



BRCGS

BRCGS078 Position Statement on Onsite Audits Post Covid-19 Lockdown

Change log

Version no.	Date	Description
1	27/5/2020	First publication of BRCGS Position and Guidance
2	29/5/2020	Change in witness auditor requirements for new auditors
3	06/07/2020	Change to requirements relating to certificate extensions when an audit cannot be completed to intended schedule (section 3.1.3). BRCGS Positions on an auditor loan agreement and the use of ICT to facilitate remote auditing are both updated.



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1. Introduction

When the Covid-19 lockdown ends it is likely that a large number of sites will require audits in a relatively short timescale, and as a consequence auditors and certification bodies will be much busier than normal. Audit arrangement will therefore be more challenging than usual and may cause delays to normal audit timescales.

It is important that where audits are completed they cover all requirements, and are completed to the usual high quality and consistency. This Position Statement therefore outlines the BRCGS response to these challenges to assist certification bodies, auditors and sites.

The new arrangements outlined in this document to mitigate potential resource issues will apply until **at least January 2021**. The situation will be kept under review and this may be further extended depending on circumstances.

2. Auditor Requirements

2.1 Witness audits and new auditor sign-off audits

2.1.1 Witness sign-off audit of new auditor

Where the CB wishes to register a new auditor to BRCGS or to a new Standard a witness audit within the Standard completed by the Accreditation Body is acceptable.

Where the auditor is currently a BRCGS registered auditor in a specific Standard, except for Consumer Products, they can transfer to another Standard without a further witness audit where a satisfactory witness audit report undertaken by the employing CB, AB or **BRCGS**, within the last 12 months is available.

2.1.2 Auditors Transferring from one CB to another – witness audit requirement

Where auditors are currently registered with BRCGS and are transferring employment to, or contracting with, another CB, a witness audit is not required where a satisfactory BRCGS witness audit in that Standard has been undertaken within the last 12 months and the BRCGS confirms that there are no concerns from their work history.

A concession shall be requested from BRCGS. The information justifying the position shall be added on the auditor profile under 'witness auditor' referencing the concession number to enable it to be validated.

A witness audit will be required within 12 months.



2.1.3 '2 yearly' witness audits requirement

Onsite witness audits can be postponed for upto 12 months since the last witness audit for all auditors, i.e. are due 36 months +/- 3 months since the last one according to BRC018.

2.1.4 Witness assessors

Please contact BRCGS if you think that the BRCGS Compliance auditor pool may be of help to you in undertaking witness audits and we will try and facilitate availability.

2.2 Minimum annual audit numbers to retain auditor registration

For 2020, auditors shall be required to undertake a minimum of five on site audits against GFSI approved standards and at least one annual onsite audit against the relevant BRCGS approved standard.

2.3 Consecutive audits rule

The rule for consecutive audits (currently 3) is suspended.

2.4 Virtual training for auditors

BRCGS virtual training is an acceptable option for auditors looking to complete training courses but unable to attend traditional classroom-style courses. For example, Standard courses for auditors and conversion courses for new Standard issues.

Courses must be facilitated by an Approved Virtual Trainer if delivered online or a concession requested from training@brcgs.com.

BRCGS have published instructions to ATPs (Approved Training Partners) on the requirements that must be met for completion of virtual courses. This is to ensure the quality of the course is maintained and auditors have all the information required.

Further information can be obtained from training@brcgs.com.

2.5 Loan of auditors between certification bodies

BRCGS have published a 'loan scheme' whereby certification bodies can agree the loan of a qualified auditor to another certification body to complete an audit.

Full details are available in BRCGS082.



2.6 Auditor profile sharing where auditors change CB

Linked with section 2.5 is the need to simplify the population of information into the auditor profile on the BRCGS Directory.

Further details will be published as soon as the protocol is available.

2.7 Auditor category requirements

In order to maximise the scope of BRCGS audits that an auditor can complete, BRCGS have reviewed the category competence requirements associated with each of the Standards.

Whilst it is important that certification bodies maintain processes to ensure the competence of their auditors, including the appropriate category knowledge, where certification bodies are satisfied that the auditor has sufficient knowledge the tables in appendix 1 highlight the additional categories which may be added to their existing auditors' competences.

To ensure a consistent process, the certification body should complete the auditor's profile in the normal way, however, instead of listing the individual audits or work experience in the new category, use the text 'Category Extension in Accordance with BRC078'. BRCGS will validate the profile with the new category.

Where the auditor completes 5 or more audits within the category in the following 12 months these can be used to demonstrate permanent category competence. Where an auditor does not complete the minimum 5 audits, the category will subsequently be archived.

3. Onsite audits

3.1 Restarting onsite audits

The following guidance is designed for the situation when restrictions are lifted, and onsite audits are again possible.

