

External Supplier Control Obligations

Records Management

Control Area	Control Title	Control Description	Why this is important
Records Management Governance and Ownership	Roles and Responsibilities	<p>The Supplier must define 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's operating model or business.</p> <p>Key roles at the supplier must include:</p> <ul style="list-style-type: none"> (i) a senior executive, accountable for Records Management (ii) a key contact to be the liaison with Barclays on Records Management. <p>The Supplier must ensure that all personnel handling Barclays Records are made aware of the terms of this Schedule.</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 Personnel understand their responsibilities in relation to Records Management to maintain compliance with the Supplier Control Obligations</p>
	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 and reported to Barclays immediately upon identification by the Supplier. 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 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>	

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Records Retention	Records Retention	The Supplier must retain Barclays Records in line with the retention periods defined in the Barclays Record Retention Schedule. The Supplier must change the retention periods of Relevant Records, when instructed to do so by Barclays.	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.
Records Storage	Records Storage	<p>The Supplier 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 must maintain records in a specific format, where required, 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>	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.
	Scanned Documents	<p>Where scanned documents are used to replace the original physical record as the Primary Record, the Supplier 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 scanned record through a process that incorporates appropriate quality assurance controls. Captures scanned documents using a minimum scanning resolution of 200 dpi (dots per inch). 	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.

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Records Storage	Inventory	<p>The Supplier must ensure that an inventory of Barclays records being stored 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) • Details of 3rd party/subcontractors against the record (if maintained by 3rd party/subcontractor) 	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.
	Use of 3 rd Party Offsite Storage on Barclays Behalf	Where a supplier 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.
Records Retrieval	Retrieval	<p>The Supplier 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.

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		<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 must ensure retrieval processes are documented and the process 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 Disposition & Disposal Hold	Disposal Process	<p>The Supplier must securely destroy Barclays Records within twelve months of the expiry of their retention period, provided a Disposal Hold is not in effect, 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 must ensure disposal processes are documented and reviewed at least annually or upon material change to maintain compliance with Barclays Records Management Supplier Control Objectives.</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.
	Disposal Authorisation	<p>The Supplier must evidence the destruction of Barclays Records, using controls such as:</p> <ul style="list-style-type: none"> Physical Relevant Records - certificates of destruction; and Electronic Relevant Records - audit trail / reports of Relevant Records purged / deleted 	

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Records Disposal	Disposal Methods	<p>The Supplier must dispose of Barclays Records safely and securely, through disposal controls which are:</p> <ul style="list-style-type: none"> • Applicable to legislative, statutory and contractual requirements • Applicable to the medium on which the Relevant Records are stored 	
Records Disposal Hold	Disposal Hold Notification	<p>The Supplier must take reasonable steps to ensure, upon notification from Barclays, any Barclays Records covered by a Disposal Hold are suspended from destruction within 24 hours and confirm to Barclays that the Disposal Hold requirements have been applied. Where it is not possible for the Supplier to comply with the Disposal Hold requirements Barclays must be informed immediately.</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 Hold Release	<p>The Supplier must recommence the destruction of Barclays Records in line with the Barclays Retention Schedule, upon notification from Barclays of a Disposal Hold being lifted. 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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US Records Management requirements	Original and Backup Relevant Records - Universal Time Coordinator (“UTC”) services	The Supplier must have controls in place to ensure an original and a backup copy of each electronic Barclays Relevant Record are maintained and for any and all such electronic Barclays Relevant Record(s) must implement and maintain Universal Time Coordinator (“UTC”) services, 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.
	Letter of Undertaking	The Supplier 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 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 to a regulator of a Barclays Entity stating that Supplier 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’s possession or control.
Non-Relevant Records	Records which are created, retained 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.
Physical Records	Physical Records are those records such as paper that can be stored on-site or off-site.
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 created, retained, and managed in order to comply with specific Legal, Regulatory, or business and operational requirements.