



BRCGS030: BRCGS compliance site visit process

Document Scope: As part of the BRCGS compliance programme, the BRCGS reserve the right to undertake a routine surveillance activity on site or remotely, to any certificated site either announced or unannounced in order to uphold the integrity and ensure confidence in the BRCGS Standards certification schemes.

Change log:

Version no.	Date	Description
4	08/07/2019	New BRCGS logo and footer changed
4.1	10/04/2020	Document numbering convention changed.
5	17/11/2021	General Update including Inclusion of Remote Compliance Review, Process Flow, Communications



1. Purpose

As part of the BRCGS compliance programme, the BRCGS reserve the right to undertake a routine surveillance activity on site or remotely, to any certificated site either announced or unannounced in order to uphold the integrity and ensure confidence in the BRCGS Standards certification schemes.

These may occur:

- As targeted samples to ensure audits to the BRCGS Standards have been undertaken consistently, effectively and the Certification Body has adhered to BRCGS protocols.
- As targeted samples to ensure sites continue to operate to the principles of the BRCGS Standards programme
- When investigating a feedback report at a site
- When investigating activities of a Certification Body for compliance purposes
- When investigating the effectiveness of a particular auditor

The site visit or remote compliance review may be conducted by BRCGS or a BRCGS contracted company or auditor.

Generally, the compliance site-related activity will be of one day duration (4-8 hours).

2. Selection of site for visit/review

- Generally, within four months of the last BRCGS audit date, wherever possible.
- Covering range of product categories.
- Specific site / audit / report / auditor feedback.
- Sites where zero or few non-conformances have been raised, sites consistently scoring 10 minor non-conformances or sites that have excessive numbers of non-conformances.
- Additional Modules

3. Arranging a site visit or remote compliance review

Selection of Compliance Activity option will be affected by feedback received, location, government guidance or another accessibility aspect.

Standard	Compliance Activity (numbered in order of preference)		
	Site Visit Unannounced	Site Visit Announced	Remote Review
Food Safety	1	2	3
Packaging Materials	1	2	3
Consumer Products	3	1	2
Start!	3	1	2
Storage & Distribution	3	1	2
Agents & Brokers	3	2	1
Gluten-Free	1	2	3
Plant-Based	1	2	3



Guidance differs for site visits and remote compliance reviews

1. Site visits – announced

- a. Communication with CB around 4-6 weeks before the planned visit date. (Appendix 2 - Email 4)
- b. Communication with sites is generally undertaken by the certification body, unless written confirmation is given to enable the compliance auditor to communicate directly with the site.
- c. Announced visits, sites may be informed with ideally short notice of 3-4 days to minimise "audit preparation", unless regional issues or exceptional circumstances require longer.
- d. Agreement of a mutually agreeable date to allow for the presence of site management will be undertaken. The visit date may not be delayed by more than seven days from the original proposed date.
- e. The Certification Body will be informed of the proposed visit and invited to attend.
- f. Dates will be confirmed to the site, generally the responsibility of the certification body given that the site is their customer.
- g. The details of the personnel who will be present will be submitted to the site along with a proposed outline of the site visit including the time of arrival on site, approximate departure from site and the aspects that will be audited.

2. Site visits – unannounced

- a. Where the visit is unannounced, the site will receive no prior notice of the visit.
- b. The Certification Body will be invited to join the visit as outlined above, but will be made aware of the unannounced, confidential nature and clearly instructed not to make the visit known to the site.

3. Remote compliance review

- a. Communication with CB around 4-6 weeks before the planned visit date. (Appendix 2 - Email 1)
- b. Given that the remote compliance review process requires uploading of documentation by the sites, this cannot be undertaken unannounced and sites are given 10 working days notice of the selection for review. (Appendix 2 – Email 2)
- c. Documentation and video recording request is given five days prior to the review date. This is undertaken directly by the compliance auditor to the site and copying the certification body representatives. (Appendix 2 – Email 3 and Checklist)
- d. The Certification Body will be invited to join the review.
- e. Set up OneDrive and Microsoft Teams Meeting and communicate links to site and CB

Note – Competence details of the BRCGS auditor will be available on request.

