

# 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, supplied by Supplier or used by Supplier 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 v2.1 AA Level](#)) or any subsequent version.

Supplier 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 Barclays digital accessibility policy 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 <b>Digital Product</b> (e.g. major upgrades), Supplier must ensure that their <b>Digital Product</b> complies with the most up to date <b>Digital Accessibility Standards</b> 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.</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 must have an established accessibility 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.</p> <p>This should include processes for monitoring and reporting of compliance levels and remediation progress to the Supplier’s Accountable Executive at least every six months.</p> <p>Digital Accessibility Standards must be embedded within the Supplier’s product development lifecycle, procurement processes and staff training.</p>	<p>Suppliers must provide evidence of accessibility compliance for all their Digital Products provided to Barclays Customers &amp; 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
	3 Diverse user consultation and testing	<p>Supplier conducts user testing and consultation with disabled people as part of the product development lifecycle, striving to go beyond minimum accessibility standards/compliance.</p> <p>Clear and appropriate feedback mechanisms must exist for disabled users to raise issues or seek support.</p>	<p>By developing Digital Products by, for and with people with disabilities, these products reduce the risk of excluding disabled customers and improve the experience for everyone.</p>