become part of the school day: phishing attempts, contacts from outsiders and more.**

Impacts of increasing offline violence: More widely relating to the rights of children, the economic hardship that follows the COVID-19 pandemic will disproportionally impact the most vulnerable children and may, in the longer term, heighten the risks relating to e.g. child labour and trafficking that are also relevant to all business sectors. The world's leading child protection agencies have voiced their collective concern over the increased risk of violence to children going forward.[25] This is a space where mobile operators can play a key role by ramping up their own internal controls and supporting child helplines and other child protection partners.

> **It is not only about the volume of children online now. Those who were already online are more at risk than before. They are spending more time on screens and accessing new services.**

23 UNICEF, July 2020: Children's rights and digital business during COVID-19 and beyond

24 The EdTech industry is set to be worth £128bn by 2021 globally, with online learning as the main driver of growth in the COVID-19 era. Some initial collaboration projects are listed in GSMA, May 2020: Education for all during COVID-19: Scaling access and impact of EdTech

25 Letter "Violence against children: A hidden crisis of the COVID-19 pandemic" published and signed in April 2020, e.g. by Child Helpline International, UNICEF, ECPAT and Plan International.

Immediate industry response

Mobile operators made significant efforts to support remote education in terms of connectivity, access to content and digital literacy support. Educational content was amongst the zero-rated services that operators were offering to their customers. For example, Vodafone zero-rated its e-school platform as well as other educational sites. Operators offered special data packages to students, lifted data caps and there have been collaborations with education ministries to launch SMS learning systems and provide free SIM cards.[26] Operators that participated in this review have also created dedicated funds to support education or have boosted their existing educational initiatives, such as T-mobile's 10 Million project.

As more children came online, many mobile operators also sought to strengthen existing online safety support for children and their parents and teachers. Companies promoted their parental control solutions, parental guidance materials and provided additional support to their external partners in this space. For example, in response to the pandemic, Millicom and UNICEF boosted their collaboration in nine Latin American countries to ensure learning continuity for children affected by lockdowns. This not only involved providing access to government education platforms for their customers free of charge but also: training of teachers on digital skills; raising awareness of health, education and child online protection through mass communication campaigns; and empowering adolescents as leaders in and promoters of digital and transferable skills.

Some operators have also carried out research to understand key issues relating to digital child safety. AT&T's 'Digital Family Poll', carried out in July 2020, showed teen screen time was increasing – in line with increased parental concerns. However, still less than half of parents were using the parental controls available. Telia Company activated its "Children's Advisory Panel" and investigated children's experiences of online learning, offering insights for improved digital learning going forward. In other findings from the Telia study, children noted that bullying had decreased but 1 in 10 children had been contacted by an unknown adult whilst studying.

In addition, other operators responded to the increased risk of violence, abuse and mental stress children were facing whilst in lockdown. In many countries, child helplines faced a huge increase in demand while struggling sometimes to maintain services during lockdowns. As an example, Telia Company in Sweden stepped up their support for the local child helpline by providing additional capacity and financial resources to support the services.

26 World Bank blog, April 2020: How ministries of education work with mobile operators, telecom providers, ISPs and others to increase access to digital resources during COVID19-driven school closures

3.3 Trust, privacy and security

As the COVID-19 pandemic has spread across the world, it has been accompanied by a massive, nearly overnight increase and dependence on digital services. This huge opportunity for increased digital inclusion and adoption of new services relies on a solid relationship of trust with existing and potential customers.

COVID-related scams, phishing and fraud have proliferated and, for companies across many sectors, exposure to cyber-attacks has also increased as employees work via potentially less secure connections and new locations and back-up servers are brought into use.[27]

Even before the pandemic, aggregated, non-identifiable mobility data had been successfully used to understand population movements to help contain the spread of diseases and in disaster response.[28] It was therefore to be expected that governments and health organisations would aim to collaborate with mobile operators to investigate the potential of using this data to help understand and contain the spread of COVID-19.

> **Cybersecurity is especially important. The threat of cyber-attacks is growing and we need to educate our workforce on the new forms of online fraud.**

27 Bain & Company, March 2020: Telcos and Coronavirus: Three Steps to Manage the Crisis

28 GSMA, 2019: Mobile Big Data Solutions for a Better Future Report

Spotlight on AI for Impact

First established in 2017, the GSMA's AI for Impact (AI4I) Initiative has been supporting the mobile industry to develop scalable approaches that enable products and services leveraging mobile big data analytics and AI to be adopted sustainably across the world.

Pre-COVID-19, operators have been applying their mobile data analytics and AI capabilities across a range of use cases, including epidemics, climate change and disaster preparedness. However, since the emergence of COVID-19, operators have invested to fast-track the development of tools and insights relevant for this pandemic, for example to:

- inform epidemiological models to reveal how the disease is spreading by helping to identify transmission hotspots;
- evaluate the right time to implement or reduce social distancing measures;
- monitor the impact of policies and directives on actual behaviour; and
- provide insight into the cost-benefit analysis of measures and the associated impact on the economy.

