

Suppliers Control Obligations

Records Management

Control Area	Control Title	Control Description	Why this is important
Data & Records Management Governance	Escalation	<p>Documented controls and processes must be in place to ensure Records Management incidents are reported and managed.</p> <p>Records Management incidents and breaches should be responded to by the Supplier/Subcontractor and reported to Barclays immediately or not later than 48 hours upon identification by the Supplier/Subcontractor. A process for timely handling and reporting of incidents and breaches related to the management of Barclays Records should be established.</p> <p>The Supplier/Subcontractor must ensure that identified remedial actions following an incident are addressed with a remediation plan (action, ownership, delivery date) and shared and agreed with Barclays.</p>	<p>Barclays can be well prepared for risk assessment and remediation in case an incident or breach is reported in management of Barclays records being managed by the Supplier/Subcontractor. A well planned and documented procedures and processes will assist Barclays to ascertain Supplier/Subcontractor's ability and prepared-ness to manage and remediate breaches and incidents.</p> <p>For some records we may need to report issues to the regulator.</p>

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Records Identification, Indexing & Ownership Standard	Records Inventory & Metadata	<p>The Supplier must ensure that an inventory of Barclays records being stored & managed is maintained and shared with Barclays, at least on an annual basis or upon change. This must also include any inventory of Barclays records being stored by their subcontractors.</p> <p>The inventory must contain at least the following mandatory information in order to facilitate efficient retrieval:</p> <ul style="list-style-type: none"> • Record name • Record Type • Jurisdiction • Record location • Box number (where stored in boxes) • Description of contents • Retention periods (As per Record Type and Barclays Retention Schedule which is shared by Barclays) • Details of 3rd party/subcontractors against the record (if 	<p>If these requirements are not implemented then this could result in legal and regulatory sanction, reputational damage, or loss / disruption of business as a result of a failure to locate and retrieve records.</p>

		maintained by 3rd party/subcontractor)	
	Roles and Responsibilities	<p>The Supplier/Subcontractor must define, document and communicate roles and responsibilities for Records Management to the employees who manage Barclays Records. These must be reviewed after any material change to the Supplier/Subcontractors operating model or business.</p> <p>Key roles at the Supplier/Subcontractor must include: (i) a senior executive, accountable for Records Management (ii) a key contact to be the liaison with Barclays on Records Management.</p>	<p>Records Management requires high-level sponsorship in order to ensure that controls are designed, implemented, and operated effectively.</p> <p>It is important that all Supplier/Subcontractor Personnel understand their responsibilities in relation to Records Management to maintain compliance with the Supplier Control Obligations</p>
Records Retention	Records Retention	<p>The Supplier/Subcontractor must retain Barclays Records in line with the retention periods defined in the Barclays Record Retention Schedule. The Supplier/Subcontractor must change the retention periods of Relevant Records, when instructed to do so by Barclays.</p>	<p>If these requirements are not implemented then it may result in Barclays information not being retained in line with the applicable legal, regulatory or business requirements, which may result in legal and regulatory sanction, reputational damage, loss / disruption of business.</p>
Records Storage	Records Storage	<p>The Supplier/Subcontractor must ensure that Barclays Records stored in their systems remain complete, useable and accessible throughout their lifecycle (inclusive of historical records).</p> <p>The Supplier/Subcontractor must maintain records in a specific format, where required and as informed by Barclays, to comply with any applicable country legislation / regulation. For example, maintaining relevant records in a non-rewritable, non-erasable format (e.g. 'Write once, read many (WORM)' or immutable storage.</p>	<p>If these requirements are not implemented then it may result in Barclays information not being retained in line with the applicable legal, regulatory or business requirements, which may result in legal and regulatory sanction, reputational damage, loss / disruption of business.</p>
	Scanned Documents	<p>Where scanned documents are used to replace the original physical record the Supplier/Subcontractor must ensure the Barclays Records are captured through a scanning process that:</p> <ul style="list-style-type: none"> Adheres to any applicable country-specific requirements relating to the retention of scanned records to replace the physical record and Legal admissibility of using scanned images. Captures the 	<p>If these requirements are not implemented then this could result in legal and regulatory sanction, reputational damage, or loss / disruption of business as a result of a failure to locate and retrieve records.</p>

		<p>scanned record through a process that incorporates appropriate quality assurance controls.</p> <ul style="list-style-type: none"> • Captures scanned documents using a minimum scanning resolution of 200 dpi (dots per inch). 	
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Records Storage	Use of 3 rd Party Offsite Storage on Barclays Behalf	Where a Supplier/Subcontractor sends documents or other material to an Offsite Storage Provider on Barclays Behalf (e.g. original copies of scanned documents), the type(s) of material and volumes must be reviewed on an at least annual basis with the Supplier Accountable Executive and Group Records Management to ensure offsite storage is still required.	If these requirements are not implemented, it is possible that Barclays will incur ongoing costs for offsite storage of items no longer considered to be Relevant Records.
	Storage Facility	<p>The Supplier/Subcontractor must ensure its storage facility is suitable for storage or hosting of Barclays physical records. The following factors apply here:</p> <ul style="list-style-type: none"> • Where Records are stored in a facility the building is appropriately designed and maintained to preserve the physical records for the length of their storage. • Regular checks on the premises must be made and documented to ensure any risks are identified and addressed. 	If these requirements are not implemented then there is a risk that records could be damaged or lost.
Records Retrieval	Retrieval	<p>The Supplier/Subcontractor must be able to retrieve and must supply Barclays, or another recipient at Barclays direction, on request, any Barclays Records within the following required timescales:</p> <p>Electronic Records (structured and unstructured storage) retrievable within two (2) working days or within a period required by any applicable legislative or statutory requirements; and</p> <p>Physical off-site Records / archived electronic records (not accessible on a live system) retrievable within ten (10) working days, or within a period required by any applicable legislative or statutory requirements.</p>	If these requirements are not implemented then this could result in legal and regulatory sanction, reputational damage, or loss / disruption of business as a result of a failure to retrieve records.
		<p>Physical on-site Records / archived electronic records (not accessible on a live system) retrievable within five (5) working days, or within a period required by any applicable legislative or statutory requirements.</p>	

