

BRCGS080: Position Statement and Procedure for Blended Audits - Remote Auditing using ICT

Document Scope:

This normative document adds the option for a blended audit to the audit protocol. It is applicable to the following Standards:

- Food Safety (including Intermediate level START! audits)
- Packaging
- Storage & Distribution
- Consumer Products
- Agents & Brokers
- Gluten-Free Certification Program

It may be applied to all relevant audits starting on or after 1st August 2020.

Change log

Version no.	Date	Description
1	13/07/020	First version.
2	09/09/2020	Addition of Gluten-Free Certification Program to the scope
3	01/02/2021	Addition of requirements for combined audits (section 3.8)
3.1	01/03/2021	Minor changes made to the document template.



Blended Audit

1. Introduction

1.1 What is a Blended Audit?

The Blended Audit is an audit which comprises an offsite - remote assessment followed by an onsite audit. **This option is only available for the announced audit programme.** The remote audit takes place using ICT (Information & Communication Technology) as explained below.

1.2 What is ICT (Information and Communication Technology)?

As per IAF MD4:2018, ICT is the use of technology for gathering, storing, retrieving, processing, analyzing, and transmitting information. It includes software and hardware such as smartphones, handheld devices, laptop computers, desktop computers, drones, video cameras, wearable technology, artificial intelligence, and others. The use of ICT may be appropriate for auditing/assessment both locally and remotely.

The certification body shall have a documented process for undertaking blended audits which shall ensure compliance to IAF MD4:2018 THE USE OF INFORMATION AND COMMUNICATION TECHNOLOGY (ICT) FOR AUDITING/ASSESSMENT PURPOSES.

1.3 Are Blended Audits compulsory?

The certification bodies and the sites can decide whether or not to offer or accept the Blended Audit option which includes a remote audit as a part of audit.

Before planning remote audits, the certification body should take into consideration the willingness of the client organization to consent to the application of remote auditing by use of ICT and the availability of ICT to be able to complete this part of the audit effectively. The use of a blended audit shall be mutually agreed upon.

1.4 Are these allowed for all Standards and any audit?

Blended audits can be used for all BRCGS GFSI benchmarked Standards (i.e. Food, Packaging, Storage & Distribution, Agents & Brokers), Consumer Products and Gluten-Free Certification Program.

Details regarding the incorporation of Additional Voluntary Modules into blended audits is given in Appendix 1.

This option is only applicable for **re-certification audits** and not for the first BRCGS audit at a site. That means it is not applicable for initial audits or for sites not holding a current BRCGS certificate. (Initial audits often require additional time (for example, during opening and closing meetings) where the auditor explains processes or the information/documents they need to review. It is beneficial for this to occur onsite and therefore blended audits are not permitted for initial audits).



Remote audits can be used as part of the re-certification audit, irrespective of the site's previous grade (i.e. all grades from AA – D can receive a remote audit), however, consideration shall be given during the risk assessment (refer to section 2.1).

For BRCGS Agents & Broker Standard the initial audit shall also be fully onsite, however, subsequent audits can be completed as a full remote audit (i.e. no onsite audit required) providing this is supported by the risk assessment (section 2.1) below.

2. Procedure for blended audits

2.1 Step 1 - Risk Assessment

As per IAF MD 4:2018 clause 4.2 the certification body shall undertake a risk assessment to determine if audit objectives can be achieved. The risk assessment shall consider:

- Historical performance of the site including any risks identified from complaints and recalls.
- Availability of documentation and records in electronic form and willingness of the site to share these remotely.
- Capability of the certification body to conduct the remote audit (e.g. trained auditors, technical experts, etc.).
- Access to an IT system that both, the certification body, and organization, will be able to use.
- Capability of the site's staff to utilize technologies used in remote audit techniques including onsite video (e.g. in production) and meetings

The risk assessment is not included in the calculation of the audit duration.