Several mobile operators are working with national authorities to leverage their mobile data and AI capabilities for COVID-19 response. Examples include: Orange in France, Telenor in Norway and MTN in Nigeria. Further information can be found in the paper The role of AI4I in the fight against COVID-19.

Longer-term priorities

There was general consensus among participants in this review that, due to the use of data applications, analytics and insights to help respond to and contain the spread of COVID-19, there has been an increase in awareness (even of less informed consumers) about the customer data mobile operators hold; how governments may look to access and use this data; and the privacy implications that follow.

Operators fully recognise that when people are confident that the digital environment is sufficiently trustworthy, they are more likely to take advantage of the full benefits of a digitally enabled life and so the focus on trust, safety and privacy will continue to grow in importance for the sector.

Regardless of the maturity of their current programmes, operators will continue to review and update their privacy, data protection and cyber-security policies and procedures in the light of the new issues the COVID-19 pandemic has brought to light.

Specifically, companies highlighted the need to focus on:

- **building trust with consumers** through transparency and open information about data collection, storage and use, as well as providing support to consumers to manage COVID-related scams or cyber-attacks;
- **having a full and up-to-date understanding of local legal frameworks** and their strengths and weaknesses, in order to, as the pandemic progresses, harness the full positive power of aggregated non-identifiable user data within the law and international principles;
- ensuring any **cyber-security and fraud vulnerabilities** are addressed, including relating to remote working of employees and essential contractors, such as customer service agents.

> **Data privacy issues have been more in the fore – we have to make sure we are aware of the laws, who is vulnerable, and what measures we have to take.” to make sure vulnerable people are protected.**

Immediate industry response

The GSMA COVID-19 Privacy Guidelines that were published at the start of the crisis, outline recommendations on how the mobile industry maintains trust while responding to those governments and public health agencies that have sought assistance in the fight against COVID-19.

As part of any such initiatives, many of the operators surveyed have focused carefully on ethical considerations as well as meeting the privacy requirements of local law and internationally defined principles. In some cases, operators have spent considerable time reviewing and collaborating with the authorities on such requests and also working together, at times with the coordination of the GSMA.

Communication and transparency about these requests and how companies have responded is important for consumer trust. As an example, Telia Company maintains information on its website of the relevant government assistance requests it has received since the beginning of the pandemic. For each of its markets it explains the request received and how the company has responded.

Operators surveyed also cited isolated cases where existing legal frameworks do not provide adequate protections for the requests from authorities or where national laws may be hindering the analysis or use of such data, for example by not allowing anonymised data sets to be exported across borders to the expert teams who need to complete the necessary analysis.

3.4 Employee health, safety and wellbeing

During the pandemic, the world of work has been severely impacted by the imposition of lockdown measures aimed at reducing the spread of the virus and protecting people's lives and health.

According to the ILO, as of the 15th June 2020, 93% of the world's workers resided in countries with workplace closure measures of some kind.[29] This has had huge implications for jobs, with the latest ILO estimates showing that, during the second quarter of the year, an estimated 14% of global working hours (equivalent to 400 million full-time jobs) were lost relative to the fourth quarter of 2019. It has also led to a significant number of people working from home.[30]

Longer-term priorities

Employee health, safety and wellbeing will continue to be a top priority not just for mobile operators but across all sectors, as society navigates the pandemic and in the longer term.

Focus on mental health: As well as the obvious pandemic health issues, there has also been a growing focus by operators on mental health. A number of participants in this research believe that the increase in openness in the workplace about mental health is here to stay.

Remote and flexible working: Mirroring the debate that is going on across business,[31] almost all participants in the research believed that flexible working practices in the sector have shifted for good. Although the transition to more flexible ways of working had begun for many operators, this has been dramatically accelerated. Several participants commented that productivity has gone up - in part due to no commuting time - reflecting insights from across business more generally.[32] In the longer term, this flexibility could allow for greater diversity, as well as allowing operators to attract talent from greater distances.[33]

> **The future of work has changed. We have dramatically accelerated going digital and working from home and this change is for good.**

29 ILO, June 2020: ILO Monitor: COVID-19 and the world of work. Fifth edition. As at 15 June, 32% of the world's workers were living in countries with required workplace closures for all but essential workplaces. An additional 42% were living in countries with required workplace closures for some sectors or categories of workers, and a further 19% in countries with recommended workplace closures.

30 Bain & Company, July 2020: Now That We Know Remote Works, What's Next?

31 IDC, August 2020: Returning to Work: Top 5 Future of Work Initiatives

32 Bain & Company, July 2020: Now That We Know Remote Works, What's Next?

33 Acre, 2020: A COVID-19 Market Analysis for Sustainability and Safety Professionals

However, there was recognition that the shift to remote working is a big cultural change that will have an impact on many HR processes, such as performance management. Concerns about how to build company culture virtually were raised and it was pointed out that the future skills agenda needs to be accelerated to ensure all employees can fully embrace a more digital and virtual work environment. It was also recognised that people have "uneven" experiences of working from home that may impact wellbeing and productivity.

