




External Supplier Control Obligations Customer Complaints

Important Note: For regulated Suppliers (i.e. those granted a license or authorisation by a regulator to carry out activities which are regulated by that regulator), the Suppliers must adhere to any specific requirements set out by the regulator in their local jurisdiction, which may include (but not limited to), the definition of a complaint, the costs associated with contacting the Supplier, the timescales on response, the response content and referral rights to Alternative Dispute Resolution (ADR) organisation. Unless otherwise prescribed by local legal or regulatory requirements, Barclays defines “Complaint” as any expression of dissatisfaction, whether justified or not, about any activity, product or service provided to a Barclays customer (“Customer”), which has or may have a material effect on the complaining Customer.

Control Title	Control Scope			Control Description	Why this is important?
	Suppliers who handle complaints under Barclays brand	Suppliers who handle complaints end to end under their own branding	Suppliers who receive and forward on complaints to Barclays to handle		
1. Complaint Handling: Information on how to raise a complaint	✓	✓	✓	<p>Customers are provided with clear, consistent, readily available information on how to raise a Complaint. Consideration must be given to Customers who demonstrate indications of vulnerability (e.g., health conditions that may impact their ability to understand the product or service) or financial difficulties and how such Customers complaints will be identified, managed by Suppliers and reported to Barclays.</p> <p>The information on Complaints Handling must be accessible to everyone, including people with disabilities in compliance with any applicable laws (including the 2010 UK Equality Act) and therefore 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.</p> <p>Guidance: <i>A vulnerable customer is someone who, due to their personal circumstances, is especially</i></p>	<p>Suppliers must ensure that the Complaints process is available and accessible to everyone, so Customers are aware of the Complaint process if they wish to express dissatisfaction on any element of their relationship with Barclays and/or the Suppliers.</p> <p>Suppliers must not prevent or put barriers up which deter Customers from making a Complaint. A complex process may deter Customers from making a Complaint.</p>

				<p>susceptible to harm. All customers are at risk of becoming vulnerable on either a permanent or temporary basis, and this risk is increased by having characteristics of vulnerability. Characteristics or circumstances of vulnerability have four key drivers (examples are non-exhaustive):</p> <ul style="list-style-type: none"> (i) Health – physical or mental health conditions, illnesses or disabilities that affect ability to carry out day-to-day tasks. (ii) Life Events – life events such as bereavement, caring responsibilities (which may include operating a power of attorney), job loss, relationship breakdown or other circumstances that affect people’s experience of financial services e.g., leaving care, migration or seeking asylum, human trafficking or modern slavery, convictions; (iii) Resilience – low ability to withstand financial or emotional shocks, or financial hardship; and (iv) Capability – low knowledge of financial matters or low confidence in managing money (financial capability). Low capability in other relevant areas such as literacy, numeracy or digital skills, or lack of local language skills. <p>These circumstances or characteristics can be complex and overlapping and could include business customers where personal circumstances may directly impact their business arrangement e.g., using personal property as collateral to fund a business loan</p>	
2. Complaint Handling: Costs of raising complaints				Customers are not charged for raising a Complaint.	Suppliers must not charge Customers to raise a Complaint; this includes directing Customers to premium rate telephone numbers or other revenue generating telephone lines. Charging to raise a Complaint could deter Customers from raising issues

					which need addressing or cause a reputational risk for Barclays and Suppliers.
3. Complaint handling: Feedback Mechanisms	✓	✓	✓	<p>Customer Feedback Mechanisms provide clear information on the appropriate process for raising a Complaint, including the different channels a complaint can be raised through (e.g., telephone, face to face, email, post etc)</p> <p>Unmonitored mailboxes should have an autoreply function to advise of the correct process to raise a Complaint.</p>	Suppliers must ensure that Customers are informed of how they can raise Complaints through any channel which the business operates. This ensures Customers can choose the most appropriate and convenient channel.
4 Complaint Handling: Period review	✓	✓	✗	<p>Complaint handling process should be reviewed annually or where required in order to comply with new regulatory requirements. The review should ensure the process remains consistent with the regulatory requirements and the Customer base, and addresses material issues or concerns raised by Customers.</p> <p>(For guidance “The Customer base is a group of individuals or entities with whom Barclays has established a contractual relationship to provide products and/or services, either directly, or via a third party”)</p>	Suppliers must ensure they review the complaints process annually provided for Customers to remain consistent with regulatory requirements and Customer type. This includes out of cycle review for regulatory change and material issues.
5.Complaint Handling: Recording requirements	✓	✓	✓	<p>Complaints are logged by Suppliers (within 24 hours from the time of receipt) and recorded in a manner which must be appropriate to the nature, scale, and complexity of the Business and type of Customer and in accordance with any applicable regulation or laws (where applicable)</p> <p>For data retention, consideration should be given to any local privacy regulatory requirements.</p>	Suppliers must log and record details of all Complaints received and keep records of the Complaint in line with data retention policies (as a minimum) and any applicable laws as long as required
6. Complaint Handling: Acknowledging Complaints	✓	✓	✓	All Complaints are promptly acknowledged (within 24 hours from the time of receipt unless otherwise agreed with Barclays)	