2.2 Confidentiality, Security & Data Protection (CSDP)

As per IAF MD4:2018 clause 4.1, the certification body needs to consider local data protection and privacy laws. It is important that if ICT such as video is utilized that relevant consents have been sought from individuals involved, to ensure compliance with local privacy regulations.

To prepare for the use of ICT, all certification, legal and customer requirements related to confidentiality, security and data protection shall be identified and actions taken to ensure their effective implementation. This implies that both the auditor and the auditee agree with the use of ICT and with the measures taken to fulfil these requirements. Evidence of agreements related to CSDP shall be available. This evidence could be records, agreed procedures, or emails. The importance resides in having these CSDP criteria acknowledged by all participants.

Measures to ensure confidentiality and security shall be confirmed during the opening meeting. The audit team shall prevent the access and retention of more documented information than it would in a normal face to face audit. It is probable that the audit team will want to have access to more information in advance, to prepare for the audit. It is a good practice that when documented information is to be analyzed in this way, it is shared in a secure and agreed system, such as cloud based, Virtual Private Network or other file-sharing systems, utilizing CSDP guidelines. Once the audit is complete, the auditor shall delete from its system, or remove access to, any documented information and records not required to be retained as objective evidence.

Auditors shall not take screenshots of auditees as audit evidence. Any screenshots of documents or records or other kind of evidence shall be previously authorized by the audited organization.

In the case of non-fulfilment of these measures or non-agreement of information security and data protection measures, the certification body shall not use the blended audit option.

2.3 Planning the blended audit

1. The certification body shall prepare a clear audit plan which highlights which documents will be needed remotely. This plan shall be shared with the site prior to the audit.
2. The certification body shall set up the technical requirements for the remote audit e.g. internet access (via lan cable or Wi-Fi), software (webex/Go to Meetings/Skype/Zoom/Teams/etc.) and hardware (monitors/webcams/cameras/microphones).
3. BRCGS recommend the certification body test the compatibility of the ICT platform with the site, especially prior to the first blended audit at the site and when new ICT platforms will be used. 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.

If testing reveals issues which cannot be rectified, then the audit shall be completed as a full onsite audit.

4. **The onsite audit shall be conducted within 28 days of the remote audit in a way that the site has enough time for non-conformity closure and the certification decision can take place within 42 days of onsite audit.** Although it is recommended that remote and onsite audits shall be planned as close to each other as possible.

In exceptional, justifiable circumstances, the certification body may request a concession from BRCGS for a maximum of 90 days.

5. 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 head sets should be considered.

6. In the event that the technology fails during the remote audit the certification body and site can reschedule, providing this occurs within the 28-day window. 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.
7. When no agreement is reached for the use of ICT for audit/assessment, the audit will revert to a fully onsite audit.
8. Assigning work to audit team members, including technical experts should take into consideration their ability to utilize remote technologies.

2.4. Audit duration for remote and onsite parts of the audit

The total audit duration is the same as specified in the specific Standard. This total duration is the sum of the time spent onsite auditing and remote auditing. But does not include time spent on audit planning, the risk assessment or report writing.

However, the amount of time spent onsite and remotely is also dependent upon the risk assessment completed in step 1 (section 2.1) and the historical performance of the site (including complaints and recalls). For example, if the risk assessment demonstrated that a remote audit is possible, but the historical performance of the site has been of concern, then the proportion of time spent onsite is expected to be greater than a situation where the risk assessment identifies few risks.

The remote audit duration shall not exceed **50%** of the total audit duration in any case. It should be noted that 50% represents the maximum proportion of the audit that may be completed remotely. The actual duration of the remote audit will be dependent on certification body assessment (e.g. the risk assessment in section 2.1) and may therefore be significantly less than the maximum in some circumstances (for example, if additional risks are identified, specific documents are not available for the remote audit or the certification body identify clauses that actually need to be audited onsite, even when they relate to documents or records).

