

Barclays Bank UK

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**Barclays Bank UK plc's breach of the Retail Banking Market Investigation Order 2017 in relation to Service Quality Indicators**

I am writing to you on behalf of the CMA concerning a breach by Barclays of Part 3 of [the Retail Banking Market Investigation Order 2017](#). This requires banks and building societies that offer Personal Current Accounts (PCAs) and Business Current Accounts (BCAs) to publish Service Quality Indicators (SQIs). These indicators show whether surveyed account holders would recommend certain aspects of the quality of service offered by a bank or building society to friends or family. Information must be published on the bank or building society's main personal or business banking page and the information must be updated twice a year.

**The breach**

Barclays did not update an SQI relating to Overall Service Quality (OSQ) for PCAs in Great Britain. This is one of four SQIs Barclays is required to display under the Order. It should have displayed the OSQ for August 2021 on the home page of its [website](#) (which is also its personal banking page) but between 16 August and 13 October 2021 inclusive it mistakenly continued to display the OSQ for the previous period.

The out of date OSQ ranking and score showed Barclays PCA survey result to be better than in reality it was:

- The out-of-date OSQ showed Barclays to be the 6th best bank for PCAs in Great Britain whereas Barclays was in 7th place
- The out of date OSQ showed Barclays with an overall score of 66% for PCAs in Great Britain, whereas this had dropped to 63%.

Barclays notified the CMA of the breach on 27 October 2021.

The original, out of date OSQ is here:

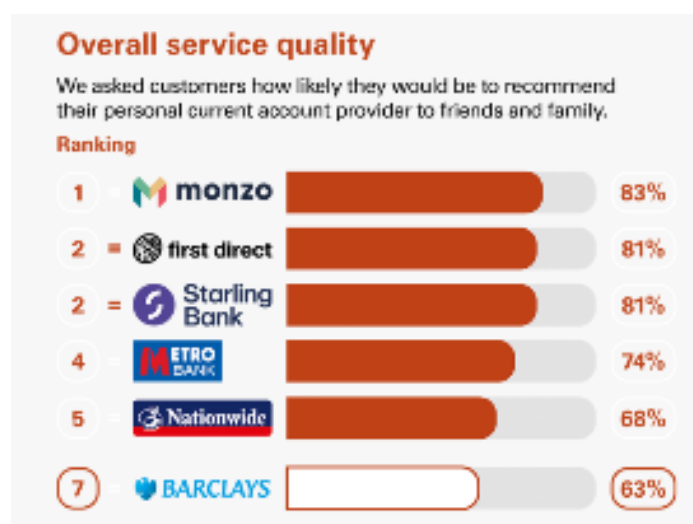
### Overall service quality

We asked customers how likely they would be to recommend their personal current account provider to friends and family.

#### Ranking



The correct, up to date OSQ is here:



### The CMA's concerns

The requirement for current account providers to publish up-to-date Service Quality Indicators, including the OSQ personal banking page requirement, is an important element of our reforms introduced following the [Market Investigation](#). This measure, in combination with other parts of our reforms, was designed to make it easier for consumers or small businesses to choose the best PCA or BCA for them. If published material is not up-to-date consumers might make decisions based on out-of-date information. The Order requires banks and building societies to update Service Quality Indicators twice a year to ensure it reflects improvements (or

deterioration) in customer service.

In this case some users may have only seen the incorrect OSQ on Barclays' personal banking homepage. Customers in Great Britain may have kept their PCA with Barclays if they solely looked at this webpage, whereas had they seen the up to date information they may have switched to a higher-scoring competitor.

### **Barclays has taken action to put things right**

I note that Barclays has taken steps to end the breach and to prevent a recurrence.

Barclays has:

- updated team inventories to reinforce the location of items that are managed and as a point of reference when initiating any changes;
- introduced regular reminders to staff on the importance of the SQIs and how to comply with the requirements;
- enhanced operational instructions across all teams involved with end to end SQI processes;
- introduced a 'four eyes' process, whereby each change is checked by two people. Individuals must record their initials and dates of when tasks are completed:
  - before any artwork is amended;
  - before approving amendments on the system to be printed/produced; and
  - post-live once changes are implemented;
- introduced a manual validation check with SQI page owners when amends are requested to ensure that no changes are made in error; and
- introduced a further step in its internal instructions to ensure both the homepage and SQI page are confirmed as having been updated.

### **CMA assessment and next steps**

Given the action that has been taken and is being taken by Barclays, the CMA does not consider it appropriate to take further formal enforcement action in relation to this breach at present. However, the CMA will consider such action in the event of any further failures. The CMA will monitor Barclays' future compliance closely.

Yours sincerely

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