BRCGS086 Remote Certification During Pandemic and Serious Event Restrictions

Document Scope:

This document is applicable to the following Standards:
- Food Safety (including START! audits)
- Packaging
- Storage & Distribution
- Consumer Products
- Gluten Free Certification program

Sites seeking Agents & Brokers certification should refer to BRCGS080 - Position Statement and Procedure for Blended Audits which provides a fully remote protocol for the Agents & Brokers Standard.

It may be applied to all relevant audits starting on or after 7th September 2020.

The arrangements outlined in this document will apply until **at least 31st December 2021**.

This situation will be kept under review by BRCGS in conjunction with stakeholders and may be further extended depending on circumstances, however, may also be subject to change. A minimum of 3 months' notice will be given prior to any change that would prevent planned audits being completed.

This document supersedes BRCGS077 Certificate Extension Plus.

Change log

Version no.	Date	Description
1	09/09/2020	First issue
2	25/02/2021	Expiry date extended in line with other BRCGS Covid-19 protocols (BRCGS078 and BRCGS089) and relocated to front of document.
2.1	01/03/2021	Minor changes made to the document template.

1. Introduction

The widespread outbreak of coronavirus and the resultant response actions have resulted in travel restrictions in some regions. This has an impact on audit arrangements where auditors are not permitted to access the site. BRCGS will expect certification bodies to follow government guidance during the specified timeframe.

This audit protocol, where certification bodies operating under IAF MD4 and IAF ID3 may audit and certify organizations against a BRCGS Standard, utilizing a fully remote assessment protocol. This protocol is being put into action to help mitigate the impact of Covid-19 movement and access restrictions; it is not expected to be used where site access is safely available (i.e. it should not be used where a normal onsite audit is possible).

It should be recognised that this is not a GFSI benchmarked program.

2. Scope and applicability

This program is applicable to BRCGS Food including START!, Packaging, Storage and Distribution, Consumer Products and Gluten Free Certification Programs. The remote program for Agents and Brokers is outlined specifically in BRCGS080.

The requirements of any associated additional modules can also be included in the scope except for the ASDA AA module.

Where off-site activities are included in the scope of the audit, for example, head office audits, offsite storage, and field rigs, these can also be included in the remote audit process, providing the requirements can be fully audited.

This remote audit can be used for amendments and extensions to scope, for example where there are seasonal products or changes to the product range.
The assessment and certification can be completed by any certification body that is approved to audit the specific Standard. This program is available to any currently BRCGS certificated site (irrespective of their current grade), or whose certificate expired in 2020. Sites outside these parameters including "new to BRCGS" sites may be eligible for certification, under the concession program (approved by BRCGS prior to audit) through their certification body.

Certification will be based on:

- A feasibility assessment based on principles identified in section 3
- A detailed review of the results of the sites internal audit programme which includes any impacts or changes as a result of the pandemic
- Audit of all the Standard requirements following IAF MD4 protocol
- Audit shall include remote visual (video based) inspection of the production/storage facility, as directed by the auditor

Certification bodies are responsible for ensuring that auditors are fully briefed on the appropriate processes. Whilst remote audits will create some challenges, it is important that the integrity and quality of the audit process is maintained.

3. Step 1 – Feasibility assessment by the Certification Body

The Certification Body shall assess the feasibility of granting 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.*

As the Certification assessment is reliant on the use of Information and Communication Technology (ICT) reference should also be made to requirements of IAF MD4:2018 *The use of information and communication technology (ICT) for auditing/assessment purposes* to ensure that the site is willing and capable of accepting this assessment process.

4. Step 2 – Site submission of information for audit planning

The Certification Body shall gather information from the certified site and consider within the feasibility assessment (in addition to those requirements already listed in the Standard protocol)

- The history and maturity of the BRCGS system
- Recalls in the preceding 12 months
- Pending compliance activities / legal proceedings
- Whether the site is functioning normally and is not currently closed (site must be in operation for the audit to take place)
- Any changes to processes or services outsourced following the COVID-19 pandemic

5. Step 3 – Planning the remote audit

The certification body should confirm and test the compatibility of the ICT platform with the site. Ideally, a trial meeting using the same media platforms will be conducted to ensure that the scheduled remote audit can be performed as planned. Use of webcam/cameras shall be agreed upon (refer to section 6 for further details on the use of live video within the remote audit).

