

THE USE OF INFORMATION COMMUNICATION TECHNOLOGY (ICT) IN THE AUDIT PROCESS

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I. SQF Policy

- a. All SQF Food Safety and Quality Codes for certification, recertification, and surveillance audits can be conducted in part using remote activities.
- b. The goal of the updated SQF Audit Policy is to enhance the audit process allowing the auditor to conduct a more risk focused audit. It is expected that the remote activities will not disrupt the systems audit approach and that the certification of a site's SQF System is an assurance that the site's food safety and quality plans have been implemented according to the SQF Code requirements and the site's System has been verified and determined effective to manage food safety and quality.

II. GFSI

- a. The use of remote activities shall meet the following Global Food Safety Initiative (GFSI) requirements from GFSI 2020.1, Part II 3.1.2; 4.3; 4.6.1; 4.10.2; 5.23; 5.31; 5.32; 5.33; 5.34; and 5.34.1.

III. Key Terms

- a. **Information Communication Technology (ICT):** Information and communication technology. The use of technology for gathering, storing, retrieving, processing, analyzing and transmitting information. It includes software and hardware such as smartphones, handheld devices, laptop computers, desktop computers, drones, video cameras, wearable technology, artificial intelligence, and others. Reference: IAF MD:4
- b. **SQF Audit:** A systematic and independent examination of a site's SQF food safety and/or quality System by an SQF food safety and/or quality auditor to determine whether food safety, quality systems, hygiene and management activities are undertaken in accordance with that system documentation and comply with the requirements of the SQF food safety and/or quality Code, as appropriate, and to verify whether these arrangements are implemented effectively. The audit can be conducted in part using remote activities using information communication technology (ICT) from a location other than the physical location of the audit site
- c. **Remote Activities:** The actions that occur to collect objective evidence from a location other than the physical location of the audited organization as part of a full systems audit.

IV. General Principles

- a. SQFI favors the use of the term 'Information Communication Technology (ICT)' or 'remote activities' over the term 'remote audits' as a better description of this process.
- b. The use of ICT applies in instances of extraordinary events as well as to certification, recertification, and surveillance audits.
- c. The use of ICT applies to all the SQF Codes, including Fundamentals, Food Safety and Quality.
- d. Unless otherwise specified in this policy, the respective rules in the relevant SQF Food Safety Code, SQF Fundamentals and the SQF Quality Code apply.

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- e. All SQF food sector categories and sites are eligible to participate in the remote activities pending approval from the certification body based off the feasibility assessment (see section V below) and mutual agreement from the site.
 - f. The information identified in this document reference the following IAF Documents:
 - i. IAF MD 4:2018-IAF Mandatory document for the use of information and communication technology (ICT) for auditing / assessment purposes.
 - ii. International Accreditation Forum (IAF) Food Working Group Task Force Document: Remote Auditing Activities for Accredited Food Safety Certification.
 - g. Certification bodies that allow for the use of ICT as part of the SQF audit process shall have in place a process and procedures that follows the requirements of IAF MD 4:2018. Where there is a difference between the IAF MD 4:2018 document and the SQF Policy on the Use of Information Communication Technology (ICT) in the Audit Process, the CB shall defer to the SQF Policy.
 - h. The overall objectives of an audit shall not change with the use of ICT activities.
 - i. Remote activities or other ICT methods can only be used as part of the witness audit process to monitor auditor behavior.
 - j. Witness audits as part as the initial auditor qualification shall follow the audit plan and include the use of ICT, when applicable. For those parts of the audits that are conducted on-site the witness assessor shall be present in person and shall not conduct that part of the witness audit remotely.
 - k. Guidance for the site, auditor and CB shall be established and appropriate training shall occur that includes proper use and training of the applicable use of ICT.
 - l. The typical flow of the audit using remote activities includes the following steps. Each is further defined below:
 - Step 1: Determining the feasibility of using ICT methods with the site.
 - Step 2: Planning and scheduling the audit.
 - Step 3: Using ICT to collect audit evidence from a remote location.
 - Step 4: Conducting the onsite audit.
 - Step 5: Close out the audit.
- V. Determining the feasibility of using remote activities as part of the audit process.
- a. The decision to conduct a remote audit shall include a risk assessment to determine if the audit objectives can be achieved and include the following:
 - i. Agreement from all parties involved including the site, auditor, and CB.
 - ii. Availability of relevant personnel.
 - iii. Availability of documentation and records in electronic form.
 - iv. Access to all relevant IT systems, that the CB, auditor, and site will be able to use.
 - v. The capability of personnel to access and utilize the required technology used in remote activities.

