External Supplier Control Obligations

Data Management

Control Area	Control Title	Control Description	Why this is important
Data Governance	Roles and Responsibilities	The supplier is responsible for making sure that all individuals who are involved in providing service to Barclays are aware of, and adhere to, the Barclays control requirements of this document. For Barclays control requirements supplier should ensure that a suitable specialist team and/or individuals with appropriate skills, with defined roles and responsibilities, are in place and operating effectively to protect Barclays service(s). The Supplier must define and communicate roles and responsibilities for all domains covered by the control requirements. These must be reviewed regularly (and in any event not less than once every 12 months) and after any material change to the Supplier operating model or business.	Data Management requires high-level sponsorship in order to ensure that controls are designed, implemented, and operated effectively, thus ensuring the required Data Quality of Data supplied to Barclays. It is important that all relevant Supplier Personnel understand their responsibilities in relation to Data Management to maintain compliance with the Supplier Control Obligations
	Escalation	Documented controls and processes must be in place to ensure Data Management incidents are reported and managed. It is Supplier responsibility to ensure that their employees/staff are familiar with and comply with the control requirements of this standard and associated policies and standards. The Supplier must appoint a Point of Contact for any escalation who will liaise with Barclays.	Data Management requires high-level sponsorship in order to ensure that controls are designed, implemented, and operated effectively, thus ensuring the required Data Quality of Data supplied to Barclays. It is important that all relevant Supplier Personnel understand their responsibilities in relation to Data Management and ensure incidents are reported and managed to maintain compliance with the Supplier Control Obligations

Data Governance	Education and Awareness	The Supplier must have an awareness training program established for all employees, contractors, short term hires, consultants and third-party users of their organisations. All individuals with access to Barclays data/ information or other physical assets must receive appropriate awareness training and regular updates in organisational procedures, processes, and policies relating to their professional function relative to the organisation. The Supplier must ensure that all personnel undertake mandatory education and awareness training within one month of joining the organisation and/or upon joining Barclays service(s). Training is refreshed, at least, on an annual basis. Supplier also must ensure that there is a testing component to verify that the user understands the training and awareness. All training delivered must be recorded and maintained for all employees working on Barclays service(s).	It is important that suppliers engaged in data management (managing critical data elements or third party managed applications) are provided with data management awareness training and education sufficient to perform their duties.
Metadata Management	Identifying Critical Data Elements	The Supplier must refer to the Critical Data Element as defined in "Appendix A - Definitions of CDE & Data Quality Dimensions", should be able to identify any critical data being produced (including data that Barclays deems critical) and inform Barclays about the same.	It is important that supplier should identify critical data elements and inform Barclays about the same.
Data Lineage	Establish Data Quality controls from source to target	The supplier must understand the front to back flow of the data to capture lineage and to enable the establishment of appropriate Data Quality controls from source to target.	It is important that supplier understands flow if data to capture lineage.

Control Area	Control Title	Control Description	Why this is important
Data Quality	Data Quality Controls / Measures Framework Documentation	Data quality controls and measures to monitor their effectiveness must be defined, documented and implemented at an appropriate granularity. The framework within which the controls and measures operate must be documented and reviewed annually.	If these requirements are not implemented then it may result in Barclays ingesting and / or distributing data of that does not meet the required quality which may result in legal and regulatory sanction, reputational damage, loss / disruption of business.
	Data Quality Dimension Coverage	Data Quality Controls / Measures must be defined, implemented at source and approved by a recognized data owner within the supplier organization, and consider the quality of data in one or more of the following dimensions as appropriate: • Completeness • Consistency • Accuracy • Timeliness • Duplication (Uniqueness) • Conformity • Coverage Refer to "Appendix A - Definitions of CDE & Data Quality Dimensions" for definition of the above dimensions.	
	Data Quality Controls / Measures Reporting & Remediation	Data Quality Controls / Measures must be monitored, reported and governed. All exceptions will be treated as issues and exception must be immediately reported to Barclays with a remediation plan, where the progress of the remediation is tracked following the supplier's governance structure.	

