

BRC072 BRCGS Audits impacted by Covid-19

Where there are travel restrictions currently in place in specific regions as specified by the local government due to Covid-19, or justifiable company corporate policies in place preventing visitors, BRCGS issue the following guidance to certification bodies arranging BRCGS recertification audits.

BRCGS will expect certification bodies to follow government guidance during the specified timeframe.

We appreciate that the travel restrictions will have an impact on audit arrangements already made where auditors located in a restricted travel area can't audit other regions. BRCGS, do however expect that certification bodies utilise their global auditor pool. Reasons for audit delay due to cost purposes will not be accepted. This process is not applicable to sites not currently certificated to BRCGS.

Certification Bodies shall inform BRCGS where their own corporate advice impacts delivery of audits.

Reference can be made to appendices 1 and 2 outlining specific scenarios.

Re-audits due

Where the site is operational, but a physical audit may not occur on or before the audit due date and will result in existing certificates expiring, a new certificate of up to 12 months validity may be issued based on:

- The site providing to the Certification Body results of a documented BRCGS format self assessment 'internal audit' outlining how the control processes at the site meet the Standard requirements.
- The Certification Body verifying and challenging these controls through a 'remote audit'.
- An additional onsite GMP audit or review if the site is still not accessible within 6 months

Risk Assessment

The Certification Body shall assess the risks of continuing certification and have a documented policy and process defining the methods for evaluating the site. Reference may be made to the principles of IAF document ID3:2011 *Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations*.

The risk assessment of the certificated site shall consider:

- Ability of site to accept remote audit i.e. internet connection and video capabilities
- The history of third party certification
- The history and maturity of the BRCGS system
- Whether there is any other management system or certification in place

Audits to Packaging Standard issue 6

Where sites are currently certificated to BRCGS Packaging issue 5, note that the self assessment and remote audit shall also be against issue 5. This will allow extension of the current issue 5 certificate. Once travel restrictions are lifted, an audit on site to issue 6 should be carried out as soon as possible.

Audits to Gluten Free Certification Program

Where certification to the GFCP is currently in place at a site based on a third party certification, other than BRCGS, the remote audit principle may be used for sites that fall into the criteria, as long as the third party certification is maintained ie other scheme certificate is permitted to be extended through remote audit.

Informing BRCGS

'Concession reference numbers' are not required for remote audits that fulfil this criteria. The CB is responsible for notifying BRCGS through the Directory. The system for denoting remote audits via the audit scheduling system will be confirmed shortly.

Where the option of an audit – physical or remote – are refused by the site, the usual process of notification of certificate expiry through the 'reaudit status' tab of the Directory will be completed by the Certification Body.

The screenshot shows the 'Certificates' section of the BRCGS system. The 'Re-Audit Status' tab is selected. Below the 'Certificates' header, there is a list of reasons for expiry with checkboxes. A red arrow points from the 'Comments' field to the list of reasons.

Outline reason including reference to Coronavirus with specific wording:

1. Remote audit offered and declined due to Coronavirus
2. Physical audit offered and declined due to Coronavirus
3. Site not operational due to Coronavirus

Site 'internal audit document'

The Certification Body shall ensure that the site provides them with a completed BRCGS format self assessment internal audit document, eg F804a relevant for the Food Standard available from brcgs.com, in a timely manner. A maximum of one month from request is suggested. It would be expected that some non conformities would have been identified by the site during this process although corrective action does not have to be completed prior to submission of the document to the Certification Body. The report shall contain sufficient information on which to base the remote audit challenge.

Remote audit

Reference shall be made to IAF MD4:2018 *The use of information and communication technology (ICT) for auditing/assessment purposes*.

All remote audits shall be carried out 'announced' on a date and time agreed with the site. Note however that those sites in the unannounced programme may keep the 'unannounced grading' as specified in certification below.

The duration of this audit shall be appropriate to the complexities of the site and sufficient to adequately cover the aspects to be audited. Typically this will be one day duration.

Detailed guidance of expectations on how to complete the remote audit shall be issued shortly.

The remote audit shall include live video check of the manufacturing process, fabrication and hygiene of the site. This shall include discussion with relevant personnel from the site. Any video does not require recording.

The remote audit will include a traceability challenge, challenge of key procedures and challenge of specific aspects of concern identified through review of the self assessment.

Use of remote technology shall ensure that adequate controls are in place to avoid abuses that could compromise the integrity of the audit process. For example evidence of start and finish times of the video check of the manufacturing process e.g. through video screen shot would be good practice.

Identified Non Conformities

Non conformities identified by the Certification Body during the remote audit will be handled as per the usual protocol and evidence of closure shall be submitted within 28 days. These non conformities shall not, however, affect the certification grading. Evidence of closure of any outstanding non conformities from the sites own internal audit will also be required within this timeframe.

Certification

If the certification body is satisfied that the site continues to meet the requirements of the Standard, a new certificate may be issued.

- The grading will stay the same as the current certificate based on the last physical audit at site.
- The reaudit due date anniversary will stay the same as the current certificate and will therefore be recalculated as 12 months from the last physical announced audit at site.
- The certificate expiry date anniversary will stay the same as the current certificate and will therefore be recalculated as 12 months from the last certificate.
- Audit programme shall denote 'remote'

Sites currently graded C or D may have a certificate extended by 6 months only.

6 month GMP audit

All sites require a GMP audit to be carried out as soon as practical following lifting of travel restrictions, but no later than 6 months of the remote audit. Details of the protocol and reporting of this GMP audit will be confirmed shortly. However, note these will be unannounced for those sites within the unannounced programme.

