



# **POLICY ON MANAGEMENT OF EXTRAORDINARY EVENTS OR CIRCUMSTANCES AFFECTING SON MSCMSC AND THEIR CUSTOMERS**

## **1. Introduction**

- 1.1 This policy document present actions to be taken in the event of any situation preventing access to certified clients, such that planned certification activities cannot take place.
- 1.2 These situations include events preventing access to specific clients; general access to a geographical area (including critical locations); or directly affecting the CAB's ability to operate.

## **2. Terms and Definition**

### **2.1 Certified client**

Organizations whose Management System has been certified by SON MSC MSC.

### **2.2 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 including instances such as where due to security and/or visa issues in the Country, an audit cannot be performed as announced or unannounced.

## **3. Acronyms**

SON MSC- Standards Organisation of Nigeria

ICT- Information communication technology

## **3. Events or Circumstances Affecting Certified Clients, SON MSC and required actions**

### **3.1 Actions to be taken by the SON MSC**

3.1.1 The policy guidelines issued by relevant Accreditation Bodies (AB) shall apply to SON MSC in the event of an extraordinary circumstance affecting SON MSC.

3.1.2 SON MSC 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.

3.1.3 Where contact can not be made, SON MSC shall apply the normal procedures for suspension and withdrawal

### **3.2 Initial certification and scope extensions**

3.2.1 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.

3.2.2 Therefore, during a period when due to extraordinary circumstances, normal operation and auditing is not possible, initial certification and extension of existing scopes of certification is not possible

### **3.3 Surveillance activities (if applicable)**

3.3.1 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.

3.3.2 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).

3.3.3 In case of subsequent surveillance audits a postponement of the audit should not exceed 6 months. Extended periods between surveillance visits as specified above may result in a need for additional surveillance visits for the remainder of the certification cycle.

3.3.4 Extended periods between surveillance visits as specified above may result in a need for additional surveillance visits for the remainder of the certification cycle.

3.3.5 For FSSC Scheme, in cases of first surveillance audits following certification, the SON MSC 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 certificate, suspend the certificate or postponement of the surveillance audit by a maximum of 6 months within the calendar year, dependent on the outcome of the risk assessment.

3.3.6 SON MSC shall use ICT means of monitoring such as remote audit (in line with IAF MD4) where onsite is impossible.

3.3.7 Use of ICT during audits/assessments by SON MSC 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.

3.3.8 Measures shall also be taken to ensure that security and confidentiality is maintained throughout audit/assessment activities

3.3.9 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

### **3.4 Re-certification**

3.4.1 Using information gathered by SON MSC, if there is sufficient documented proof to provide confidence that the certified management system is effective, SON MSC will extend the certification for a period not exceeding 6 months beyond the original expiry date.

3.4.2 If the recertification assessment cannot be undertaken within 6 months, the certificate may be suspended or other actions taken based on management recommendation.

3.4.3 For the FSSC Scheme, in case certificate will expire, a certificate validity extension of up to 6 months is allowed following a documented risk assessment. In all cases the SON MSC will be responsible for the decision to extend the certificate validity. SON MSC may issue an extended certificate to the organization. The full 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 certificate dates shall be aligned with the current certification cycle.

### **3.5 Actions to be taken by the certified clients**

**3.5.1** Certified client affected by an extraordinary event or circumstance, shall conduct an evaluation of impact of the event on certification scope.

**3.5.2** 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.

3.5.3 The outcome of the review must be recorded and and be made available for assessment by SON MSC on demand.

## **APPENDIX:**

### **AUDITING IN EXTRAORDINARY CIRCUMSTANCE**

Where an audit can be conducted without modification to auditing requirement, SON MSC shall carry out audits following standard requirements.

NOTE: It is acceptable to conduct document review remotely when key portions of the audit (e.g. site tour, worker interviews) can be conducted on-site.

For each affected scope certificate where regular auditing is not possible, the certification body may select one of the following options.

1. Extension of scope certificate validity where risk is determined low
2. Completion of a remote audit in place of an on-site audit for eligible organizations ;  
or
3. Extension of scope certificate validity following partial remote audit and onsite audit upon lift of emergency situation

### **RISK LEVEL DEFINITON**

Low risk clients:

Last audit was conducted by SON

No outstanding Non-conformities

Exemplary past audit performance

Satisfactory review of records (e.g. Internal audit records and Management review, CAPA)

Scheme requirements

Options when audit is not feasible:

Allow for postponement or extension of certificate

High risk clients:

Unresolved Non-conformities

Major NCs raised in past audit

Unexemplary past performance

Satisfactory review of Internal audit records and Management review & CAPA

Clients within the categorized under High risk in the Technical area classification

Scheme requirements

Transfer

Options when audit completely not feasible:

Allow for postponement or extension of certificate after conducting partial remote where on-site audit be shall completely immediately after the circumstance is lifted.

Apply suspension policy

