

BRCGS078 Position Statement Amending Audit Protocol Due to Covid-19 Related Challenges

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	Requirements for certificate extensions (section 3.1.1), auditor loan agreement and the use of ICT to facilitate remote auditing updated.
3.1	16/07/2020	Clause number in changes log box corrected
4	09/09/2020	Updated to reflect <ul style="list-style-type: none"> • BRCGS080 – Blended audit options • BRCGS086 – Remote audit options • Unannounced audit rules clarified • Amended requirements for witness audits • Amended requirements for auditor profiles
5	14/10/2020	Removal of remote witness audit (2.1.3) for initial witness sign-off for GFSI audits, addition of remote witness for ongoing witness and for transferring auditors. Reiteration of meeting accreditation requirements when using the auditor loan programme (2.5)
5.1	20/10/2020	Appendix 1 – reference to clause 2.7 changed to 2.6.
6	17/12/2020	Following clauses updated (including re-numbering of clauses): 2.1.2 Witness sign-off audit - existing auditor transferring to another Standard 2.1.3 Auditors transferring from one CB to another 2.1.5 '2 yearly' witness audits requirement 2.1.6 Witness assessors 2.6 Auditor category requirements 3.1 Restarting onsite audits 3.1.1 Sites with Certificate Extensions 3.3 Seasonal sites 3.8 Physical onsite unannounced audits

7	25/02/2021	End date amended to December 2021 (this position statement was previously due to expire on 1 August 2021).
7.1	01/03/2021	Minor changes to formatting.
8	28/09/2021	<p>This version of the document does not take effect until 1 January 2022.</p> <ul style="list-style-type: none"> • End date amended to 1 July 2022 (this position statement was previously due to expire on 31 December 2021) • 2.1.3 Updated to reflect process as it relates to the current /new version of the Directory • 3.1 Removal of reference to BRCGS089 Position Statement on Unannounced Audits • 3.1 and 3.2 amended to reflect reinstatement of requirement to issue non-conformities relating to late audits • 3.1.1 updated to include the possibility of a 2nd certificate extension following an onsite audit. • 3.8 Physical onsite unannounced audits section removed
8.1	19/11/2021	Removed misplaced sentence from section 3.2 (Late audits).
9	04/01/2022	Additional guidance on unannounced audit window and block days section 3.1
10	18/01/2022	3.2 Reinstating the suspension for late audits until March 2022.
11	04/05/2022	<p>This version of the document does not take effect until 1 July 2022.</p> <p>Change in title to reflect current situation</p> <p>1 Introduction - updated to reflect the changing situation and disruptions caused by Covid-19.</p> <p>2. Auditor requirements</p> <ul style="list-style-type: none"> • clarified allowances for witness sign-off audits of an existing auditor transferring to another standard • added SSCI • reinstatement of '2 yearly' witness audit requirement from 1st January 2023 • reinstatement of minimum annual audit numbers to retain auditor registration • reinstatement of consecutive audit rule <p>3. Audit Planning</p> <ul style="list-style-type: none"> • emphasis on restarting unannounced audits • emphasis on returning to normal onsite audit protocols, and guidance on audit options including when certificate extensions and remote audits may be considered, by concession. • Removal of section 3.4 • Addition of Appendix 2 – Audit Options Decision Tree



Contents

1. Introduction

2. Auditor requirements

- 2.1 Witness audit requirements (including sign-off audits)
- 2.2 Minimum number of audits per auditor
- 2.3 Consecutive audits (temporary suspension of the consecutive audit rule)
- 2.4 Virtual training for auditors
- 2.5 Loan of auditors between certification bodies
- 2.6 Auditor category requirements

3. Audit Planning

- 3.1 Restarting unannounced audits
- 3.2 Onsite audits
- 3.3 Late audits
- 3.4 Seasonal sites
- 3.5 Clarification on audit teams
- 3.6 Audit duration
- 3.7 Sites with grades C or D

Appendix 1 – Tables of auditor category requirements

Appendix 2 – Audit Option Decision Trees



1. Introduction

BRCGS acknowledge that Covid-19 continues to impact the planning and undertaking of audits, often with changes required at short notice. Government controls continue to be in place and resource impacts both Certification Bodies and sites.

It is important that audits are completed to the usual high quality and consistency and comply to BRCGS protocols. BRCGS Compliance will continue to monitor the management of these concession changes.

This Position Statement therefore outlines the BRCGS response to these challenges to assist certification bodies, auditors, and sites.

The arrangements outlined in this document to mitigate potential resource issues will apply as indicated and until 31st December 2022. . The situation will be kept under review and may be further extended depending on circumstances, however, may also be subject to change in light of any GFSI requirements.