If testing reveals issues which cannot be rectified, then the audit shall not be possible.

The remote audit shall be facilitated in quiet environments wherever possible to avoid background noises and interferences. The use of noise cancelling technology such as 'mufflers on microphones' or headsets should be considered.

If the technology fails during the remote audit the certification body and site can reschedule, providing that the remote audit is completed within 28 days of the first day of the remote audit. The site may be liable to pay for the lost audit day where this is a site issue and this should be covered in the contract.

Usual auditor competence rules apply to the remote audit and the audit team allocated shall have the relevant expertise to challenge the processes of the site. However, consecutive audits rule shall not apply – it would be an advantage for the auditor to be familiar with the site having previously visited it.

All remote audits shall be carried out 'announced' on a date and time agreed with the site. Where sites are currently certificated the remote audit should ideally take place within the normal audit due period. Where a certificate has already expired or an auditor is not available, then the audit may be planned for other mutually agreeable dates. There is no penalty for a late audit within this assessment.

The duration of this audit must be appropriate to the complexities of the site and sufficient to adequately cover the aspects to be audited. The duration calculators applicable to the relevant Standard should still be used to calculate the expected audit duration, It is recognised that the balance of time spent on video site tours to document review may be different with less time than usual on the video tour.

6. Step 4 – Conducting the Remote audit

The usual format of an audit shall be followed including an opening and closing meeting, interview with personnel, documentation review and site tour. A thorough visual tour by remote technology is required, but BRCGS recognizes that the minimum times expected in production and/or storage areas may not be achievable. Where this is the case it is likely that more time will be needed to review documentary evidence to assess compliance.

Use of remote technology shall ensure that adequate controls are in place to demonstrate 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.

The 'remote' audit must include live visual feed (e.g. live video capability), which must be portable around the site, including in production and storage facilities, as well as audio capability. This is to ensure that the auditor can observe relevant procedures, hygiene, and facilities, and discuss operations with relevant staff. This is not expected to be recorded unless specifically agreed with the site. At the discretion of the site, photographic evidence can be sent to the auditor, during the audit.

7. Non-conformities and audit result

Non-conformities identified by the auditor during the remote audit will be handled as per the usual protocol:

- The level of non-conformity assigned by an auditor against a requirement of the Standard follows the normal protocol within the Standard with respect to severity.

- The site shall provide evidence of corrective actions, root cause analysis and a preventive action plan. This shall be submitted to the certification body within 28 days.

- Where the number or severity of the non-conformities raised at the audit exceeds the limits for certification stated in the Standard, this will prevent the site from being certificated.

The audit result will be graded AA to D based on the number and type of non- conformities as per the usual protocol, except for Consumer Products Foundation Level, START! and Gluten-Free Certification Program which do not have grades and follow the normal pass/fail criteria specified within the protocol in those Standards.

8. Audit Report and Certificate

The audit shall be documented on the report template and uploaded to the BRCGS Directory in the normal timescales (for Consumer Products this includes the interim report). The "remote audit" option shall be selected from the drop-down menu.

Where systems have been amended due to the management of the ongoing Covid-19 pandemic this information shall be recorded in the relevant section of the detailed audit report. For example, a change to CCPs would be added to the information recorded about the Food Safety Plan - HACCP, where changes to cleaning regimes is added to the section on Housekeeping and hygiene.

The certificate shall have an expiry of 6 or 12 months from the audit date based on the normal protocol specified within the Standard, unless the site requests an earlier expiry date to re-align the audit due date with the preferred time of year.

The certificate shall be accredited and state that the Remote Audit Option has been used.

The normal BRCGS service fee will be applied to certification bodies on report upload.

9. Ongoing Re-Certification

The audit report and certificate shall have an expiry of 6 or 12 months from the audit. The next BRCGS audit should therefore be planned using the normal audit cycles.