

# BRCGS

## BRCGS Covid-19 Assessment Additional Module

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### Document Scope

This additional module covers the management of risks to product safety, quality and legality due to disruption and changes of operation caused by Covid-19.

### Change log

Version no.	Date	Description
1	28.5.2020	First publication
2	09/09/2020	Revision to reflect changes to BRCGS product offer

## 1. Introduction

The restrictions which many countries have brought into place to manage the spread of Covid-19 have in turn severely impacted the Food industry. Consumer buying patterns have changed resulting in panic buying, testing the ability of some food chains to respond whilst in other sectors closures of food service outlets and non-food retail has resulted in loss of markets.

Much of the focus in factories has rightly been on changing the way that we work introducing social distancing and new working practices to safeguard the health of our workers.

The changes which sites have had to make do however introduce new challenges to the way that food safety is managed and new risks mitigated. Not least the risks presented from potential disruption to supply chains, staff absenteeism and an influx of new temporary workers to the food industry.

This additional module has been developed to allow sites to demonstrate to their customers that they have effectively implemented processes and working practices to mitigate any new risks during this period.

It is published alongside a developing set of complimentary subject guides, useful links and webinars which are all available on the BRCGS website <https://www.brcgs.com/resources/covid-19-response/>

### 1.1 Scope

This additional module has been developed to verify processes in place at sites certificated to the BRCGS Food Safety Standard issue 8 but may also be used to assess sites certificated to other GFSI benchmarked Standards or equivalent 2<sup>nd</sup> Party audit programmes.

The scope covers the management of risks to product safety, quality and legality due to disruption caused by Covid-19.

The scope does not directly include health and safety practices implemented in response to Covid-19 for worker welfare.

The additional module is applicable to sites where a recertification or certificate extension assessment is not imminent.

## 2. Assessment Protocol

### 2.1 Assessment planning

The requirements of the module shall be assessed by a BRCGS registered Certification Body preferably the certification body with whom the site has been certificated for the core Food Safety Standard requirements as they will be familiar with the site and underlying food safety management systems.

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Assessments are conducted as an announced pre-planned activity on a date/dates agreed between the site and the certification body.

Auditors carrying out the assessment shall be registered with BRCGS and approved to carry out audits to the BRCGS Food Safety Standard issue 8. Auditors shall be qualified in the Field of the audit but are not required to be qualified down to product category level.

## 2.2 Assessment Preparation

The assessment process will be carried out remotely using technology both to share and discuss documents and the capability for the transmission of live video images of the site.

Certification Bodies are required to review in advance of the assessment date the availability and suitability of IT equipment and connectivity to allow the assessment to take place.

The certification Body should ensure the requirements of the IAF document MD4 The use of information and communication technology (ICT) for auditing/assessment purposes are applied to the assessment process.

The Certification Body shall be provided in advance with key information to facilitate the assessment including

- IT arrangements
- key contacts
- detailed site plan
- a copy of the most current BRCGS certification audit report or applicable GFSI Benchmarked scheme report

## 2.3 Assessment duration

The assessment will typically take 4 hours /half a day with further time required for review of corrective actions arising and preparation of the assessment report. The assessment may be carried out as a single activity or spread across one or more sessions by agreement with the site. Where more than one session is planned the full process must be completed within one week.

## 2.4 Assessment Process

The scope of the assessment shall be the same as that defined in the existing BRCGS Certificate.

The assessment process is intended to be undertaken remotely and shall include the following process steps

- Opening meeting
- Senior Management interview
- Online remote review of changes to management systems
- Verification of key changes
- Video tour of the operation to review new Covid-19 procedures in practice

- Closing meeting including identification of non-conformities and discussion of site action plans.

## 2.5 Non-conformities and corrective actions

Where the module requirements have not been met in full a non-conformity shall be raised by the auditor using the standard non-conformity classification as defined in the BRCGS Food Safety Standard issue 8 i.e. Critical, Major or Minor

Where possible the site will confirm the intended corrective action at the closing meeting. Evidence of correction shall be provided to the certification body within 7 working days of completion of the assessment.

## 2.6 Result

The result of the assessment will be classified as either Pass or Further action required.

To Pass there shall have been no Critical non-conformities identified at the assessment and all non-conformities shall have been corrected to the satisfaction of the Certification Body based on evidence provided within 7 working days of completion of the assessment.

## 2.7 Assessment Report

The assessment report shall be completed and entered onto the BRCGS Directory within 10 working days of the completion of the assessment.

The assessment report will be completed on the BRCGS Covid-19 Assessment report template available from the BRCGS Directory. This will include:

- site details and assessment date/dates
- result of the assessment
- details of any non-conformities identified together with corrective actions taken by the site where this has been submitted
- confirmation of the technology used to undertake the assessment both for desktop and site tour.
- narrative summary of the processes in place to comply with the requirements of the module.

