

FAQS on implementing updated BRCGS 072 25/3/2020 v3 process

The following scenarios should help in answering practical implementation of the BRCGS processes. If you have a query that you cannot find the answer to here, please email the technical team enquiries@brcgs.com

Note the guidance is applicable to all BRCGS Standards.

No	Question	BRCGS Comment
1	We have a site as a new client this year. They have already signed a contract and paid the bill for an onsite audit. An onsite audit is not possible and they want a certificate extension. The site cannot go back to their 'old' certifying CB as they are no longer accepted by the specifier.	Unfortunately the certificate extension process is in place to be able to extend current certificates. So therefore this is only available to CBs that have issued the current certificate. Encourage the site to speak to their customer regarding CB acceptance
2	A company is currently certificated, but has just moved their site to a new physical location. Due to the current situation, they are not allowing onsite audits. Can the site be certificated?	Unfortunately the certificate extension process is in place to be able to extend current certificates. As certificates are site specific, as soon as the company moves address the current certificate shall be withdrawn. Unfortunately the new site can only be certificated through a full onsite audit.
3	A contract has been agreed. The site has submitted a self assessment based on version 2 of BRC072 (12.3.2020) guidance	Review self assessment as part of new risk assessment process and complete new process Outcome: Certificate extension to be issued for 6 months No BRCGS certification fee Next audit – full on site recertification audit
4	A remote audit has been booked and contractual arrangements agreed based on version 2 of BRC072 (12.3.2020) guidance	Cancel the remote audit and convert to the new process Outcome: Certificate extension to be issued for 6 months No BRCGS certification fee Next audit – full on site recertification audit
5	A remote audit has been completed based on version 2 of BRC072 (12.3.2020) guidance – ie the site supplied a self assessment and we have completed a full audit report. We have an agreed contract with the company. The site is expecting a 12 month certificate extension. The site is expecting a requirement for a GMP onsite audit after 6 months. The site has paid the BRCGS fee	Please complete the new 'risk assessment' report template (BRC075). If the full audit report has been completed – this can be attached to the BRCDirectory via the paperclip mechanism in addition to the new report – this SHOULD NOT BE THROUGH THE UPLOAD PROCESS A certificate with 6 months extension can be issued. The site should be aware that a GMP audit will NOT be required. A full reaudit shall be due as soon as the site is accessible. The BRCGS fee shall be refunded to the site
6	A remote audit has been completed based on version 1 of BRCGS guidance (31.1.2020) – ie the site did not supply a self assessment and we have reported on an 'extraordinary report' based on BRC049a. The site is expecting a 6 month certificate extension No BRCGS fee was charged	Please complete the new 'risk assessment' report template (BRC075). Please ensure you have sufficient data to complete all sections. A certificate with 6 months extension can be issued. The site should be aware that a full reaudit shall be due as soon as the site is accessible.

7	Some sites refuse or are not able to have someone available to submit or review the Covid 19 processes required for the risk assessment. When an onsite audit is undertaken in future, does a major NC need to be raised because it was beyond the due date or a concession need to be requested?	As the situation changes rapidly and we don't know how long this situation will continue, BRCS would encourage that sites complete the certificate extension process. However, if this is not completed, their certificate will expire. No penalty of NC for late audit will be issued.
8	IFS does not permit, at the moment, certificate extensions, and IFS certificates will expire. CBs are mainly performing BRCS and IFS combined audits	Where sites are required to have BRCS certification, they should opt to complete the certificate extension process. A full onsite reaudit is due as soon as the site is accessible. We understand that this may cause some issues with future arrangements once things start to return to normal. We will continue dialogue with other scheme owners to confirm the best way forward.
9	The site is in the unannounced audit programme, can we delay the onsite physical audit to the end of the audit window.	As unannounced audits are now cancelled, announced onsite physical audits should be scheduled within the usual last month of the window. The outcome of the audit will be to an announced grade.
10	In case a site decides to wait until access restrictions are finished and wants to receive a physical onsite audit, is there a penalty of major NC for a late audit?	As the situation changes rapidly and we don't know how long this situation will continue, BRCS would encourage that sites use the certificate extension process. However, if this is not completed, their certificate will expire. No penalty of NC for late audit will be issued
11	If from the risk assessment the CB has doubts about the sites operation and concerns about continuing certification, what happens?	As the CB, you need to be confident that the site maintains appropriate controls to be able to supply safe products and is operating to the BRCS Standards. If you have concerns that you are not able to extend the certificate and these concerns cannot be rectified through the usual corrective action process, then the current certificate will expire.
12	Does BRCS need to approve CB's site risk assessments or are we free to use whatever we feel suitable? Are they going to want to see this assessment?	CBs must use the report template BRC075 supplied by BRCS which includes details of the risk assessment. This needs to be available on the BRCDirectory site record – being attached through the 'paperclip mechanism'
13	How soon must the risk assessment to confirm the certificate extension take place to ensure certificates don't expire?	We recognise at the moment production and distribution facilities are under severe pressure to keep the food supply chains open. We would encourage that the assessment is completed in good time to ensure the current certificate does not expire. This maybe beyond the audit due date but prior to certificate expiry.
14	Where a site was within the unannounced scheme and their audit will now mandatorily change to announced, what will be their resulting grade?	Where a site has an onsite physical announced audit, the grading of the new certificate issued will be to the announced scheme.

