



## KENYA BUREAU OF STANDARDS CERTIFICATION BODY

### CER/POL/09: Policy on Management of Extra Ordinary Events or Circumstances Affecting KEBS Certification Body(CB) Certified Clients or their Customers.

#### 1. Introduction

- 1.1 This Policy provides information regarding actions to be taken by KEBS CB and its certified clients in the event of any situation preventing access to KEBS CB certified clients, such that planned certification activities on **Initial Certification**, **Surveillance Audits** and **Recertification** cannot take place.
- 1.2 These situations include events preventing access to certified clients, general access to a geographical area (including critical locations). The situations also include events directly affecting KEBS CB ability to operate normally, as may be guided by applicable Laws, Government Circulars or KEBS Human Resource Policy.

#### 2. References

- 2.1 IAF Informative Document IAF ID 3: 2011 "Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations".
- 2.2 FSSC requirements for Certification Bodies in relation to novel coronavirus (COVID-19)-ver. 2

#### 3. Terms and Definitions

**3.1 Certified Client:** Organization whose Management System has been certified.

*(Source: ISO/IEC 17021-1:2015)*

In the context of this Policy, this pertains to all bodies certified by KEBS CB.

**3.2 Remote Auditing:** The facilitation of auditing a certified client or person from a location other than that being physically present.

**3.3 Hybrid Audit:** An audit conducted using a combination of both physical/on-site and remote audit

#### **3.4 Extraordinary event or circumstance (EEC)**

A circumstance beyond the control of the organization, commonly referred to as "Force Majeure" or "act of God". Examples are war, strike, riot, political instability, geopolitical tension, terrorism, crime, pandemic e.g. COVID-19, epidemic, flooding, earthquake, malicious computer hacking, other natural or man-made disasters. *(Source: IAF ID 3: 2011).*

## 4. Events or Circumstances Affecting Certified Clients, KEBS CB and required actions

### 4.1 Actions to be taken by Certified Clients

4.1.1 For each case where a certified client has been affected by an extraordinary event or circumstance, the certified client shall evaluate the risks presented to the scope of certification.

4.1.2 In the first instance, the certified client shall conduct an evaluation on the extent of any impact of the situation on its ability to continue to operate in accordance with the certification requirements, detailing:

- a) Scope and extent of the affected services and products, business areas, and sites;
- b) Number of affected customers;
- c) When the certified client will be able to function normally within the current scope of certification;
- d) Alternative programs planned to maintain confidence in the certified client's systems;
- e) Site actions in response to the extraordinary event or circumstance, e.g. development/adjustment of procedures and operations to ensure continued compliance to the FSSC Scheme and the supply of safe products;
- f) whether the existing inventory still meets customer specifications;
- g) whether the certified client has implemented a disaster recovery plan or emergency response plan effectively as required by the management system standard;
- h) whether some of the processes are, or need to be subcontracted to other organisations, and if so, what controls have been put in place;
- i) whether an impact assessment has been conducted;
- j) for Food Safety Management Systems, documented risk assessment to include as a minimum;
  - ✓ 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. It is expected that certified organizations increase the frequency of internal audits in support of the FSMS and to ensure food safety.
  - ✓ Pending compliance activities / legal proceedings.
  - ✓ Whether the organization is operating to the scope of certification.
  - ✓ Any changes to processes or services outsourced following the EEC.
  - ✓ Emergency preparedness and response including the impact of the EEC on the supply chain of the organization and the potential impact on resources and food safety.

4.1.3 The outcome of the review shall be recorded and be made available for assessment by KEBS CB on demand.

## 4.2 Actions to be taken by the KEBS Certification Body

- 4.2.1 Where operations of KEBS CB are affected by extraordinary event or circumstances, the policy guidelines issued by relevant Accreditation Bodies (AB) shall apply.
- 4.2.2 When determining whether it is possible for certification to be maintained under the EECs, KEBS CB shall take into account the extent of the impact on the certified client and determine whether it is possible for certification to be maintained under the circumstances.
- 4.2.3 If contact with the certified client cannot be made, KEBS CB shall follow normal processes and procedures for suspension and withdrawal of certification.