What the future working model will look like is still to be defined by most companies participating in this research. Employee surveys are indicating that, although some employees may want to work at home full-time in the future, others are keen to get back to the office - and the majority of employees would opt for some kind of hybrid model.

Immediate industry response

As was the case for all sectors, employees' health, safety and wellbeing was an immediate priority for operators (alongside maintaining connectivity and services for customers). Across the world, a significant proportion of operators' employees (in some cases over 90%) rapidly shifted to working from home. When needed, they were supported with devices, connectivity and even office equipment to do so. For those not able to work at home, enhanced safety measures have been put in place including providing Personal Protective Equipment (PPE) and training, and implementing social distancing measures and extensive workplace cleaning. Some operators have also put in place additional support for employees who may become unwell such as enhanced medical cover, employee testing and access to medical advice.
Even where the technology, tools and competencies were for the most part already in place, this dramatic shift to home working came with a range of challenges and issues.

Employee engagement: Operators have ramped up internal communications to help employees stay connected and to keep them informed and engaged. Townhalls and virtual meetings are being used extensively and many operators have done regular surveys of employees to gauge how they are managing in the environment, as well as to gather feedback on their experiences of working from home. A number of operator representatives commented that - because connectivity became so critical for customers and society - their company's purpose became extremely clear and people's connection to that purpose strengthened.

Mental health: Many operators have made efforts to support their employees and create an environment and culture which encourages more open conversations about mental health and wellbeing. There has also been a recognition that employees may be experiencing very different home working situations in terms of working environment, social isolation or managing work life balance.

The mental health initiatives and support provided has varied but includes: strengthening existing Employee Assistance Programmes; running wellness webinars; introducing "no meeting" days; establishing "peer buddies" to keep in touch regularly; and providing tools for managers and employees to help provide support and encourage open conversations.

3.5 Responsible procurement and supplier capacity development

Global supply chains have been under enormous pressure and the impact of supply chain disruption caused by the pandemic has been felt across the world.

From a sustainability perspective, the pandemic has highlighted issues including: heightened risks to vulnerable workers of poor working conditions and modern slavery;[34] supply chain transparency; and supply chain resilience and diversification. Much of this is relevant to sectors beyond mobile operators.

Longer-term priorities

Participants in this research overwhelming recognised that the global supply chain disruption caused by the pandemic will only increase the priority of responsible procurement and supplier capacity development in the longer term, although it is early days in understanding exactly what the repercussions may be for the sector or more broadly.

Across business, it is clear that the disruption has highlighted the vulnerabilities of complex global supply chains, particularly from a business continuity perspective. Going forward, supply chains need to be more resilient and this has a number of implications from a sustainability perspective.

Supply chain transparency: The need for greater resilience may drive greater supply chain transparency (beyond tier 1 suppliers) as companies will need to understand where the vulnerabilities in their supply chain are greatest.[35] Transparency is something that responsible procurement experts have been pushing for many years as critical to being able to identify and mitigate labour standard and environmental risks in supply chains.

Diversification and local sourcing: Strengthening the resilience of supply chains may also lead to operators looking to both diversify their supply chains and potentially source more locally – for example by reshoring some customer contact centres.[36] This has implications for jobs in both the previous and new locations, but may also positively impact supply chain emissions due to, for example, reduced transport of goods. Cybersecurity risk was also highlighted in the discussions in relation to resilience of supply chains.

Vulnerable workers: The more immediate risks relate to the impact of supply chain disruptions on vulnerable workers in the supply chain. BSR has noted[37] that suspension of production or last minute changes to orders - either cancelling or placing new orders – could lead to vulnerable workers losing their jobs and livelihoods or having to meet increased demand, with all the implications for working hours and conditions. These concerns may have been valid in device manufacturing which experienced stoppages in some markets. Additional pressure has also been placed on suppliers such as tower companies and maintenance crews, who were designated as essential services. Pressure to maintain connectivity could lead to long working hours and potentially other risks to health and safety.

Responsible supply chain programmes: In practice, at least in the mid-term, there will be practical challenges to delivering on-site suppler audit and capacity building programmes, given ongoing travel restrictions and infection control measures. Operators are already considering how much of this can be delivered virtually.

34 BSR, July 2020: Why Modern Slavery Risks Should be Top of Mind for Business during COVID-19
35 Deloitte, June 2020: COVID-19 Impacts on Supply Chains, Sustainability and Climate Change
36 Bain & Company, April 2020: COVID-19 Gives Sustainability a Dress Rehearsal
37 BSR, July 2020: Why Modern Slavery Risks Should be Top of Mind for Business during COVID-19

> **Supply chain resilience is high on the agenda. We need less complexity and better visibility of our suppliers' supply chains in order to better understand where there may be vulnerabilities.**

Interestingly, one operator shared that some of its suppliers – having noted the linkages between sustainability performance and resilience - have reached out seeking support to introduce their own sustainability programmes.

