
















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 regulated activities), the Supplier must adhere to any specific requirements set out by the regulator in their local jurisdiction, which may include (but not limited), definition of a complaint, costs associated with contacting a firm, timescales on response, 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 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 manage 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 their product) or financial difficulties and how such Customer complaints will be identified, managed and reported to Barclays.</p> <p>The information 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) v2.1 AA Level.</p>	<p>Suppliers must ensure the Complaints process is available so Customers are aware if they wish to express dissatisfaction on any element of their relationship with us/the Supplier.</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>

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 complainants 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 reputational risk for Barclays.
3. Complaint handling: Feedback Mechanisms				Customer Feedback Mechanisms provide clear information on the appropriate process for raising a Complaint, including what channel a complaint can be raised through (e.g. telephone, face to face, email, post etc...) Unmonitored mailboxes should have an autoreply function to advise of the correct process to raise a Complaint.	Suppliers must ensure that Customers are informed 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: Acknowledging Complaints				All Complaints are promptly acknowledged and recorded on a timely basis (for guidance Barclays views this as 5 days). Complaints must be acknowledged even if the Customer does not use the words 'I want to complain' we 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 account operating procedures.	Suppliers ensure Customers are aware that their Complaint has been received and is being/will be reviewed. For some jurisdictions an informal resolution period applies and the acknowledgement would be sent at the end of this period if the Complaint was not resolved.
5. Complaint Handling: Recording requirements				Complaints are recorded in a manner appropriate to the nature, scale, and complexity of the Business and type of Complainant and in accordance with any applicable regulation or laws. For data retention, consideration should be given to any requirements of the Data Privacy External Supplier Control Obligations and local privacy regulatory requirements.	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 so if the Customer, auditor, regulator or Alternative Dispute Resolution (ADR) provider needs details of the issue they can be easily retrieved.
6. Complaint Handling:				Complaints are fairly and thoroughly investigated, documented and resolved in a timely manner appropriate to the nature, scale and complexity of	Suppliers must ensure Complaints are investigated timely, thoroughly and fairly addressing the Customer dissatisfaction and

Investigation requirements				the Business and type of Complainant. 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.	provide an appropriate resolution so as the Customer understands the complaint outcome and rationale for this. Complaint resolution should be communicated to Customers using the appropriate Customer letter template.
7. 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.
8. 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 Business Senior Manager who is responsible for determining an appropriate course of action. This could be as simple as asking another colleague or team to handle the Complaint. 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.	Suppliers must deal with any conflicts of interest appropriately (e.g. not have the advisor/salesman who advised on/sold the product, 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 conduct risk to either the Supplier or Barclays.
9. Complaint Handling: Keeping Customers updated	✓	✓	✗	Customers are kept informed of the progress of their Complaints Investigation using templates approved by Barclays.	Suppliers ensure Customers receive timely and appropriate updates on the progress of their Complaint resolution.
10. 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	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

				Complainant, using templates approved by Barclays.	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.
11. Complaint Handling: Providing appropriate redress	✓	✓	✗	When a Customer Complaints Investigation has been concluded, appropriate remedial action and/or appropriate redress are offered to Customers.	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 Supplier delegated authority) are made in relation to costs incurred and any distress or inconvenience experienced.
12. Complaint Handling: Consistent redress approach	✓	✓	✗	All decisions related to redress are based on consistent principles, articulated in a Business Standard or Business Procedure applied to the specific facts and circumstances appropriate to the nature, scale and complexity of the Business.	Suppliers ensure the decisions and outcomes of Customer complaints are consistent (e.g. this could be achieved by having a quality assurance (QA) process in place). This supports fair Customer outcomes and will aid coaching and training of Complaint handling staff.
13. Complaint Handling: Provision of escalation processes	✓	✓	✗	If the outcome of a Complaints Investigation is not satisfactory to the Customer, clear information is provided 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 management information is undertaken including appropriate escalation of issues identified relating to Complaints and Complaints Investigations designed to: <ul style="list-style-type: none"> • Identify emerging risks; • Perform root-cause analysis; and • Identify and resolve any recurring or systemic issues. 	Suppliers track management information to ensure root causes of Complaints about recurring issues are addressed and regulatory reporting is completed.
15. Complaint Handling: Quality Assurance	✓	✓	✗	Quality assurance over Complaints handling is implemented (on a risk based basis) by the Supplier and results shared with Barclays at a minimum during service management reviews.	To ensure that Barclays Customers are receiving consistent high quality Complaints handling experience.

				The process has been reviewed on a periodic basis by Barclays to ensure it remains in line with Regulatory Requirements and appropriate for the Customer base	
16. Complaint Handling: Supplier Contracts	Barclays Responsibility			Barclays undertakes annual checks to ensure that the Barclays External Supplier Requirements for Complaints is incorporated in any Supplier contracts and is in line with requirements	To ensure our contracts are inclusive of any specific requirements where appropriate for Complaints