		<p>The Supplier/Subcontractor must ensure retrieval processes are documented and communicated to those involved. The retrieval process must be tested at least annually through a testing regime or through business as usual processes to maintain compliance with Barclays Records Management Supplier Control Objectives.</p>	
Records Disposal & Disposal Hold	Disposal Process	<p>The Supplier/Subcontractor must securely destroy Barclays Records within twelve months of the expiry of their retention period only once the approval to destroy has been obtained from Barclays (provided a Disposal Hold is not in effect or if not subject to any express instructions from Barclays to retain Barclays Records beyond the retention period.)</p> <p>Retention periods are defined in the Record Retention Schedule.</p> <p>The Supplier/Subcontractor must ensure disposal processes are documented and reviewed regularly (at least annually) and where changes to laws and regulations necessitate an update, or upon material change to maintain compliance with Barclays Records Management Supplier Control Objectives.</p> <p>The Supplier/Subcontractor must define, document and operate a process to review the ongoing need to retain Non-Relevant Records older than 12 months, to mitigate the risk that Non-Relevant Records are being retained for longer than necessary.</p>	<p>If these requirements are not implemented then it may result in records being over-retained past their specified retention period or records being destroyed without authorisation, which may result in legal and regulatory sanction, reputational damage, loss / disruption of business.</p>
	Disposal Authorisation	<p>The Supplier/Subcontractor must evidence the destruction of Barclays Records, using controls such as:</p> <ul style="list-style-type: none"> • Physical Relevant Records - certificates of destruction • Electronic Relevant Records - audit trail / reports of Relevant Records purged / deleted • Applicable to the medium on which the Relevant Records are stored Including the date of destruction, types of records destroyed, a certificate of destruction for all records held by storage Supplier/Subcontractors, and approvals from relevant individuals or groups, including the Record Owner. The disposal process/methods must be applicable to legislative, statutory and contractual requirements. 	

	Disposal Hold & Release	<p>When a Disposal Hold is issued by Barclays, the Supplier/Subcontractor must take reasonable steps to ensure Barclays records are suspended from destruction within 24 hours. Evidence of the application of the hold must be retained by the Supplier/Subcontractor.</p> <p>Where it is not possible for the Supplier/Subcontractor to comply with the Disposal Hold requirements Barclays must be informed immediately.</p> <p>Upon notification from Barclays of a Disposal Hold release, the Supplier/Subcontractor must be able to apply business as usual retention and disposal processes to records to mitigate the risk of over retention of Records.</p> <p>Any Barclays Records that have passed their destruction date whilst the Disposal Hold was in place must be destroyed within 12 months of the Disposal Hold being lifted.</p>
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Control Area	Control Title	Control Description	Why this is important
US Records Management requirements (Applicable to Legal entity - BBPLC)	Original Relevant Records – Coordinated Universal Time (“UTC”)	The Supplier/Subcontractor must have controls in place to ensure an original copy of those electronic Barclays Relevant Records related to daily trading records are maintained and for any and all such electronic Barclays Relevant Record(s) maintain a record of the date and time, to the nearest minute, using Coordinated Universal Time (UTC), by timestamp or other timing device, to ensure that file date/time stamp recordings and parameters are applied consistently.	If these principles are not implemented then it may lead to Relevant Records not being stored and retained in accordance with applicable regulations / legislation, which may result in legal and regulatory sanction, or reputational damage, loss / disruption of business.
US Records Management Requirements US (Applicable to Legal entity – BCI and BBPLC)	Letter of Undertaking	The Supplier/Subcontractor must promptly provide the applicable regulator with a Letter of Undertaking if requested to do so, post immediate notification and receipt of consent from Barclays.	

Definitions	
Barclays Records	The Relevant and Non-relevant Records that are stored by a Supplier/Subcontractor on Barclays behalf.
Disposal Hold	An instruction issued by the Barclays Legal Team requiring the suspension of the business-as-usual document disposal activities due to a Legal or Regulatory requirement to ensure availability of evidence.
Electronic Records	Records such as email, electronic chat communications, or voice communications, that can be stored on-site or off-site.
Letter of Undertaking	A letter from Supplier/Subcontractor to a regulator of a Barclays Entity stating that Supplier/Subcontractor will take reasonable steps to fulfil any request by such regulator to download to any acceptable medium Barclays Relevant Records that are maintained in electronic storage media within Supplier/Subcontractor possession or control.
Non-Relevant Records	Records which are indexed, retain, store, retrieve, dispose, or apply a disposal hold, and managed for informational, value or for convenience purposes, and which do not meet the definition of a Relevant Record. These Records may still be included as part of any potential disposal hold.
Primary Record	Where duplicate copies of a Record exist, the Primary Record is the original version which is chosen to be used as the Relevant Record.
Record Retention Schedule	The list of the Relevant Records which Barclays are required to maintain, including details of the applicable country retention periods, any specific format / storage requirements and the confidentiality classification of the Relevant Records.
Relevant Records	Barclays records which must be indexed, retain, store, retrieve, dispose, or apply a disposal hold, , and managed in order to comply with specific Legal, Regulatory, or business and operational requirements.