Immediate industry response

Although many operators managed to transition customer service staff (including outsourced staff) to a working from home model, in some markets, the services provided by outsourced contact centres were significantly impacted by restrictions to movement and the inability of workers to work from home. In Singapore, Singtel responded to this by providing complementary temporary accommodation for employees who wished to stay and continue working in Singapore while borders were closed.

Supporting SMEs: During this time, a number of operators also put in place additional measures to support SMEs and other more vulnerable suppliers, for example:

- Vodafone was one of several operators to reduce payment terms for SMEs and in March committed to ensuring that all new orders issued to micro and small suppliers providing goods and services to Vodafone's European operations were paid in 15 days.
- Telefonica allocated 75 million euros, including debt deferral and advance payment of invoices to suppliers, to help SMEs and the self-employed.
- Axiata established a cash fund to provide financial assistance to micro-SMEs (not just suppliers) facing financial difficulties arising from the pandemic.
- Telia in Finland used its advertising space to launch a nationwide campaign to promote small local businesses and entrepreneurs.

SMEs have also needed support to digitise rapidly in order to continue to operate during lockdowns. A number of mobile operators have provided such support. For example, Singtel gave free use of productivity, collaboration and security tools to SME customers; and Zain Jordan held various online sessions for professionals and mentors to provide start-ups with useful advice during the current period on, for example, cyber security.

Responsible procurement: A number of operators also indicated that they have modified their responsible procurement programmes. Inevitably some face-to-face activity – such as onsite audits and supplier training – has been adjusted, in recognition of the significant pressure suppliers may be under as well as infection control measures. Others have added a COVID aspect to their supplier self-assessments or used innovative ways to gather feedback from workers in their supply chain.

> **Small suppliers are struggling, and they are looking to us to help them survive this time. For example, they are asking us for support to go digital.**

3.6 Climate change

Addressing climate change and its effects is one of most urgent concerns that the world faces today. Despite the drastic reduction in human activity due to the COVID-19 crisis, the resulting 6% drop in emissions projected for 2020 falls short of what is needed to meet the climate change targets set out in the Paris Agreement, and emissions are expected to rise as restrictions are lifted.[38]

However, many stakeholders – including the investment community[39] - believe that the COVID-19 pandemic is bringing greater attention to climate change. The disruptive size of this crisis has made the potential impact of the next one much clearer.

Longer-term priorities

The issue of climate change was already on an upwards trajectory in terms of priority for mobile operators and is one of the core pillars of the sustainability strategies of the majority of companies participating in this research. Although there was a recognition and concern that climate change may fall down the agenda if the economic downturn is long and deep, this does not appear to be materialising for the mobile sector and climate change will continue to be a top priority within sustainability strategies.

Increase in consumer awareness: In some regions, it was felt that climate change may have moved up the agenda for consumers, as they recognised and appreciated the impact of lockdown measures on clear skies and air quality. It was felt that at least some of the increase in working from home that has been seen during the pandemic will remain and, in the longer term, this may lead to changes for commuting, traffic, air quality and emissions (including for operators).[40]

> **As society rebuilds and recovers from the COVID-19 crisis, we have an opportunity to reshape our future sustainably to ensure that recovery does not come at a cost to the environment.**

38 United Nations, 2020: Sustainable Development Goals Report 2020

39 J.P. Morgan, July 2020: Why COVID-19 Could Prove to Be a Major Turning Point for ESG Investing and Tony DeSpirito, BlackRock, April 2020: How a Global Pandemic Could Accelerate the ESG Imperative

40 Telenor, 2020: Telenor's Post-pandemic predictions

Impact of stimulus packages: A number of operators (in particular in Europe but not exclusively) also referred to the importance of stimulus packages being linked to a green recovery as key drivers for the continued importance of their environmental programmes. The European Green Deal (which is focused on meeting the EU's target of net-zero carbon emissions by 2050) was seen as a significant opportunity for the sector.

Enablement in the recovery: Through what is called 'the enablement effect', increased use of smart, connected technologies across all economic sectors will make a manifest difference in greenhouse gas emissions. This means that the mobile sector can help to accelerate the green transition not only through energy efficient networks, but also through its potential to enable other sectors of the economy to reduce their own emissions, explored in more detail in GSMA's Enablement Effect report.

Immediate industry response

In May 2020, following a survey of several of its large operator members, GSMA confirmed that the energy consumption and carbon emissions of telecoms networks have remained mostly unchanged, despite significant increases in network traffic as a result of COVID-19 lockdown measures. A number of interviewees did recognise that there was potential for demands on the network to have knock on impacts (for example an increased use of diesel) but also that there may be some carbon efficiencies to be gained through a reduction in business travel and increase in people working at home over the pandemic period.

A number of operators acknowledged that some short-term, tactical climate change related activities, such as reporting or carbon footprinting work, may have been disrupted or delayed slightly in the immediate crisis, particularly as network teams focused on business continuity. Participants did confirm, however, that broader ambitions and larger projects (such as putting in place long-term Power Purchase Agreements) remain unaffected and are still very much ongoing.