4. Opening Meeting

Applicable to compliance site visits and remote compliance reviews

- State that the purpose of the visit/review is to confirm the validity of the currently held certificate and to ensure that the previous audit had been completed in line with BRCGS Standards and that it was undertaken consistently, effectively and the Certification Body and Auditor have adhered to BRCGS protocols.
- Confirm the visit/review duration
- Confirm that there is no cost to the site.

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- Explain all information will be kept confidential and that auditing is a sampling process and that consequently new/additional non-conformances may be raised due to the lapse in time since the original audit. Where documentation and media are uploaded to OneDrive this will be deleted on completion of the review.
- Grade will not be affected unless significant major, critical or fundamental non-conformity is identified.
- Explain non-conformance procedure as detailed below in Section 6 – Closing Meeting
- Confirm the visit / review plan and that a closing meeting will be held at the end of the visit / review. An indication on timings will be given.
- Confirm whether the scope of the audit has changed since the last BRCGS audit.
- Invite any questions

Where the visit is undertaken unannounced, the audit will begin with the site production facility inspection and this will be expected to commence within 30 minutes of the auditor arriving on site.

5. Site Visit / Remote Compliance Review

The requirements that will be reviewed will be influenced by the product or process type or feedback / complaint received regarding the site or Certification Body

- Where possible, confirm CCP's for the site before site tour.
- Conduct a site review (by video for remote review that will cover all areas or some areas depending on site size or specific to feedback) and include document review and staff interviews, where possible.
- Review a sample of similar paperwork as noted in previous BRCGS audit.

6. Closing Meeting

- Thank the relevant parties for their openness, assistance and hospitality.
- Reconfirm the scope of the visit / review and briefly summarise the activities that have been completed during the audit
- Review positive findings and convey non-conformities identified during the visit / review
- Confirm the next steps – 28-day communication of corrective action regarding non-conformities to Certification Body
- Confirm that any further action required must be discussed and communicated via the Certification Body

7. Site non-conformity and corrective action handling

- Where non-conformities are identified, these will need to be closed out in the normal way. The site will have 28 calendar days to provide the Certification Body appropriate evidence. Alternatively, the certification body may conduct a site visit to close out these non-conformities. The auditor will discuss these non-conformities and the action that needs to be taken after the visit at the closing meeting. Written details of the non-conformities will be provided to the company within 24 hours of the visit and provided to the Certification Body.
- Where issues are identified which may significantly affect the safety or legality of product or affect the integrity of the current certificate, the Certification Body is expected to take appropriate action and the site certification may be suspended or withdrawn, pending a full re-audit by the Certification Body.



8. Compliance Visit / Review Outcome

- Typed non-conformities and site detail report - (Initial sections 1-4 of the full BRCGS027 report) to be completed by the BRCGS Auditor and provided to the site and Certification Body either on the day of the visit / review or within 24 hours. This may be in local language, if required.
- Full BRCGS027 report and relevant Report Review Form - (in English) to be completed for the benefit of feedback to the Certification Body and shall be sent to the Certification Body target within seven days of the visit / review.
- Where there have been significant issues, a copy of typed non-conformities and site detail report shall be forwarded to BRCGS Compliance Manager within 24 hours.
- The report will be submitted to the Certification Body primary / secondary contact within 14 days of the visit / review.
- The report will not be publicly available on the BRCGS Directory but may be supplied to Accreditation Bodies on request.

9. BRCGS Compliance Auditors

The site visit will be undertaken by auditors experienced in BRCGS.