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- b. The determination of allowing remote activities as part of the audit process shall take into consideration the following factors:
 - i. Sufficient and appropriate information for planning and conducting the audit.
 - ii. Adequate cooperation from the auditee.
 - iii. Adequate time and resources (e.g. access to adequate and appropriate Information and communication technology) for conducting the audit.
- c. Data protection and privacy laws, including ICT such as video, shall be considered and the use of these devices and relevant consents be sought from individuals involved.
- d. The remote activities shall only be conducted with the mutual agreement of the certified site and the CB.

VI. Planning and scheduling the audit.

- a. It is the responsibility of the certification body to ensure the effective application of SQF Code effectively achieves the stated audit objectives.
- b. Audit duration shall be calculated in line with the SQF audit duration guide stated in the relevant SQF Code and outline the activities that will be conducted remotely and what will be conducted onsite.
- c. A minimum of half of the audit duration shall be on-site.
- d. The audit plan and schedule shall reflect the scope and complexity of the audit and reflect the type of remote audit activities (refer to VII a. and b.) and when they were conducted. during the audit process.
- e. The scope of the audit shall consider the following:
 - i. If the audit is announced or unannounced audit.
 - ii. The Codes included in the scope of certification.
 - iii. The role of the audit team and the use of auditors, witness auditors and technical experts.
- f. Except for close out of non-conformances, remote activities or the use of ICT cannot be used with an unannounced audit.
- g. If remote activities cannot be achieved, then this should be identified through the planning process and areas assessed through the on-site audit.
- h. Prior to the remote activities, the CB shall identify the platform and specific ICT methods to be used by the CB and the site. This shall be agreed upon by the site and, if needed, appropriate training shall be provided for all stakeholders involved including the site and auditor.
- i. The auditor shall advise the site of the required information required to be reviewed prior to the commencement of the remote activity to allow sufficient time to gather the required information. The off-site activities shall use ICT and be in accordance with IAF MD 4:2018.
- j. Preference would be that the remote activities would occur prior to the on-site audit There shall be no more than 30 days between the use of ICT activities and the completion of the on-site audit. Under extenuating circumstances, and the 30-day requirement cannot be met, the time period may be extended to no more than 90 days, but may not extend outside the audit

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recertification window, if applicable A risk assessment shall be provided to SQF for review and approval to justify the extension.

- k. The auditor conducting the remote activities shall be qualified to conduct the audit under the site's scope of certification. It should be encouraged that the same auditor conducts the on-site and remote activities. If there is a need to use two auditors then both auditors shall be qualified to conduct the audit under the site's scope of certification and the CB shall have in place a policy that provides direction on how to communicate the results of the previous auditor's observations and findings to the subsequent auditor.
- l. Technical experts may make uses of ICT during the audit process. A qualified auditor is required to be synchronously present, either in person or remotely
- m. Any non-conformances that have been identified during the remote or on-site audit activities shall be considered a non-conformance to the final audit report and calculated as such.
- n. Areas identified as in-compliance indicate that the specific requirement is under control and the information reviewed as part of the audit process does not need to be repeated during the follow up activity.
- o. Any non-conformances that were identified during the on-site or off-site audit process shall be closed out following the requirements in the relevant SQF Code.4. If an extension was granted and the remote and on-site audit activities were greater than 30-days apart then major non-conformances identified in any of the SQF Food Safety Codes shall be closed out within 30 days of the sited non-conformance. This shall be sited in the audit report.