In some cases, operators' climate change programmes have accelerated during the pandemic period. For example, in July 2020, Vodafone announced a new target to help customers save 350 million tonnes of CO_2e by 2030. Alongside this was an additional target for its European network to be powered by 100% renewable electricity no later than July 2021 (an acceleration of previous targets).

> **Climate change was already a top priority and the scale and impact of the pandemic has dramatically highlighted the risks and disruption that crises can cause.**

3.7 Other issues

The issues covered previously in this section are those issues where interviewees consistently felt that the impacts and implications of the COVID-19 pandemic had resulted in an increase in priority and focus for the longer term. However, the pandemic has also had an impact on other material sustainability issues for the sector. For some issues the overall priority may not have changed, but there is a new perspective or focus that has come in to play, or there has been a shift in priority for some operators or in some regions, but not for others.

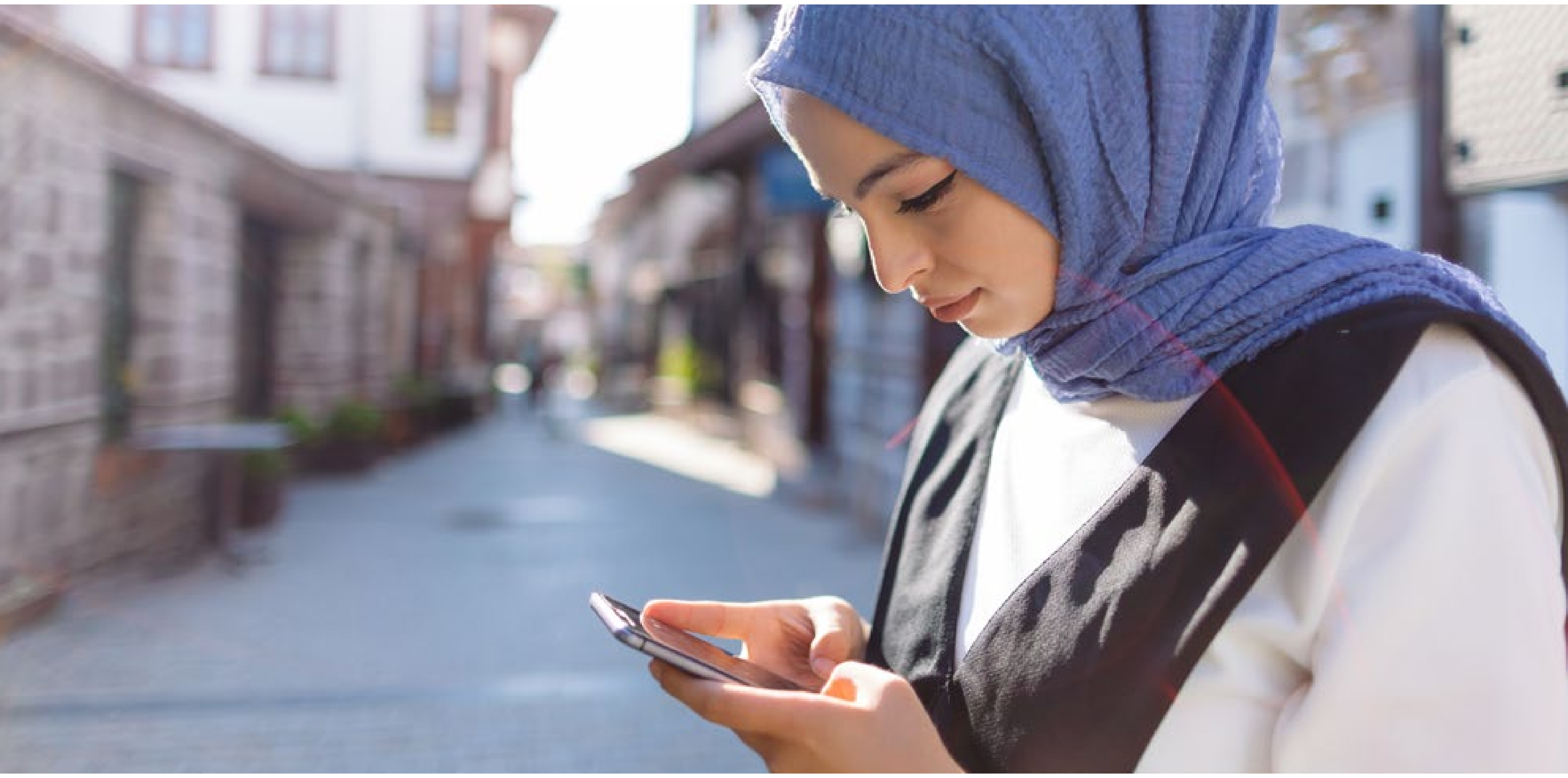
Anti-bribery and corruption

A number of participants referred to ways in which the COVID-19 pandemic may be introducing new fraud and corruption risks within society more broadly as well as unmasking existing bad practices. Examples include: illegal or fraudulent trading of PPE supplies; the risk that financial and in-kind donations are not used appropriately; the risk of remote working making it easier for employees to commit fraud; and greater awareness of visa fraud and trading as the authorities gain a better grasp of individuals who are actually living in any given country.