2. Auditor Requirements

2.1 Witness audits and new auditor sign-off audits

2.1.1 Witness sign-off audit of a 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.

2.1.2 Witness sign-off audit of an existing auditor currently registered – Transferring to another Standard

Where the auditor is currently a BRCGS registered Food or Packaging auditor, they can transfer to Storage and Distribution and/or Agents and Brokers without a further witness audit, only where a satisfactory BRCGS witness audit report has been undertaken by the employing CB, AB or BRCGS within the last 12 months.

2.1.3 Auditors Transferring from one CB to another – auditor profile registration requirements.

A witness audit is not required where a satisfactory BRCGS witness audit in that Standard has been undertaken within the last 12 months and BRCGS confirms that there are no concerns from their work history. A remote witness audit may also be accepted where a witness audit is not available from the last 12 months. Details of the witness audit or a concession request shall be sent to BRCGS. BRCGS will add the information to the auditor profile under 'witness auditor' and add access for the Certification Body.

A witness audit will be required within 12 months. Where difficulties continue due to Covid 19 disruption please contact compliance@brcgs.com to discuss the potential for a concession on a case-by-case basis.

2.1.4 Sign off Witness Audits

BRCGS078 Position Statement amending audit protocol due to Covid-19 related challenges	BRCGS
Version 11: 04/05/2022	Page 4 of 13



Witness audits may be undertaken during blended audits – where the auditor is witnessed for the entirety of the audit (i.e. remotely and during the onsite audit).

Witness auditors may conduct witness audits of auditors completing a physical onsite audit, however the witness auditor themselves may be remote where the technology is available to successfully complete such a remote witness. This may be used for non GFSI benchmarked schemes only i.e. Consumer Products and START! They may also be used for 'ongoing' 2 yearly witness audit requirements.

Witness audits for initial qualification of BRCGS auditors of GFSI and SSCI benchmarked schemes must be carried out onsite with the witness assessor on site in accordance with GFSI and SSCI requirements. Initial qualification may be achieved through a blended audit programme.

2.1.5 '2 yearly' witness audits requirement

The extension previously permitted for ongoing witness audits to be postponed for up to 12 months i.e., due 36 months +/- 3 months will be rescinded from **1st January 2023**.

It will therefore be expected that BRCGS018 will be adhered to and witness audits will be required for all auditors every 2 years (+/- 3 months)

2.1.6 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 contacts.

2.2 Minimum annual audit numbers to retain auditor registration

GFSI requires auditors to undertake a minimum of five on site audits against the **BRCGS Standards**, with at least one audit against each relevant BRCGS standard that the auditor is approved for. Note Blended audits count towards this requirement. Where this cannot be met for 2022 a concession shall be requested where the auditor has completed **5 GFSI audits** including one against each relevant BRCGS Standard. The concession request shall detail the specific reasons why the requirement could not be met, a general comment of 'covid impacted' is unlikely to be acceptable.

For non GFSI approved Standards, they shall conform to the Standards minimum annual audit requirements e.g. three Consumer Products audits (this may include being the witnesser of another auditor) per year (preceding 12 months) against either of the Consumer Products Standards (PCH or GM) to maintain scheme knowledge.

2.3 Consecutive audits rule

The rule for consecutive audits (currently 3) will be reinstated from **1st January 2023**.

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.

BRCGS078 Position Statement amending audit protocol due to Covid-19 related challenges	BRCGS
Version 11: 04/05/2022	Page 5 of 13



Courses must be facilitated by an Approved Virtual Trainer if delivered online or a concession requested 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. It is important that the Certification Body ensures that accreditation requirements are met.

Full details are available in BRCGS082.

2.6 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 BRCGS078'. BRCGS will validate the profile with the new category.

Where the auditor completes 5 or more audits within the category by the end of 2022 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. Audit planning

3.1 Restarting unannounced audits

While the choice of announced and unannounced audit programmes remains with the site, it should be noted that customers are requiring sites to return to the unannounced audit programme. Therefore, sites are encouraged to opt back into unannounced audits at the earliest opportunity where it is customer mandated

Where the site requires an unannounced audit, the audit protocol requires the unannounced audit to be agreed with the certification body within 3 months of the previous audit. However, where this early agreement is not possible due to the continuing impact of Covid-19, then the site should agree an unannounced audit with their certification body at the earliest opportunity, and at least 4 calendar months prior to the audit due date. The 4 month period therefore becomes the audit window in which the audit may take place at any time. Where more than 4 months is available, the audit may take place at any time but is typically within the last 4 months.

