

BRCGS077 – Certificate Extension PLUS BRCGS Audits impacted by Covid-19

Change log

Version no.	Date	Description
1	23/05/2020	First issue

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

After consultation with industry there is a growing need for additional assurance over and above the certificate extension process BRCGS072 which is based on risk assessment as required for GFSI benchmarking.

This audit protocol 'Certificate Extension PLUS' can offer increased levels of assurance to customers through a more extensive assessment process based on a full site self assessment and the use of remote audit technologies. It also incorporates an assessment of the management of the specific risks likely to occur as a result of Covid-19 restrictions as defined in the BRCGS Covid-19 Additional Module issue 1.

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

Certificate extensions granted as a consequence of using the BRCGS Certificate extension PLUS do however allow for the issue of a GFSI compliant certificate extension in addition as the process fully incorporates the risk assessment certificate extension process BRCGS072 Audits impacted by Covid-19.

See appendix 1 for the relationship between the various BRCGS certificate extension and Covid-19 additional modules.

2. Scope and applicability of Certificate Extension PLUS

This programme is applicable to sites currently certificated to BRCGS Food Safety Standard issue 8 and 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 certificate extension of 6 months may be issued based on:

- The Certification Body completing a risk assessment of the sites audit history and current performance according to the procedure BRCGS072 (ref section 3)
- 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. (ref section 4)
- The Certification Body verifying and challenging these controls through a 'remote audit'. (ref section 5)
- The site demonstrating effective management of the risks identified in the BRCGS Additional module for Covid-19

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.

Sites currently graded C or D are not eligible for certificate extensions through the risk assessment, however, with the additional robust review through this process, they are eligible for Certificate Extension PLUS.

This process is applicable currently to BRCGS Food Standard issue 8 only. Stakeholders that may be interested in other Standards should contact BRCGS directly enquiries@brcgs.com.

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 Risk Assessment by the Certification Body

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*.

As the Certification plus 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.

As the certification plus assessment process is always carried out in conjunction with the current certificate extension process, the risk assessment as identified in BRCGS072 will also apply.

The Certification Body shall gather information from the certified site and consider within the risk assessment:

- 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
- Absence of critical situations throughout the organization's certification history with respect to the BRCGS standard
- Pending compliance activities / legal proceedings
- Product recalls since the last BRCGS audit
- Whether the site is functioning normally
- Whether significant changes have been made at the site since the last BRCGS audit
- Whether the site is operating to the scope of certification
- Any changes to processes or services outsourced following the COVID-19

- emergency
- The ability of the site to host a remote audit

4 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) available in a number of languages. F804a,b,c Issue 8 [Food] Auditor Checklist and Site Self-Assessment Tool is available here <https://www.brcgs.com/brcgs/food-safety/help-and-guidance/>

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 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 supporting records and/or photographic evidence outlining how the control processes at the site meet the Standard 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 extension 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.

5 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 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 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.

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

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.

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.

5.1 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 - 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 through the live video feed
- Review of CCPs – to include both documented records and observation of the activity (where the activity normally occurs during the audit)
- Review of any significant changes to the operation of the site in response to Covid-19 e.g. changes in outsourcing and the controls the site have put in place.

- 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
- Review of implementation of site's emergency response plan to Covid 19 as defined in the Covid -19 Additional module.
- Physical contamination controls (e.g. metal detection)
- Complaints, recalls/withdrawals 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)
- Corrective action resulting from non-conformities identified during the site's self-assessment
- Controls relating to high risk, high care and ambient high care (i.e. section 8 of the Standard) must be audited in full where applicable
- 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. 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.

6. 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 extension of time should be consistent with the normal time committed to these activities.

7 Off-site activities included in the audit scope

Where off-site activities are included 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.

8 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).

9 Audit Report

A full BRCGS audit report, will be completed and uploaded to the BRCGS Directory following normal procedures. The template is available on the BRCGS Directory– please ensure the correct template is used. This should specify that this certificate extension plus has been undertaken

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).

Upload will generate a BRCGS service package fee of £400.

10 Certification

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 certificate extension to be refused, in which case the normal certificate expiry date (and processes) will apply.

If the certification body is satisfied that the site continues to meet the requirements of the Standard, an accredited certificate may be reissued.

- The grading will stay the same as the current certificate based on the last physical audit at site.
- The re-audit due date window will be listed as 'from' the current last audit due date, 'to' with the addition of 6 months to this date.
- An additional 6 months will be added to the current certificate expiry date.
- Audit programme shall denote 'certificate extension PLUS'

Appendix 1

Relationship between the BRCGS Covid-19 modules

There are 3 different assurance products that can be carried out individually or combined They are:

1. Certificate Extension (reference BRCGS072 v3)
2. Certificate Extension PLUS (reference BRCGS 077)
3. Covid-19 Additional Module

Product	1	2	3
	Certificate Extension	Certificate Extension PLUS	Covid-19 Additional Module
Who	All BRCGS Certificated sites	All BRCGS Certificated sites	Any Food manufacturer
When	Certificate expiry (Within 28 days before audit due date)	Certificate expiry (Within 28 days before audit due date)	Any time
Requirements			
Base BRCGS scheme requirements	Yes	Yes	No
Covid-19 additional requirements	No	Yes	Yes
Site self-assessment	No	Yes	No
Remote interview and document review	Yes	Yes	Yes
Remote site review	No	Yes	Yes
Senior management interviews	No	Yes	Yes
Typical audit duration	0.5 Day	1 Day	0.5 Day
Auditor competence	Registered BRCGS Standard auditor	Registered BRCGS Standard auditor	Registered BRCGS Food Standard auditor
Report type	Risk Assessment Report	BRCGS Food Safety Report (incl. remote site findings)	Covid-19 Report (incl. remote site findings)
Upload time	42 days	42 days	10 days
Certificate	Yes – 6 month extension	Yes – 6 month extension in combination with 1	No Pass/Fail or risk rating
Results on public BRCGS Directory	Yes	Yes	Yes

GFSI compliant	Yes	No - Additional to GFSI certification in 1	No
Accredited	Yes	No	No

Appendix 2 – Help and guidance

Further help and guidance can be found on the BRCGS 'Covid-19 help hub'
<https://www.brcgs.com/resources/covid-19-response/>

BRCGS have a comprehensive guidance document for food manufacturers on 'Managing food safety during Covid19'

<https://www.brcgs.com/media/2082504/food-safety-covid-19-guideline-unlocked.pdf>

Location of Site Self-Assessment Templates

The site self-assessment 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/>

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.

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

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subsequent day. But ultimately, if the information cannot be satisfactorily obtained then an extension of the certificate under the plus programme is not possible and a judgement will be made on whether the site is granted the standard certificate extension.

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