## 2.8 Report Sharing

The BRCGS Directory allows sites to share their reports with customers including retailers, manufacturers, food service companies and other specifiers using the same mechanism as for the full BRCGS Certificated audits.

## 2.9 Governance and Compliance

The assessment process will be subject to BRCGS compliance activities which shall include BRCGS observing assessment activities and review assessment reports to ensure consistency of the assessment process and identification of any areas of improvement. It is a condition of acceptance of the assessment process that these activities shall be allowed on request.

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## Module Requirements

### 1. Senior Management

#### 1.1 Management responsibilities

The site shall have a clear leadership team with defined responsibilities for the sites Covid-19 processes. There shall be a nominated manager and deputy with specific responsibilities for managing and updating the Covid-19 processes and for the management of communications with staff.

#### 1.2 Covid-19 Management meetings

There shall be regular team meeting to review the Covid-19 processes and any changes required due to changing circumstances. As a guide the meetings should include:

- Update on the progress from the previous actions
- Review of resource issues – raw materials, staff, cleaning supplies etc.
- Any feedback from employees on measures taken
- Review of any incidents and learning points
- Review of absenteeism levels due to staff sickness, isolations for Covid-19
- Any changes to Government or industry advice
- Any new Customer requirements or requests

Actions and decisions from the meetings shall be documented

#### 1.3 Access to information

The site shall have access to Government advice and any applicable industry advice and actively review.

#### 1.4 Communication

The site shall have a clear communication process which is fully implemented to keep employees and where appropriate visitors informed on Covid-19 procedures and any changes.

### 2.1 Food Safety plan HACCP

#### 2.1.1 Changes to the pre-requisite plans

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Where changes are required to existing pre-requisite plans in response to Covid-19 there shall be a formal review process which includes sign off by the HACCP Team or Manager to ensure food safety is not compromised. Documented records of the review shall be kept.

### **2.1.2 HACCP review**

Where changes to the process or raw materials are introduced in response to the pandemic then this shall be reviewed by the HACCP Manager to ensure food safety is not compromised. This review and any outcomes shall be documented.

### **2.1.3 Management of critical control points**

The site shall ensure that the Critical Control Points are given specific emphasis including:

- Identification and training of deputies to manage CCPs to cover for any absenteeism.
- Clear identification of critical control points within the processing environment for the benefit of new employees.
- Additional review of records where checks are carried out by new or less experienced members of staff.

## **3. Food Safety and Quality Covid-19 Crisis Management**

### **3.1 Internal Audits**

The internal audit programme shall be reviewed to ensure the focus is on processes most at risk as a result of changes introduced in response to the Covid-19 pandemic. Any changes including the deferral of activities shall be documented.

### **3.2 Emergency Supplier and Raw Material Approval**

There shall be a process for the ongoing review of the potential risk to the raw material supply chain and continuity plan in case of disruption. Raw materials include ingredients, processing aids and packaging materials. There shall be processes for the emergency approval of suppliers and raw materials and acceptance testing protocols.

3.2.1 Where it is necessary to source from new raw material suppliers at short notice there shall be a process for supplier approval based on risk, prior to acceptance. This may include (although not an exhaustive list):

- Checks for existing certifications or audit reports
- Completion of a remote site audit by a competent auditor

- Online searches for historical site issues or information
- Review of product samples and specifications for assessment

Approval of new suppliers shall be agreed by the authorised Technical Manager.

3.2.2 Where new raw materials need to be sourced at short notice for example because of disruption to the usual supply chain then the approval process shall include as appropriate:

- Product specification review including all component raw materials as applicable
- an assessment of any significant variance from the current raw material it will be used to replace
- the nature of the raw material i.e. frozen, chilled etc and any subsequent effect on processing
- a review of allergens declared or considered likely to have cross contaminated during production. Most importantly check for any new allergens not present in the original raw material
- any potential effect on product shelf life
- the potential for fraud or substitution

3.1.3 Where new raw materials are introduced then raw material acceptance, inspection and testing procedures shall be defined and include as appropriate:

- the need for positive release of initial deliveries
- enhanced testing and inspection protocols for the new raw material receipt
- any specific additional laboratory testing required for the raw material
- the need for certificates of analysis to be supplied with the raw material

### **3.3 Customer Focus and Communication**

3.3.1 Where products are co-packed for brands or manufactured/supplied as customer branded products, any changes to be made to raw materials, raw material suppliers or significant changes to production methods or controls shall be notified to the brand owner in advance.

The changes and where required confirmation of agreements to change, need to be documented and finished product specifications updated as appropriate.

Wherever changes are required to customer brand labels these must be agreed in advance with brand owners.

