

GSA Seafood Processing Standard Blended Audit Policy

1.0 Scope and Purpose

- 1.1 This policy describes the scope, eligibility, and procedures for a blended audit¹ process under Global Seafood Alliance (GSA) Seafood Processing Standard (SPS) where the facility is partly audited remotely and partly on-site.
- 1.2 This policy is applicable to certified facilities and new applicants subject to approval by GSA.
- 1.3 The details presented herein provides guidance on blended audits to Certification Bodies (CBs) to ensure business continuity while maintaining the integrity of GSA Standards and compliance to GFSI benchmark requirements.

2.0 Normative Documents²

- 2.1 GAA³-BAP SPS Remote Audit Policy (current version).
- 2.2 IAF MD 4:2018_Issue 2 The Use of Information and Communication Technology (ICT) for Auditing/Assessment Purposes.
- 2.3 ISO 19011:2018 Guidelines for auditing management systems, Third edition 2018-07.
- 2.4 GAA-BAP Requirements for Certification Bodies offering Certification Against the Criteria of the Global Aquaculture Alliance (current version).
- 2.5 GFSI Benchmarking Requirements Version 2020.1.

3.0 Agreements and Restrictions

- 3.1 Only CBs fully approved by GSA are eligible to conduct blended audits.
- 3.2 Prior to the scheduling of a SPS blended audit the CB, facility and GSA shall mutually agree to the following conditions as they apply:
 - 3.2.1 To utilize a remote audit process followed by an on-site audit.
 - 3.2.2 To utilize Information and Communication Technology (ICT) in accordance with IAF MD4 (normative document 2.3) for the remote portion of the blended audit.
 - 3.2.3 To provide essential documentation, schedule and attend meetings, conduct technology checks, and document reviews, and develop and utilize an audit plan as prescribed in normative documents of Section 2.

¹ Blended audit can be described as an audit where it comprises a remote portion of the audit followed by an on-site portion.

² For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

³ GAA and GSA are interchanged synonymously in Normative Documents through a transition period of Global Aquaculture Alliance (GAA) to GSA and will be updated in subsequent revisions.

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- 3.3 All parties shall agree that the remote portion of the blended audit may be discontinued by the auditor if ICT problems prevent the remote audit from being conducted in a timely manner, or if integrity of the remote audit is compromised due any reason. In such situations, the CB and facility must plan and reschedule to complete the portions of the remote audit and review and verify those aspects during the on-site portion of the blended audit as soon as possible per below.
- 3.3.1 The maximum period of time between the beginning and the end of all audit activities included in the blended audit duration to maintain the audit efficiency and integrity shall not exceed 30 calendar days.
- 3.3.2 In specific situations where the requirement at 4.3.1 cannot be met, the Certification Bodies must conduct a risk assessment for further extension of audit time, beyond the above stated 30 calendar days, on the efficiency and integrity of the audit. If the risk assessment results indicate no adverse effects on the efficiency and integrity of the audit, the period of time between the beginning and the end of all audit activities included in the audit duration shall not be extended beyond 90 calendar days.
- 3.3.3 If, due to unforeseen circumstances the audit cannot be completed within the above stated 90 calendar days, the audit will not be considered GFSI compliant.
- 3.4 Facilities electing to receive a blended audit shall be capable of such audits and in operation at the time of the audit. All parts of the facility and personnel shall be available for the entire audit process – both for the remote portion and the on-site portion of the blended audit.
- 3.5 CBs shall retain the documentation, including the risk assessments pertaining to the extension of the audit time beyond the 30 calendar days.
- 3.6 The CB shall have a procedure/policy for retention of objective evidence including video or audio recordings beyond which these shall be deleted/disposed of per agreements with the facility.
- 3.7 GSA Program Integrity reserves the right to participate as an observer of blended audits conducted by CBs, including but not limited to real time and recorded ICT interviews, to assess the effectiveness of the audit process. The CB shall arrange technological and physical access for this participation upon request.

4.0 Auditor Qualifications and Assignments

- 4.1 The CB shall ensure auditors conducting blended audits are properly trained in remote auditing, including the use of ICT tools used in the remote portion of the blended audit (see Normative Documents 2.3 and 2.4, and reference document ISO 9001 Auditing Practices Group Guidance on: REMOTE AUDITS Edition 1, 2020-04-16).
- 4.2 Shadow audits of CB auditors: (refer to section 3.7 in GAA-BAP CB Requirements document)
- 4.2.1 The auditor in training can be part of the SPS blended audit where an assigned CB auditor is conducting the remote portion of the blended audit using ICT tools.

