



S7 - CQA GUIDANCE FOR AUDITS DURING THE COVID-19 OUTBREAK

UPDATED VERSION: Dec 2021

This guidance is valid from publication date and subject to periodic review as and when necessary (i.e. governmental guidance) or until further notice - whichever comes first

Reference documents and information:

- IAF ID 3: 2011 (Informative Document for the Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations)
- DAFMs COVID-19 internal policies
- GSSI COVID-19 Policy 17th July 2020 (https://www.ourgssi.org/wp-content/uploads/2020/07/200717_GSSI-Management-of-Extraordinary-Events-Policy.pdf).
- Commission Implementing Reg 2021/1325 (10th August 2021) amends Commission Implementing Regulation 2020/977 as regards the period of application of the temporary measures in relation to controls on the production of organic products from Reg 889/2008 & 1235/2008 as regards controls on the production of organic products due to the COVID-19 pandemic, which extends the period of application until the end of 2021
- IAF MD4:2018: “The use of information and communication technology (ICT) for auditing/assessment purposes” (see www.iaf.nu).

Additional Guidance:

- Principles on Remote Assessment Issue 1 (IAF ID 12:2015)

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Issued By	V. Flynn	Approved By	C. Morrison
Issue Date	Dec 2021		
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Scope

This guidance is normative for all CQA audits that will be conducted during the COVID-19 outbreak. All CQA Certification and Accreditation requirements not referenced or related to this policy shall remain applicable.

CQA Audit Options

Where travel restrictions or health risk restrictions exist, CQA is directing CBs to carry out reviews of Client organizations by virtual and online means, with later onsite reviews for specific criteria that cannot be assessed remotely, as a means of continuous data collection during this extraordinary period.

Therefore, and arising from the extended period of COVID 19 travel restrictions, the following is updated guidance to the CB when determining the circumstances of remote assessment and certificate management.

- The CB shall carry out a review on the effectiveness of their documented policies, for conducting remote audits. The review shall consider the identification of specific areas of risk associated with:
 - The ICT capability and security
 - The preparations and planning of the remote audit
 - Conducting the remote audit
 - Risks to the verification to the evidence base used to demonstrate conformity
 - Post audit follow up, risk review and certification decisions.

Guidance: IAF ID 12:2015 Issue 1 Conducting Remote Assessments

- Based on the review, The CB shall update, amend or otherwise confirm the remote audit procedures.
- Implement the remote audit procedures including; carrying out a risk assessment to determine the best course of action for each audit in order to protect the integrity of the Certification, the CQA Programme and the approval from competent authorities and the accreditation board.
- In the absence of national travel restrictions and corporation restrictions of visitors, CQA is open to Client Audits as normal but only if all parties are agreeable and a key desire of the Client to be combined with an on-site audit during the course of the certificate cycle to make up or complete any part of the regular audit/assessment not covered by the Remote Audit.
- Certificate extensions are allowable as follows:
 - Up to 3 months for CQA Organic Operators, subject to review and subject to DAFM guidance.
 - Up to 6 months for CQA Core and Eco. This is consistent with GSSI guidance.
- Certification of new applicant to the CQA Programme is not possible without an onsite audit.

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As per IAF guidance below it is the CQA Programme’s understanding that all short-term methods of assessment during the COVID-19 pandemic will have been developed and approved by all required relevant parties in the certification body operation.

Direction cited by IAF (IAF ID 3: 2011)

Planned Course of Action

An extraordinary event affecting a certified organization or Conformity Assessment Body (CAB) may temporarily prevent the CAB from carrying out planned audits on-site. When such a situation occurs, ABs and CABs, operating under recognised standards or regulatory documents need to establish (in consultation with certified organizations) a reasonable planned course of action.

Risk Assessment

The CAB should assess the risks of continuing certification and establish a documented policy and process, outlining the steps it will take in the event a certified organization is affected by an extraordinary event.

Policy and Process Development

The established policy and process of the CAB should define methods for evaluating the current and expected future situation of the certified organization and define alternate potential short-term methods of assessing the organization to verify continuing effectiveness of its management systems.

Information Gathering

To enable the CAB to assess risk for continuing certification and understand the certified organization’s current and expected future situation, the CAB should gather necessary information from the certified organization before deciding on an appropriate course of action. The information collected by the CAB should include the following as appropriate:

- When will the organization be able to function normally?
- When will the organization be able to ship products or perform the service defined within the current scope of certification?
- Will the organization need to use alternative manufacturing and/or distribution sites? If so, are these currently covered under the current certification or will they need to be evaluated?
- Does existing inventory still meet customer specifications or will the certified organization contact its customers regarding possible concessions?
- If the certified organization is certified to a management system standard that requires a disaster recovery plan or emergency response plan, has the certified organization implemented the plan and was it effective?
- Will some of the processes and/or services performed or products shipped be subcontracted to other organizations? If so, how will the other organizations’ activities be controlled by the certified organization?

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- To what extent has operation of the management system been affected?
- Has the Certified organization conducted an impact assessment?
- Identification of alternative sampling sites, as appropriate.

Agreed Forward Action

If the risk of continuing certification is low, and based on the collected information, the CAB may need to consider alternative short-term methods of assessment to verify continuing system effectiveness for the organization. This may include requesting relevant documentation (for example, management review meeting minutes, corrective action records, results of internal audits, test/inspection reports, etc.) to be reviewed off site by the CAB to determine continuing suitability of the certification (on a short-term basis only).

At a minimum, the process should address the following items:

- Proactive communication between the affected certified organization and the CAB.
- Steps the CAB will take to assess the affected organization and how the plan to move forward will be communicated.
- Specifying the maximum time an alternative short-term assessment method could be used before suspension or withdrawal of certification.
- Criteria for renewing normal oversight, including the method and timing of any reinstatement activities and assessments.
- Possible amendments to organization’s oversight plans on a case-by-case basis and in accordance with CAB procedures.
- Ensuring that any deviation from accreditation requirements and CAB procedures is justified and documented, and agreement reached with the AB on plans to address temporary deviations from requirements.

Re-establishment of surveillance/recertification activities according to CAB oversight plans when access to the affected location is re-established. If contact with the organization cannot be made, the CAB should follow normal processes and procedures for suspension and withdrawal of certification.

Signed 
CQA Programme Manager
 Dec 15, 2021

Date

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