

ET210: BRCGS Ethical Trade and Responsible Sourcing Issue 2 Audit Duration Calculator

Document Scope: This document is applicable to audits against the Ethical Trade and Responsible Sourcing Standard.

Change log:

Version no.	Date	Description
1	22/12/2020	First Issue.

1. Background

This document provides a guideline for the audit duration for the initial certification audit (stage 1 and stage 2) and a certificated site's audit programme including surveillance and recertification audits against the BRCGS Standard for Ethical Trading and Responsible Sourcing, Issue 2.

Irrespective of audit type, the onsite audit process always has 3 main components

- Documentation review of the site's management system, including its policies, processes and procedures, its objectives and targets, how it is monitored by senior management and communicated, including staff training and the management of corporate governance, which will typically take between 3-4 hours to complete
- Site inspection that reviews key ethical trade aspects of the Standard, including the operational management of labour standards, health and safety, worker welfare and human rights, to gather information for further investigation. The time required is based on the size of the site and includes worker accommodation and rest facilities, as well as all temporary and permanent facilities and all staff, typically taking between 1.5 to 3 hours to complete
- Worker interviews and human resources record reviews which are determined by the number of workers onsite and the languages spoken.

There may be other factors that may influence the calculation of audit duration (which are identified in Appendix I) but are considered to be less significant. These factors should not influence the audit duration by more than 30% from the total audit duration calculated.

The time taken to write the audit report and for the review of any corrective actions provided following the audit is NOT included within the audit duration calculator.

2. Calculation of audit duration

The audit duration calculator is based on:

- Total number of workers across all shifts including peak seasonal workers (for example, temporary) and sub-contracted workers sourced through third party labour providers
- Size of the manufacturing site (in square metres) - including onsite storage facilities. The conversion from square feet to metres is 10.76 (e.g. 86,000 square feet equals 8,000 square metres).
- Language and the need for interpreters to be used for worker interviews

You can find the interview programme that appears in the Standard in Appendix 2, which is based on number of workers on a site.

2.1 Calculation for Initial Certification Audit

Stage 1 announced

In Issue 2, stage 1 of the initial certification audit is announced and designed to be a “readiness audit”, where the audit team assess if a site has the necessary policies, processes and procedures to constitute an ethical trade and responsible sourcing management system.

The certification body will review the information submitted by a site on its application form, together with its self-assessment questionnaire with accompanying documentation to decide whether the stage 1 audit should be onsite or delivered remotely.

For example, if a site has been audited against other methodologies such as SMETA or has been working to standards such as SA8000, then it is possible that they already have some or all of the required elements of an ethical trade and responsible sourcing management system. If so, the certification body may decide that the stage 1 audit may be conducted remotely. If not, they will conclude that the audit team should be onsite to conduct the stage 1 audit.

Irrespective of whether stage 1 is onsite or remote, it should take no longer than 1 day to complete. Any deviation from one day should be explained in the stage 1 audit report, as well as the Initial certification audit stage 1 and stage 2 audit report required at the end of a site’s audit process.

Stage 2 unannounced

In Issue 2, stage 2 of the initial certification audit is unannounced, taking place in a 28-day audit window. The site is notified of its audit window but will not know the actual date when the audit team will arrive onsite. The stage 2 audit will include a documentation review of the site’s management system, a site tour of all facilities where staff work and worker interviews, which are calculated as follows:

N° workers	Size of manufacturing site			
	<10k sq. m	10k-25k sq. m	>25k sq. m	>50k sq. m
1 - 100	8	8	9	9
101 - 500	12	12	13	13
501 - 1000	14	14	15	15
1001 - 2000	18	18	19	19
>2000	20	20	21	21

Additional time allocation for sites where worker interviews are conducted through an interpreter:

N° worker	Additional time (in hours)
1 - 100	2.5
101 - 500	6
501 - 1000	8.5
1001 - 2000	12.5
>2000	14

Any deviation from the calculated audit duration needs to be justified in the initial certification audit stage 1 and stage 2 report that is uploaded to the BRCGS Directory.

2.2 Calculation of audit time for surveillance audits against ETRS

Surveillance audits take place annually in years 1 and 2, between the initial certification audit in year 0 and the recertification audit in year 3. During the two annual surveillance audits, the 11 Fundamentals of the Standard, together with a number of other sampled clauses are always audited. The objective of surveillance is to monitor the ongoing conformity of a site, so that across the two annual audits the requirements of the Standard are checked.

