BRCGS

BRC073 - Completing a Remote Audit During the Covid-19 Pandemic

Change log

Version no.	Date	Description
1	13/3/2020	First publication of Remote Audit Guideline
2	14/3/2020	Updated audit schedule instruction

1. Introduction

The widespread outbreak of coronavirus and the resultant government and health authority actions have resulted in travel and work restrictions in some geographic regions. This has an impact on audit arrangements where sites are not able to operate or auditors are not permitted to travel.

In all cases where a site is operating, but a physical audit cannot occur on or before the audit due date and therefore the existing certificate will expire, a new certificate may be issued providing:

- The site provide the certification body a completed, self-assessment internal audit, which clearly outlines how the site processes meet the requirements of the Standard
- The certification body verify and challenge the site controls using a 'remote audit'
- An additional onsite GMP audit, or review if the site is still not accessible, within 6 months

This document must be read in conjunction with:

- BRCGS072 Position Statement on Audits Impacted by Covid-19

This document explains the content and process for conducting a remote audit. It does not cover scenarios in which a remote audit cannot take place, for example due to a lack of available technology at the site, or due to the site being unwilling to permit a remote audit. In these situations reference must be made to the document listed above.

The processes described aim to facilitate certification body decisions on whether a certificate can be extended or not. It is therefore important that the process is operated in such a way that the certification body has sufficient confidence in site operations before a certification decision is made. Where it is not possible to gain this level of confidence, it may be necessary for a new certificate to be refused, in which case the normal certificate expiry date (and processes) will apply.

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.

Remote audits can only be completed for sites that are already certificated. Only the Certification Body that has issued the current certificate may undertake a remote audit at the site. Initial audits at a site cannot be completed remotely.

2. General Rules

2.1 Site Self-assessment

The certification body shall ensure that the site provides a completed self-assessment internal audit report. This must be completed using the BRCGS template (Site Self-Assessment Tool) relevant to the Standard being audited. For example, F804a,b,c Issue 8 [Food] Auditor Checklist and Site Self-Assessment Tool.

These documents are available to site's on the BRCGS website (https://www.brcgs.com). A full set of website addresses is provided in appendix 2 of this document.

Where these documents are available in several languages, the site and certification body may agree which is most relevant for them to complete.

The self-assessment must be completed in a timely manner, prior to the remote audit, allowing the auditor sufficient time to review the document. A maximum of one month from request is suggested. Wherever practical the remote audit (section 2.2) should be completed by the audit due date. Where this is not possible, it is expected that the remote audit will be completed, not later than 1 month after the audit due date on the current certificate. There is no late audit non-conformity for sites where these timescales are applied.

Prior to the remote audit, the auditor will review the self-assessment. The time required for this review will depend on the size and complexity of the site and product range, but will typically be 2 – 3 hours.

The self-assessment report is not a 'tick-box' exercise, it must contain sufficient information to explain how the site complies with each requirement in the Standard and will therefore contain sufficient information for the auditor to verify compliance and to challenge any aspects during the remote audit. For example, it may refer to documented procedures, records audited or processes witnessed by the internal auditor with supporing records and/or photographic evidence outlining how the control processes at the site meet the Stndard requirements. In the event that the self-assessment doesn't contain sufficient information to provide the auditor with clarity regarding compliance mechanisms, the auditor may need to request additional information. Where sufficient information is still not forthcoming, this must be raised during the remote audit, and where evidence of compliance with the requirement is still not available or remains unclear, it may be necessary for the extention of a certificate to be refused.

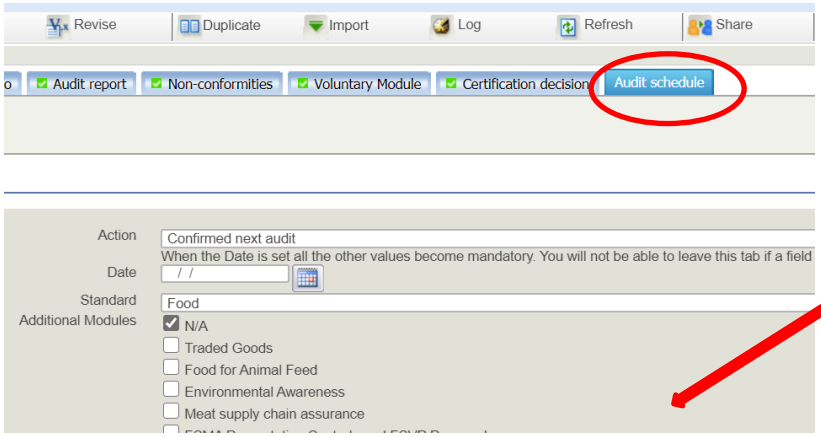
A thorough internal audit completed by a site would normally be expected to identify some non-conformities. The site is not expected to complete corrective action on these non-conformities prior to submission of the document to the certification body. However, by the date of the remote audit, the site must either have closed out the non-conformity (i.e. demonstrably completed corrective action which the auditor can review) or have temporary actions in place. These corrective actions will be reviewed at subsequent audits. Where neither of these are in place the auditor will raise a non-conformity.

