

























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 activities which are regulated by that regulator), the Suppliers must adhere to any specific requirements set out by the regulator in their local jurisdiction, which may include (but not limited to), the definition of a complaint, the costs associated with contacting the Supplier, the timescales on response, the 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, product 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 the product or service) or financial difficulties and how such Customers complaints will be identified, managed by Suppliers and reported to Barclays.</p> <p>The information on Complaints Handling 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 that the Complaints process is available and accessible to everyone so Customers are aware of the Complaint process if they wish to express dissatisfaction on any element of their relationship with Barclays and/or the Suppliers.</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 Customers 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 a reputational risk for Barclays and Suppliers.
3. Complaint handling: Feedback Mechanisms				Customer Feedback Mechanisms provide clear information on the appropriate process for raising a Complaint, including the different channels 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 of 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: Period review				Complaint handling process should be reviewed annually or where required in order to comply with new regulatory requirements. The review should ensure the process remains consistent with the regulatory requirements and the Customer base, and addresses material issues or concerns raised by Customers. (For guidance “The Customer base is a group of individuals or entities with whom Barclays has established a contractual relationship to provide products and/or services, either directly, or via a third party”)	Suppliers must ensure they review the complaints process annually provided for Customers to remain consistent with regulatory requirements and Customer type. This includes out of cycle review for regulatory change and material issues.
5. Complaint Handling: Acknowledging Complaints				All Complaints are promptly acknowledged (within 5 days from the time of receipt) Complaints must be acknowledged even if the Customer does not use the words ‘I want to complain’; Suppliers 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.

6.Complaint Handling: Recording requirements				<p>Complaints are logged by Suppliers (within 24 hours from the time of receipt) and recorded in a manner which must be appropriate to the nature, scale, and complexity of the Business and type of Customer and in accordance with any applicable regulation or laws (where applicable)</p> <p>For data retention, consideration should be given to any requirements of the Data Privacy Supplier Control Obligations and local privacy regulatory requirements.</p>	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
7. Complaint Handling: Investigation requirements				Complaints are fairly and thoroughly investigated, documented (including steps taken during the investigation) and resolved in a timely manner appropriate to the nature, scale and complexity of the Business and type of Complaint. 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.	Suppliers must ensure Complaints are investigated timely, thoroughly and fairly addressing the Customer dissatisfaction and provide an appropriate resolution so as the Customer understands the complaint outcome and rationale for this. Complaint resolution should be communicated to Customers.
8. Complaint Handling: Complaint handler competency				<p>Complaints Investigations are conducted by individuals who:</p> <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. 	<p>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.</p> <p>Suppliers should ensure there is an annual or ongoing training provided to their personnel.</p>
9. 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 at the Supplier who is responsible for determining an appropriate course of action. Alternatively, this could be as simple as asking another colleague or team to handle the Complaint.	Suppliers must deal with any Conflicts of Interest appropriately (e.g. not have the advisor/salesman who advised on/sold the product or service, 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 or a reputational risk to either the Suppliers or Barclays.

				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.	
10. Complaint Handling: Keeping Customers updated	✓	✓	✗	Customers are kept informed of the progress of their Complaints Investigation.	Suppliers ensure Customers receive timely and appropriate updates on the progress of their Complaint resolution.
11. 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 Customers.	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 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.
12. Complaint Handling: Providing appropriate redress	✓	✓	✗	When a Customer Complaints Investigation has been concluded, appropriate remedial action and/or appropriate redress are offered by Suppliers 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 Suppliers delegated authority) are made in relation to costs incurred and any distress or inconvenience experienced.
13. Complaint Handling: Provision of escalation processes	✓	✓	✗	If the outcome of a Complaints Investigation is not satisfactory to the Customer, clear information is provided by Suppliers 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 recurring issues and systematic problems is undertaken to: <ul style="list-style-type: none"> •Identify emerging and/or thematic risks. •Analyse the root cause of individual complaints and identify any common themes. 	Suppliers should have appropriate processes and controls in place to ensure complaint handling identifies and resolves the root cause of recurring issues and systematic problems.

				<ul style="list-style-type: none"> •Consider whether such root causes may also affect other processes, products or services, including those not directly complained of. •Remediate the root cause of complaints as appropriate. 	
15. Complaint Handling: Quality Assurance	✓	✓	✗	<p>Quality assurance over Complaints handling and redress payment is implemented on a risk based approach by the Suppliers and evidence shared with Barclays at a minimum during service management reviews.</p> <p>(For guidance “redress payment” is a sum of money offered by Suppliers to compensate the Customers for any detriment or loss suffered by them).</p>	To ensure that Barclays Customers are receiving consistent high quality Complaints handling experience.
16 Complaint Handling: Governance Oversight	✓	✓	✗	The approach to complaint handling has been appropriately documented by the Suppliers with oversight from Business Senior Management at the Suppliers. The approach to complaint handling should have approval from Business Senior Management (or delegate) at the Suppliers	To ensure the Suppliers complaint handling process and documentation has appropriate senior management oversight and regulatory changes are incorporated as appropriate
17. Complaint Handling: Supplier Contracts	Barclays Responsibility			Barclays undertakes annual checks to ensure that the Barclays Suppliers Requirements for Complaints is incorporated in any Supplier contracts and is in line with Barclays requirements.	To review and update our contracts with Suppliers to ensure that our contracts include these Customer Complaints requirements where applicable