## 4.3 Initial certification and scope extensions

- 4.3.1 Initial certification and extension of existing scopes can only be operated when the full planned audit and appraisal is possible as in such cases it is not possible to support a certification decision with existing information originating from previous oversight activities.
- 4.3.2 Theoretically it might be possible to conduct all these activities off-site.
- 4.3.3 Therefore, during a period when due to extraordinary circumstances, on site operation and auditing is not possible, initial certification and scope extension is only possible if all above mentioned activities can be done remotely or hybrid in a satisfactory manner.

## 4.4 Surveillance activities (if applicable)

- 4.4.1 Surveillance activities must be completed as quickly as possible once the emergency status has been lifted and as soon as the normal situation and operation is restored. Wherever possible the surveillance must take place within the **current** certification year. Subsequent surveillance activities should continue in line with the original program.
- 4.4.2 In case of the first surveillance audit after initial certification, a postponement of the audit should not exceed 6 months (18 months from date of initial certification).
- 4.4.3 In case of subsequent surveillance audits a postponement of the audit should not exceed 6 months.
- 4.4.4 Extended periods between surveillance visits as specified above may result in a need for additional surveillance visits for the remainder of the certification cycle.
- 4.4.5 For FSSC Scheme, for surveillance audits for Ver.5 upgrade, the CB shall assess the risks in the situation of the certified organization and take appropriate action(s) that could lead to a certification decision to maintain the Ver.4.1 certificate, suspend the Ver.4.1 certificate or postponement of the surveillance (Ver.5 upgrade) audit by a maximum of 6 months within the calendar year, dependent on the outcome of the risk assessment. The exception will also apply to the first surveillance audit following an initial certification.

- 4.4.6 During postponement of audits KEBS CB shall use ICT means of monitoring that may be available such as remote assessments (see IAF MD 4), desktop reviews of documentation submitted or other methods. Examples of the use of ICT during audits/assessments which KEBS CB shall apply may include but are not limited to:
- a) Meetings; by means of teleconference facilities, including audio, video and data sharing;
  - b) Audit/assessment of documents and records by means of remote access, either synchronously (in real time) or asynchronously (when applicable);
  - c) Recording of information and evidence by means of still video, video or audio recordings;
  - d) Providing visual/audio access to remote or potentially hazardous locations.
- 4.4.7 The objectives for the effective application of ICT for audit/assessment purposes are to:
- a) Provide a methodology for the use of ICT that is sufficiently flexible and non-prescriptive in nature to optimize the conventional audit/assessment process;
  - b) Ensure that adequate controls are in place to avoid abuses that could compromise the integrity of the audit/assessment process;
  - c) Support the principles of safety and sustainability.
- 4.4.8 Measures shall also be taken to ensure that security and confidentiality is maintained throughout audit/assessment activities.
- 4.4.9 Other schemes, normative documents and conformity assessment standards may impose limitations on the use of ICT for audit/assessment and may take precedence over this Policy.

## **4.5 Re-certification**

- 4.5.1 If based on information gathered by the certification body, there is sufficient documented proof to provide confidence that the certified management system is effective, then KEBS CB may consider to extend the certification for a period not exceeding 6 months beyond the original expiry date.
- 4.5.2 If the recertification assessment cannot be undertaken within 6 months, the certificate shall be suspended. In this case the regular policy of KEBS CB in case of suspension and the certification contract will be applicable.
- 4.5.3 For the FSSC Scheme, in case the Ver.4.1 certificate will expire, a certificate validity extension of up to 6 months is allowed following a documented risk assessment. In all cases the KEBS CB will be responsible for the decision to extend the certificate validity. The KEBS CB may issue an extended Ver.4.1 certificate to the organization. The full Ver.5 re-certification audit needs to take place within the 6-month validity extension window, with sufficient time to ensure that the extended certificate does not expire, and continuous certification is maintained. The new Ver.5 certificate dates shall be aligned with the current certification cycle.