Throughout all processes it is vital that the certification body maintains good communication with sites, for example, to agree that audits are now permitted.



BRCGS recommend that wherever possible certification bodies prioritise audits at sites which are due for an audit (i.e. haven't expired or been extended but the audit is due in the period after lockdown restrictions are lifted), this should prevent additional sites' certificates from expiring. This will ideally be followed by sites which have already expired due to Covid-19, and finally sites whose certificates have been extended, which can be completed within the previously granted extension.

Additional considerations for each of these scenarios is detailed below:

3.1.1 Sites with an audit due after lockdown

Where a site's audit is due after lockdown the audit should wherever possible, be planned in the normal way, i.e. before the audit due date, where necessary using the additional guidance in this document.

Audits may be announced or unannounced and this remains the site's choice.

The certification body should confirm that site policy permits visitors such as auditors, as some companies may remain in self-isolation for longer than required by government regulations.

Where a successful audit is completed, the new certificate will have an expiry date dependent on grade, and in accordance with the normal audit protocol.

Where the certification body is not able to undertake an audit prior to the audit due date (for example, because of auditor availability) the site has a number of choices:

- assess whether an audit can be completed by an alternative certification body.
- apply for a Certificate Extension (according to BRC072) - if successful, the site certificate will be extended for an **additional 6 months** during which time an onsite audit should be arranged.
- arrange an audit for the earliest possible date. The current certificate will expire on the certificate expiry date, and the site will therefore be uncertificated from this date until the new audit and certification process is completed.

A non-conformity for a late audit will not be given. Refer to section 3.2.

3.1.2 Sites whose certificate has already expired

Where a site's audit was due during the lockdown period and the certificate has now expired. A new audit should wherever possible, be planned in the normal way, where necessary using the additional guidance in this document.



The certification body should confirm that site policy permits visitors such as auditors, as some companies may remain in self-isolation for longer than required by government regulations.

Audits may be announced or unannounced and this remains the site's choice but the site should be aware that unannounced audits will occur at any time during the following 4 months in line with current audit protocol.

Where a successful audit is completed, the new certificate will have an expiry date, dependent on grade, in accordance with the normal audit protocol, unless a site wishes an earlier certificate expiry date, for example to reset the audit schedule and re-align it back to the previous audit window. These earlier than normal audits can be arranged with the certification body with no penalty to the site for the early audit.

A non-conformity for a late audit will not be given. Refer to section 3.2.

3.1.3 Sites with Certificate Extensions

Where a site's certificate has been extended using Certificate Extension or Certificate Extension PLUS procedures the following steps must be considered:

Audits should be planned for the earliest possible dates following the lifting of the Covid-19 restrictions. It is not necessary to wait for the 28 day audit window prior to the extended audit due date. Once agreed the audit can be planned:

- For announced audits – an audit date shall be agreed with the site. This may occur on any date from the site agreement that an audit can occur, until the audit due date. Ideally, audits should take place as soon after agreement is reached as possible.
- For unannounced audits – the audit may occur on any date from the site agreement that an audit can occur, until the 28 day window prior to the audit due date. The exact date is not communicated to the site. Where a site is not able to accommodate an audit until the 28 day audit window, then the audit shall be announced.

Where a successful audit is completed, the new certificate will have an expiry date, dependent on grade, in accordance with the normal audit protocol, unless a site wishes an earlier certificate expiry date, for example to reset the audit schedule and re-align it back to the previous audit window. These earlier than normal audits can be arranged with the certification body with no penalty to the site for the early audit.

Where an audit is not possible prior to the audit due date (for example, due to auditor availability) the current certificate will expire on the date shown. (It is not



possible to extend a certificate beyond the 6 months permitted in the Certificate Extension Programme).

A non-conformity for a late audit will not be given – refer to section 3.2.

3.2 Late audits

For information on late audits please refer to section 3.1 (restarting audits) and BRC072 (Audits impacted by Covid-19).

Requirements relating to late audits are currently suspended and non-conformities relating to late audits will not be given for a period of 12 months from the date of this document.

3.3 Seasonal sites

This represents the current BRCGS position. It is hoped that our ongoing discussions with GFSI will develop improved options for seasonal sites and this guidance will be updated accordingly:

If the site is still operating when restrictions are lifted, the site and certification body should arrange an onsite audit wherever practical. All sites are expected to make appropriate efforts to have an onsite audit where this is possible and permitted by the Covid-19 restrictions.

Where a site is able to utilise the 6 month Certificate Extension (refer to BRC072 on audits impacted by Covid-19) this provides additional time on the audit window. If the season lasts long enough for the audit to be conducted within this window (assuming the lifting of restrictions before the end of the 6 month extension) then the site should utilise that option.