Where there is less than 4 months remaining to the audit due date, the potential for a concession may be discussed with BRCGS by the certification body compliance@brcgs.com

BRCGS078 Position Statement amending audit protocol due to Covid-19 related challenges	BRCGS
Version 11: 04/05/2022	Page 6 of 13

The site may indicate up to 10 'block out days' within this 4 month period. With longer periods, they may be pro rata'd to the maximum of 15 days permitted for the 9 month audit window.

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.

3.2 Onsite Audits

BRCGS designed protocols to aid continued certification for sites where Covid-19 prevented onsite audits. Whilst we recognise that in some instances these protocols are still required, we've had feedback from users of the scheme that they would like to see a return to the 'usual' protocols and the following options must only be used as a last resort, where an onsite audit is genuinely not possible:

- apply for a Certificate Extension (according to BRCGS072) - if successful, the site certificate will be extended for an **additional 6 months** during which time an audit should be arranged.
- apply for a remote audit (according to BRCGS086) - if successful, a new certificate can be awarded.

In accordance with normal audit protocol (as stated in the relevant Standard) a non-conformity may be given for a late audit. Refer to section 3.3 for full details.

3.2.1 Sites with Certificate Extensions

Sites may be faced with situations where they are unable to have an onsite audit due to regulatory lockdown restrictions, a Covid-19 outbreak at the site, or the scheduled auditor has contracted Covid-19 shortly before the audit and the CB is unable to arrange for an alternate auditor to perform the audit. Such situations may lead to expiry of the current certificate and therefore an extension may be granted. All certificate extensions must be approved by BRCGS through an agreed concession. Requests must include justification for the extension and a date when an onsite or blended audit will take place.

Whilst the certificate is issued with an additional 6 month expiry, the re-audit shall be planned and undertaken at the earliest opportunity (e.g. following the lifting of the Covid-19 restrictions, end of the site's Covid-19 outbreak, or as soon as an auditor is available, as applicable)

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.

Consecutive certificate extensions are not possible, however, there may be justifiable circumstances where a 2nd certificate extension is required following a regular onsite or blended audit cycle. For example, a site may receive a certificate extension, followed by an onsite audit as normal, followed by another certificate extension. In this case, please contact BRCGS to discuss a concession each time a certificate extension is required.



Where an onsite or blended audit is not possible prior to the audit due date, and the site has already received a certificate extension, the site may opt for a fully remote audit (according to BRCGS086). A concession must be agreed with BRCGS for a remote audit with full details of justification. An onsite or blended audit must be arranged at the earliest opportunity, therefore a certificate of 12 months duration will not be given. Expiry dates will be based on individual circumstances and agreed during the concession process. It should be recognised that the BRCGS fully remote audit option is not a GFSI benchmarked programme.

3.3 Late audits

Requirements relating to late audits were suspended until 31st March 2022. Therefore, from 1st April 2022 non-conformities will be given for any late audits that are not Covid-19 related.

Where Covid-19 related issues affects audit planning and results in a late audit:

- The audit may be completed up to 21 calendar days late. In this situation, no concession is required, and a non-conformity for the late audit will not be given.
- Where the audit will be more than 21 calendar days late, a concession must be agreed, in advance, with BRCGS. Where a concession is agreed, no non-conformity will be given for the late audit.

Reaudit due dates will remain unchanged despite any late audits carried out.

3.4 Seasonal sites

If the site is operating when restrictions are lifted, the site and certification body should arrange an onsite or blended audit wherever practical. All sites are expected to make appropriate efforts to have an onsite or blended 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 BRCGS072 on certificate extension for 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, 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.

Where the onsite or blended audit are not possible the site may opt for a fully remote audit completed in accordance with BRCGS086. It should be noted that this option will need to be completed during the production season i.e. whilst the site is operating.



BRCGS have produced BRCGS095 Factsheet on the certification process for Seasonal sites affected by Covid-19 restrictions, available to download on the BRCGS website (in the Covid-19 resources section) which provide recommendations on the certification process for Seasonal sites affected by Covid-19 restrictions.

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 auditors do not have the full categories.

3.6 Audit duration

Where sites have amended their 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 Sites with grades C or D

Sites currently graded C or D are not eligible for certificate extensions through the risk assessment process (BRCGS072), however, where an onsite or blended audit is not possible the site may opt for a fully remote audit in accordance with BRCGS086. A concession must be agreed with BRCGS for a remote audit. An onsite or blended audit must be arranged at the earliest opportunity. It should be recognised that the BRCGS fully remote audit option is not a GFSI benchmarked programme.



