



Frequently Asked Questions (FAQs) on Remote Audits, Blended Audits, and Certificate Extensions

The following questions should help answer practical implementation of the BRCGS processes.

The questions relate to certificate extensions, blended audits and remote audits.

Note the guidance is applicable to all BRCGS Standards.

| Number | Question | BRCGS Comment |
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| Questions relating to the different audit options | | |
| 1 | What audit options are available to help a site maintain certification? | Please refer to our website which has up to date information about Covid-19 and the options for maintaining certification during the pandemic: https://www.brcgs.com/resources/covid-19-response/procedural-documents/ |
| 2 | What is a certificate extension? | Where it is not possible to carry out an onsite audit of an existing certificated site due to unforeseen circumstances the certificate may be extended for up to a maximum of 6 months. Granting of the extension is based upon a risk assessment and review between the site and certification body of the controls in place at the site. Certificate extensions must be approved by BRCGS through the concession process. Certificate extensions can only be completed by the certification body who issued the last certificate to the site. |
| 3 | What is a blended audit? | The audit takes place in two parts: A remote online assessment of site documentation followed by a shorter onsite audit. This provides the opportunity for a rigorous audit but with a reduction in auditor time spent onsite. A 6 or 12 month certificate based on grade (except for Consumer Products foundation level and the Gluten-Free Certification Program where there is no grade and the normal pass/fail criteria apply) may be issued on successful completion. |
| 4 | What is a remote audit? | Where it is not possible for an audit to take place onsite due to government directed Covid-19 restrictions a site may opt for a remote audit. The remote audit includes a review of internal audit results, a remote documentation review and live video audit of production/storage facilities. |

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| | | <p>A 6 month (maximum) certificate based on grade (except for Consumer Products foundation level and the Gluten-Free Certification Program where there is no grade and normal the pass/fail criteria apply) may be issued on successful completion.</p> <p>This option is not GFSI Benchmarked.</p> |
| 5 | Is there an auto renewal certification process for sites? | There is no auto renewal due to COVID-19. The site needs to undergo a risk assessment before the certificate can be extended or the site needs an audit so that a new certificate can be issued. |
| 6 | The site has a grade C certificate. Can it receive a certificate extension? | <p>Unfortunately, those sites with grades C or D are deemed high risk and are not eligible for a certificate extension.</p> <p>However, the site may opt for a blended or remote audit.</p> |
| 7 | The site is not functional currently and the certificate will expire prior to the end of Covid 19-lockdown. What are our options? | <p>The site can apply for a certificate extension of up to a maximum of six months. The relevant managers from the site must be available to complete the risk assessment process with the certification body.</p> <p>Other options such as blended audits and remote audits are only available where the site is functioning.</p> |
| 8 | <p>The site is functional but</p> <ul style="list-style-type: none"> • are not letting anyone into the facility as part of their COVID-19 prevention plan • auditors are unable to travel | <p>The site should keep their certification body up to date on any known restrictions that might prevent an onsite audit.</p> <p>Certificate extension or a remote audit may be permitted in these circumstances and must be approved by BRCGS.</p> |
| 9 | The site is functional. However, the internet connection is not good. How do we proceed? | <p>To complete several of the BRCGS audit options (including blended audits, certificate extensions and remote audits) the Certification Body will need to talk to some of the key personnel at the site, to review your documents and/or enable remote auditing via live video. Where this is not possible this should be discussed with the certification body.</p> <p>A certificate extension may be possible over the telephone with documents for review emailed in advance.</p> <p>If the review cannot be completed, then a certificate extension, blended audit or remote audit may not be possible.</p> |
| 10 | The site is functional, but key staff are not onsite. | Certificate extensions, remote audits and blended audits employ remote techniques such as video conferencing which are suitable for completing elements of the audit. |