Digital services can help to reduce risks through increased transparency, with mobile money in particular helping to reduce corruption within cash-based economies.[41]

> **The pandemic has brought to light a number of corruption scandals, and with it renewed public awareness and expectations.**

41 https://www.vodafone.com/what-we-do/services/m-pesa

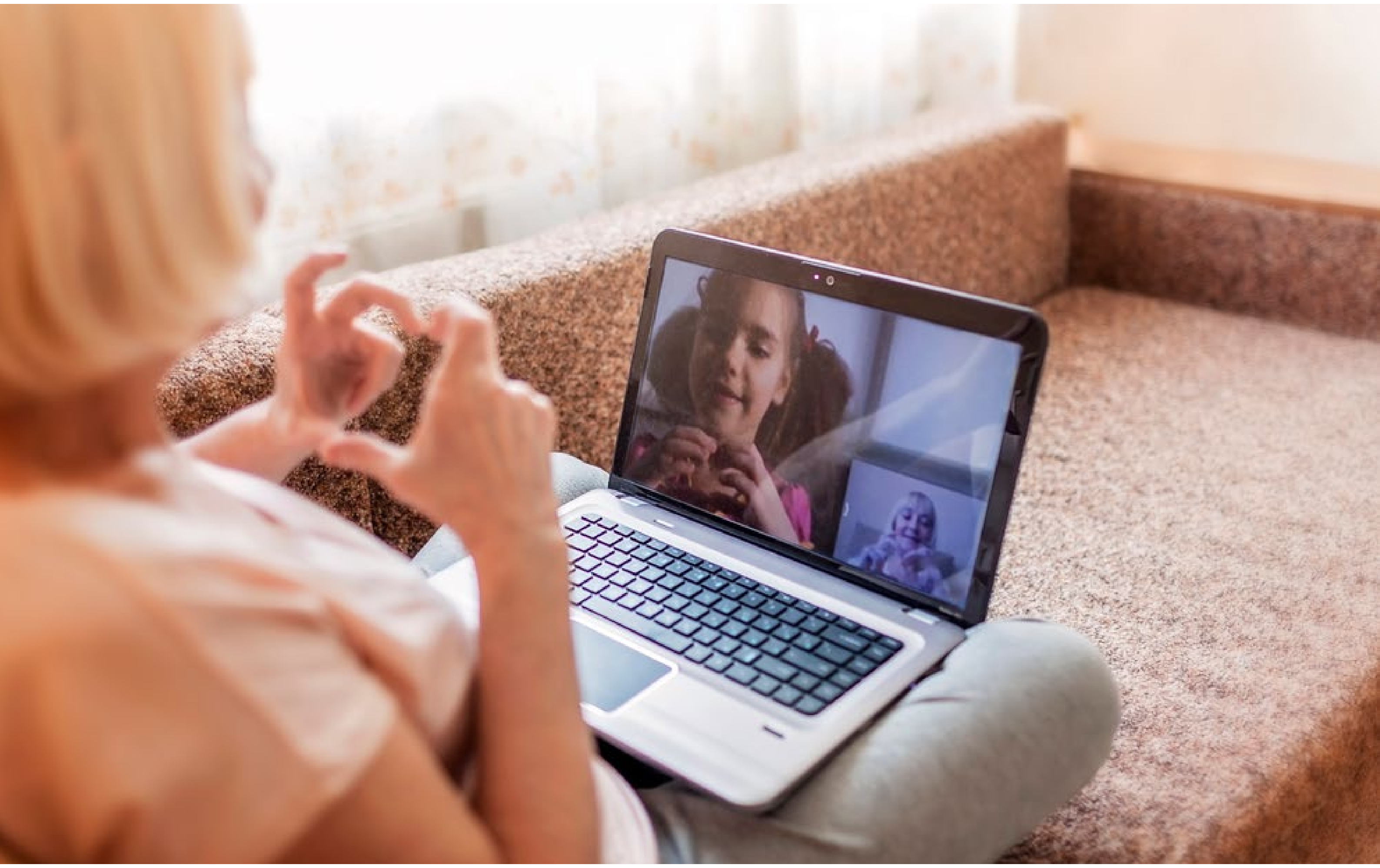


Customer service

Customer service has always been, and will continue to be, a top priority for mobile operators and never so much as during a crisis. Movement restrictions and COVID safety measures have impacted the way in which customer service is delivered, with an acceleration of the digitisation of services. Mobile operators have had to close majority of their stores for at least some periods of time during the pandemic and customer services staff have been successfully transitioned to working from home rather than in contact centres. The use of contactless and virtual services (such as virtual top ups and chat bots) has also accelerated and some of this shift will certainly "stick" in the longer term.