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- 4.2.2 The auditor in training must have undergone the GAA-BAP Remote Auditor Training either administered by GSA or the CB.
- 4.2.3 The CB and/or auditor scheduling these shadow audits must ensure that the ICT platform that will be used in the remote portion of the blended audit can accommodate more than one individual since some ICT applications have inbuilt restrictions on the number of participants that can log in simultaneously.
- 4.2.4 Both the lead auditor (assigned auditor to conduct the blended audit) and auditor in training must be part of the pre-audit preparation.
- 4.2.5 The auditor in training must adhere to all other criteria of the shadow audit process as detailed in the GAA-BAP CB requirements document and the CB's own procedures.
- 4.3 Witness audits of CB auditors: (refer section 3.7 in GAA-BAP CB Requirements document)
 - 4.3.1 The witness audit(s) carried out as part of the Certification Body's initial auditor qualification must follow the standard audit plan agreed with the facility, including the use of ICT as applicable, without compromising the effectiveness of the witness assessment. The witness auditor must be present on-site for parts of the blended audit carried out on-site.
 - 4.3.2 The auditor performing the witnessing function must meet all criteria per the current GAA-BAP CB Requirements document section 3.11.
 - 4.3.3 The auditor being witnessed must have completed at least one shadow audit remotely in addition to the shadow audit criteria per the CB Requirements document prior to being witnessed.
 - 4.3.4 The auditor being witnessed is responsible for all aspects of the blended audit as stipulated in the GAA-BAP CB Requirements document.
 - 4.3.5 The challenges of ICT with two auditors being present during the remote portion of the blended audit must be addressed and sorted out by the CB prior to the witness audit. This is important because the auditor witnessing not only has to observe what is being audited but also observe the auditor being witnessed.
- 4.4 Both auditors must abide by the facility confidentiality agreements, if any.
- 4.5 The reporting of both shadow and witness audits to GSA by the CB must conform to the criteria per GAA-BAP CB Requirements document.

5.0 Audit Duration and Planning

- 5.1 Blended audit duration decisions shall be in accordance with the current issue of the BAP CB Requirements document for SPS audits and shall be re-assessed by the CB prior to scheduling the blended audit based on risk assessments.
- 5.2 If a CB foresees a situation where audit duration is expected to exceed those specified in the CB requirements document and based on risk assessments, the CB shall contact BAP for guidance prior to the start of the blended audit. In situations where the duration of the blended audit process takes less time than that of a full on-site audit, the CB/auditor must provide justification and record this in the audit report.

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5.3 Audit preparation and planning shall include the following considerations:

- 5.3.1 The scope of the blended audit, correct issue of the standard and normative documents to be used.
- 5.3.2 The facility size, product forms, species, production processes, complexity, and language barriers.
- 5.3.3 The facility activities, areas, information, and personnel to be involved in the remote portion and the on-site portion of the audit.
- 5.3.4 Requests for documentation/records prior to the audit, and accessibility thereof.
- 5.3.5 Audit duration must be given due consideration during preparation, pre- audit, remote and on-site stages of the blended audits. Audit time spent between remote document/record reviews and physical on-site verification may also need consideration.
- 5.3.6 Development of a written audit plan to be shared with the facility, including tasks to be verified, personnel to be interviewed, timeframes, process reviews, breaks, sampling, etc., and what aspects would be covered during the remote portion and those that would be verified during the on-site portion of the blended audit.
- 5.3.7 Planning for identifying and addressing issues regarding information that cannot be shared remotely due to confidentiality, accessibility, and other issues or concerns and how these could be verified during the on-site portion of the blended audit.
- 5.3.8 Planning shall seek to identify potential activities/clauses where audit objectives may be difficult to achieve and how these could be verified during the on-site portion of the blended audit.
- 5.3.9 Available ICT tools, and those that appear optimal for use, including but not limited to, video conferencing, smart phones, drones, wearable video technology, screen sharing tools, other internet enabled means as deemed suitable by the CB (see IAF MD 4:2018 clause 4.2.3), and the extent to which ICT will be utilized. Identified ICT tools and back up if needed, shall be tested by both the CB and facility prior to the actual remote portion of the blended audit.
- 5.3.10 Review availability of quiet areas for interviews without noise and interruptions. Noise cancelling audio options may be considered.
- 5.3.11 Remote portion of the blended audits must be executed by auditors and other involved persons (e.g., drone pilots, technical experts) with required training and experience to understand and utilize technology necessary for the audit.
- 5.3.12 Selection of sample audit data (e.g., offline, online) at both the facility and CB, for collecting, observing, and reviewing objective evidence.
- 5.3.13 Review of facility applications and self-assessments.
- 5.3.14 Review of audit reports, non-conformity reports and corrective action evidence from the most recent previous audits, where available and/or applicable.

5.4 CBs shall be provided specialized SPS Remote Audit Checklist Tool as guidance for use when conducting blended SPS audits. This color-coded checklist will help in identifying which requirements may be audited by way of document/record review during the remote portion and those that require on-site physical inspection/observation and interviews of facility staff or both.