15	If the risk assessment and site discussion occurs past the due date – does a major NC need to be raised or a concession requested?	No, we understand that changing arrangements and making sure someone is available may take some time. There will be no penalty for it being past the audit due date. However, we encourage that it should occur in good time before the certificate expiry. We suggest that the decision process should be shorter than the usual 42 days.
16	The audit at site is based on a head office audit. If a number of sites within the group require a certificate extension, can the head office complete the onsite discussion once to cover all sites?	The head office may provide the relevant corporate policies to the CB, however the discussion and challenge shall involve each site individually as the CB must challenge the implementation and understanding at site level.
17	Can the ASDA certificate be extended through the risk assessment process?	Yes. The requirements of the additional voluntary modules including Asda can be included in the risk assessment scope.
18	Where modules are included in the sites current certification – can these be extended?	Yes. CBs need to ensure that they cover in sufficient detail the controls in place at the site to be confident of including the module within the certificate extension. Therefore within the discussion it needs to be confirmed whether there has been any changes or impact of Covid 19 to the specific module.
19	Does the consecutive audits rule apply for physical onsite audits during this pandemic period and once restrictions return to normal?	BRCGS will sympathetically consider concession requests where consecutive audit rules are exceeded. We understand that auditor capacity will be severely affected and the number one priority is to be able to undertake robust audits on time at a site. This is unlikely to affect KPIs
20	Does the auditor have to be competent in the product categories to be able to undertake a risk assessment	No, the auditor reviewing the risk assessment and having the discussion with the site does not have to cover the scope competencies of the site. This is because they are challenging management processes only. The auditor does have to be a currently registered with BRCGS.
21	I have a new auditor I have trained up and just need to do the Witness Sign Off Audit – can this be done remotely?	No. New auditors that are not currently registered with BRCGS would need to be witnessed on site in the normal way
22	I have a new auditor that is transferring to us from another CB – do I need to do a Witness audit?	Yes, however, if they are a new auditor to you but they are already registered with BRCGS and are transferring over to you from another CB, if you have the appropriate technology and have sites undertaking full onsite audits, there is the potential for a 'remote witness assessment' to be accepted – please discuss and agree with us.
23	I have a number of '2 yearly' witness audits due	Ongoing witness audits can be postponed. It is acceptable that these are late in the current climate of travel restrictions and auditor availability. We would want these to be carried out onsite in the normal way when they can.
24	Will the requirement for auditors to undertake minimum numbers of audits per year eg 5 to retain registration still apply?	This is a GFSI rule which we need to look at adhering to. BRCGS have just completed the review exercise for 2019, therefore we will look at this again later in the year, bearing in mind the unprecedented situations.

25	The site is seasonal – there is concern that there won't be any production when the full audit is due on site	Noted, further consideration on how this will be handled needs to take place
26	Internal audits at a site may fall behind due to lack of internal staff or banning of external consultants onto sites to undertake them. Should sites receive action points if behind schedule	Sites still need to meet the requirements of the Standard and CBs need to see evidence of compliance and raise action points where this is not the case. In these unprecedented times, product safety systems will be pressurised and it is arguably even more vital that sites ensure good practices of which the internal audit programme is a powerful tool. So it may be about review and prioritisation – to maintain the internal audits of the most vital systems, GMP inspections, etc, and update scheduling of audits of less vital systems. Sites may need to adapt their normal ways of working, for example where appropriate to the subject being audited such as documentation, remote systems may be just as effective.
27	Management review meetings at a site may fall behind due to lack of internal staff. Should sites receive action points if behind schedule	Sites still need to meet the requirements of the Standard and CBs need to see evidence of compliance and raise action points where this is not the case. We would expect sites to specifically have crisis management systems in place and have considered the impact of Covid 19 on their business which CBs shall challenge. It would be expected that management meetings to discuss impacts will be happening at a more frequent basis during this time. Sites, for example, should have considered impact of staff availability with contingency plans in place. They shall have updated their screening processes for current staff and agency staff and have a policy in place for staff members who may have been exposed to Covid 19. The site shall have considered requirements for additional or increased cleaning for surfaces, e.g. in the staff canteen. Sites have contingency plans in place for ingredient supply that may be affected.
28	Where sites have banned external contractors from coming on site eg pest control, equipment maintenance – should this be raised as an action point	Sites still need to meet the requirements of the Standard and CBs need to see evidence of compliance and raise action points where this is not the case. It is recognised that access to sites is currently challenging for many service providers due to the ongoing circumstances relating to Covid-19. The site is responsible for reviewing their processes to ensure the continued production of safe products. The site must therefore have sufficient controls in place to ensure continuation of safe production. It is the site's responsibility to ensure they look at options and decide how this happens.
29	If the CB identifies concerns during the risk assessment and discussion with the site – what is the process?	Where concerns are highlighted, these shall be raised as 'action points' and shall be documented on the report format. The Certification Body shall agree with the site a process where these can be

		actioned – this shall include an appropriate timeline (as short as possible). The CB needs to have sufficient confidence to be able to extend the certificate. Where doubts remain or issues unactioned, the certificate shall expire
30	If the site is not able to complete corrective action for any identified action points – what happens	If the site are not able to send evidence of corrective action to enable the CB to have confidence in extending the certificate, then the current certificate will expire. We would expect the CB to work with site and agree appropriate timelines but would suggest this should not exceed 42 days.
31	What should be denoted on the certificate?	Any certificate extensions should denote 'extension due to Covid 19' under the 'audit programme box'
32	When will the BRCGS Fee be charged for the certificate extension	There is no BRCGS fee due for the certificate extension
33	As sites will have a full onsite audit as soon as travel restrictions are lifted, what will be the due dates of audits in 2021?	A 12 or 6 month certificate shall be issued depending on grading, with dates reset from this latest audit.
34	When travel restrictions are lifted and onsite audits are due, there will be significant backlogs of audit work and a lack of auditor availability. What is BRCGS doing about this?	BRCGS recognise the stresses that will be caused on the industry and will be reviewing where we can make changes to alleviate this.