Where a site produces different products throughout the year or has different parts of the production process taking place at different times in the year, then scheduling an audit during any of these production periods remains an option. Ideally, audits are scheduled to coincide with the products or processes with the highest risk (for example, glass bottling in the alcohol industry). Where this is not possible due to the Covid-19 restrictions, certification bodies can schedule audits for other production periods during the year, reviewing records for the remaining products or processes. Where there is a significant risk which cannot be assessed via document review, it may be necessary to schedule an extension to scope visit at the beginning of that season to confirm appropriate management of these risks.

BRCGS are developing a protocol to allow remote auditing, which may provide a partial solution for seasonal sites. However, it must be noted that GFSI Benchmark



Rules do not allow the entire audit to be completed remotely and a site visit during production will still need to occur prior to certification.

Where a site is no longer producing when the restrictions are lifted, it will not be possible to complete an onsite audit. In these situations, the certificate will expire on the given expiry date. It is recommended that the site explain this situation to their customers prior to the expiry. If a customer or specifier requires further explanation of the certification and expiration rules, they can be directed to enquiries@brcgs.com. It is recommended that, as a priority, sites arrange their next audit, with their certification body for the earliest opportunity (likely to be the beginning of the next season). This audit will be conducted in accordance with the normal audit protocol for seasonal sites within the Standard (except that no non-conformity will be given for a late audit).

3.4 Remote technology (use of ITC) to create a blended audit (part remote audit and part onsite audit)

BRCGS have developed a Position Statement on blended audit programmes designed to allow part of the audit to be completed remotely using technology systems such as video conferencing.

Full details are available in BRCGS080.

3.5 Clarification on audit teams

Certification bodies are reminded of the contents of BRC013: BRCGS expectations on the use on the use of audit teams and technical experts which may be required where available audits do not have the full categories.

3.6 Audit Duration

Where sites have amended there operations and are working with less staff or fewer production lines, it is important that the audit still covers all the products that are included within the audit scope.

However, it is likely that less time will be needed to audit a production line that is not operating (for example, process flow, CCP records and hygiene can be audited, but actual production will obviously not be witnessed). This is considered a justifiable reason for reducing the audit duration. The audit duration calculator permits up to 30% reduction in calculated audit duration.

3.7 Audit reports



BRCGS have commenced a full review of the audit reports for our Standards.

Results of the review, and an amendment to the report writing requirements will be published in due course.

3.8 Sites with grades C or D

Sites currently graded C or D are not eligible for certificate extensions through the risk assessment process (BRC072), however, Certificate Extension PLUS (BRC077) provides an additional robust review through the additional assessment of site processes and use of remote technology and is available for all certificated sites including those with grades C and D.

It should be recognised that the BRCGS Certificate extension PLUS programme is not a GFSI benchmarked programme.



Appendix 1 Auditor Category Requirements

Refer to section 2.7 for details on the use of these tables:

Food Standard Categories:

Existing Approval	Permitted Category Additions
Category 1, 2 or 4 Category 8 Category 6 Category 15 or 17	Category 3 may be added Category 10 may be added Category 5 may be added Category 15 or 17 (i.e. auditors with 15 receive 17 and vice versa)

Packaging Standard Issue 6 Categories:

Existing Approval	Permitted Category Additions
Category 4 Category 5	Category 5 may be added Category 4 may be added

Storage & Distribution Standard Categories:

There is no change to the industry knowledge requirements for the Storage & Distribution Standard, which remain as follows:

There are 4 categories in the Storage & Distribution Standard. The Standard operates the following principle for category approval:

Auditors approved for Category 1 are automatically approved for Categories 2, 3 and 4
Auditors approved for Category 2 are automatically approved for Categories 3 and 4
Auditors approved for Category 3 are automatically approved for Category 4

Consumer Products Standard Categories:

There is no change to the industry knowledge requirements for the Consumer Products Standard.



There are 8 product categories:

- A1 Chemicals and Formulated Chemicals
- A2 Fabricated paper
- A3 Wood, straw, cork, bamboo
- A4 Rubber and Plastics
- A5 Textiles and Textiles Mix
- A6 Electrical, Electronic, Batteries
- A7 Glass, Ceramics, Gemstones
- A8 Metals and Metal Mix
- A9 Assembly packing only

Agents & Brokers Standard Issue 2 Categories:

There is no change to the industry knowledge requirements for Issue 2 of the Agents & Brokers Standard, which has considerably less product categories than Issue 1:

There are only 4 categories in the Agents & Brokers Standard Issue 2. No additional sub-category information is required in the auditor's profile.

- Category 1 - Chilled/Frozen Food
- Category 2 - Ambient Food
- Category 3 - Packaging
- Category 4 - Consumer Products

START!

There is no change to the industry knowledge requirements for the START! Programme – auditors are expected to have industry experience in the Product Field (not the specific product category. There are 6 fields of knowledge.