



The Equitable Food Initiative COVID-19 Alternative Auditing Protocols

Conformity Assessments during COVID-19 Pandemic

VERSION 2.1

Contact Details

Equitable Food Initiative
1875 Connecticut Ave NW
10th Floor
Washington, DC 20009
USA
www.equitablefood.org
Email: info@equitablefood.org



Prioritizing Safety

During the Covid-19 pandemic, EFI offers this alternative set of audit protocols to be used in certain cases where the risk of disease transmission presents an unacceptable risk for spreading or contracting the virus to workers and managers at audited operations, certification staff, or the larger community through auditing activities.

1. Applicability

- 1.1. These protocols are to be used only when one or more of the following conditions apply to a scheduled audit:
 - 1.1.1. There are new documented COVID-19 cases within the client's workforce in the 15 days prior to the audit, and the Grower has implemented a no-visitor policy that applies to all auditing activities, including other food safety or social certifications
 - 1.1.2. Onsite auditing cannot be performed in accordance with the CB protocols regarding auditor and worker safety that have been reviewed and approved by EFI
 - 1.1.3. Health authorities have placed the audit location in their highest risk category
 - 1.1.4. Isolation and/or quarantine times required by health authorities in either the jurisdiction where auditors are traveling from or to cannot be reasonably met
- 1.2. Prior to initiating these protocols for a specific audit, CBs must specify in writing to EFI which of the above conditions are applicable and request and receive approval to employ remote practices.

2. Document Review

- 2.1. Each CB will make available to their clients a document storage platform which:
 - 2.1.1. Conforms with US regulations for the storage of sensitive data in the cloud, and
 - 2.1.2. Follows industry best practices for how documents are uploaded, accessed, stored, edited, and deleted, and
 - 2.1.3. Logs all activity related to the uploading, accessing, editing, and deleting of each document, and
 - 2.1.4. Is only accessible on the grower-side to staff identified by the client point of contact and by CB personnel who are required to review the records for the exclusive use of implementing these protocols.
- 2.2. The CB shall request the client upload all documents required to be assessed within a span of five business days.
- 2.3. In cases where a sample of documents is required by the auditors, such as paystubs, personnel records, or timecards, the auditor shall use video conferencing technology to request and review the desired documents. The documents don't need to be produced in

view of the auditor. But they must be available for review within a time period set by the auditor that ensures their veracity.

- 2.4. CBs shall assess documents for conformance within five business days of becoming available on the document storage platform.
- 2.5. Should the document review reveal conditions that would, under standard auditing procedures, be considered a nonconformity (NC) with the EFI Standards, then a finding of NC shall be assigned to the related indicator(s) and corrective action processes initiated.
- 2.6. Client documents held on the CB storage platform shall be permanently deleted within 20 business days of the certification decision.

3. Worker Engagement in the Audit

- 3.1. Phone-based worker surveying technology will be employed in lieu of worker interviews, normally before Step 2 above. EFI shall charge the CB \$1,050 per instance of the survey.
- 3.2. Roll-out of the survey technology will require the participation of members of the LT in a video conference to provide training on how the system will be accessed by workers and support in developing an LT-implemented strategy for promoting the use and understanding of the survey across the workforce.
- 3.3. EFI will aggregate the data provided by the survey in a manner that protects the anonymity of users. This data will be provided to the auditors, the LT, and management of the farm. The LT and management can use this data to identify issues that may emerge during the audit when timing allows.
- 3.4. EFI will tabulate survey results to determine if the minimum number of responses has been met. Survey results meeting the threshold established by EFI will qualify as evidence of an NC. If survey results indicate some evidence of nonconformity but fail to meet the established threshold, auditors will be advised to indicate an *Area of Concern*.

4. Video Conferencing

- 4.1. Opening & Closing Meetings & Management Interviews shall be conducted by a video conferencing platform accessible to the client.
 - 4.1.1. Scientifically verified norms around social distancing during the pandemic shall be observed during all video interactions. The CB can limit the number of personnel present for the opening and closing meeting to meet these requirements.
- 4.2. Leadership Team Interviews shall be conducted by a video conferencing platform that is accessible to the client.

- 4.2.1. Standard practices related to the engagement of the Leadership Team (LT) during the audit should be met as much as possible without contravening social distancing requirements. Significant leeway can be exercised to conduct Leadership Team interviews in small groups or with individuals.
- 4.3. Management shall facilitate a video walk-around.
 - 4.3.1. Working within the bounds of available internet connectivity, an auditor may request that they be provided a 'video tour' of the operation.
 - 4.3.2. The auditor will instruct whomever on the client-side is providing the video feed as to what they would like to see. Direct engagement with workers is not allowed through this modality.
- 4.4. Evidence gathered through video conferencing can be used as evidence of a finding of nonconformity. However, it is also expected that video conferencing will not, in many cases, be able to conclusively confirm an NC is warranted. In these cases, the auditor shall use the audit report template to document a finding of *Area of Concern*.
- 4.5. An *Area of Concern* is not considered an NC and does not trigger a corrective action process. But the issue will be subject to additional auditing during the next assessment.

5. Variances

- 5.1. The COVID-19 pandemic is forcing significant operational adjustments to be made frequently by growers, CBs, and EFI. Because of this, efforts to protect staff and consumers and to slow the transmission of the virus may take an audited operation out of conformance with EFI Standards. In cases where COVID-19 is a credible contributing factor in an NC, EFI will work with the Grower and the CB on a pragmatic response that prioritizes the workforce's health and safety and community-level risk reduction.

6. Required Onsite Audit

- 6.1. Ten days after the remote closing meeting (Section 3.1), the CB shall assess whether one or more of the Section 1.1 conditions (Clauses 1.1.1-1.1.4) still apply. If they do, the CB shall reassess in ten days.
- 6.2. Once the Section 5.1 assessment determines that no Section 1.1 conditions are applicable, an onsite audit must be performed within sixty calendar days. The audit shall include:
 - 6.2.1. All indicators not fully assessed through these protocols, and

- 6.2.2. All *Areas of Concern* identified through Sections 2-4 above.
- 6.2.3. Reauditing of all NCs or the verification of the effectiveness of any corrective actions undertaken through these protocols.
- 6.3. The CB may request a variance to the timing of the onsite audit should seasonality require it.