

# BRCGS Standard for Consumer Products

## CP429: Position Statement

### BRCGS Unannounced audits

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#### Document Scope

Position Statement on Unannounced audits for the BRCGS Standard for Consumer Products.

Position statements are used where clarification or interpretation of a requirement of a BRCGS Standard or its protocol is necessary. This will be published on the BRCGS website [brcgs.com](http://brcgs.com) as a position statement and such statements are mandatory in their use from the date specified for implementation or the date of publication on the BRCGS website, where no date is specified.

#### Change log

Version no.	Date	Description
1	10/10/2017	First issue of CP429 - Position Statement BRCGS Unannounced audits
2	09/08/2019	New BRCGS logo and footer changed

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## 1 Introduction

Historically, unannounced audits have not been available for the Consumer Products Standard Issue 4. Whilst this is not a mandatory requirement, a full unannounced audit is now offered to sites certificated at foundation or higher levels. This document clarifies how unannounced BRCGS audits should be conducted for Consumer Products

## 2 The unannounced audit protocol

Where a certificated site wishes to have an unannounced audit, this will be a single unannounced audit against all the requirements of the Standard. The date of the audit shall not be notified to the site in advance of the audit. The audit will be unannounced and replace the normal scheduled audit. Although the audit may occur at any stage between months 3 and 12 of the audit due date, this shall typically be within the last 4 months of the certification cycle.

Only a certificated site can opt for the unannounced audit programme, therefore a site's initial audit (i.e. their first audit to the BRCGS Standard for Consumer Products) will always be announced. However, they may opt into the unannounced programme for all subsequent audits.

### 2.1 Audit planning

#### 2.1.1 Selection of the unannounced audit programme

Within the first year of the availability of this programme, the site may notify the certification body of the request to join this programme within 9 months of the previous audit date. Thereafter, the site shall notify its certification body within 3 months of the last audit date of its intention to join or remain within the unannounced audit programme. This allows the opportunity for the site to select an alternative certification body if required while allowing the audit to be undertaken at a time of the certification body's choosing.

#### 2.1.2 Preparation by the Site

The actual audit date will not be provided by the certification body and it is therefore important that the site has arrangements in place to receive an audit and facilitate the audit process.

Success at an unannounced audit relies upon the ability of the site to share information and knowledge within the site, to have effective deputies to cover in the absence of the relevant manager, and a shared responsibility within the management team for product safety and compliance with the Standard.

#### 2.1.3 Information to be provided to the certification body for audit preparation

As detailed in 2.1.1 Within the first year of the availability of this programme, the site shall notify the certification body of the request to join this programme within 9 months of the previous audit date. In the following year, the site shall notify the certification body within 3 months of the last audit date of its intention to proceed with the unannounced audit programme. The site shall supply the certification body

with background information prior to the audit day to ensure the auditor(s) is fully prepared and to provide the best opportunity for the audit to be completed efficiently. The information will be requested by the certification body and may include but is not limited to:

- a summary of critical control points (CCPs)
- the process flow diagram
- a simple site plan
- the management organisational chart
- the list of products or product groups included within the audit scope
- typical shift patterns
- production schedules, to allow audits to cover relevant processes (e.g. night-time manufacture or where production processes are not carried out each day)
- recent quality issues, withdrawals or customer complaints and other relevant performance data.

The site shall make the previous year's audit report and certificate available to the certification body, where this is a contract with a new certification body.

As the audit will be unannounced, it is likely that the certification body may also require additional information to plan for the logistics of the audit process. This may include:

- specific site directions, site entrance requirements, car parking
- a list of contacts when first arriving on site
- specific protective clothing arrangements
- any specific security arrangements to follow to gain access to the site
- any significant changes in availability of the site to receive the auditor.

**2.1.4 Nominating non-audit days**

The unannounced programme allows sites the opportunity to nominate 15 days on a pro rata basis when the site is not available for an audit within month 3 and 12 of the audit due date. The dates must be provided at least 4 weeks in advance of the earliest nominated non-audit day and the reason must be provided (e.g. a planned customer visit). The certification body may challenge the reason where this does not appear appropriate.

Days when the factory is not operating (e.g. weekends, public holidays, planned shutdowns for site holidays or maintenance) are not included within the 15 days. Any such non-production days shall be notified to the certification body when opting into the unannounced programme.

Certification bodies are expected to operate discretion in the case of emergencies.

It is a condition of electing to join the unannounced programme that the auditor shall be granted access to the site for the audit on arrival. If access is denied the site will be liable for the auditor's costs and will revert to the announced audit programme. At the discretion of the certification body, the existing certificate may also be suspended or withdrawn.

**2.1.5 Audit duration**

The typical duration of an audit is 1 to 1.5 (8 hours/day) at the site at foundation level and days 2 to 3 days at higher level. When published, audit duration shall be calculated using the BRCGS audit calculator (CP412 )

**2.2 The on-site audit**

Sites opting for the unannounced programme shall be obliged to accommodate the auditor and allow the audit to start immediately on arrival at the site. The audit process will follow the same procedures as outlined for an announced audit. There will be a short opening meeting after which the site production facility inspection will be expected to commence within 30 minutes of the auditor arriving on site.