				Complaints must be acknowledged even if the Customer does not use the words 'I want to complain'; Suppliers should consider the words, language and tone used. Further, Complaints may come from 3 rd parties (e.g. carers) and must be accepted in line with normal operating procedures.	
7. Complaint Handling: Investigation requirements	✓	✓	✗	Complaints are fairly and thoroughly investigated, documented (including steps taken during the investigation) and resolved in a timely manner appropriate to the nature, scale and complexity of the Business and type of Complaint. This includes undertaking appropriate inquiries and gathering sufficient information to make a judgement on the validity of the Customer's Complaint and the actions required to resolve it.	Suppliers must ensure Complaints are investigated timely, thoroughly and fairly addressing the Customer dissatisfaction and provide an appropriate resolution so as the Customer understands the complaint outcome and rationale for this. Complaint resolution should be communicated to Customers.
8. Complaint Handling: Complaint handler competency	✓	✓	✗	Complaints investigations are conducted by individuals who: <ul style="list-style-type: none"> • are trained and empowered to recognise and investigate Complaints effectively; and • have the relevant skills, knowledge and expertise in the relevant aspect of the Business to which the Complaint relates. 	Suppliers must ensure Complaints are investigated by trained and competent individuals, who have relevant skills and experience to complete a thorough investigation and provide an appropriate response to Customers including on complex issues. This will ensure Customers feel valued and know their issues have been carefully considered. Suppliers should ensure there is an annual or ongoing training provided to their personnel.
9. Complaint Handling: Avoiding conflict of interest	✓	✓	✗	If there is a Conflict of Interest between the individual conducting the Complaints investigation and the Customer raising the Complaint, it is escalated to a senior manager at the Supplier who is responsible for determining an appropriate course of action. Alternatively, this could be as simple as asking another colleague or team to handle the Complaint.	Suppliers must deal with any Conflicts of Interest appropriately (e.g., not have the advisor/salesman who advised on/sold the product or service, also investigate the Complaint and/or determine the outcome of the Complaint). This is so the investigation is deemed impartial and does not present a compliance risk or a reputational risk to either the Suppliers or Barclays.

				For the avoidance of doubt, a “Conflict of Interest” is where the Supplier (or their employee, contractor or subcontractor) has an interest (either financial or non-financial) which could adversely affect the process or decision making in the Complaint investigation.	
10. Complaint Handling: Keeping Customers updated	✓	✓	✗	Customers are kept informed of the progress of their Complaints investigation.	Suppliers ensure Customers receive timely and appropriate updates on the progress of their Complaint resolution.
11. Complaint Handling: Communication of complaint outcome	✓	✓	✗	Customers are provided with a timely, clear, fair, unbiased and robust response to Complaints, addressing all material elements raised by the Customers.	Suppliers ensure Customers are provided with a response informing them whether their Complaint is being upheld/rejected and the reasons for this decision; always addressing the main issues of the Complaint. This ensures the Customer is clear on the steps that have been taken to investigate and the rationale behind the decision made.
12. Complaint Handling: Providing appropriate redress	✓	✓	✗	When a Complaints investigation has been concluded, Customers are put back in the position they would have been in had the issue not occurred, and redress is offered by Suppliers to Customers, where it is appropriate to do so.	Suppliers ensure Customers are put back in the position they would have been had the issue complained about not taken place and appropriate offers of redress (in line with the Suppliers delegated authority) are made in relation to refunds, payment of interest, costs incurred and any distress or inconvenience experienced. Suppliers may also consider the payment of a gesture of goodwill to maintain customer confidence or generate goodwill where no Barclays error has occurred.
13. Complaint Handling: Provision of escalation processes	✓	✓	✗	If the outcome of a Complaints investigation is not satisfactory to the Customer, clear information is provided by Suppliers on any relevant internal and external escalation process.	Suppliers ensure Customers are provided with details of any escalation process (e.g., free and independent complaints review bodies).

14. Complaint Handling: Root Cause Analysis				A regular review of recurring issues and systematic problems is undertaken to: •Identify emerging and/or thematic risks. •Analyse the root cause of individual complaints and identify any common themes. •Consider whether such root causes may also affect other processes, products or services, including those not directly complained of. •Remediate the root cause of complaints as appropriate.	Suppliers should have appropriate processes and controls in place to ensure complaint handling identifies and resolves the root cause of recurring issues and systematic problems.
15. Complaint Handling: Quality Assurance				Quality assurance over Complaints handling and redress payment is implemented on a risk-based approach by the Suppliers and evidence shared with Barclays at a minimum during service management reviews. (For guidance “redress payment” is a sum of money offered by Suppliers to compensate the Customers for any harm or loss suffered by them).	To ensure that Customers are receiving consistent high quality Complaints handling experience.
16 Complaint Handling: Governance Oversight				The approach to complaint handling has been appropriately documented by the Suppliers with oversight from senior management at the Suppliers. The approach to complaint handling should have approval senior management (or delegate) at the Suppliers	To ensure the Suppliers complaint handling process and documentation has appropriate senior management oversight and regulatory changes are incorporated as appropriate
17 Use of Subcontractors				The Supplier must ensure that any contract concluded with subcontractors it relies on to fulfil the handling of Complaints raised by Customers, includes the control requirements set out in this document. The Supplier must monitor and audit the relevant subcontractors to ensure that they comply with the control requirements set out in this document.	Suppliers must have oversight of any subcontractors to ensure that they have the relevant controls in place to mitigate complaints risk within the supply chain.