Control Area	Control Title	Control Description	Why this is important
Data Architecture	Fix Data Quality at source	Supplier must fix, or provide a mechanism for Barclays to fix, data quality issues at source. To avoid correcting data quality issues within the downstream interface between Barclays and the Supplier which may lead to inconsistencies.	To avoid correcting data quality issues within the downstream interface between Barclays and the Supplier, which could lead to data integrity issues over time.
	Utilise Industry Standard Reference Data	Supplier must agree the sourcing of standardised data and taxonomies with Barclays, leveraging, such bodies as the International Organization for Standardization (ISO). As a minimum, and as appropriate to the service, the following standards should be used: • ISO 3166 Country Codes • ISO 4217 Currency Codes • UK Standard Industrial Classification of Economic Activities (UKSIC) • Standard Industrial Classification (SIC) • North American Industrial Classification System (NAICS) • Nomenclature des Activités Économiques dans la Communauté Européenne (NACE) • Nomenclature of Territorial Units for Statistics (NUTS)	To promote standardisation and consistency across all Barclays data, regardless of whether hosted internally or externally.
	Reconcile data periodically	If supplier holds data supplied by Barclays that Barclays considers to be master data (customer, client, etc.) then a periodic reconciliation of this data should be undertaken. This is to ensure data remains accurate and complete over time.	To ensure data remains accurate and complete over time.
	Externally hosted data made available on request	Supplier must provision, on request, any data they hold or maintain for Barclays back into the Barclays environment to support regulatory, risk or business analysis. Data must be made available to Barclays to allow identification of any regulatory or risk impacts, etc. within the mutually agreed SLA.	Data must be made available to Barclays to allow identification of any regulatory or risk impacts, etc.
	Utilise data according to its agreed and stated purpose	The supplier must evidence on request end-to-end lineage for data provisioned by Barclays to ensure data usage is in accordance to its agreed and stated purposes. Need to ensure the Supplied does not use Barclays data in a way that contravenes agreed Terms and Conditions.	Need to ensure the Supplied does not use Barclays data in a way that contravenes agreed Terms and Conditions.

Control Area	Control Title	Control Description	Why this is important
Authoritative Data Sources	Supplier supporting activities for Trusted Source Assessment	Applications provided by the supplier that are managed by Barclays, the supplier must support Barclays activities for Trusted Source Assessment. 3rd party applications that are not managed by Barclays are out of scope for the Trusted Source Assessment, however suppliers should follow the remaining Supplier Control Obligations, and ensure that such applications can be trusted as reliable sources of data.	It is important to identify and establish the authoritative data sources (ADS) and rules for provision of such ADS. Supplier should assess the reliable sources of data.

Appendix A: Glossary

Definitions of CDE & Data Quality Dimensions

Critical Data Element

A conceptual unit of data that has been defined as Critical for Barclays and, has a purpose and meaning that is unambiguous and are subject to the Data Management Standards and includes:

- Critical Data element names, definitions, ownership
- Personal Data
- Regulatory flags (where applicable)
- Authoritative Data Sources
- Procedures to manage, integrate and publish metadata content

Definitions of 3rd party managed / non managed applications

3rd Party Applications managed by Barclays: Developed and/or hosted by vendor and data managed by Barclays (have an entry on Barclays Internal System-ServiceFirst).

3rd party applications non-managed by Barclays: Developed hosted and data managed by vendor (may not have an entry on Barclays Internal System ServiceFirst).

Definitions

Definitions of CDE & Data Quality Dimensions	Accuracy	Extent to which data is a correct reflection of reality at a given point in time
	Completeness	Extent to which mandatory fields are populated with data (if there are no values captured in a field or it is NULL when there should be a value, this means the dataset is incomplete)
	Conformity	Extent to which data conforms to Data Quality standards that were set for a Critical Data Element, including format and use of allowable reference data values
	Consistency	Extent to which data in one dataset is the same as in another one
	Coverage	Extent to which a dataset contains the right scope of data for its intended purpose
	Duplication (Uniqueness)	Extent to which there are any Critical Data Elements that exist more than once within a particular dataset
	Timeliness	Extent to which the data was provided within an agreed timescale, and the extent to which the data is up-to-date in line with its usage requirements
	Data Quality Control	The action to enforce DQ Rules through a system or process to identify, prevent, or mitigate data quality exceptions. It can be either automated or a manual process
	Data Quality Measure	A Data Quality Measure is a quantitative indicator against one or more Data Quality Dimensions and/or a pre-defined Target used to determine if the data is fit for purpose