Reporting

A full BRCGS audit report will be generated and uploaded to the BRCGS Directory as usual procedures. It shall be made clear within the audit report that information was gathered through a remote audit. The sites self assessment audit shall also be attached to the Directory record as a pdf through the 'paperclip mechanism'.

A summary of the risk assessment of the site and justification for the remote audit will be included within the 'company profile' section of the audit report, as well as an overview of the type of technology used for the remote audit.

Upload will generate the usual service package fee allowing sites continued access to BRCGS services.

Compliance

Accreditation Bodies will be responsible to assess the implementation of this guidance as well as BRCGS. Either party may require to be included as observer during any remote audit.

These guidance notes are under continual review as per the developing situation and may be subject to change.

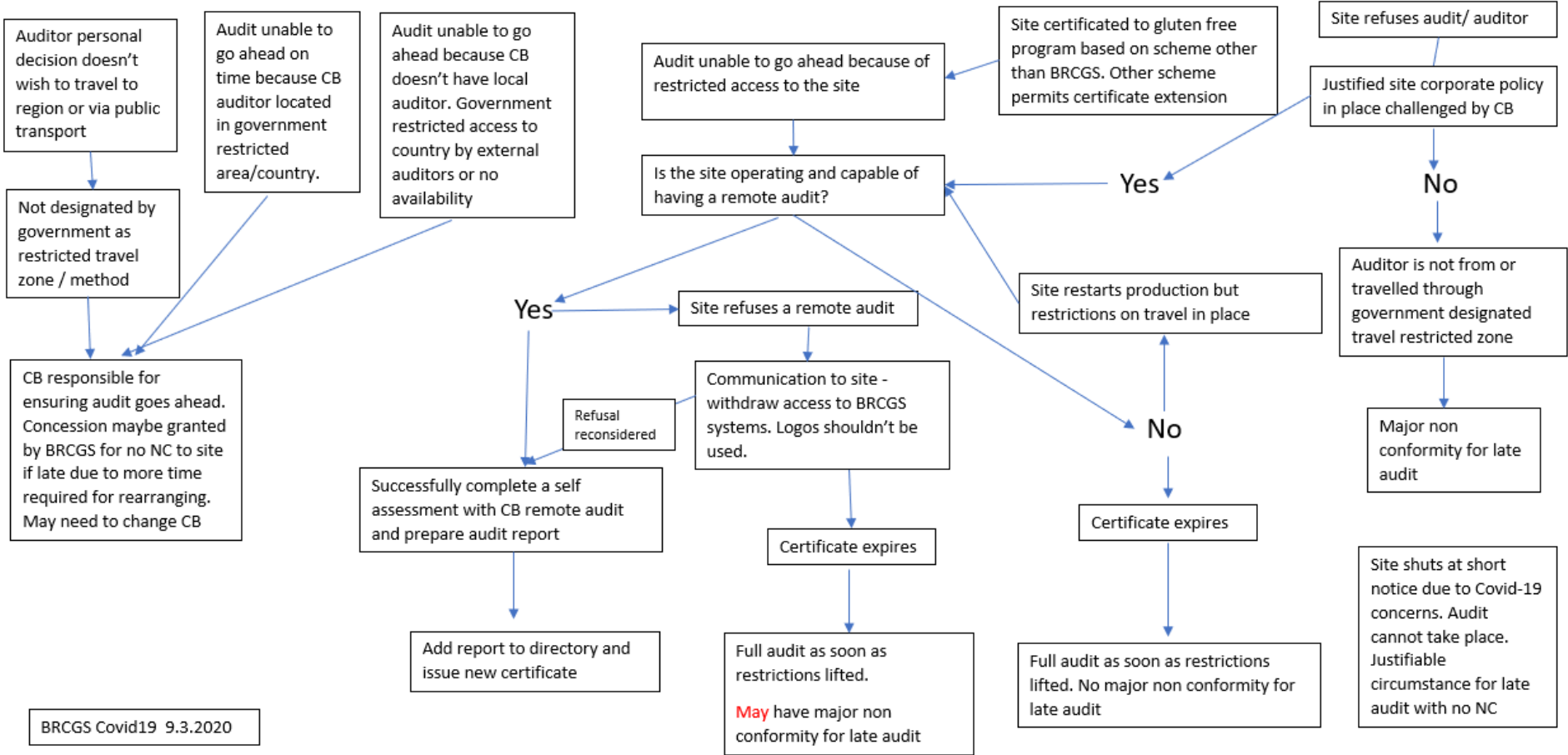
More information

For more information, please contact:

- Certification and Accreditation Bodies – Karen Betts, karen.betts@brcgs.com
- Brand Owners and Specifiers – John Tomlinson, john.tomlinson@brcgs.com
- Sites – please contact your Certification Body



Decision tree for audits delayed by Covid-19 travel restrictions





Appendix 2

Illustrated Scenarios

Scenario	Outcome
Site operating but situated in government restricted travel zone or biosecurity company policy does not allow an auditor onsite	Remote audit undertaken and new certificate issued
Site operating in government restricted travel zone refuses opportunity for remote audit	Certificate expires
Site is not operating	Audit cannot take place and is due as soon as the site starts operating. Current certificate expires
Site refuses auditor without appropriate justification	Audit doesn't take place and non conformity is issued for late audit
CB cannot provide appropriate auditor to undertake audit	Advise site to contact alternative CB to arrange. Concession will be issued so site is not penalised with non conformity for late audit
CB needs to change confirmed audit arrangements because auditor is affected by travel restrictions	Concession will be issued so site is not penalised with non conformity for late audit
The site is still not accessible 6 months after the remote audit	Normal concessions apply
The site originally had an unannounced site, how will this change?	The certificate based on the remote audit will carry the same grade and same type (announced/unannounced). The GMP second audit will be conducted in the same way as the last full audit