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| | | All audits may include remote interviews and discussions as needed, providing suitable connectivity and capability is in place. |
| 11 | A new site would like to be certificated, but cannot facilitate an onsite audit due to Covid-19 restrictions, for example: <ul style="list-style-type: none"> • Visitors are not permitted into the site due to COVID-19 protocols • The site is not functional due to COVID-19 | The site must have a full audit by an approved Certification Body to be certificated. This must occur when the site is operating. Where possible this should be a physical onsite audit (announced or unannounced). Where an onsite audit is not possible, the certification body may submit a concession request to BRCGS to allow the initial audit to be completed remotely, however this will not be GFSI recognised. |
| 12 | The site has additional modules in their current certification. Can these be included in the certificate extension, blended audit or remote audit? | Additional modules can be included in the certificated extension. Additional modules can be included in the blended audit – some clauses will be audited onsite and some during the remote section of the audit. |
| 13 | Can a site have more than 1 certificate extension? | Consecutive certificate extensions are not possible, however, there may be justifiable circumstances where a 2 nd 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, the certification body should contact BRCGS to discuss a concession. |
| 14 | Can a site have more than 1 remote audit? | There is no limit to the number of consecutive remote audits a site can have, however, it should not be used where a normal onsite audit is possible. |
| 15 | Can an unannounced audit be performed remotely? | No, an unannounced audit must be conducted onsite. |
| Questions relating to the audit process | | |
| 16 | How can the site apply for a certificate extension, blended audit or remote audit? | The site should contact their chosen certification body – ideally this should occur before the audit due date. |
| 17 | What is a 'risk assessment'? What does the site need to do? | The Certification Body will complete some background data on the history of the site. This is required prior to certificate extension, blended audit or remote audit. The Certification Body will ask the site to send through some documents, process details and |

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| | | <p>any changes that have been made due to Covid-19 which they will need to review. The certification body and relevant site managers will discuss the information and confirm next steps. More help can be found here:</p> <p>https://www.brcgs.com/resources/covid-19-response/</p> |
| 18 | <p>The site is unable to complete the risk assessment process for a certificate extension, remote audit or blended audit. The certificate has expired/will expire prior to the full audit. Will the site get a major non-conformity?</p> | <p>The risk assessment process is required for these audits.</p> <p>We would encourage the site to undergo the risk assessment with their certification body. However, if this is not completed, and a full onsite audit cannot be completed, then the certificate will expire.</p> <p>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:</p> <ul style="list-style-type: none"> - 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. |
| 19 | <p>Part of the production process cannot be video'd. Can the site still receive a remote audit?</p> | <p>The certification body should include this in their feasibility assessment to consider whether there are alternative techniques that could ensure a thorough audit of all the relevant requirements. Where alternative options are available, then a concession should be requested from BRCGS.</p> |
| <p>Questions relating to site operations</p> | | |
| 20 | <p>What changes are needed at a site to ensure product integrity during the current situation.</p> | <p>BRCGS has put together a resource page to support sites in the current situation. It has guidance under various heads which you will find helpful. Please refer to https://www.brcgs.com/resources/covid-19-response/ for more details.</p> |

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| <p>21</p> | <p>The site's internal audits reviews have fallen behind due to</p> <ul style="list-style-type: none"> • lack of internal staff • banning of external consultants onto sites <p>Will the site receive non-conformities if I am behind schedule?</p> | <p>Sites still need to meet the requirements of the Standard and Certification Bodies need to see evidence of compliance and will raise this where they are not completed.</p> <p>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.</p> <p>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 effective.</p> |
| <p>22</p> | <p>The site's management review meetings have fallen behind due to lack of internal staff. Will I receive non- conformities for this?</p> | <p>Sites still need to meet the requirements of the Standard and Certification Bodies need to see evidence of compliance and will raise this where they are not completed.</p> <p>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.</p> <p>The site shall have considered requirements for additional or increased cleaning for surfaces, e.g. in the staff canteen. Sites shall have contingency plans in place for ingredient supply that may be affected.</p> |
| <p>23</p> | <p>We have banned external contractors from coming on site e.g. pest control, equipment maintenance. Will this be raised as an issue?</p> | <p>Sites still need to meet the requirements of the Standard and Certification Bodies need to see evidence of compliance will raise this where they are not completed.</p> <p>It is recognised that access to sites is currently challenging for many service providers due to the ongoing circumstances relating to Covid-</p> |