These changes do have a number of data security implications. As services become even more digitised, existing and new customers need to have at least a basic understanding of safety and security online to help protect them from scams, phishing and other cybersecurity risks. And with more customer service agents working remotely and able to access sensitive data, there are also additional security considerations – such as fraud and cybersecurity risks – that need to be robustly managed.

> **We have been very responsive to customers and their needs during this difficult time and new digital service channels have been introduced in record time. There will be no going back from these expectations.**



Diversity and inclusion

All operators participating in this review said they promoted diversity and inclusion and that this commitment will remain unaffected by the pandemic.

There was a recognition that – with children at home and vulnerable relatives needing additional care – there may be the potential for women to be disproportionately affected by the unequal distribution of these increased care demands. This is something to consider when and if home working periods are extended and companies are making decisions about the future of work beyond the immediate crisis.

Human rights

A number of key human rights issues that have an increased priority for operators have been covered earlier in this report including:

- the link between human rights and digital inclusion and the potential for digital to help reduce existing inequalities, but also the risk that vulnerable groups will be left behind;
- the risk that the pandemic will negatively impact livelihoods, labour standards, working conditions and rights for workers across the value chain; and
- greater awareness of and public debate on digital rights such as privacy and child online safety.

None of the participants in this review referred to ways in which the pandemic had affected freedom of expression. However, in some regions, there was initial concern that economic hardship could lead to civil unrest, which then has the potential to increase the risk that operators are required by governments to, for example, restrict services.

> **Human rights from the technology perspective was not present in the public debate like this before. There are initiatives in preparation from governments on digital rights specifically.**

Mobile masts and health

In a number of countries, concerns relating to mobile phones, mast and health have been impacted by the pandemic where disinformation linking 5G communications technology to the spread of the virus has incited fear, aggression and vandalism against critical infrastructure and essential maintenance workers. GSMA's response is available here.

Tax transparency

Government budgets are coming under increased pressure as a consequence of the pandemic and potential new tax initiatives targeting the sector have been mentioned by a number of interviewees. These in turn may have adverse consequences on the cost of connectivity and digital inclusion in the long run.

The disclosure of a company's tax policy, strategy and payments, as advocated by the GSMA through its commitment to The B Team Responsible Tax Principles, may increase in priority as a mechanism to demonstrate the significant contribution the mobile sector is already making to government finances.

Waste and e-waste

Across society, COVID safety measures have resulted in a dramatic increase not only in the use of single use PPE - such as gloves and face masks - but also other single use plastics such as plastic bags. PPE is of course being used by operators in some circumstances and so this may have knock on impacts for operators' waste volumes and indicators. There is also an expectation that public awareness of plastic waste will increase.

O2 in the UK has responded to this challenge by partnering with TerraCycle, a world leader in hard-to-recycle waste, to introduce a PPE recycling solution for O2 stores.

It is still to be seen whether there will be a knock-on impact in relation to e-waste and operators' targets for collection and recycling of e-waste.

> **With PPE and single use plastic use on the rise again, we need to make sure we do our bit. We are also asking employees working at home to manage their waste responsibly.**

04

Guidance on applying a “COVID-lens” to materiality assessments


50%
40%
30%
10%

Some of the mobile operators involved in this research had already undertaken a materiality process during the first half of 2020; some were embarking on it during Q42020; whilst others were planning to do this at a slightly later time frame, in line with their establishing materiality and reporting timeframes.

It is clear that the COVID-19 pandemic has brought several new considerations to the table for mobile operators as they embark upon their assessments. This section provides some practical guidance to identify implications of the pandemic for operator sustainability strategies, including how to utilise some of the findings of this review.

Explaining materiality assessments

The aim of materiality assessments is to identify a company's most important sustainability issues. The findings should inform the company's sustainability strategy, KPIs, reporting and prioritisation of actions. Most common approaches to materiality assessment follow the principles set out by the Global Reporting Initiative (GRI), which calls for companies to consider sustainability issues in two dimensions:

- The significance of the company's economic, social and environmental impact – i.e. the size of the positive or negative impact the company's activities can have on the issue;
- How important the issue is to key stakeholders and how likely it is to influence their assessments of and decisions about the company.

Materiality assessments usually consist of: interviews and surveys of internal teams and external stakeholders such as customers, civil society organisations and investors; research into current trends and guidance; and should be based on a solid understanding of the company's operating environment.

Bringing a "COVID-lens" to stakeholder engagement

Materiality assessments are founded on engagement with both internal and external stakeholders to hear their views and understand what is important to them. There are a number of practical ways in which operators could apply a "COVID-lens" to this stakeholder engagement and materiality process.

Internal Stakeholders: Operators could consider engaging with a broader set of internal stakeholders than usual in order to build a deeper understanding of how the pandemic has impacted local operations, for example Country General managers; Enterprise teams (including public sector); HR and H&S teams. There may also be internal teams working on specific projects looking at how the COVID crisis has, for example, affected customer experience.