Where the Standard permits a separate audit of the head office or central function, this can be completed using the Blended Audit protocol in accordance with the color-coding of the relevant clauses of the Standard (refer to section 3.1). In some situations, this may mean that the auditor does not need to visit the head office as all clauses are appropriate for remote audits. If the head office contains a mixture of clauses (i.e. some that require onsite and others which may be remote) the site may elect to have:

- a Blended Audit of the head office
- a fully onsite head office audit
- a remote head office audit with the remaining onsite elements being assessed at each of the site audits

3. Conducting the audit

All blended audits are announced. It is NOT possible to complete a blended audit as part of the unannounced audit programme.

3.1 Activities covered remotely and onsite

The onsite audit shall include as a minimum inspection / physical verification of Good Manufacturing Practices, and implementation of the Food Safety Management System (including HACCP activities, for example, the effective operation of pre-requisite programmes, verification of the process flow diagram, CCP monitoring and verification) and the Traceability Challenge.

In addition, the requirements of most BRCGS Standards are color coded to identify which would be audited during onsite and which may be completed by remote audit. For example, in the Food Standard the orange and green color coding is as follows:

Audit of production facilities and good manufacturing practices	Onsite
Audit of records, systems, and documentation	Remote Permitted
Requirements assessed in both	

Where clauses are dual coloured (e.g. both orange and green in the Food Standard), it is important to note that it is not optional whether these are audited remotely or onsite. If there is a remote assessment, additional practical application needs to be confirmed onsite. Alternatively, auditors may elect to audit the entire clause whilst onsite.

It is important to note that the colour coding within the Standard indicates the clauses that may be audited remotely. Certification body assessment (e.g. the risk assessment in section 2.1) may identify clauses that actually need to be audited onsite, even when they relate to documents or records.

A detailed list of activities for other Standards and the Additional Modules when included in the audit scope are detailed in Appendix 1. Their inclusion in the blended audit are dependent on the requirements of the specific module.

3.2 Conducting the remote audit

The remote audit shall be conducted first before the onsite audit (unless section 3.8 applies) and planned in a way that the site has enough time for non-conformity closure and the certification decision can take place within 42 days of onsite audit. Therefore, the remote audit may take place within the 56 days prior to the audit due date. (N.B. as explained in



sections 2.3 and 3.3, the gap between the remote audit and the onsite audit shall not exceed 28 days).

The auditor conducting the remote audit shall be fully competent in the category(s). If an expert is used during the assessment, then the documents shared by the site shall be made accessible to the technical expert as well.

The remote audit may also include a live video check of the manufacturing process, fabrication, and hygiene of the site, if required. Any video shall not be recorded, but a record shall be kept of the duration of the live video and what was covered. This is to be recorded in the audit report.

The structure of the remote audit will be similar to that used for onsite audits:

- Opening meeting – to confirm the scope and process of the remote audit
- Document review
- Interview/discussion with personnel, for example, to discuss the document, policy or record being audited
- Final review of findings by the auditor(s) – preparation for the closing meeting
- Closing meeting – to review remote audit findings with the site and confirm non-conformities

If a critical non-conformity and/or the number and level of non-conformities identified at the remote audit would result in the failure to achieve a certificate, the existing certificate for the site shall be immediately withdrawn. A new audit shall be completed. This new audit shall be fully onsite. (This process is identical to the normal protocol used for onsite audits, which is documented in the Standards).

3.3 Conducting and Onsite Audit

The onsite audit shall be conducted within 28 days of the remote audit and it shall be conducted during the audit due window of the current certificate (i.e. during the 28 days prior to the audit due date) unless section 3.8 applies. It is recommended that the gap between remote and onsite audit is as short as practicable.

The onsite audit shall include as a minimum inspection / physical verification of Good Manufacturing Practices, the Traceability Challenge (traceability test) and implementation of the Product Safety Management System (For example, for the Food Standard this includes HACCP activities, such as, the effective operation of pre-requisite programmes, verification of the process flow diagram, CCP monitoring and verification; for the Packaging Materials and Consumer Products Standards this includes Hazard analysis and risk assessment activities; verification of the process flow diagram; where relevant, CCP monitoring and verification).



