



BRCGS Food Safety, Packaging Materials and Storage & Distribution

BRCGS079: Position Statement and Protocol on Unannounced Audits – Meeting the GFSI Benchmark

Change log

Version no.	Date	Description
1	9/10/2020	First publication of document.
1.1	30/10/2020	Initial certification body briefing removed.
2	25/02/2021	Updated to include requirements for exceptional circumstances for extremely short season, small sites and intermittent operation (section 5.8) and information about unannounced audits for Storage and Distribution (Issue 4) in section 2.1. Section 1.1 audit dates clarified in response to feedback.
2.1	01/03/2021	Minor formatting changes made.

1. Introduction

1.1 Background

Unannounced audits provide companies with an opportunity to:

- demonstrate confidence in their systems and procedures, to the extent that they are can be subjected to unannounced scrutiny
- adopt an audit ready food safety culture
- improve customer confidence, by providing their customers with an independent unannounced review of systems and procedures that demonstrates they are maintaining their systems in good order

Due to the added confidence provided by unannounced audits, the GFSI Benchmark Version 2020 introduces a new requirement for certificated sites (with food safety, packaging materials or storage & distribution scopes) to have at least 1 unannounced audit every 3 years, i.e. the site must have at least one unannounced audit during 2021 – 2024 with

subsequent unannounced audits occurring at least every 3 years. For sites with annual (12 month) audits, this will result in at least every 3rd audit being unannounced.

For example as shown below in Figure 1: Audit history:

- The audit in 2021 should go ahead as planned. After this audit, the site automatically joins the 1 unannounced audit in every 3 years process.
- The Certification Body should notify the site whether their next audit will be announced or unannounced and update the Directory accordingly.
- The first unannounced audit should take place between 2022-2024 and in the example below the site has the unannounced audit in 2022.
- Subsequent unannounced audits will occur at least every 3 years. In this example, the site will receive its first unannounced in 2022, therefore the following unannounced audit will be completed in 2025 unless a site requests an earlier unannounced audit.

Announced/Unannounced	Audit Date	Audit Due Date (Refer to section 4.2)
Initial audit at site (Announced)	1- 2 June 2020	1 st June 2021
Re-audit (Announced)	20 – 21 May 2021 (audit within 28 days prior to audit due date)	1 st June 2022
Site enters the process for 1 unannounced audit to occur every 3 years. Certification body informs the site that an unannounced audit will occur in 2022.		
Re-audit (Unannounced)	1 - 2 March 2022 (audit in 4 months prior to audit due date)	1 st June 2023
Re-audit (Announced)	18-19 May 2023 (audit in 28 days prior to audit due date)	1 st June 2024
Re-audit (Announced)	20 – 21 May 2024 (audit in 28 days prior to audit due date)	1 st June 2025
Certification body reminds the site that an unannounced audit is required in 2025.		
Re-audit (Unannounced)	10 – 11 March 2025 (audit in 4 months prior to audit due date)	1 st June 2026

Figure 1: Audit history

Sites who receive a grade C or D at any of their audits will still be expected to have an unannounced audit at least once every 3 years, but there will obviously be a larger number of announced audits in the interim.

This document outlines the requirement and the procedures for sites and certification bodies to implement the new requirement into BRCGS audits.

1.2 Who is affected?

All sites certificated to a GFSI Benchmarked Standard for food safety, packaging materials or storage & distribution using an announced audit programme. This includes announced audits for:

- BRCGS Food Safety
- BRCGS Packaging Materials
- BRCGS Storage & Distribution

Sites that have opted into the fully unannounced audit programme are not affected by this change and will continue to follow the unannounced audit protocol outlined within the Standard they are certificated to. Where a site chooses to revert to the announced audit programme then these requirements will apply.

1.3 Timelines for the introduction of unannounced audits

BRCGS audits starting on or after 1st February 2021 will be completed according to this protocol.

For Storage and Distribution these requirements only apply to Issue 4, and therefore only apply to audits from 1st May 2021.

Therefore, after these dates, following the issue of a certificate, the certification body will notify the site whether their **next** assessment will be announced or unannounced. For example – if a site has an announced audit due in June 2021 this will go ahead as usual. After this audit and certificate decision, the site automatically joins the 1 in 3 programme and will be notified whether their next audit will be announced or unannounced.

2. The Audit Planning Process

2.1 What is the process?

The certification body is responsible for managing the audit process and ensuring that within the 3 year period all certificated sites have received at least 1 unannounced audit.