External stakeholders: Operators could also broaden the external stakeholder input that they gather and the groups that they engage with in a number of ways. Questions to consider may include:

- Are there stakeholder groups who haven't been involved in past materiality assessments but may have particular expertise on the impacts of the COVID-19 pandemic and the role of the mobile sector?
- Much of the response to the pandemic has focused on understanding and being responsive to specific, local needs. It may be worthwhile engaging with grassroots organisations that local operations have been engaging with on a country, state or regional level.
- Other company functions may have also been asking for regular feedback from their key external stakeholders on issues related to COVID-19. It has always been good practice to try and feed this input into materiality assessments, but this may be even more enlightening at this time. Has for example, the procurement team surveyed SME suppliers on their needs and challenges? What have customer or employee surveys specific to the pandemic response and impacts been highlighting as new issues and opportunities?
- Another angle that operators could consider is having more detailed conversations with trusted partners in order to take a closer look at the impact of the pandemic on their partnerships and priorities. How are partners faring during the pandemic? Have partner priorities shifted? What insights can they bring from their areas of expertise and their activities? If the partnership aims to support specific groups of people, how have their needs been impacted or reprioritised? Does the nature and focus of the partnership need to change in response to the pandemic?

Additional questions to ask: As part of their materiality assessments or other stakeholder engagement, operators can ask specific questions about the pandemic to tease out its impacts on business responsibility. Possible questions could include:

1. Do you think society's expectations of business responsibility have changed as a result of the pandemic? In what way? And of this company in particular?
2. Do you have any feedback on the company's response to the pandemic – was it in line with your expectations? Can you highlight what the company did well and where it could improve?
3. Which topics of the company's sustainability strategy and plan do you think are most important for pandemic recovery and why?
4. Are there new sustainability and ethical issues, angles or considerations that the company should be considering in relation to the pandemic?
5. Moving beyond the immediate crisis response, should the focus of sustainability in the company change as a result of the pandemic? In what way?
6. For internal functions: what role did the team play in the pandemic response? Has the pandemic affected the role and priorities of the team or the way it works with others inside the company?
7. What have been the financial impacts of the pandemic for the company? What does this mean in terms or priorities but also resources and focus going forward?

Introducing a human rights perspective to materiality

The most vulnerable in society have been hardest hit by this crisis and will continue to be so going forward. A couple of operators specifically referred to how they are using (or are planning to use) human rights impact assessments (HRIA) in either planning specific activities as part of their COVID-19 response or for more in-depth analysis of key material issues.

By analysing impacts from the perspective of different stakeholders (or "rightsholders" in this context), companies can identify vulnerable groups and build an understanding of how a particular issue or course of action may impact the most vulnerable. Businesses can then systematically think about how they can address any negative impacts or potential harm. Such an approach is aligned to the expectations of the UN Guiding Principles on Business and Human Rights (UNGPs) in relation to vulnerable groups.

Including learnings on specific issues from this research

The below summary of findings may also be a useful input for operators as they consider how to apply a "COVID-lens" to their materiality assessments – or how significantly the pandemic may have affected each issue. More information on likely future trends and potential new activities for each issue can be found in section 3 of this report.

Key: The arrow indicates the change in priority going forward following the pandemic.

↑ Indicates much higher priority; ↗ indicates slightly higher priority; → indicates no change in priority.

Sustainability issues common to the mobile sector[42]	Explanation of issue	Change in priority in response to the COVID-19 pandemic
Customer service	Identifying and meeting the needs of customers.	↗
Child safety online	Protecting young people from threats and exploitation online and taking measures to protect children from sexual exploitation and abuse online.	↗
Digital inclusion	Ensuring products and services are accessible to all members of society, including the underserved.	↑
Privacy	Privacy: Ensuring privacy risks are considered when designing new apps and services and developing solutions that provide customers with simple ways to understand their privacy choices and control their data.	↗
Freedom of expression	Freedom of expression: Protecting the right of customers to access and publish content freely, and without deliberately causing harm to others' character and/or reputation by false or misleading statements.	→
Anti-bribery and Corruption	Policies, systems and controls to guide employee conduct and prevent breaches of anti-bribery and corruption laws.	↗
Human rights	Recognising and actively protecting the human rights of employees and wider stakeholders in line with the UN Universal Declaration of Human Rights.	↗
Tax transparency	Disclosure of tax policy, strategy and payments.	→
Mobile mast health	Being compliant with electromagnetic fields and health-related policies based on established science.	↗
Employee diversity	Measuring and promoting workforce diversity and preventing discrimination.	↗
Employee health and safety	Practices for protecting the workforce in the area of health and safety.	↑
Supply chain responsibility and supplier capacity development	Setting and applying standards for environmental, social and ethical practices and performance by suppliers and developing initiatives or programmes to increase the professional capacities of suppliers.	↗
Waste and e-waste	Managing waste, e-waste and hazardous waste from production or use of products and waste returned by customers.	→
Climate risk	Identifying and reducing environmental impacts and contribution to climate change and identifying and reducing exposure to climate risks.	↗
Conflict minerals	Identifying and acting upon the use of conflict minerals in supply chains.	→

42 Derived from GSMA's Sustainability Assessment Framework

For further information please visit
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