Where different auditors are used for the remote and onsite audits there shall be a clear handover process in place prior to the onsite audit, to ensure that the auditor has all the necessary information to fully complete the audit and ensure all the requirements of the Standard are fully covered either remotely or onsite.

All auditors shall be qualified in the appropriate product categories (i.e. the same auditor category requirements apply to both the remote and onsite audits).

Where audit teams are used the audit report shall be clear on whether each auditor has completed remote and/or onsite activities.

The onsite audit consists of the following stages:

- Opening meeting – to confirm the scope and process of the audit.
- Production facility inspection – to review practical implementation of the systems, including observing product changeover procedures, and interview of personnel.
- Requirements identified for onsite audit in the specific Standard (refer to section 3) and during the risk assessment (section 2.1)
- A review of documentation needed to complete the audit trail including a traceability test (e.g. pest control records).
- Final review of findings by the auditor(s) – preparation for the closing meeting.
- Closing meeting

3.4 Non-Conformities and Corrective Action

Any non-conformities identified during the remote and onsite audit shall follow the existing requirements of the scheme. Evidence of the action taken to correct non-conformities identified at the remote audit and onsite audit shall be submitted to the certification body within 28 days of the completion of the audit (i.e. the last day of the audit). Verification of the preventive action plan and the implementation of the corrective actions may take various forms (including further on-site assessment or the scrutiny of submitted evidence through ICT); it shall be carried out by technically competent personnel of the certification bodies using a method appropriate to an effective verification of the corrective actions.

3.5 Audit Report

The option selected in the report shall be **Blended Announced** (For Intermediate level START! audits the audit type **Blended Intermediate** shall be selected for the audit type). The audit report shall clearly identify the extent to which any ICT has been used in carrying out the audit and the effectiveness of ICT in achieving the audit objectives. The audit report shall include all summarized information and findings of both the remote and onsite audit such that all the Standard requirements are covered in the single report and uploaded on the Directory. The report shall also reference the dates and the duration of the onsite and remote audits. The audit report shall include records of the people having attended the remote audit



and onsite audit. The requirements assessed during the remote assessment shall be identified by placing an * at the beginning of the information.

3.6 Grading of the Audit

The grade awarded is based on the total number of non-conformities identified (i.e. it is the sum of non-conformities identified at the onsite and remote audit) and according to announced audit protocol in the Standard. Non-conformities identified during the remote audit, which have been closed out and corrected before the onsite audit, are included in the grade calculation.

3.7 Certification

The design and information on the certificate are the same as for all audits in the Standard, except the certificate shall state **Blended Announced**. The dates of both audits (remote and onsite) elements shall be included on the certificate.

3.8 Combined Audits with other GFSI schemes

The preferred audit sequence for a BRCGS blended audit is to complete the remote audit first, followed by the onsite audit. This is to ensure that the site is not disadvantaged by any failure in the IT system, and that any items that remain unclear at the end of the remote audit, can be fully investigated during the onsite audit.

However, to avoid duplication of audit activities where the BRCGS audit is combined with another GFSI benchmarked standard, the sequence of the 2 parts of the audit may be reversed i.e. the onsite audit may be completed first, followed by the remote audit.

The certification body will still complete all of the planning actions, including the risk assessment (section 2.1), consideration of confidentiality (section 2.2) and testing the IT systems (section 2.3), etc. prior to the audit.

The onsite audit will therefore be completed within 56 days prior to the audit due date. The remote audit will follow this within 28 days and in the normal audit window (i.e. the 28 days prior to the audit due date).

The certification body risk assessment is still used to identify which clauses may be audited remotely and which will be completed during the onsite audit.

