Procedure 39

Procedure for managing extraordinary events – COVID-19 Coronavirus

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Purpose:

Based on the current situation on pandemic of the Novel Coronavirus (COVID-19) it is impacting the processes of MSCERT's to complete the scheduled audits and thus potentially impacting the Client's certification status of organizations.

In order to manage such situation MSCERT has decided to consider an exception in the case of the Coronavirus where this is preventing MSCERT from travelling to organizations in affected areas/countries.

MSCERT has defined its documented procedures and keep records of the activities mentioned below as required by the accreditation requirements /Schemes as applicable w.r.t its applicable standards.

To reduce the spread of Coronavirus COVID-19, it has introduced its procedure to assess applicable risks and allows clients to confirm if this extraordinary situation is preventing the usual audit activities during this pandemic event.

Reference standard :

Document IAF ID3 - Informative Document For Management of Extraordinary Events or Circumstances Affecting Abs, CABs and Certified Organizations.

IAF MD 4

Procedure:

Since there are domestic and international travel ban in many countries, based on current situation the locations where there are travel ban, MS Cert has decided to introduce the process of remote audit or delayed audit until the situation of virus outbreak diminish.

This needs to be mutually agreed between the client and MSCERT.

Audit will be assigned to respective code auditor(s) which will be official informed to the client through an regular audit notice along with the mode of audit, interaction app IDs (example: Skype/Zoom) etc.

The audit also include interaction with Top Management on Leadership, Context, Risk and opportunities , Objectives and Interested Parties, different process owners from all significant processes of the organisation, supplier monitoring, QC, productions, maintenance, Design, Sales, logistics ,HR etc.

Sample recording of such interaction also shall be recorded where applicable.

Relevant documents either can be uploaded to the respective app or can be mailed to the auditor for review in their end.

Related tools like remote computer monitoring system like team viewer etc. can be shared among the auditee and audit team for effective real-time interaction.

Adequate evidence of such information shall be captured by the auditor.

This is only possible for the cases where the client business /scope is falling under low and medium category, MSCERT need to review the risk for each and every cases.

For high risk scopes, where there are site activities like as applicable for construction, food, health care, mining, petroleum this remote off site audit shall also recorded with video evidences of site activities as captured by the be auditors through a virtual tour of site/s preferably with the facility of geo tagging in the pictures/video.

The man-days of such remote audits will be same as per its certification plan.

This is a temporary arrangement in order to manage the current situation of pandemic outbreak, the normal procedure of surveillance/recertification activities as per the regular documented procedure will be followed immediately once the situation improved at the various geographical locations.

MSCERT management will review the situation of the outbreak until the situation diminished.

Where the client is not in operation, the unit is fully closed with no staffs available on site, in such cases, information or application shall be received from the client as per format F89- Site specific information.

However, if all the points as per F89 indicate an adverse situation and the client is not performing its regular activities, neither has any alternative site to offer for audit.

For such cases, MSCERT adopts alternate short-term methods of assessment taking into consideration the following limitations:

First Surveillance Audit

Normally, the first surveillance audit after initial certification is to be within 12 months of the last day of the initial stage-2 audit. However, providing that sufficient evidence has been collected as above, to provide confidence that the certified management system is effective consideration may be given to postpone the first surveillance for a period not normally exceeding 6 months (18 months from date of initial certification).

Otherwise the certificate has to be suspended or the scope reduced.

a) Subsequent Surveillance Audits

There may be specific circumstances by which MSCERT can justify adjusting the timing of a subsequent surveillance audit. If an organization has to shut down completely for a limited period of time (less than 6 months), it would be reasonable for MSCERT to postpone an audit, that had been scheduled to occur, during the shutdown until the organization resumes its operations. The organization should inform MSCERT when operations resume so that the CAB can conduct the audit promptly.

b)Recertification Audits

Normally the recertification audit must be completed and the recertification decision made prior to expiration to avoid loss of certification .However, providing that sufficient evidence has been collected as above, to provide confidence that the certified management system is effective consideration may be given to extend the certification for a period not normally exceeding 6 month beyond the original expiry date.

The re-certification should be carried out within this permissible extended period. Otherwise, a new initial audit should be performed. The expiration of the renewed certification should be based on the original recertification cycle.

All deviations from the established certification program should be justified, documented.

All such cases with such amendments to organization's oversight plans on a case-by-case basis shall be maintained as per MSCERT's procedures and shall be reviewed by technical reviewer before granting continuation or recertification.

It is to be ensured that any such deviation from accreditation requirements and MSCERT procedures are justified and documented in the audit report.