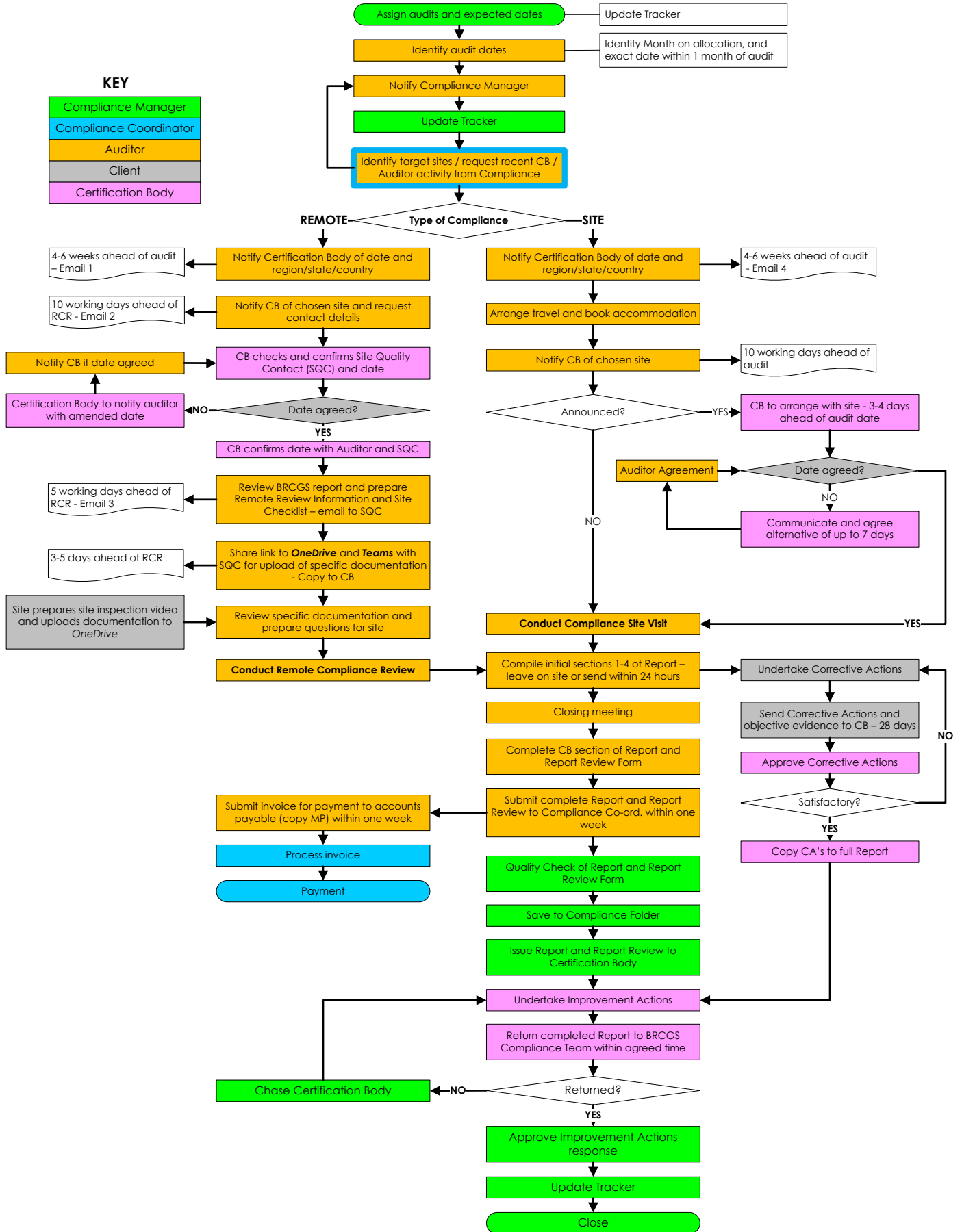
Where it is not possible to identify an auditor independent of any BRCGS approved Certification Body, this will be declared to the Certification Body and site.

The BRCGS nominated auditor shall: -

- Be competent and demonstrably impartial
- Declare to BRCGS any past associations with a BRCGS approved Certification Body as well as potential links with BRCGS certificated sites which may pose a conflict of interest.

Have appropriate experience and qualification as necessary, to be registered in the product category appropriate to the site being visited or reviewed.