It is therefore expected that each year, the certification body will aim for approximately a third of the BRCGS certificated sites, within the announced audit programme, to be completed as unannounced audits (this is in addition to any sites that have opted for the fully unannounced audit programme). Certification bodies will discuss audit options with sites and notify them which year an unannounced audit will take place (obviously the actual date of the unannounced audit will not be communicated to the site). This discussion must occur within 3 months after the last audit, to ensure that the site knows if an unannounced audit will take place in the coming year. Sites that have changed (or are planning to change) certification body should refer to section 2.7 below.

The unannounced audit can take place at any time during the 4 months prior to the audit due date. This period, when an audit can occur, includes the 28 days immediately prior to the audit due date. It should be remembered that BRCGS audits cannot take place after the audit due date, except by concession in the event of exceptional circumstances.

The first (initial) BRCGS audit at a site should be announced, unless the site has specifically requested an unannounced audit.

Where a company has a separate Head Office audit prior to the audits of its individual production sites, the head office audit may be completed as an announced audit (only the production site audits must be unannounced).

Where a site needs an extension to scope audit, separate from the scheduled annual audit, for example, due to the introduction of a new product or process this may be completed as an announced audit.

For Storage and Distribution: For the year when a site is due their unannounced audit, S&D operations will have 2 options to choose from 1. Option 1 Fully Unannounced or Option 2-part unannounced/part announced.

2.2 Information required & contract

The certification body will require some additional information to help them plan audits and ensure that the auditor does not turn up when there is no production. This information is likely to include:

- Typical shift patterns
- Shift patterns or production schedules, to allow audits to cover relevant processes, for example, where certain production processes are not completed every day
- Any dates where an audit cannot take place, for example, due to non-production
- The management organisational chart
- A simple site plan
- The process flow diagram
- A summary of critical control points (CCPs)
- The list of products or product groups with the audit scope
- A copy of the last audit report (where the audit was completed by another certification body)

It is important that this information remains up to date and any changes are notified to the certification body in a timely manner. The site is responsible for communicating any changes in a timely manner.

2.3 Scheduling

The unannounced audit will replace the normal scheduled (announced) audit. It can occur at any stage within the last 4 months of the certification cycle, including the last 28 days before the audit due date (i.e. unannounced audit within the 4 months prior to the audit due date).

The audits shall only take place on weekdays, during normal site operations, unless other arrangements have been agreed in advance with the site.

The site **must not** be notified of the proposed audit date in advance.

In accordance with BRCGS067 audit dates are expected to be added to the BRCGS Directory a minimum of 7 days before the audit takes place. (Note the audit dates are not visible or accessible to the site or supplier so this will not enable sites on the unannounced audit programme to see their planned audit date).

2.4 Nominating Non-Audit Days

It is expected that compliance with the Standard is maintained at all times and that the site is therefore audit ready. However, there may be dates when an audit genuinely cannot take place, for example, when there is no production, or the site is closed.

Therefore, a site may nominate a maximum of 10 days when they are not available for an audit. Sites on a 6 month audit schedule (e.g. sites certificated to the Food Standard with grades C or D) may nominate a maximum of 5 days.

Days when the factory is not operating (e.g. public holidays or site holidays) are not included with the 10 days (or 5 days). Any such non-production days must be notified to the certification body.

Any nominated non-audit days must be for a justifiable reason, for example due to a customer visit for a scheduled first production, which involves technical and managerial staff. Whereas non-audit days to a specific colleague being absent (such as on holiday) is not justifiable (refer to section 5.2) nor is booking a single day every week. The dates and reasons must be provided to the certification body as soon as known and at least 4 weeks in advance. The certification body may challenge the reason where this does not appear appropriate and at its discretion refuse these nominated dates if they are not justifiable.

Certification bodies are expected to operate discretion in the case of emergencies.

2.5 Arrival on site

It is particularly important that the usual practical issues surrounding the audit are agreed at the time of registering for an audit, periodically reviewed, and where necessary updated. This includes:

- Directions to the site
- Site contact on arrival and deputy
- Agreed earliest time of arrival
- Factory protective clothing requirements (e.g. coat and shoe size)

2.6 Auditor identification

As the site will not be expecting the auditor's arrival, it is important that the auditor has sufficient identification to confirm that they are a genuine representative of the certification

body. This may include the option for the site to contact the certification body to confirm the identification.

2.7 Changing certification body

Within 3 months of an audit the certification body will communicate to the site whether the next audit will be announced or unannounced.

