

BRC072 BRCGS Audits impacted by Covid-19

Change log

Version no.	Date	Description
1	12/3/2020	First publication
2	18/3/2020	Document not published although main message changes were: Updated permissions on remote audits, certificate extension period changed from 12 to 6 months and postponement of unannounced onsite audits
3	25/3/2020	Update to be in line with GFSI position 6 month certificate extension based on completion of risk assessment verified through site discussion

Note that BRC073 Guidance of expectations on how to complete the remote audit is rescinded and is no longer in use.

With the rapidly changing global controls for combatting coronavirus, BRCGS have updated our guidance to balance staff and consumer safety whilst maintaining supply chain fluidity. BRCGS have issued this updated position statement, to take into account the publication of guidelines from GFSI.

BRCGS will expect sites and certification bodies to follow any government guidance in place for the region or country applicable.

The procedure applies to existing certificated sites who are unable to receive a physical audit because:

- The site is located in a country or region where government advice/restrictions prevent movement or access to the site
- Where company policy prevents visitors to the site to safeguard the health of employees
- Where it is the policy of the certification body to restrict auditors travel to a particular country or region to safeguard the health of their auditors.

We appreciate that the travel restrictions will have an impact on audit arrangements where auditors located in a restricted travel area can't audit other regions. We also understand that high risk staff members may have to be safe guarded. BRCGS, do however expect that certification bodies utilise their global auditor pool. Reasons for audit delay due to cost purposes will not be accepted. This process is not applicable to sites not currently certificated to BRCGS.

Reference can be made to appendix 1 outlining specific scenarios.

Re-audits due

Where the site is operational, but a physical audit may not occur on or before the audit due date and will result in existing certificates expiring, a certificate extension of up to 6 months validity may be issued based on:

- The successful completion of a risk assessment by the Certification Body confirming it is appropriate to continue certification
- The Certification Body completing a discussion with the site and review of procedures in place to establish the impact of Covid 19 extraordinary circumstances to the site operations and the effective implementation of any emergency response plan.

Note that certificates may only be extended by the current Certifying Body.

Risk Assessment

The Certification Body shall assess the risks of continuing 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*.

The Certification Body shall gather information from the certified site and consider within the risk assessment:

- The history of third party certification
- The history and maturity of the BRCGS system
- Whether there is any other management system or certification in place
- Absence of critical situations throughout the organization's certification history with respect to the BRCGS standard
- Pending compliance activities / legal proceedings
- Product recalls since the last BRCGS audit
- Whether the site is functioning normally
- Whether significant changes have been made at the site since the last BRCGS audit
- Whether the site is operating to the scope of certification
- Any changes to processes or services outsourced following the COVID-19 emergency
- The appropriateness of the sites emergency response plan to Covid 19

Discussion with site

The aim of the discussion is to assess the site actions in response to Covid-19 and ensure that the site has developed its procedures such that it can continue its operations to supply safe products.

The Certification Body shall agree appropriate times with the site to complete a review of the risk assessment details to confirm that it is appropriate to extend certification.

This does not need to be completed in one session and the duration can be appropriate to the complexity of the issues to be discussed but should be a minimum of 1 – 2 hours where there are few site changes. This shall be conducted with suitably senior and competent persons at the site. It is expected that supporting documents are provided as evidence for discussion.

This shall include as appropriate:

1. Review of implementation of sites emergency response plan to Covid 19.
 - As a minimum it is expected that sites have considered impact of staff availability with contingency plans in place. They shall have updated their screening processes for staff and have a policy in place for staff members who may have been exposed to Covid 19.
 - The site shall have considered requirements for additional or increased cleaning and where appropriate hand washing.
 - The site shall have defined minimum criteria for cleaning and product quality management where the optimum activities have needed to be adjusted due to staff shortages.
 - Sites shall have contingency plans in place for ingredient supply that may be affected.
 - The site have a clear policy on access to the site and the impact on any service provision changes eg maintenance and pest control, to ensure continued production of safe products.
 - The Certification Body would be expected to sample evidence of an appropriate management meeting discussion/actions as well as the documented policies.

2. Internal Audits
 - Review of internal audits schedules and implementation to ensure that product safety systems continue to operate effectively under pressure.
 - Review of any adaptations the sites may have to make to normal ways of working.
 - The Certification Body would be expected to sample an appropriate recent internal audit as well as the documented policies

3. Review of any significant changes to the operation of the site in response to Covid 19 eg changes in outsourcing and the controls the site have put in place.
4. Review of recent customer complaint levels
5. Review of any product recall since the last BRCGS audit, root cause and corrective actions put in place as a consequence.

Outcome

Any concerns following the discussion with the site that could raise doubts to continuing certification shall be documented in a similar format to 'non conformities' and the Certification Body shall agree with the site a process where these can be actioned, where appropriate, so that certification can be extended.

Certificates may only be extended to the current scope – significant changes to scope may not be made.

Sites Certificated with C and D Grades

Where sites are currently certificated with a grade C or D, unfortunately these shall be classified as 'high risk' and certificates may not be extended.

Sites Certificated to Packaging Standard issue 5

Where sites are currently certificated to BRCGS Packaging issue 5, note that the risk assessment and discussion shall be against issue 5. This will allow extension of the current issue 5 certificate. Once travel restrictions are lifted, an audit on site to issue 6 should be carried out as soon as possible.