Appendix 1 – Process Flow





Appendix 2 - Typical Communications

Email 1 – CB Remote Compliance Review Notification

As part of the BRCGSs' compliance programme, BRCGS reserve the right to undertake a routine surveillance visit to any certificated site either announced or unannounced, or to complete a Remote Compliance Review, in order to uphold the integrity and ensure confidence in the BRCGS certification schemes.

Typically, the visit or review is undertaken within 4 months of the BRCGS Certification Audit Date, although this may be extended slightly.

I am planning to undertake the Remote Compliance Review for a **BRCGS Food Safety** certificated site in **Country** on **Date**. The remote process consists of two main stages, firstly a review of documentation provided by the site prior to the review and secondly a remote video-based (via Microsoft Teams) discussion with the site, on the day. Ideally, I would request that you provide a representative of your Certification body to attend the latter. They can be present on-line or at the site, to suit you.

I will notify you of the specific site chosen around 10 working days before the review date, in order to notify the site that it will be now man one more happening on that date and confirm contacts for the review. Then at one week (five working days) prior to the remote review, I will provide a document to yourselves and to the chosen site, including some detailed information on how the process will work, questions for the site, and a request for specific documents to be shared by the site using the BRCGS 'OneDrive'. The site will then need to upload documents two days in advance of the audit in order for my preparation to be completed in time for the day.

If you require any further information at this stage, please do not hesitate to contact me or Ritu Bajaj - Compliance Manager at BRCGS.



Email 2 – Remote Compliance Review – CB Site Confirmation Notification

Accompanied with Review Information sheet and FAQ

Thank you again for your assistance with this process to date.

I am now able to confirm the site details for the Remote Compliance Review on **date**.

The review will be undertaken in English and either the site should ensure that there is someone available who is able to communicate in English or the Certification Body Representative is able to translate or you may wish for a representative of your certification body to be present on site at the time of the review.

Company: xxxxxxxxxxxxxxxxxxxx

Site: xxxxxxxxxxxxxxxx

Location: Country

Site Number: Directory Code

Action required by the Certification Body. Please can you:-

- 1) Inform the site that they have been randomly selected for a BRCGS remote compliance review, which will take place on the date above. It is strongly suggested that this be by telephone. This process is a mandatory requirement if requested, as defined in the Global Standard and within your contract with the company. Attached is the **Company Information Sheet and FAQ document** that you may wish to send to the site.
- 2) Confirm with the company/site, the name and email address of the person who will be uploading the documents to me.
- 3) Confirm that the communication has been received and understood by the site team, by telephone. It would be appreciated if you could reply to this email, that you have successfully communicated with the site.
- 4) Confirm who the designated CB representative to attend the remote audit will be. If you wish a representative of the CB to be present at the site, this would be acceptable.
- 5) Send copies of the site application / contract review and any other pre-audit information your auditor was provided with to me.

A significant part of this process is that the site upload selected documentation to a designated secure BRCGS OneDrive, for review by BRCGS prior to the day, (this will need to be uploaded at least two days prior to the remote audit). In order to facilitate this upload process, I will need to send a link to the secure OneDrive, to yourselves as the Certification Body, and also to a designated representative of the site.

A short (up to one hour) video presentation of the production facility or selected parts will be requested and will be presented by the company during the review on the day.

Once the contact details have been confirmed, the site (and CB representative) will receive a document that will explain the remote compliance process in detail, along with a list of documents for them to upload around five days before.

The remote compliance review process is a new process as an interim measure currently in place of site compliance visits. Other members of the BRCGS Compliance Team may also be attending the video conference, which will take place on the day, as an observer of the process only.

For the video conferencing (through Microsoft Teams), I will use the same contacts for yourselves and the site, as for the upload link, unless requested otherwise. If the site require more than one attendee on the review, they will need to send the contact details to allow invitations to be sent.



I look forward to receiving the required information and in the meantime please don't hesitate to contact me should you have any questions.