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- 5.5 Blended audits shall incorporate the use of synchronous ICT tools (e.g., real time video streaming, audio visual monitoring, screen sharing) to the extent possible to allow for observations in real time during the remote portion of the audit. When this is not possible, asynchronous ICT tools (time and date stamped video clips, photographs, pictures, screen shots, etc.) may be considered so as to achieve audit objectives and not to jeopardize the audit and program integrity. Subsequently these issues shall be verified during the on-site portion of the blended audit. Risk assessments shall have identified these concerns.
- 5.6 Personnel interviews shall be planned and conducted during the onsite portion of the audit.

6.0 Audit Process

- 6.1 CBs and auditors shall take precautions to ensure full integrity of the blended audit process. Blended audits must address the full scope of the SPS and the audit (e.g., certification, extension of scope).
- 6.2 All parts of the facility shall be included in blended audits; no exclusions are allowed during an audit within the scope selected.
- 6.3 CBs shall strictly follow the requirements stated in IAF MD 4 to ensure information security and confidentiality.
- 6.4 Audit duration in hours must be specifically noted in the audit reports. Deviations from agreed audit duration shall be stated with proper justification.
- 6.5 The format of the audit process shall consist of all elements per SPS in accordance with ISO 19011 – opening meeting, site assessment (including dormitory and canteen, if applicable), collection of any necessary samples, worker interviews, review of management systems / records and procedures (including traceability/mass balance exercises), closing meeting, and provision of non-conformance summary to the facility.
- 6.6 Physical site inspection during the on-site portion of the blended audit shall include as a minimum inspection / physical verification of pre-requisite programs including GMPs and SSOPs, implementation of the Food Safety Management Systems including HACCP activities, CCP monitoring, process flow verification, worker interviews, product and effluent sampling, storage areas, external areas, pest control activities, etc.
- 6.7 Document and record reviews during the remote portion of the blended audit shall be done by video conferencing, online document sharing, and/or other means as deemed suitable by the CB.
- 6.8 The facility manager or person in charge must remain present and/or available throughout the entire blended audit process (exception – personnel interviews must be conducted in private). Interviews shall be conducted in a noise free area without interruption.
- 6.9 Facility audit representative and workers' identities shall be protected, and interviews shall be conducted in private by employing video calls/conferencing during the remote portion and face-to-face during the on-site portion of the blended audit.
- 6.10 Facility and site physical tour/inspections shall be conducted during the on-site portion of the blended audit for the most part and those that are required to be done during the remote portion of the audit must be done by employing live video streaming (synchronous) to the greatest possible extent. If this is not possible, the CB shall assess the situation and consider time stamped recorded videos taken by the auditee. In all cases the CB/auditor must ensure integrity of the blended audit is not jeopardized.
- 6.11 If the remote portion of the blended audit cannot be completed due to technology

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breakdown/malfunction during the audit, the audit shall be rescheduled, however, must follow the timelines stated at clause 3.3. The auditor shall immediately inform the CB, who will inform BAP. The aspects that were not covered during the remote portion of the audit shall be audited during the on-site portion of the audit at a rescheduled date based on full agreement between the facility, CB and BAP. Such deviation must be stated in the audit report (see clause 3.3 above). This may have a bearing on the audit duration which the CB must take into consideration.

- 6.12 CBs and auditors shall determine whether product and/or effluent sampling and testing requirements can be satisfactorily fulfilled during the on-site portion of the blended audit.
- 6.13 Objective evidence obtained during the blended audit shall be logged and retained by the CB as deemed necessary. Any video or audio recordings as part of the objective evidence shall be obtained with the explicit consent/agreement with the facility and shall comply with IAF MD 4.

7.0 Reporting

- 7.1 Non-conformities identified by the auditor during the SPS blended audit shall be handled per BAP CB Requirements document (current version).
- 7.2 Corrective action evidence for closure of non-conformities shall be received and reviewed within the timeframe stated in the BAP CB Requirements document (current version).
- 7.3 The 35-day timeframe for submitting the corrective action evidence against non-conformities issued during the blended audit will start from the day following the end of the audit. CBs shall complete the closure of all NCs and technical reviews within the KPI timeline stated in the CB Requirements Document.
- 7.4 Audit reports shall be submitted in the same format as those used for fully on-site audits (BAP PORTal/Excel, as applicable).
- 7.5 The auditor/CB shall state “Blended Audit” on the audit report and corresponding checkboxes in BAP Portal as applicable.
- 7.6 Audit reports shall satisfy reporting requirements of IAF MD4:2018 clause 4.2.6 as to the types of ICT tools utilized and effectiveness of ICT to achieve audit objectives pertaining to the remote portion of the blended audit. These can be recorded in a table in individual Remote Audit Checklist Tool and in BAP PORTal. Examples include: “database records”, “email correspondence”, “telephone interviews conducted”, “video calls/skype”, “screenshots viewed”, etc.

8.0 Certificate Issuance, Content and Validity

- 8.1 CBs shall issue a new certificate based on a successful outcome of the blended audit.
- 8.2 Certificate expirations shall be handled per the current issue of the CB Requirements document.

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