2.2 Remote audit

Usual auditor competence rules apply to the remote audit and the auditor 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 must be carried out 'announced' on a date and time agreed with the site.

Updates are currently being made to the BRCGS Directory audit schedule tab and should be available shortly after 23rd March 2020.



Where the next booked audit is to be remote, tick the *Remote Audit* box in the Additional Modules check-boxes (not currently visible – will be after 23rd March).

The duration of this audit must 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.

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. There is no requirement for this to be recorded. At the discretion of the site, photographic evidence can be sent to the auditor, during the audit. 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) is good practice.

2.2.1 Structure of the remote audit

It is unlikely that the auditor will be able to effectively audit all of the requirements of the Standard remotely, within the reduced audit duration. Priority must be given to those key processes with the greatest impact on product safety and integrity. Therefore, all remote audits will include:

- Opening meeting – in addition to the normal considerations at the start of an audit, the auditor will need to explain the remote audit process
- Verification of the process flow diagram (for example, clause 2.6.1 of the Food Standard) – to be completed by site staff walking through the process and explaining each step to the auditor
- Review of CCPs or equivalent controls for non-food Standrds (e.g. Hazard Analysis and Risk Assessment) – to include both documented records and observation of the activity (where the activity normally occurs during the audit)
- Discussions with relevant staff, for example, those that complete the key product safety and critical quality processes – wherever possible site staff should be located in the area where the activity is normally completed such that any demonstration of activity, identification of equipment or records can easily be viewed
- Test of the traceability and vertical audit systems (where appropriate including assessment of the mass balance). (N.B. the auditor needs to identify a product and commence the process in a timely manner to ensure sufficient time before the end of the audit).
- Challenge of specific aspects of concern identified through review of the self-assessment
- Controls for managing situations caused by restrictions to normal operating conditions (this may be included in incident management procedures or by specific site procedures)
- Physical contamination controls (e.g. metal detection)
- Complaints, recalls/withdrawals, internal audit results and the results of other outputs and performance against targets which demonstrate site control (for example, environmental monitoring results, product testing or pre-requisite programmes)
- Standard specific requirements outlined in appendix 1 of this document

- Corrective action resulting from non-conformities identified during the site's self-assessment
- Closing meeting – the agenda of the closing meeting will be similar to the closing meeting at a physical audit

As with physical audits, the auditor is not expected to 'remain' in an office or meeting room. With the exception of the Agents & Brokers Standard, the audit must include 'time spent in' production and storage areas. For this to occur, the site will need portable, live video. The site representative will need to take the camera or other video equipment (e.g. a laptop, mobile phone or tablet) into production areas and enable the auditor to witness, see and question any aspects.

2.2.2 Additional voluntary modules

The requirements of the additional voluntary modules can be included in the remote audit scope.

In these situations, the site self-assessment should contain details explaining the compliance processes.

The remote audit duration will need to be extended to incorporate any applicable modules. This extention of time should be consistent with the normal time committed to these activities.

2.2.3 Off-site activities included in the audit scope

Several Standards include audit protocol which allows off-site activities to be captured in the scope of the audit. For example, head office audits, offsite storage and field rigs.

These can be included in the remote audit process, providing the requirements can be fully audited i.e. the processes outlined in 2.1, 2.2 and 2.2.1 are followed.

2.3 Non-conformities and grading

Non-conformities identified by the certification body during the remote audit will be handled as per the usual protocol, and evidence of corrective actions, root cause analysis and a preventive action plan shall be submitted within 28 days. These non-conformities shall not, however, affect the certification grade. The grade will stay the same as the current certificate (i.e. based on the last physical audit at the site).