## **4. Site Standards**

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## 4.1 Site Security and Food Defence

4.1.1 The food defence plan shall be reviewed to consider any additional requirements to manage any increased vulnerability resulting from the recruitment of high levels of temporary staff. This may include consideration of:

- the availability of site rules for new employees
- any requirements for additional signage
- employee security screening as appropriate

### 4.1.2 Management of visitors

The site shall review and define a clear policy for acceptance of visitors to the site during the period of Covid-19 restrictions. The policy shall consider the following visitor groups:

- General visitors
- Sub-contractors/service providers including Pest Control, Service Engineers, Contract Cleaners, laundry services, laboratory couriers etc
- Vehicle drivers
- Emergency services

The site policy and where appropriate lists of visitors and subcontract service providers which are permitted access to the site shall be available to site security staff at the entrance to the site.

Where service providers and transport drivers are allowed access, the site rules and requirements shall be available when coming on site. This should include any health declarations which may have been introduced. New site rules for visitors shall be provided in advance to the management of service providers.

## 4.2 Lay out, Personnel and Product Flow.

Any proposed changes to staff entrance points, employee and material flow around the site to accommodate social distancing shall have been reviewed to assess any likely impact on physical, chemical (allergen) or microbiological cross contamination. Where necessary to allow for new arrangements mitigations shall be put in place to protect food safety.

Sites with high-care or high-risk facilities shall ensure there is no compromise to the strict control of movement of people, equipment and product in and out of these areas.

## 4.3 Maintenance

4.3.1 Preventative maintenance plans shall be reviewed to set minimum maintenance levels acceptable to run the plant without unacceptable increased risk of breakdown.

4.3.2 Items which are of known risk of failure and consequent contamination risk shall be identified and regularly inspected where normal planned maintenance programmes have been reduced e.g. sieves, rubber gaskets, plastic mixing paddles etc.

4.3.3 Where engineering contractors/ service engineers are used these shall be closely controlled and managed in accordance with the sites Covid-19 visitor policies.

#### **4.4 Staff Facilities**

4.4.1 Changing areas and locker rooms.

Where it has been necessary to change the usual arrangements for changing facilities and/or locker areas, for example to achieve social distancing, this shall not compromise food safety.

Changing facilities for high risk and high care areas shall continue to meet the requirements of 8.4 of the Food Safety Standard.

4.4.2 Storage of Personal Protective Equipment (P.P.E.).

The site shall ensure that there are adequate storage facilities for any issued personal protective equipment. If any of the PPE is expected to be reused, then procedures shall be in place to ensure that this is:

- effectively cleaned after each use
- individually marked to be identifiable to the wearer
- safely and hygienically stored between shifts

4.4.3 Hand washing facilities

Where access routes to production areas have been changed, the site shall ensure that workers are provided with facilities to wash their hands before starting work in production areas.

The management of hand washing at periods of peak demand, for example the start of a shift shall ensure that the efficacy of hand washing is not compromised by the need to ensure social distancing.

#### **4.5 Chemical and physical product contamination control.**

Where additional equipment has been added to lines for instance Perspex screens to protect workers, then the potential for foreign body contamination shall be mitigated.

Where Perspex screens are added these shall be included in the glass and hard plastic register and inspection process to identify damage.

## 4.6 Housekeeping and Hygiene

4.6.1 Cleaning schedules and priorities shall be reviewed to include as appropriate:

- identification and inclusion of hard surfaces with the potential for transfer of Coronavirus between employees for example door handles, utensils, frequent touch points, re-useable crates etc.
- inclusion of additional equipment such as screens added to lines to safeguard workers
- the cleaning of equipment either being taken out of production or previously infrequently used equipment coming back into production.
- The need for specific cleaning procedures to be used where an employee is taken ill from suspected Covid-19 during the working day

Minimum acceptable access time for cleaning shall be established and factored into production planning.

4.6.2 Cleaning procedures shall be reviewed and as necessary updated to ensure these are accessible and processes clearly defined to facilitate use by any new cleaning staff.

### 4.6.3 Cleaning Materials

Contingency plans shall be available in case it is necessary to change cleaning chemicals or chemical supplier. The plans shall ensure that:

- the new product is appropriate and effective for the intended cleaning activity by reviewing specifications and discussions with the chemical supplier.
- cleaning instructions are changed for example, to accommodate any changes to dilution rates, usage and health and safety requirements.
- any changes to contact times or surface rinse to remove residues is fully understood and implemented
- new products are compatible with the cleaning equipment used on site for example foam cleaners
- materials remain suitable for use on site for example strongly scented cleaning materials are not purchased or used

### 4.6.4 Cleaning subcontractors

Where part, or all, of the cleaning activities are carried out by subcontractors, the subcontractor shall be notified of the sites Covid-19 management policies and ensure that these have been explained to their employees.