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| | | <p>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.</p> |
| 24 | The site has moved to a new facility. Can the certificate be extended to the new site? | <p>Unfortunately, the certificate extension process is only able to extend current certificates for the same site address. The new site will need to undergo a full audit.</p> |
| 25 | Can a change of scope be included in the certificate extension, blended audit or remote audit? | <p>Changes in scope is only possible during an audit. Therefore scope amendments can be made during blended or remote audits but not for certificate extensions.</p> |
| 26 | The site wishes to change certification body. Is this permitted? | <p>The certificate extension process is in place to extend current certificates and can therefore only be completed by the certification body who issued the last certificate. A site can change to a different certification body for blended and remote audits.</p> |
| 27 | The site is seasonal – there is concern that there won't be any production when the full audit is due. | <p>BRCGS recognise that there will be challenges for seasonal sites. A remote audit can be used where onsite audits are not possible due to Covid-19 restrictions. A successful audit will result in a certificate of 6 or 12 months (as per the normal audit protocol within the Standard). The remote audit is also available for scope extensions where an extension to scope visit is not possible.</p> |
| 28 | The audit at site is based on a head office audit. Can this be included in the blended, remote and certificate extension processes? | <p>Head office assessments can be included in these audit options. BRCGS080 explains this process for blended audits. For remote audits the head office audit is organised according to the normal protocol but will occur remotely rather than onsite. For certificate extensions the head office may provide the relevant corporate policies to the certification body, however the discussion and challenge shall involve each site individually as the certification body must challenge the</p> |

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| | | implementation and understanding at site level. |
| Other Questions | | |
| 29 | The site is in the voluntary unannounced audit program and the audit is due. What are the options? | The voluntary unannounced audit programme had previously been suspended, however from 1 January 2022, the suspension was lifted and sites may choose to have an unannounced audit. 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. |
| 30 | The certificate has already been extended. Should the site wait till close to the extended expiry date before scheduling the full audit? | Despite the certificate extension the next onsite audit is due as soon as possible after restrictions are lifted. In the event that restrictions remain in place throughout the certificate extension then the site should opt for a remote audit prior to extended expiry date. |
| 31 | The site certificate has expired. How soon can they get the new audit done and certificate issued? | Audits can be planned in the normal way. Therefore sites should contact their certification body as soon as possible to get an exact timeline and discuss the audit options. |
| 32 | Will the audit report and certificate look any different if we have received a remote or blended audit? | The audit report and certificate will indicate the audit type that the site has received, for example, announced, unannounced, blended announced or remote. Any certificate extensions will denote 'extension due to COVID-19' under the 'audit programme box' on the certificate. The audit report for a certificate extension is also different to the report for an audit. |
| 33 | In case a site decides to wait until access restrictions are finished and wants to receive a physical onsite audit, is there a penalty or major non-conformity for a late audit? | As the situation changes rapidly and we don't know how long this situation will continue, BRCGS would encourage that sites use the certificate extension and remote audit processes if necessary. However, if no audit or certificate extension is completed, the certificate will expire. A non-conformity will be issued for a late audit. |
| 34 | Does the auditor have to be competent in the product categories to be able to | No, the auditor reviewing the risk assessment for a certificate extension and having the discussion with the site does not have to cover the scope competencies of the site. This is |



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| | undertake a risk assessment for certificate extensions? | because they are challenging management processes only. The auditor does have to be currently registered with BRCGS in the Standard. |
| 35 | An auditor is able to carry out an onsite physical audit but is not qualified in the site categories – can a technical expert join remotely? | Yes, if there is sufficient technology to support the technical expert joining the audit remotely for an onsite audit. The certification body should request a concession from BRCGS. |
| 36 | The site is already in the START! basic/intermediate program and the reaudit is due. What are the options? | Sites in START! basic program can apply for certificate extension or remote audit options. For sites within the START! intermediate program, the option to apply for the blended audit is also available in addition to the above. |