The certificate will state that the audit type was 'Remote'.

2.4 The audit report

Updates are currently being made to the BRCGS Directory and audit reports. As soon as these are available we will notify certification bodies.

A full BRCGS audit report, will be completed and uploaded to the BRCGS Directory following normal procedures. The template for this report is currently being prepared and will be available shortly (we will notify certification bodies when it is available). The *Audit Type* box will include options for 'Remote' and 'GMP' audits and these options should be used where a remote or GMP audit is completed. Therefore the announced/unannounced options should only be used for physical audits (i.e. where the auditor goes to the site). The new report template will also include these new options for the *Next Audit Type*, so that this information can also be added to the report (as explained below it is expected that all sites receiving a remote audit will receive a GMP audit within 6 months).

As this will be a full report the certification body will be expected to reference some of the data provided in the site self-assessment in this report.

A summary of the certification body's risk assessment and justification for the remote audit must 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'.

The site's self-assessment must also be uploaded to the BRCGS Directory. The pdf is attached using the 'paperclip mechanism'.

The issue of certificates and upload of documents to the BRCGS Directory must occur to the normal timescales (e.g. 42 and 49 days).

2.5 GMP audit, full re-audit or repeated remote audit

All sites audited remotely (except Agents and Brokers which are explained in appendix 1) require a GMP (good manufacturing practice) audit to be carried out as soon as practical following the end of the travel restrictions, but no later than 6 months after the last audit of the site (i.e. 6 months after the remote audit).

This GMP audit is a validation of the continuing certification status of the site.

The GMP audit may be completed announced or unannounced depending on the site's current audit option. Where the audit is unannounced this should be completed within a 2 month period following the end of travel restrictions (i.e. when access to the site is possible). Where it is not possible to complete this audit within 6 months of the remote audit, it should be referred to BRCGS.

In the event that government travel restrictions remain in force 6 months after the remote audit, then it may be necessary for the certification body to complete an additional remote audit, according to the protocol highlighted in this document. No site can receive more than 2 remote audits without reference to BRCGS.

The duration of this audit must 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.

The requirements that will be audited will be influenced by the product, process type and results of the remote audit. The audit will be focused on the production, storage facilities, vehicle operations (where applicable to the Standard) and operating practices, such as hygiene and product handling. Some supporting documentation will be audited to complete audit trails.

As a minimum the auditor will:

- Verify the process flow, by following the process through the site from goods receipt to product dispatch including storage and production areas
- Confirm correct operation of CCP's
- Review non-conformities identified during the remote audit, including subsequent corrective actions, root cause analysis and preventive action
- Audit all requirements that are colour coded in the Standard to audited as part of audits of production facilities and good manufacturing practice (and the equivalent requirements for Storage and Distribution, Packaging and Consumer Products)
- A review of requirements for complaints, recalls and non-conforming products

Where non-conformities are identified, these will need to be closed out in the normal way (i.e. corrective action, root cause analysis and preventive action plans). The site will have 28 calendar days to provide the certification body appropriate evidence.

The details of the current certificate will not be changed (e.g. grade), however if the certification body is presented with evidence that makes the validity of a current certificate unsafe then it may be suspended pending a full re-audit by the certification body.

The GMP audit report template will be provided as a separate document. As soon as these are available we will notify certification bodies.

Appendix 1 – Standard Specific Requirements

This appendix outlines the Standard specific requirements that must be completed, during a remote audit. (These requirements are additional to those listed in section 2.2.1 of the document).

Food Standard Issue 8

In addition to the activities identified in section 2.5 specific focus shall be given to:

- All fundamental sections of the Standard (i.e. those sections denoted with the star symbol and listed in the introduction to the requirements)
- Controls relating to high risk, high care and ambient high care (i.e. section 8 of the Standard) must be audited in full

Gluten-Free Certification Program Issue 3

For standalone audits, all requirements must be considered.

For audits combined with a GFSI audit, in addition to the activities identified in section 2.5 specific focus shall be given to:

- Section 1 Senior Leadership commitment
- Section 3 Gluten Controls
- Section 7 Validation
- Section 8 GFMS maintenance and reassessment
- Section 9 Internal audits

START! Standard (both Basic and Intermediate)

In addition to the activities identified in section 2.5 specific focus shall be given to:

- All basic level clauses within the START! Standard
- Controls relating to high risk, high care and ambient high care (i.e. section 8 of the Standard) where applicable

Plant-Based Global Standard Issue 1

Because the Global Standard is new, it is not possible to conduct remote audits because sites do not have an existing certificate.