If contact with the organization cannot be made, MSCERT shall follow its normal processes and procedures for suspension and withdrawal of certification.

Offsite remote audit based on ICT includes but not be limited to review of the followings: Management System policies and procedures, related amendments, internal audits records, Management Reviews Records, objectives programme, complaints, appeal, nonconformities, inspection record, corrective action, improvement, Training plan and record, legal and regulatory requirements, process and product control, evaluation, Document and record Control, use of certification and accreditation mark, customer feedback.

For FSMS,
- Review of the key changes since the last audit e.g. HACCP plans, product recalls and significant complaint levels.

- Status with regard to objectives and key process performance, management review and internal audits;

- Document review of processing records including but not limited to the monitoring and corrective actions linked to OPRPs and CCPs;

- Review of PRP records i.e. hygiene, pest control and maintenance records;

- A traceability test to ensure continued compliance with the Scheme rules;

- Emergency preparedness and response including the impact of the Corona virus on the supply chain of the organization and the potential impact on resources

The duration of this audit shall be appropriate to the complexities of the site and sufficient to adequately cover these aspects. Where the 'remote' audit identifies significant issues (i.e. major or critical non-conformities) or risk to the integrity of the scheme or the certification, then the validity of the certificate shall not be extended. Any identified minor nonconformities will require verification of the correction and the corrective action, prior to extending the validity of the certificate.

In all cases MSCERT is responsible for the decision to extend the certificate validity and is required to keep records to support the certification decision.

Specific to EMS/OHSMS, additionally coverage of audits shall include but not be limited to review of the following:

ISO 14001 -Aspect and impact assessment/OHS Risk Assessments (Site specific) , OHSAS 18001/ISO 45001 Accidents/Reportable Incidents, EMS/OHSAS/OHSMS Planning, Objectives & any changes, actions to Risks and Opportunities, Leadership, Communication & Documented Information, Needs & Expectation of Interested Parties, Operational Planning and Control **(Video or Image evidence with geo tagging)/**Designing ,Site Visit (**Video or Image evidence with geo tagging**), Calibration, Emergency Preparedness response, health monitoring, Evaluation of Compliance ,customer related process, Communication, PPE issue , etc.

For EnMS also, it shall includes:

EnMS System Management Documentation , Energy Policy, Risk & Opportunity Management, Strategic, Tactical, Operational Objective, Planning & Status, Energy performance improvement (energy efficiency, energy consumption, energy use, and energy baseline),Energy performance indicator value, outsourced & Process SEU ,Energy relevant Variables requirements, Type of Energy uses & Consumption, Static Factor, Energy Baseline Data & Development of Base Line Data, Energy Data Collection Planning etc.

Remote audit cannot be carried out for a establishment where the organisation is not operating.

For New application, Stage 1 Audits only can be carried out Off-Site as per the above procedure. However the Stage 2 audit will be carried out onsite which may be postponed until the situation improve. For special cases (on a case to case basis as per the risk assessment) stage 2 audit can be conducted partially through remote audit with a provision of virtual tours but final audit recommendation only can be made after an onsite visit minimum of additional 0.5 man-day where the effective manpower is upto 100 and 1 man-day in case, the effective manpower is more than 100 numbers.

All remote audit should be planned keeping adequate time and coverage with support of effective sample size based on the scope and risk of the client business processes.
Such audit shall be conducted under supervision of an IT coordinator or competent person to ensure smooth and uninterrupted audit service.

Respective auditors performing such audit also shall be trained to handle software, geotagging and related operations of performing remote audit, undertaking virtual tours etc.

Record of such training will be maintained.   This procedure will effect from 12th March 2020.

In this emergency situation, in order to maintain an economical balance, such an approach of remote audit has been adopted. No travel and stay expenses are applicable the regular audit fees as per client contract along with government taxes as applicable will be charged to the client.

This procedure is only to follow at time of emergency situation which will be immediately replaced by regular procedure once the situation is restored as per the geographical locations.

All the government advise and law shall be followed at any cases.

As a suggestion, following online tools/apps/software may be used in the remote audit upon mutual agreement between the two parties:

Data Sharing	Video Conferencing
- Email - Whatsapp - Dropbox - Team Viewer - Box - Google Drive	- Whatsapp - Skype - Zoom - Google hangout meets - Others
Others Geo tagging software -GPS map camera GPS CAM	

Record :
F81A.   Client's site specific risk assessment in emergency situation
F81B.   Register for cases of delayed assessment
F81C.   Register of cases with Remote assessment