Sites Certificated to Gluten Free Certification Program

Where certification to the GFCP is currently in place at a site based on a third party certification, other than BRCGS, the risk assessment principle may be used for sites that fall into the criteria, as long as the third party certification is maintained ie other scheme certificate is permitted to be extended.

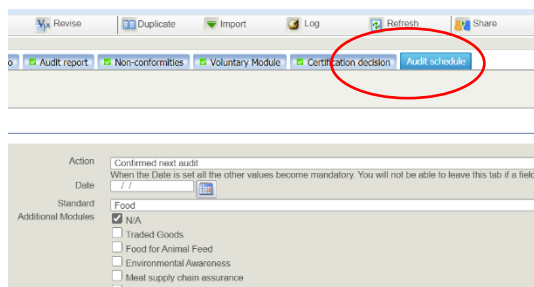
Physical onsite Unannounced audits

In the current climate, it is recognized by stakeholders that unannounced audits may place undue burden on sites busy with ensuring supply chain continuity. Therefore unannounced audits will be temporarily suspended. Where physical onsite audits are still taking place and unannounced audits are due in the next 4 months, Certification Bodies should contact sites to arrange an announced audit. Protocols for announced audits shall then apply including grading outcomes.

Informing BRCGS

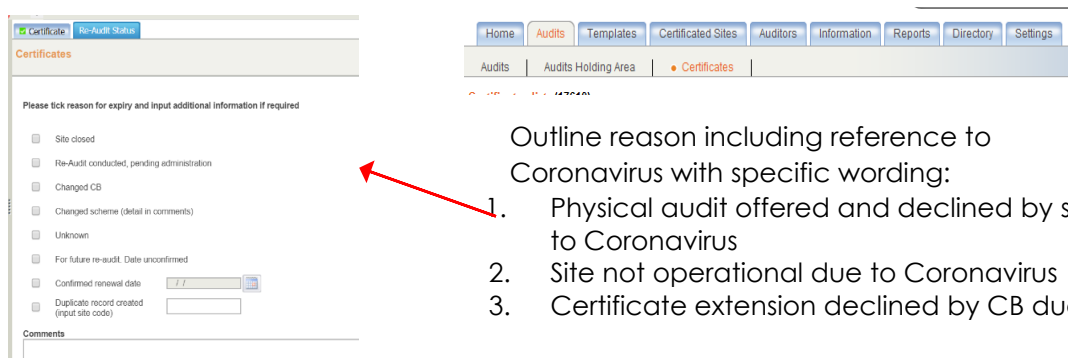
'Concession reference numbers' are not required for certificate extensions that fulfil this criteria. The certification body is responsible for notifying BRCGS through the Directory.

Updates are currently being made to the BRCGS Directory audit schedule tab and should be available shortly .



Where the certificate is to be extended, tick the Certificate extension box in the additional modules list

Where the certificate expires, the usual process of notification of certificate expiry through the 'reaudit status' tab of the Directory will be completed by the Certification Body.



Outline reason including reference to Coronavirus with specific wording:

1. Physical audit offered and declined by site due to Coronavirus
2. Site not operational due to Coronavirus
3. Certificate extension declined by CB due to risk

Certification

If the certification body is satisfied that continued certification of the site is appropriate, a certificate extension of 6 months may be issued.

- The grading will stay the same as the current certificate.
- The reaudit due date anniversary will stay the same as the current certificate and will therefore be recalculated as an additional 6 months.
- The certificate expiry date anniversary will stay the same as the current certificate and will therefore be recalculated as 6 months.

Reporting

The risk assessment of the site and conclusions made by the Certification Body shall be attached to the BRC Directory site record through the paperclip mechanism

BRCGS Fees

There will be no BRCGS fee due on extension of the certificate. Sites will continue to be able to access the usual BRCGS support service packages.

Audit Due

Once the site becomes accessible, the full onsite audit will need to take place as normal and a new certificate will be issued for a further 12 months.

Compliance

Accreditation Bodies will be responsible to assess the implementation of this guidance as well as BRCGS. Either party may require to be included as observer during any site discussion.

These guidance notes are under continual review as per the developing situation and may be subject to change.

More information

For more information, please contact:

- Certification and Accreditation Bodies – Karen Betts, karen.betts@brcgs.com
- Brand Owners and Specifiers – John Tomlinson, john.tomlinson@brcgs.com
- Sites – please contact your Certification Body



Appendix 1

Illustrated Scenarios

Scenario	Outcome
Site operating but situated in government restricted travel zone or biosecurity company policy does not allow an auditor onsite	Risk Assessment and discussion with site undertaken and extended certificate issued
Site is not operating and staff unavailable for any discussion with Certification Body	Risk assessment cannot be completed. Current certificate expires
The site is still accessible and has an unannounced audit due in the next 4 months.	Unannounced audits will not continue in the short term. The site shall be contacted by their CB to arrange an announced physical onsite audit
Site is currently certificated but has changed to a different Certification Body for their next audit.	Unfortunately this process is in place to be able to extend certificates. So therefore this is only available to CBs that have issued the current certificate.
A company is currently certificated, but has just moved their site to a new physical location. Due to the current situation, they are not allowing onsite audits. Can the certificate be extended with the new site address?	Unfortunately the process is in place to be able to extend current certificates. As certificates are site specific, as soon as the company moves address the current certificate shall be withdrawn.
If from the Certification Bodys risk assessment the site is not appropriate for a certificate extension, what happens?	The CB needs to be confident that the current certificate can be extended. If this is deemed not possible from the risk assessment, then the certificate will expire.