Appendix 1 Auditor Category Requirements

Refer to section 2.6 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 technology categories:

- Category A1 Chemicals and Formulated Chemicals
- Category A2 Fabricated paper
- Category A3 Wood, straw, cork, bamboo
- Category A4 Rubber and Plastics
- Category A5 Textiles and Textiles Mix
- Category A6 Electrical, Electronic, Batteries



Category A7 Glass, Ceramics, Gemstones

Category A8 Metals and Metal Mix

Category 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

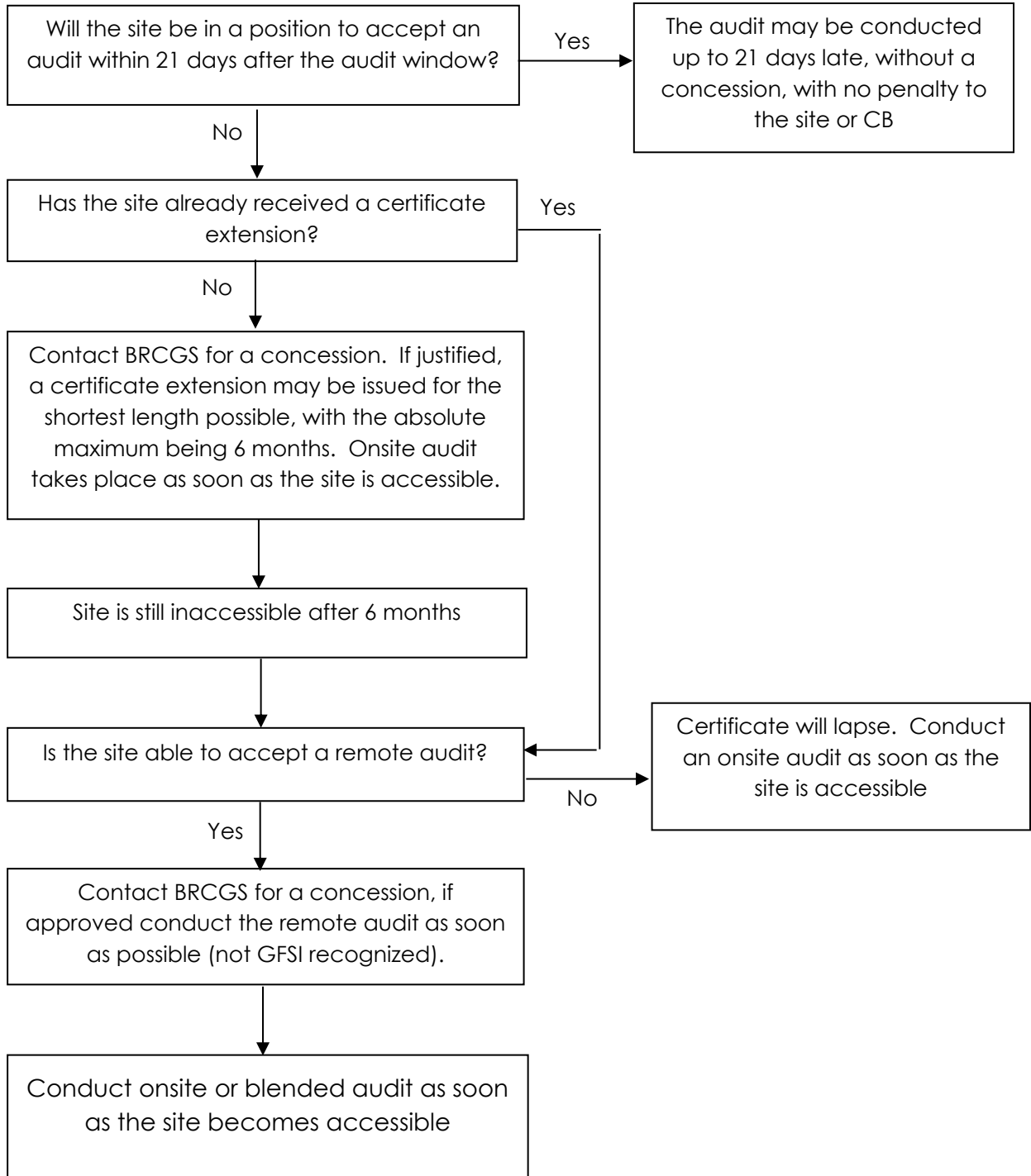
START!

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).

Appendix 2 – Audit Options Decision Trees

Scenario 1: Site is unable to accept an audit before the audit due date due to a Covid-19 related emergency (government directed lockdown or Covid-19 outbreak at the site)



Scenario 2: Certification Body is unable to deliver the audit before the due date due to a Covid-19 related emergency (auditor contracted Covid-19 and CB is unable to schedule a replacement in time)

