

BRCGS078 Position Statement Amending Audit Protocol Post Covid-19 Lockdown

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 1st August 2021).
7.1	01/03/2021	Minor changes to formatting.

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1. Introduction

When the Covid-19 lockdown ends it is likely that a large number of sites will require audits in a relatively short timescale, and as a consequence auditors and certification bodies will be much busier than normal. Audit arrangement will therefore be more challenging than usual and may cause delays to normal audit timescales.

It is important that where audits are completed, they cover all requirements, and are completed to the usual high quality and consistency. This Position Statement therefore outlines the BRCGS response to these challenges to assist certification bodies, auditors, and sites.

The new arrangements outlined in this document to mitigate potential resource issues will apply until **at least 31st December 2021**. 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 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 existing auditor currently registered – Transferring to another Standard

Where the auditor is currently a BRCGS registered auditor in a specific Standard, they can transfer to any other standard except for Consumer Products without a further witness audit, only where a satisfactory witness audit report has been undertaken by the employing CB, AB or BRCGS is available within the last 12 months.

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

Where auditors are currently registered with BRCGS and are transferring employment to, or contracting with, another CB, an auditor profile is required on the system. Where this is completed on the 'old Directory system' details of justifications of meeting requirements for category competence and Standard requirements are not required where these meet the categories already registered with BRCGS. The profile should indicate the requested categories through inclusion of headings, but the justification box may be left blank. It shall be ensured that the Certification Body meets all accreditation 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 the 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. A concession shall be requested from BRCGS. The information justifying the position shall be added on the auditor profile under 'witness auditor' referencing the concession number to enable it to be validated.

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 Witness Audits

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 benchmarked schemes must be carried out onsite with the witness assessor on site in accordance with GFSI requirements. Initial qualification may be achieved through a blended audit programme.

2.1.5 '2 yearly' witness audits requirement

Onsite witness audits can be postponed for up to 12 months since the last witness audit for all auditors, i.e., are due 36 months +/- 3 months since the last one according to BRC018. 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.

2.1.6 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

For 2020, auditors shall be required to undertake a minimum of five on site audits against GFSI approved standards and at least one annual onsite audit against the relevant BRCGS approved standard. Note Blended audits count towards this requirement.

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 witness 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) is suspended.

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.

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 BRC078'. BRCGS will validate the profile with the new category.

Where the auditor completes 5 or more audits within the category by the end of 2021 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. Onsite audits

3.1 Restarting onsite audits

Where a site's audit is due and lockdown restrictions allow an onsite audit, it should wherever possible, be planned in the normal way, i.e. before the audit due date, where necessary using the additional guidance in this document.

The audit may be:

- Announced fully onsite audit
- Unannounced fully onsite audit
- Announced blended audit (according to protocol BRCGS080)

The choice of announced and unannounced remains the site's choice (refer to section 3.9) however, BRCGS have published a statement recommending that unannounced audits are not conducted whilst Covid-19 remains a concern, and sites are therefore advised to opt for announced or blended audit options. Refer to BRCGS089).

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.

Where the certification body is not able to undertake an audit prior to the audit due date (for example, because of Covid-19 restrictions) the site has a number of choices:

- apply for a Certificate Extension (according to BRC072) - 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.

A non-conformity for a late audit will not be given. Refer to section 3.2

3.1.1 Sites with Certificate Extensions

Where a site's certificate has been extended using Certificate Extension procedures the following steps must be considered:

Audits should be planned for the earliest possible dates following the lifting of the Covid-19 restrictions. It is not necessary to wait for the 28-day audit window prior to the extended audit due date. Once agreed the audit can be planned:

- For announced audits – an audit date shall be agreed with the site. This may occur on any date from the site agreement that an audit can occur, until the audit due date. Ideally, audits should take place as soon after agreement is reached as possible.
- 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.

Where a successful audit is completed, the new certificate will have an expiry date, dependent on grade, in accordance with the normal audit protocol, unless a site wishes an earlier certificate expiry date, for example to reset the audit schedule and re-align it back to the previous audit window. These earlier than normal audits can be arranged with the certification body with no penalty to the site for the early audit.

Where an onsite or blended audit is not possible prior to the audit due date the site may opt for a fully remote audit (according to BRCGS086). (It is not possible to extend a certificate beyond the 6 months permitted in the Certificate Extension Programme).

A non-conformity for a late audit will not be given – refer to section 3.2.

3.2 Late audits

Requirements relating to late audits are currently suspended and non-conformities relating to late audits will not be given.

3.3 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 BRC072 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.

3.4 Remote technology (use of ITC) to create a blended audit (part remote audit and part onsite audit) or remote audit

BRCGS have developed a Position Statement on blended audit programmes designed as an offsite - remote assessment followed by an onsite audit. Full details are available in BRCGS080.

BRCGS have also developed an option for a fully remote audit designed for use where onsite and blended audits are not possible. Full details are available in BRCGS086.



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 (BRC072), however, where an onsite or blended audit is not possible the site may opt for a fully remote audit in accordance with BRCGS086.

It should be recognised that the BRCGS fully remote audit option is not a GFSI benchmarked programme.

3.8 Physical onsite unannounced audits

Please refer to position statement BRCGS089 for guidance on onsite unannounced audits.



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).

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