Email 3 – Remote Compliance Review – Notification from Compliance Auditor to Site

Accompanied with documentation request form

You will have received a notification from your Certification Body with regard to the request for a remote compliance review of your site on **Date**. As a reminder, independent audits or reviews by the BRCGS Compliance Team are a mandatory requirement if requested, defined in the contract with your certification body and in the relevant BRCGS Global Standard and may be announced or unannounced. Outside pandemic times, compliance activity would be via an unannounced site visit, but due to restrictions, these visits are being undertaken remotely, specifically with short notice given to sites. **Please reply to this email to confirm that you have received it.**

The review will be in English.

Please could you confirm the GPS location of your site for our records? This can be obtained from a smartphone or from Google Maps, for example.

Please find attached detailed remote compliance review information. This document includes three parts:-

- 1) An explanation of the purpose of the compliance programme, and the process that we will be following during the remote compliance review.
- 2) Some questions on the attached form are regarding the business and the BRCGS audit that was conducted earlier this year. **Please answer these questions and save to the OneDrive link you will be provided with.**
- 3) A list of documentation that must be uploaded to the secure BRCGS OneDrive (a link for this will be sent separately), **by 9pm on the DATE.**

IMPORTANT - If documentation is not in English, please upload the Microsoft Word versions to enable easy translation, it saves time on the day of the review having to translate them!

These documents are specific references which are taken from the auditor's report, in order to enable verification of effective review during the audit. **If this is not completed in time this could result in the review being postponed and potential suspension or withdrawal of your certification.**

When uploading the documents to the BRCGS OneDrive, please can you also upload a completed copy of the attached checklists pages with appropriate reference numbers to documentation.

You are requested to prepare some video footage of some aspects of your facility to fully understand what the auditor viewed on their certification audit. Video footage can be recorded through mobile phone, tablet or camera, whichever is easiest for yourself as long as they are uploaded to your computer or the BRCGS OneDrive. This will be viewed during the audit through shared screen facility from your computer. Aspects are highlighted in the attached document.

It is strongly suggested that you have a wired (LAN) internet connection to ensure adequate bandwidth. Wi-Fi connection generally does not enable effective presentation.

You should discuss this aspect with your IT department and confirm that screen sharing is possible from your computer in advance of the meeting. Special permission may be required from them.

Your certification body representative(s), is copied on this email in case you need their support during this process.

On the day of the remote compliance review, via Microsoft Teams, we will have an opening meeting to start the day, as explained in the attached document. You will receive an invitation to this meeting. We may leave and re-join the meeting on the day to study evidence and for breaks. Your certification body representatives will also attend these meetings.



If you have any questions, please do not hesitate to ask, and I would be grateful if you could please confirm receipt of this email.

I look forward to speaking to you during the review.



Email 4 – Site Compliance Visit – Announced / Unannounced – CB Site Confirmation Notification

As part of the BRCGSs' compliance programme, BRCGS reserve the right to undertake a routine surveillance visit to any certificated site either announced or unannounced in order to uphold the integrity and ensure confidence in the BRCGS certification schemes. The visit is mandatory if requested and is a requirement of certification and should be defined in the contract they have signed with yourselves.

The site below has been selected for an unannounced site visit on xxxxxxxxxxxxxxxxxxxx

Company: Name

Location: Country

BRC Reference No.: XXXXXX

Type of visit - delete as appropriate:-

Announced - The visit will be short-period announced and the certification body is responsible for notifying the site. This is your responsibility as the company is your client. Notification to the site is a maximum of 3-4 working days prior to the visit. If you could notify the site of the visit at the appropriate time, no earlier than **DD-MM-YYYY (visit date minus 4 days)**, that would be appreciated.

Unannounced - The visit selected is unannounced and the site must **not** be made aware of the unannounced, confidential nature.

The visit may not encompass all areas of the plant depending on size and complexity of the operation. Estimated time of arrival at the site is 08.30.

If you wish a representative of your Certification body to attend, please could you confirm the identity of the person who will be attending?

If you require any further information, please do not hesitate to contact myself or Ritu Bajaj, Compliance Manager at the BRCGS.