The site shall fully assist the auditor(s) throughout the audit. It is expected that at the opening and closing meetings those attending on behalf of the site will be senior managers who have the appropriate authority to ensure that corrective action can be progressed if non-conformities are found. The most senior operations manager on site or their nominated deputy shall be available at the audit and attend the opening and closing meetings.

The audit process gives emphasis to the practical implementation of the Standard and general good manufacturing practices. It is expected that at least 50% of the audit will be spent auditing production and site facilities, interviewing staff, observing processes and reviewing documentation in production areas with the relevant staff.

During the audit, detailed notes shall be made regarding the site's conformities and non-conformities against the Standard and these will be used as the basis for the audit report. The auditor(s) shall assess the nature and severity of any non-conformity and shall discuss this with the accompanying manager at the time.

At the closing meeting, the auditor(s) shall present their findings and reconfirm all non-conformities that have been identified during the audit, but shall not make comment on the likely outcome of the certification process. Information on the process and timescales for the site to provide evidence to the auditor(s) of the corrective action to close non-conformities must be given. A written summary of the non-conformities discussed at the closing meeting will be documented by the auditor(s) either at the closing meeting or within one working day after completion of the audit.

At the closing meeting the auditor(s) shall provide the site with an explanation of the BRCGS Directory, which allows secure access to audit data to both the client and their nominated customers, together with the feedback systems available to communicate with the certification body and with BRCGS.

The decision to award certification and the grade of the certificate will be determined independently by the certification body management, following a technical review of the audit report and the closing of non-conformities in the appropriate timeframe. The site will be informed of the certification decision following this review.

## 2.3 Non-conformities and corrective action

Procedures for handling non-conformities and corrective actions are the same as for the announced audit scheme (see section 2.3.2). Any concessions requested by a site (e.g. an extension) will be considered and managed by the certification body.

## 2.4 Grading of the audit

The process for grading is the same as for the announced audit programme (see section 2.4 of the Standard). For higher level, the grade awarded following certification shall be based on the number and level of non-conformities, as outlined in Table 1 of the Standard. Note that the grade will have the addition of a plus symbol after the grade (i.e. AA+, A+, B+, C+ or D+). For foundation level this will be represented as FOUNDATION +

## 2.5 Audit reporting

The audit reporting requirements are the same as for the announced audit programme (see section 2.5 of the Standard). However, the report shall state 'Unannounced'.

## 2.6 Certification

The certification requirements are the same as for the announced audit scheme (see section 2.6 of the Standard). However, the certificate shall state 'Unannounced'.

This certificate will supersede the existing certificate. The certificate shall be issued within 42 days of the audit and will have an expiry date based on the expiry date of the previous certificate plus 12 months, providing the site remains within the unannounced audit programme. If the site decides to return to the announced audit programme, the certificate expiry date will be based on 12 months from the date of the unannounced audit.

This ensures that where the audit occurs before the expiry of the current certificate and the site remains within the unannounced programme it is not disadvantaged by a shorter certificate life and increased frequency of audits. So, the frequency of audits remains the same but the certificate life may be longer.

## 2.7 Ongoing audit frequency and recertification

### 2.7.1 Scheduling re-audit dates

The site can choose whether to:

- remain within the unannounced programme
- revert to the announced audit programme.

If the site wishes to remain in the unannounced programme the next audit will be unannounced. The audit may occur at any stage from 3 months after the last audit date through to 42 days prior to the certificate expiry date; however, this shall typically be within the last 4 months of the certification cycle. This allows sufficient time for corrective action to take place in the event of any non-conformities being raised without jeopardising continued certification.

It is the responsibility of the certification body to ensure that the audit is undertaken within the certification window and the late audit non-conformity clause (1.1.5) shall not apply.

If the site wishes to withdraw from the unannounced audit programme, the next audit will be scheduled to occur within the 28 days up to and including the anniversary of the last audit date; this ensures that the maximum time between audits is not more than a year.

**2.7.2 Seasonal production sites**

The unannounced programme may be applied to seasonal production sites (see the glossary for the definition of 'seasonal or intermittent production sites'). The following rules will, however, apply:

- The expected seasonal production dates shall be notified to the certification body at the time of choosing the unannounced programme.
- Sites may nominate up to 7 non-audit days within the production season.

Where the announced audit due date occurs towards the beginning of the production season and this could limit the dates available for an unannounced audit. This because the unannounced audit must fall between the start of the production season but before the previous announced audit due date. Therefore, in the first year that the site is within the unannounced programme the audit window is extended to allow the unannounced audit to be carried out up to 6 weeks after the audit due date. There will be no penalty for late audits in this situation. This is to ensure that there are sufficient dates to conduct a truly unannounced audit.

The next audit due date and the certificate expiry date (42 days later) shall be based on the typical production season end date agreed between the site and the certification body. In practice this will mean the issue of a certificate with a duration of more than 1 year on occasions.

Unannounced audits from year 2 may then occur at any date during the season and meet normal certification rules.

As detailed in 2.1.1 the site shall notify the certification body within 3 months of the last audit date of its intention to proceed with the unannounced audit programme. in accordance with the BRCGS audit protocol.

**2.7.3 Compliance**

Regardless of the audit programme selected by the site, the BRCGS compliance process still applies.