VII. Using ICT for Collecting Audit Evidence

- a. Audit evidence identified to be collected and reviewed using ICT shall ensure that the information reviewed meets the intent of the requirement. Examples of activities that can be conducted during the remote part of the audit process include:
 - i. Any requirement identified within the document audit.
 - ii. Review of policies, procedures, food safety (quality) plans, work instructions, and registers/listings.
 - iii. Interviews with key personnel.
 - iv. Production/operational records, logs or checks to support program reviews.
 - v. Changes to food safety (quality) plans, HACCP programs, and food safety (quality) management personnel.
 - vi. Review of internal audits, corrective actions, complaints, recalls.
 - vii. Traceability and mock recall exercise.
 - viii. Threat and vulnerability assessments for food defense and food fraud programs.
- b. Examples of ICT which can be used during the remote activities
 - i. Meetings and interviews by mean of tele-, web- or video-conference (i.e. Zoom, Microsoft Teams, Cisco WebEx, etc.).
 - ii. Document and record review by mean of remote access through a secure, web-enabled tool or secure, real-time sharing.

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- iii. Video or visual access to remote locations within the site from smart phones or wearable devices.
- iv. Reporting from in-line data monitoring systems.
- v. Pictures to support implemented procedures.
- vi. Drones to evaluate conditions during farm audits.
- c. When using ICT, the following shall be considered:
 - i. The location of the auditor and on-site personnel shall be in a location that allows for proper communication to be conducted.
 - ii. Interviews shall be conducted using synchronous, video-enabled technology, when possible.
 - iii. The location of the auditor conducting the activities shall be in a private location and a secured internet where data cannot be compromised.
 - iv. The audit duration of the remote activities shall be calculated and reflected in the final audit report.
 - v. All remote activities shall be conducted in the same manner as the on-site activities as it relates to collecting audit evidence, reporting findings, and communicating with the site.
- d. The auditor shall advise the site of the required information to be reviewed prior to the commencement of the remote activity to allow sufficient time to gather the required information. The off-site activities shall use ICT and be in accordance with IAF MD 4:2018.

VIII. Conducting the onsite audit

- a. An onsite audit shall be conducted as part of the SQF audit process and be a minimum of 50% of the total audit duration. The CB shall determine the onsite activities based on the risk to the process and/or product and include a verification of the site's location, design and condition and implementation of food safety practices.
- b. On-site activities shall include the following:
 - i. Follow-up on disputed documents and records from the remote
 - ii. activities; follow-up on interviews, and observation of work procedures (if the remote audit activity was conducted prior to the on-site activity).
 - iii. The implementation of the food safety and/or Quality plan(s) and good industry practices (e.g. GMP, GOP, GAP etc).
 - iv. Verification that the food safety management system, including HACCP, addresses all applicable parts of the site.
- c. When remote audit activities are used it is expected that the auditor spend 80% of their on-site audit time making observations and conducting interviews.

IX. Close out of the audit and the Audit Report

- a. The audit report shall follow the same requirements as outlined in the SQF Code, Part A, section 2.12 and include the following:

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- i. There shall be only one report for both the remote and on-site audit.
 - ii. The scope of certification description shall include the phrase, "Remote Activities" when remote activities are used.
 - iii. Where remote activities are used the audit plan and schedule shall reflect the type and activity used (refer VI. c.) .
 - iv. The findings of the remote and on-site audit shall be included in the audit report.
 - b. The audit process to grant certification shall follow the requirements in the relevant SQF Food Safety Codes and/or Quality Code.

- X. Tools and Training (to be developed)
 - a. Auditor Behavior
 - i. The use of ICT can be used as part of the auditor witness process to monitor auditor behavior.
 - ii. If the auditor is required to use ICT as part of the audit process, then training and oversight of the auditor shall be required.
 - iii. The auditor shall be assessed, as part of the witness auditor process, in the use of ICT.
 - b. The CB shall provide to the site, auditor, and CB staff the training needed to commence all ICT activities. This could include:
 - i. Feasibility guidance
 - ii. Compliance and oversight methods and activities
 - iii. Webinars and training for all stakeholders (CBs, Auditors, ABs, Sites)
 - iv. Witness assessment protocol for auditors