

External Supplier Control Obligations

People Screening

Control Title *	Timing	Scope	Control Description	Why is it important
1. Identity Verification	Before employment/ assignment starts	All roles	Verify the identity of an individual by checking and retaining valid, original photographic evidence, and retaining a copy as evidence.	To prove that the individual is who they say they are
2. Legal Right to Work in Assignment Country	Before employment/ assignment starts	All roles	Check that the individual is legally entitled to work in the relevant jurisdiction by obtaining the original appropriate government-issued documentation, and retaining a copy as evidence.	To verify that the individual is legally entitled to work in the relevant jurisdiction(s).
3. Address Verification	Before employment/ assignment starts	All roles	Check that an individual currently resides at a fixed abode, by obtaining a suitable and recent document addressed to the individual that bears their home address and retain a copy as evidence.	To verify the physical address of the individual to corroborate identity checks.
4. Career and Company Verification	Within 8 weeks of the start of employment/ assignment	All roles (excluding roles related to facilities and building domestic maintenance/ ATM maintenance)	<p>Verify:</p> <ul style="list-style-type: none"> - employment history for the last three years (five years if it is a regulated role); - reference checks to confirm that the employment history was without incident and that career gaps can be evidenced; and - via independent means that the contact details for references from previous employers are bona fide <p>Previous employers who are not recognised must be verified by independent means (e.g. a Companies House check).</p>	<p>To confirm :</p> <ul style="list-style-type: none"> - the suitability and integrity of the person; - that career gaps greater than three months are investigated and assessed to ensure that all information on previous employment is accurate; and - that references are genuine

*If Supplier cannot perform checks because of local legal reasons they are automatically exempt from doing so and need only notify Barclays of this. Suppliers must also perform any additional/enhanced checks that may be required by local legislation beyond Barclays' minimum requirements.

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5. Sanctions Checks	Before employment/ assignment starts	All roles	Prove compliance with applicable sanctions laws by checking an individual is not listed on any official sanctions lists or restricted activity matrices	If an individual is on a government and other sanctions list this may pose regulatory or reputational risk for Barclays.
6. Credit / Bankruptcy Checks	Within 8 weeks of the start of employment/ assignment	All roles	Carry out via law enforcement or other legal agencies, a credit and bankruptcy check of the individual, and retain a copy of the credit report on file.	These checks may reveal any individual who may pose a conflict of interest risk if the candidate is under financial pressure outside of the work environment.
7. Criminal Record Checks	Within 8 weeks of the start of employment/ assignment	All roles	Carry out, via legal agencies, a check for criminal convictions, and retain evidence of such checks.	Checks that the individual is of good character, and helps guard against inappropriate disclosure of information by individuals with criminal or malicious intent.
8. Directorship and Media Checks	Within 8 weeks of the start of employment/ assignment	For any roles with access to Secret Information ** and those requiring regulatory approval	Perform: <ul style="list-style-type: none"> - an independent check for any directorships held, to identify any potential conflicts of interest and / or disqualified status - a media coverage check to identify if the individual has been the subject of adverse media attention 	Checks that for any individuals who hold in-scope roles, that there are no conflicts of interest and/or individuals who may pose reputational risk.
9. Regulator Checks	Before employment/ assignment starts	Roles requiring regulatory approval only	Perform a check that individuals in any roles requiring regulatory approval can be evidenced in the relevant database/register.	Checks that an individual has the required approval from the regulator and that they are deemed 'fit and proper' to prevent regulatory risk.

**Secret Information - Information for which unauthorised disclosure (internally or externally) may cause serious financial or reputational damage, significant loss of competitive advantage, or regulatory sanction or legal action.

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10. Incomplete Checks or Adverse Results	As required	All roles	Supplier must have a process for dealing with incomplete or adverse screening checks. This may involve further discussion with the individual, completion of a declaration of fact, or a risk assessment to determine if a hire can still take place.	Verifies that Supplier personnel are not automatically assigned to Barclays if the required evidence for a check cannot be gathered for an individual, or if they fail a check.
11. Changes to Personal Circumstances and Failure to Disclose Information	As required	All roles	Supplier must have a process in place: <ul style="list-style-type: none"> - for individuals to notify them of relevant changes in circumstances (e.g. subsequent convictions, bankruptcy); - to ensure that subsequent discovery of adverse information is investigated and action taken if appropriate (e.g. a criminal charge that was not disclosed during screening); and - for re-screening an individual who has left the Supplier's employ and is subsequently re-employed after more than 3 months (evidence of Legal Right to Work should be obtained in all cases). 	Verifies that : <ul style="list-style-type: none"> - changes in circumstances that come to light which may change an initial screening decision are reviewed; - persons failing to disclose material information are removed from assignment; and; - appropriate rescreening is undertaken for former employees who re-join the Supplier.
12. United States Additional Provisions	Before employment/ assignment starts	Solely for roles providing services in the United States, unless otherwise agreed with Barclays	Supplier must: <ul style="list-style-type: none"> - perform drug-testing on individuals; - if requested by Barclays, provide fingerprinting specimens for personnel working on-site at a Barclays location, or having access to Barclays' systems; and - undertake additional checks where services performed for Barclays Capital Inc. (the registered broker-dealer of Barclays). There are extended and additional requirements for career verification and criminal history screening as prescribed under FINRA regulation. If this applies speak to your Sourcing contact who will engage Barclays US Compliance team for further instructions. 	To confirm the suitability and integrity of an individual and ensure that US-specific requirements and those under FINRA regulation are complied with.