



COVID-19 RESPONSE PLAN

REFERENCES:

- IAF ID 3:2011 Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations
- IAF MD 4:2022 Use of ICT for Auditing/Assessment Purposes
- JASANZ COVID-19 Policy v1.0

INTRODUCTION:

This response plan is intended to provide instruction on how Global Certification (now under Compass Assurance Services) intend to continue conducting certification audits during restrictions imposed by the COVID-19 pandemic.

Where possible, on-site audit activity will continue, however this will only be where it does not contravene the current government restrictions as per www.health.gov.au

This website will be monitored daily by the Directors and staff will be updated on any significant changes.

This response plan has been prepared in consultation with JASANZ COVID-19 Policy and IAF ID 3:2011.

DETERMINATION OF HOW TO PROCEED WITH THE AUDIT PROCESS

In accordance with IAF ID 3, the following information will be obtained before deciding on how to approach each audit:

- 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?



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- 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 been shipped or subcontracted to other organizations? If so, how will the other organizations' activities be controlled by the certified organization?
- 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.

GC will consider this information prior to determining a short-term assessment solution to verify system effectiveness for the organisation.

The short-term assessment solution will include:

- 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

HOW WE WILL COMPLY WITH THESE CONSIDERATIONS:



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Element	Compliance
Proactive communication between the affected certified organization and the CAB.	This will take place between the certified organisation and the auditor at least one month before the audit is due
Steps the CAB will take to assess the affected organization and how the plan to move forward will be communicated.	Recorded on the audit program/plan
Specifying the maximum time an alternative short-term assessment method could be used before suspension or withdrawal of certification	Recorded on the audit report
Criteria for renewing normal oversight, including the method and timing of any reinstatement activities and assessments.	Notes to be provided in the job brief, particularly where site visits and operational work was not conducted. This will be recorded in WFM as a note for the next audit.
Possible amendments to organization's oversight plans on a case-by-case basis and in accordance with CAB procedures	Three-year plan to be amended on a case-by-case basis. Changes communicated on the job brief, WFM updated to reflect changes, this may be timing to audits, splitting audits or other notes that may be applicable to ensure the next assessment covers any gaps.
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.	Deviation from accredited requirements are to be recorded in the audit report



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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	This will take place in consultation with the organisation and current government guidelines
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AUDIT PLANS AND REPORTS:

Audit plans and reports are to contain detailed information on how the audit was conducted. Records of who the auditor interviewed during the audit are to be retained in the audit report

A list of all documents reviewed as part of the remote review will also be maintained in the audit report.

SURVEILLANCE AUDITS

100% of surveillance audits are able to be conducted remotely off site. Auditors are to prepare a detailed audit plan outlining when and how communications with the client will be conducted.

All ICT used in the audit process is to be documented on the audit plan.

The auditor is to provide justification as to how the audit was conducted to ensure integrity of the system. All remote audits will comply with IAF MD 4:2022.

INITIAL AND RECERTIFICATION AUDITS:



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The preference is to visit the client site, however where this is not possible, clear documented evidence is to be retained through the audit plan and the audit program to ensure there is sufficient justification as to how the integrity of the audit process was maintained.

The auditor is to provide detail on how operational work was reviewed, whether this is through use of technology or review of past client files.

VERIFICATION OF CORRECTIVE ACTIONS

Auditors are able to use alternate methods to close out nonconformances. This can include but is not limited to:

- Use of ICT (such as video conferencing)
- Document or procedure review
- Remote review of documented evidence provided by the client

If insufficient evidence is provided, GC will escalate the nonconformity.

The usual processes for suspension will still apply.

AUDITOR VISITS TO CLIENT SITES

All auditors are required to assess risks prior to attending client sites.

GC COVID-19 management protocols are communicated to the client in the audit plan.

Auditors are encouraged to limit time on site where possible and are able to insist an audit is conducted remotely if social distancing is not able to be practiced.

Site visits and auditor travel will be in compliance with local state regulations.

Auditors are only to attend client sites and Compass offices if they have been double vaccinated with a TGA approved vaccine.



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Auditors who have not been vaccinated are to conduct audits remotely.

In cases where visits to client sites are required to ensure the integrity of the management system, the onsite component will be conducted by a vaccinated auditor.

Update as of May 2022: Due to the lifting of restriction by the Australian Government, on-site audits are the default method for performing assessments. Remote audits will still be performed on a case-to-case basis.