There shall be an effective process in place to ensure that any changes to the services provided for example staffing arrangements, changes to cleaning chemicals or methods are agreed in advance with the site.

## 4.7 Pest Control

4.7.1 Any changes to access arrangements for pest controllers for routine visits or in-depth pest management surveys shall be based on risk and consider:

- Site pest management history
- Products and raw materials handled and inherent risk of pest infestation
- Seasonal factors

4.7.2 Where pest controller activity is reduced, to compensate, additional in-house surveillance and pest reporting procedures shall be introduced following sufficient training. Where any pest activity is identified advice should be requested from the contracted specialist pest management company.

## 5 Product Control

### 5.1 Product Labelling/ Re- Labelling

5.1.1 The site shall have a procedure to ensure that whenever a change is made to a raw material, processing aid or to raw material supplier that the labels of all affected finished products are reviewed for accuracy. This label review shall consider:

- claims of provenance, organic etc
- country of origin declarations
- plant licence numbers e.g. EC numbers where product is outsourced
- allergen declarations
- ingredient list declarations
- ingredients of special emphasis
- nutrition claims

Changes required to labels shall be controlled through the label management procedures. Where necessary customers and government authorities shall be informed of and approve changes.

5.1.2 The procedures for the management of printers, the receipt, storage and issue of printed material shall be reviewed to ensure that this can effectively control the risks where temporary changes are made to label information. This should include:

- approval of changes before printing and the review of first print samples
- controls at the printer for separation of new printed packaging from existing stock

- clear identification on outer boxes overwrap etc to differentiate new and previous print runs
- checks on receipt of packaging at the site to ensure correct labels have been shipped
- clear segregation of new and existing incorrect label stock during storage
- additional specific checks on the production line to ensure the correct print run is being used.

5.1.3 Where secondary labels need to be applied to products for example to adjust packs for ingredient changes or repurposing of product from food service to retail sale this shall be completed in line with legal requirements.

Clear instructions shall be provided at the labelling area to show how additional labels should be applied and this should be accompanied with example packs for reference. Production line checks shall be carried out to ensure the correct label is used and that this is correctly placed on packs.

5.1.4 The site shall ensure that where new supplementary labels are printed on site that:

- labels are checked and signed off as correct for each batch produced
- batches of labels clearly identified by product and where possible label batch number
- records are maintained of the numbers of labels produced
- printed labels allocated to lines are checked in accordance with the core standard labelling requirements

## 5.2 Vulnerability assessment /fraud prevention

5.2.1 There is likely to be an increased risk of attempted fraud as a consequence of shortages created by the response to Covid-19. Vulnerability assessment programmes shall be reviewed and in particular sites shall:

- closely monitor raw material shortages and price changes to identify raw materials at greatest risk from fraud.
- pay close attention to articles and published incidents of fraud
- review the raw material risk rating and contingency plans
- increase testing or inspection procedures where appropriate for raw materials identified to be at increased risk.

## 7. Personnel

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During the Covid-19 crisis it is likely that absenteeism levels due to sickness or self-isolation will be higher and there may be the need to take on additional employees to compensate or to meet increases in demand.

## **7.1 Training – New and temporary employees**

### **7.1.1 Training – Temporary employees**

Training requirements and delivery methods shall be reviewed and where appropriate adapted to ensure effective training of new employees taken on directly or via agencies. This review shall include:

- Methods of training e.g. provision of remote training, e-learning resources or pre-reads where face to face training may be difficult
- Delivery of joining and reporting instructions for the first day ahead of the start date.
- Changes to the usual starter packs to reflect changes to working practices in response to Covid-19. i.e. induction training – site processes, actions in case of an emergency, health & safety, etc.
- Changes from the usual on the job training and supervision support needed to achieve social distancing requirements

### **7.1.2 Training of existing employees**

Records shall be maintained of training provided to existing staff on any changes to working procedures and practices relating to Covid-19.

## **7.2 Sickness reporting**

The existing processes for reporting sickness and guidance on medical screening shall be reviewed and where necessary updated and implemented.

## **7.3 Protective clothing and laundry facilities**

Where laundry facilities are used for the cleaning of protective clothing it shall be confirmed from the laundry service provider that the cleaning processes used are adequate to remove and kill coronavirus.

Any inhouse laundry facilities shall be operated to ensure washing at a minimum 60 °C and subsequent handling to minimise contamination risk by coronavirus.

## **7.4 Medial Screening**

The existing medical screening procedures shall be reviewed and any changes communicated to ensure employees are aware of the sites requirements with regard to the management of Covid-19.

The procedures shall include the criteria for the acceptance of employees back to work following absence due to self-isolation, suspected or confirmed cases of Covid-19.