

BRCGS086: Remote Audits During Extraordinary Events

Document scope

This document is applicable to the following Standards:

- Food Safety (including START audits)
- Packaging Materials
- Storage and Distribution
- Consumer Products
- Gluten-Free
- Plant-Based

Sites seeking Agents and Brokers certification should refer to BRCGS080 - Position Statement and Procedure for Blended Audits which provides a fully remote protocol for the Agents and Brokers Standard.

Change log

Version	Date	Description
1	09 Sep 2020	First version
2	25 Feb 2021	Expiry date extended in line with other BRCGS Covid-19 protocols (BRCGS078 and BRCGS089) and relocated to front of document.
3	28 Sep 2021	<i>This version document comes into effect 1 January 2022.</i> Expiry date extended in line with other BRCGS Covid-19 protocols (BRCGS078). Section 9 clarified that there is no limit to the number of consecutive remote audits a site can have.
4	04 May 2022	<i>This version comes into effect 1 July 2022.</i> Expiry date extended in line with other BRCGS Covid-19 protocols (e.g. BRCGS 078) Updated to stipulate that this protocol must only be used only as a last resort, after the site has received a certificate extension, and must be approved by BRCGS through the concession process. Updated to emphasize that an onsite or blended audit must be planned for the earliest possible dates following the lifting of the Covid-19 restrictions.
5	27 Sep 2022	<i>This version comes into effect 1 January 2023.</i> Expiry date extended to 1 July 2023. Updated to extend scope to all extraordinary events. Updated to emphasize that certificates may be issued for a maximum of 6 months.

6	21 Dec 2023	Removal of any expiry date of process. Adjustment of options of certificate length.
7	15 Oct 2024	Updated to IAF MD4:2023. Small formatting changes.
7.1	06 Oct 2026	Document rebranded. Contents table added.

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Introduction

BRCGS acknowledges that there may be situations where extraordinary events impact the planning and undertaking of audits. Changes may be required at short notice and resource impacts may affect both certification bodies and sites.

This audit protocol, (where certification bodies operating under IAF MD4 and IAF ID3 may audit and certify organizations against a BRCGS Standard, utilizing a fully remote assessment protocol) is being put into action to help mitigate the impact of extraordinary event restrictions; it is not expected to be used where site access is safely available (i.e. it should not be used where a normal onsite audit is possible).

It should be recognised that this is not a GFSI benchmarked program.

Scope and applicability

This program is applicable to BRCGS Food including START, Packaging, Storage and Distribution, Consumer Products, Gluten-Free and Plant-Based. The remote program for Agents and Brokers is outlined specifically in Issue 3 of the Standard.

Where off-site activities are included in the scope of the audit, for example, head office audits, offsite storage, and field rigs, these can also be included in the remote audit process, providing the requirements can be fully audited.

This remote audit can be used for amendments and extensions to scope, for example where there are seasonal products or changes to the product range.

The assessment and certification can be completed by any certification body that is approved to audit the specific Standard. This program is available to any currently BRCGS certificated site. This option must only be used as a **last resort**. A concession must be agreed with BRCGS prior to a remote audit. Concession requests must include justification for the remote audit and a date when an onsite or blended audit will take place. An onsite or blended audit must be arranged at the earliest opportunity.

Sites outside these parameters including “new to BRCGS” sites may be eligible for certification, under the concession program (approved by BRCGS prior to audit) through their certification body.

Certification will be based on:

- A feasibility assessment based on principles identified in section 3
- A detailed review of the results of the sites internal audit programme which includes any impacts or changes as a result of the extraordinary event
- Audit of all the Standard requirements following IAF MD4 protocol
- Audit shall include remote visual (video based) inspection of the production/storage facility, as directed by the auditor

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.

Process

Step 1 – Feasibility assessment by the certification body

The certification body shall assess the feasibility of granting 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 assessment is reliant on the use of Information and Communication Technology (ICT) reference should also be made to requirements of IAF MD4:2023 *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.

Step 2 – Site submission of information for audit planning

The certification body shall gather information from the certified site and consider within the feasibility assessment (in addition to those requirements already listed in the Standard protocol)

- The history and maturity of the BRCGS system
- Recalls in the preceding 12 months
- Pending compliance activities / legal proceedings
- Whether the site is functioning normally and is not currently closed (site must be in operation for the audit to take place)
- Any changes to processes or services outsourced following the extraordinary event

Step 3 – Planning the remote audit

The certification body should confirm and test the compatibility of the ICT platform with the site. Ideally, a trial meeting using the same media platforms will be conducted to ensure that the scheduled remote audit can be performed as planned. Use of webcam/cameras shall be agreed upon (refer to section 6 for further details on the use of live video within the remote audit).

If testing reveals issues which cannot be rectified, then the audit shall not be possible.

The remote audit shall be facilitated in quiet environments wherever possible to avoid background noises and interferences. The use of noise cancelling technology such as 'mufflers on microphones' or headsets should be considered.

If the technology fails during the remote audit the certification body and site can reschedule, providing that the remote audit is completed within 28 days of the first day of the remote audit. The site may be liable to pay for the lost audit day where this is a site issue and this should be covered in the contract.

Usual auditor competence rules apply to the remote audit and the audit team 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. Where sites are currently certificated the remote audit should ideally take place within the normal audit due period. Where a certificate has already expired or an auditor is not available, then the audit may be planned for other mutually agreeable dates. There is no penalty for a late audit within this assessment.

The duration of this audit must be appropriate to the complexities of the site and sufficient to adequately cover the aspects to be audited. The duration calculators applicable to the relevant Standard should still be used to calculate the expected audit duration, It is recognised that the balance of time spent on video site tours to document review may be different with less time than usual on the video tour.

Step 4 – Conducting the remote audit

The usual format of an audit shall be followed including an opening and closing meeting, interview with personnel, documentation review and site tour. A thorough visual tour by remote technology is required, but BRCGS recognizes that the minimum times expected in production and/or storage areas may not be achievable. Where this is the case it is likely that more time will be needed to review documentary evidence to assess compliance.

Use of remote technology shall ensure that adequate controls are in place to demonstrate 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. This is not expected to be recorded unless specifically agreed with the site. At the discretion of the site, photographic evidence can be sent to the auditor, during the audit.

Non-conformities and audit result

Non-conformities identified by the auditor during the remote audit will be handled as per the usual protocol:

- The level of non-conformity assigned by an auditor against a requirement of the Standard follows the normal protocol within the Standard with respect to severity.
- The site shall provide evidence of corrective actions, root cause analysis and a preventive action plan. This shall be submitted to the certification body within 28 days.
- Where the number or severity of the non-conformities raised at the audit exceeds the limits for certification stated in the Standard, this will prevent the site from being certificated.

The audit result will be graded AA to D based on the number and type of non-conformities as per the usual protocol, except for Consumer Products Foundation Level, START and Gluten-Free which do not have grades and follow the normal pass/fail criteria specified within the protocol in those Standards.

Audit report and certificate

The audit shall be documented on the report template and uploaded to the BRCGS Directory in the normal timescales. The "remote audit" option shall be selected from the drop-down menu.

Where systems have been amended due to the management of the extraordinary event, this information shall be recorded in the relevant section of the detailed audit report. For example, a change to CCPs would be added to the information recorded about the Food Safety Plan - HACCP, where changes to cleaning regimes is added to the section on Housekeeping and hygiene.

Expiry dates of the certificate will be based on individual circumstances and agreed with BRCGS during the concession process.

The certificate shall be accredited and state that the Remote Audit Option has been used.

The normal BRCGS service fee will be applied to certification bodies on report upload.