All other aspects of the audit protocol remain unchanged e.g. the site has 28 days from the end of the audit to undertake corrective action, root cause analysis, and to develop the preventive action plan.



Appendix 1: Standard specific requirements

Agents & Brokers Standard:

For BRCGS Agents & Broker Standard the initial audit shall be fully onsite, however, subsequent audits can be completed as a full remote audit (i.e. no onsite audit required) providing this is supported by the risk assessment (section 2.1). The audit shall then cover all the requirements of the Standard virtually. Where the agent/broker has multiple offices that are included in the audit scope, the certification body will need to complete additional assessment (refer to sections 2.1 – 2.3) for each office to ensure that the remote office is possible and can be suitably scheduled (the auditor shall be satisfied that a complete and thorough audit of all relevant activities is completed for each office within the audit scope). It is recommended that a representative from the central/head office of the company is available and participates in the audit of the additional offices where this is possible.

The Agents & Brokers FSMA Preparedness Module may be completed remotely.

Food Standard (including Intermediate level START! audits)

Blended audit is permitted using the color coding within the Standard in accordance with the details in section 3.1.

It is not possible to complete a Basic level START! audit using remote technology. However, this may be used for Intermediate level audits. The audit report shall reflect the use of remote ICT by selecting the audit type **Blended Intermediate**.

Food Standard Additional Voluntary Modules:

The Food Standard modules shall be completed as follows:

Module 10 (GlobalG.A.P. Chain of Custody) – Onsite audit only

Module 11 (Meat Supply Chain Assurance) – Remote audit permitted – however, any traceability test completed by the auditor as part of the audit should be initiated at the onsite audit

Module 12 (AOECS Gluten-Free Foods) – Onsite audit only

Module 13 (FSMA Preparedness) – Remote audit permitted



Packaging Materials Standard:

The requirements in the Packaging Materials Standard are colour coded to show how the site's activities can be verified. As shown in the table below, activities that form part of the physical on-site audit are coloured orange; this would include production facilities (site standards and hazard analysis and risk assessment, HARA), good manufacturing practice, and the traceability challenge. The activities that can be audited remotely are coloured blue and includes records, systems, and documentation (product safety and quality management system). There are activities where both a physical on-site audit and remote audit are necessary such as the traceability challenge, print control, training and competency of personnel:

Audit of production facilities and good manufacturing practices	On-site Audit	
Audit of records, systems, and documentation	Remote Permitted	
Requirements assessed in both		

Packaging Standard Voluntary Modules

Module 10 Plastic pellet loss prevention - Onsite audit only

Storage & Distribution Standard:

Blended audit is permitted using the color coding within the Standard in accordance with the details in section 3.1.

Consumer Products Standard:

Consumer Products Standards use colour coding to differentiate foundation and higher level certification levels, however as in the other Standards, the requirements are in fact set out in the same way. Therefore, it is possible to identify sections and clauses in the Standard relevant to an onsite audit of production facilities and good manufacturing practice which includes site standards (section 4), product inspection and testing (section 5) and process control (section 6).



Those where a remote audit would be permitted for audit of records, systems and documentation include product risk management (section 2) and product safety and quality management (section 3), process risk assessment (clause 6.1.1).

Clauses are identifiable for requirements where verification is achieved by both onsite and remote audit activities such as control and acceptance of incoming raw materials, components and packaging materials (clause 3.5.2), traceability challenge (clause 3.9) and training and competency of personnel (clause 7.1.1).

ETRS:

Please note that the Ethical Risk Assessment cannot be completed remotely and shall be completed fully onsite.

Gluten-Free Certification Program:

The Gluten-Free Certification Program does not use colour coding in the Standard, however the following clauses would require both remote and onsite assessment:

- 3.3.4
- 3.3.5
- 3.3.6
- 3.4
- 3.5
- 3.7
- 3.8
- 3.9
- 3.10.1
- 4.1

All other clauses are permitted to be assessed remotely.

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