

External Supplier Control Obligations

Digital Accessibility

Any product, service, information and technology with a user interface including but not limited to audio visual content, websites, web applications, mobile apps, software and kiosks, designed or supplied by a Supplier and/or sub-contractor in carrying out Barclays activities (“**Digital Products**”) must be accessible to everyone, including people with disabilities in compliance with any applicable laws (including the 2010 UK Equality Act). **Digital Products** must meet the most up to date internationally accepted accessibility standards (“**Digital Accessibility Standards**”) such as the accessibility requirements set out in the Web Content Accessibility Guidelines ([WCAG v2.2 AA Level](#)) or any subsequent version.

Suppliers and/or sub-contractors shall ensure that all **Digital Products** (including any subsequent major update or newer version or successor model) comply with the **Digital Accessibility Standards** on an ongoing basis, at Supplier’s own costs.

Digital Products adhering to **Digital Accessibility Standards** mean that they are easy to see, hear, understand and use for everyone, including Barclays customers or personnel with disabilities. There is a legal requirement, commercial opportunity and moral imperative for ensuring disabled people are not left out or left behind from using our Digital Products.

Barclays may conduct a periodic review of Supplier’s compliance with digital accessibility standards which would include the following controls:

Control Area	Control Title	Control Description	Why this is important
Accessible Digital Product design and delivery	1 Compliance with Digital Accessibility Standards	<p>Upon conclusion of the contract and for each subsequent material change to the Digital Product (e.g. major upgrades), Supplier and/or sub-contractor must ensure that their Digital Product complies with the most up to date Digital Accessibility Standards on an ongoing basis at its own costs.</p> <p>Supplier must be able to demonstrate such compliance by the provision of a Voluntary Product Accessibility Template (VPAT) or equivalent Accessibility Conformance Report (ACR).</p> <p>Where supplier does not meet Digital Accessibility Standards, the supplier must provide a remediation roadmap under which any issues found will be resolved within a reasonable time-frame (<12 months).</p>	<p>Barclays customer and personnel systems with inadequate levels of digital accessibility will result in them being difficult or impossible for disabled people to use – generating a poor customer experience as well as legal, reputation and conduct risk.</p> <p>Supplier can demonstrate that relevant accessibility standards, innovation and best practices have been embedded in their operations to deliver inclusive Digital Products that meet the accessibility needs of people with disabilities.</p>
	2 Accessibility monitoring and reporting	<p>Supplier and/or sub-contractor must have an established accessibility framework which includes but is not limited to policy, programme and processes in place with clear accountabilities for tracking, monitoring and remediating gaps identified from VPAT’s (or equivalent Accessibility Conformance Reports) so as to sustain accessibility compliance over the term of the contract. This should include processes for monitoring and reporting of compliance levels and remediation progress (where appropriate) to the Supplier’s Accountable Executive at least every six months.</p>	<p>Suppliers must provide evidence of accessibility compliance for all their Digital Products provided to Barclays Customers & Clients and where gaps are identified, to remediate these in a timely manner and at their cost.</p> <p>Suppliers with an accessibility commitment or policy, accountable leaders and trained staff help to ensure that products are built and stay accessible for customers.</p>

Control Area	Control Title	Control Description	Why this is important
		<p>Digital Accessibility Standards must be embedded within the Supplier's product development lifecycle, procurement processes and staff training.</p>	
	<p>3 Organisational benchmarking of bespoke Digital Products and services</p>	<p>Suppliers who design or supply bespoke Digital Products must benchmark their organisational maturity regarding Digital Accessibility using a suitable accessibility maturity model.</p> <p>Such accessibility maturity models provide a structured and systematic approach for incorporating accessibility into an organisation's staff training, customer consultation, reasonable adjustments, leadership and resourcing, design system, internal development processes and external procurement practices.</p>	<p>Although suppliers providing standard digital products can audit the accessibility of their products (the 'what' outlined in controls 1 and 2), suppliers who deliver bespoke digital services and solutions (e.g. a digital agency either designing or building a custom website) need to demonstrate that they have established processes for embedding accessibility into their products, services and culture (the 'how') through benchmarking their organisational maturity. This gives greater assurances that current and future bespoke products will be built accessibly.</p>