Therefore the duration of a surveillance audit will be less because only half the requirements of the Standard are audited, meaning that the number of workers interviewed will be halved, as follows:

N° workers	Size of manufacturing site			
	<10k sq. m	10k-25k sq. m	>25k sq. m	>50k sq. m
1 – 100	4	4	5	5
101 – 500	6	6	7	7
501 – 1000	7	7	8	8
1001 – 2000	9	9	10	10
>2000	10	10	11	11

Additional time allocation for sites where worker interviews are conducted through an interpreter

N° worker	Additional time (in hours)
1 – 100	1
101 – 500	3
501 – 1000	4
1001 – 2000	6
>2000	7

Any deviation from the calculated surveillance audit duration needs a valid justification which is recorded on the BRCGS audit report.

2.3 Calculation of audit time for recertification audits against ETRS Standard

Recertification audits take place in year 3 of a certificated site's audit programme, with the objective of reconfirming the ongoing conformity of the site with the entire requirements of the standard.

The duration of a recertification audit is calculated in the same way as the initial certification audit stage 2, using the tables under 2.1 relating to the number of interviews and the additional time required if a translator is used.

Again, any deviation from the calculated audit duration needs to be justified in the BRCGS initial certification audit stage 1 and stage 2 report.

3. Recording audit duration

A typical audit day should be 8 hours (not including lunch breaks) and should not exceed 10 hours, except where there are exceptional circumstances. Onsite audit duration should be stated in total person hours (using whole numbers e.g. 17 not 16.5), giving the time at the site where the BRCGS audit is conducted.

The start and finish times each day should be clearly stated on the BRCGS audit report and for onsite audits should reflect the actual times at the site. The auditor should agree the start and finish times with the authorised site representative. For example, the site should sign a record of the start and finish times for each day of the audit and a copy must be retained by the certification body. (This may be combined with other audit documentation, for example by adding the information to the non-conformity record sheet).

Allowance should be made (to deduct time) where audit teams are used and all auditors are present. For example, at the opening and closing meetings. Those personnel not 'auditing independently' should not be included within the total time calculation such as witness or trainee auditors.

The audit duration should not include any calculation for the writing of the BRCGS audit report which is completed away from site. It is additional and typically takes between 4 – 8 hours to finalise.

Appendix 1: Influencing factors

Other factors influencing the duration of the audit may include:

- inclusion of worker accommodation
- need to assess off-site facilities
- whether it is an Initial certification audit stage 2, surveillance or recertification audit
- a lack of or significant variance on the information provided by the site prior to the audit. For example on the application form, self-assessment questionnaire or documentation requested
- number of non-conformities recorded in the previous audit
- difficulties experienced during the audit requiring further investigation
- quality of site preparation, such as the availability of documentation or workers for interview.

Appendix 2: Worker Interviews and Sample Size

Individual worker interviews typically take between 10-15 minutes, with groups taking longer. Both individual and group interviews should include a representative sample of people, departments and worker shift patterns onsite and should include permanent, temporary, agency or migrant workers. The audit team should use their discretion and consider industry sector, location and site knowledge when determining the number of workers to interview.

The following table appears in the audit protocol of the Standard (Part III), setting out the expected sample size of individual and group worker interviews which should include all shift patterns, as well as a sample size for the review of files, including time and wage records.

Table 1: Calculation of the total number of worker interviews required

No of workers excluding management	Minimum number of individual interviews (to include all shift patterns)	Minimum number of group interviews (to include all shift patterns)	Total number of workers interviewed	Worker files / time & wage records checked per month
1-100	6 or all workers if less than 5	1 group of 4	10	10
101-500	6	4 groups of 5	26	26
501-1,000	12	6 groups of 5	42	42
1,001-2,000	20	8 groups of 4	52	52
2,000+	22	8 groups of 5	62	62

If a site has more than 2,000 workers, the number of interviews is determined on a case-by-case basis depending on the circumstances of the facility. The suggested 62 workers are a minimum and it should increase as worker numbers increase.

In addition, for sites with non-employee workers (for example, any worker onsite who is not directly employed by the site, such as agency workers or sub-contractors), the following table appears in Part III of the Standard to provide an illustration of the minimum number who should be interviewed.

Table 2: Calculation of the number of non-employed worker interviews required

Non-employee worker number	Non-employee worker interview sample
1	1
2	2
3-7	3
8-48	4
49-54	5
55-64	6
Increases of 10 workers	Increase by 1 additional non-employee worker
245+	Maximum 25

The workers that participate in the individual or group interviews should be included in the samples of personnel/worker files and records that are checked. Enough additional worker files and records should be sampled to ensure that all types of workers are reviewed.