If the site chooses to change certification body this does not change the requirement for the site to receive an unannounced audit where this has already been notified to the site. Therefore, the site must ensure that the new certification body is aware that the site is already certificated, whether the next audit was scheduled to be announced or unannounced and provide the date of their last unannounced audit. The certification body will also require evidence of the site's audit history (for example, by receiving a copy of the most recent audit report) such that the 3 year cycle can be maintained. N.B. sharing the last audit report is a mandatory requirement of the BRCGS Standards protocol (for example, in the Food Standard Issue 8 protocol section 2.1.2). Certification bodies are advised to ensure this forms part of the contractual process with the site. Where a site fails to share their last audit report in a timely manner, the new certification body will have access to the last audit report via the BRCGS Directory.

Where a site fails to have an unannounced audit within the 3 year period, it may result in the final audit being refused by BRCGS and the site becoming uncertificated until such a time as an unannounced audit is completed.

3. The Audit

3.1 Structure of the audit

The objective of the audit is to encourage sites to adopt an audit ready food safety culture and not to try to catch sites out. The intent of the audit is therefore to make an objective assessment of the everyday operating standards of the site in relation to the requirements of the Standard.

The procedures and content of the audit are identical regardless of whether the audit is announced or unannounced. However, unannounced audits will commence with a short opening meeting followed by an immediate inspection of the production facilities. It is expected that the production facility audit will commence within 30 minutes of the auditor arriving on site.

The auditor will need to understand any issues with:

- non-availability of key staff
- any time dependent processes (e.g. line changeover)

These should be discussed at the opening meeting and may require careful scheduling of the items within the audit.

It should be noted that Blended Audits (using ICT or remote technology) are not permitted as part of an unannounced audit.

4. Post-Audit Processes

4.1 Audit grading & certification

The process for reporting and correcting non-conformities is exactly the same for all BRCGS audits, i.e. following the audit, the site must undertake corrective action to remedy all the non-conformities identified during the audit. The site must also complete root cause analysis to identify the underlying cause of each non-conformity and develop a preventive action plan to address each of the root causes. This information must be submitted to the certification body within 28 days of the completion of the audit.

After a review of the audit report and the documentary evidence demonstrating corrective actions have been completed, a certification decision is made by the certification body. Where a certificate is granted the new certificate will be issued within 42 days.

Sites having an unannounced audit will receive an unannounced audit grade (e.g. AA+ or A+).

The audit report and certificate will indicate that the audit type is 'unannounced (1 in 3)'.

4.2 Planning the following audit – Audit dates for subsequent audits

The unannounced audit certificate will supersede the existing certificate. It will be issued within 42 days of the audit (assuming that certification is appropriate based on the number and severity of the non-conformities and completion of corrective actions). The certificate will have an expiry date based on the expiry date of the previous certificate plus 6 or 12 months (depending on grade). Refer to section 1 for example dates.

The date range for the next audit (the re-audit due date range) will be dependent on whether the next audit is scheduled to be announced or unannounced. This could potentially lead to inaccurate date ranges on the certificate (for example, if decisions regarding whether the next audit is announced or unannounced are made after the certificate is issued). Therefore, the re-audit due date range usually applied to certificates, will be replaced by a single re-audit due date, representing the end of the period in which the audit should occur (i.e. audits, regardless of whether they are announced or unannounced must occur before this date).

5. General Guidance – Problems & challenges

5.1 Refusal of a company to undertake the unannounced audit

Sites are obliged to accommodate the auditor and allow the audit to commence on the auditor's arrival at the site.

Sites have the opportunity to nominate (in advance) days when the audit cannot take place (refer to section 2.4 above).

Therefore, if the auditor arrives for the audit and is denied access, the site's certification will be suspended. The site will remain suspended until a new unannounced audit can be completed. Since the new audit will be unannounced, the site will not be told the new audit date, which will occur within the next 4 months after the refused audit. The audit will be completed by the same certification body, unless a concession is granted by BRCGS to change certification body during this period.

Certification bodies should establish processes to handle the recovery of costs under such circumstances.

5.2 Non-availability of key staff at the opening or closing meeting or during the audit

The Standards require the most senior production or operation manager (i.e. those who are responsible for the 'hands on' running of the site) to be present at the opening and closing meetings. Some managers may be absent on the day of the audit due to other commitments; however, there shall always be a nominated deputy available. For example, in the Food Standard:

- clause 1.1.11 requires the senior production or operation manager to attend opening and closing meetings
- clause 1.2.1 requires clear documentation regarding who deputises in the absence of the responsible person

Where a key member of staff, for example the technical manager (or quality manager), is away on the day of the audit, this will not be accepted as a reason to prevent the audit going ahead. It is expected that there is cover for managers in their absence.

5.3 No production during the audit

As part of the audit planning the site must notify the certification body of any particular days or times when production is not undertaken (refer to sections 2.2 and 2.4).