Packaging Issue 5

In addition to the activities identified in section 2.5 specific focus shall be given to:

- All fundamental sections of the Standard (i.e. those sections denoted with the star symbol and listed in the introduction to the requirements)
- Controls relating to high hygiene must be audited in full

Consumer Products Issue 4 (both Personal Care and General Merchandise)

In addition to the activities identified in section 2.5 specific focus shall be given to:

- All fundamental sections of the Standard (i.e. those sections denoted with the star symbol and listed in the introduction to the requirements)
- Higher hygiene requirements:
    - Section 7.2 Protective Clothing
    - Section 7.3 Hygiene Practices
- Controls relating to Product Contamination in Section 6.3 must be audited in full

Storage & Distribution Issue 3

In addition to the activities identified in section 2.5 specific focus shall be given to:

- Section 1 Senior management commitment
- Section 2 Hazard and risk analysis
- Section 3.2 Internal audits
- Section 3.3 Corrective and preventive actions
- Section 3.6 Traceability
- Section 4.3 Layout, product flow and segregation
- Section 5.2 Vehicle Standards
- Section 5.4 Vehicle temperature controls
- Section 6.4 Housekeeping and hygiene
- Section 8.1 Training and competency

The requirements of the modules will be included where they form part of the scope of the audit.

Agents & Brokers Issue 2

The requirements referred to in this document refer to the audit of the central or head office, i.e. to the office or offices which the auditor would normally physically audit. Where a company has multiple additional offices, remote audits of these additional offices can be completed in the normal way. The company self-assessment must contain the relevant information for all of the sites included within the audit scope.

The expectation is that the remote audit will cover all the requirements of the Agents and Brokers Standard.

The scope of the Agents & Brokers Standard means that there are no onsite production or storage areas. Therefore where these are referred to within this document the requirement will not be applicable to agents or brokers. GMP audits will therefore not be completed on these sites.

Ethical Trade & Responsible Sourcing Programme: Global Standard Issue 1 and Risk Assessment

Because the Global Standard is new, it is not possible to conduct remote audits because sites do not have an existing certificate or uncertificated grade. In addition, although the Risk Assessment is not an audit and designed to be diagnostic, it is not be possible for an auditor to provide a fair assessment of the level of ethical trade & responsible sourcing risk on a site through purely remote assessment. If further clarification is required, please email enquiries@brcgs.com

Appendix 2 – Location of Site Self-Assessment Templates

The site self-asssessment internal audit templates are located on the BRCGS website at the following locations:

Food Issue 8 – https://www.brcgs.com/brcgs/food-safety/help-and-guidance/

Packaging Issue 5 – https://www.brcgs.com/brcgs/packaging/help-and-guidance/

Storage & Distribution Issue 3 – https://www.brcgs.com/brcgs/storage-and-distribution/help-and-guidance/

Agents & Brokers Issue 2 – https://www.brcgs.com/brcgs/agents-and-brokers/help-and-guidance/

Consumer Products Issue 4 - https://www.brcgs.com/brcgs/consumer-products/help-and-guidance/

Gluten-Free Certification Program Issue 3 - https://www.brcgs.com/media/2001510/brcgs-gluten-free-issue-3-self-assessment-checklist.docx

Appendix 3 – Auditing Techniques

The auditor should remain mindful of any auditing techniques that have been published for the Standard and how they continue to apply to the remote audit. For example, it should be remembered that there are 3 key aims to an audit:

- To receive – to obtain relevant information from the site
- To check – to confirm what happens in practice, for example, does the procedure or risk assessment reflect the ways of working
- To challenge – to ensure that the process, risk assessment or document is effective, for example, are the correct risks identified and managed effectively.

As mentioned in the introduction, the aim of the process is for the certification body to gain sufficient confidence in the site's operations, such that a certification decision can be made. Where it is not possible to gain the information needed, then it will not be possible to extend the certificate. Where there is a temporary failure in technology such as a failure in the live video feed, then effort should be made to reconnect and complete the audit. This might for example, include agreeing to complete the remote audit on a subsequent day. But ultimately, if the information cannot be satisfactorily obtained then an extention of the certificate is not possible.