If the audit takes place on a date when production was supposed to be undertaken, but on arrival the auditor finds there is either no production or the only products being manufactured are outside scope, this will impact the audit. Where the audit is scheduled for multiple days, then if production is still expected on the subsequent days, it may be possible to re-organise the audit plan, so the initial day is predominantly documentation and then, once production starts, the remainder of the audit is predominantly focused on production and good manufacturing practices (GMP). However, where there is no production throughout the entire duration of the audit, it will not be possible to complete the audit.

A further unannounced audit will need to be arranged.

Liability for the auditor's time should be covered within the certification body contract with the site.

5.4 Audit duration

The audit duration will be calculated using the BRCGS audit duration calculator for the appropriate Standard and will be the same as for an announced audit.

The auditor will work with the site to plan the audit and allow time for any documentation to be found and audited. The audit duration calculator explains to certification bodies/auditors the changes that can be made to the audit duration in the event of prolonged delays.

5.5 Combined audits with an additional scheme

The BRCGS audit must follow the rules outlined above and in the Standard's audit protocol.

The certification body may be able to approach the other scheme and clarify whether they would accept an unannounced audit. If this is acceptable then both audits can be completed unannounced and simultaneously. However, if the other scheme owner does not permit unannounced audits then they will need to occur on different dates.

5.6 Site not certificated following an audit

Where a site cannot be certificated due to the number or level of the non-conformities identified during the audit, the site will require a further full audit before certification can be considered.

Once the site has addressed the non-conformities that were raised at the audit, it can arrange this new audit. The re-audit shall not take place any earlier than 28 calendar days from the audit date.

The re-audit may be announced.

The re-audit will be completed by the same certification body, unless a concession is granted by BRCGS to change certification body during this period.

It should be noted that the GFSI benchmark still requires the site to have at least one unannounced audit every 3 years and this frequency is not expected to change as a result of the failed audit.

5.7 Seasonal Production

Seasonal sites are included in the requirement for unannounced audits. However, the following rules apply:

- the expected seasonal production dates must be communicated to the certification body and kept up to date
- where the length of the season is less than the 4 month audit window, the maximum number of non-audit dates will be reduced on a pro rata basis (i.e. if the production season is only 2 months long, it is equal to half of the audit window and therefore the maximum number of non-audit days available to the site is 5 days (half of the normal 10 day allowance))

Refer to Section 5.3 for information regarding no production during the audit (e.g. due to an unexpected change in seasonality).

5.8 Exceptional circumstances for extremely short season, small sites and intermittent operation

Extremely small, intermittent operations, operations dependent on outside circumstances (i.e. weather) and other extreme circumstances may at times require additional consideration.

There are certain circumstances where the site operation will provide some challenges in meeting all the requirements of BRCGS079, specifically the following:

- Where the audit is to be planned to occur in the last 4 months of the certification cycle. A seasonal operation should be scheduled to occur in the season that occurs in this time period.
- Where the production season (i.e. for operations not running year-round) is less than the 4-month audit window. The site should make arrangements to inform the CB of the season, and update with changes as known
- Where production is intermittent during the week (i.e. dependent on labour, supplies, seasons, catch timing, weather etc.) the site must keep the CB informed on a weekly basis. The CB may verify with the site, within a 3-day window site availability.
- Where the site may be unsupervised for significant time periods in a work day, and unable to facilitate an audit (i.e. due to security, language or significant barriers) the CB may provide up to 24 hours notice to the site to ensure appropriate staff are on site.
- Where insufficient staff to support the audit would preclude an effective audit for example, working supervisors supporting an audit would result in significant material loss or significant production capability disruption) the CB may provide up to 24 hours' notice to the site to ensure appropriate staffing.
- Where a known, consistent pattern of availability for audit is in place (i.e. the site is unsupervised Monday and Friday on an ongoing basis) this may be identified to the certification body in advance to aid in planning appropriate days.
- Where site support or sponsorship (i.e. obtaining a visa or arranging transport where it can only be provided by the site) is required, it may be provided as necessary, with the certification body providing the opportunity for the audit to be as unannounced as possible.
- When non-operational days are not included in the target days or counted as part of the site identified "black out days".
- Where an audit is unable to proceed due to valid operational issues (N.B there will be no BRCGS penalty to the site).

All variations above, and any not meeting the original protocol, require a concession.

5.9 Changing certification schemes

The GFSI benchmark requires sites changing between schemes to remain on the same unannounced audit frequency (i.e. at least once every 3 years). Therefore, where a site certificated to a GFSI benchmarked standard changes scheme, the certification body will need to be aware of the audit history and plan accordingly.

6. Where can I find more information?

The BRCGS team will be pleased to provide advice required. Contact: enquiries@brcgs.



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