



MSC COVID-19 Additional Guidance for CoC CABs – remote auditing a clause by clause guide v2.0

This document provides guidelines for CABs to implement the derogation published on 2 September 2020 (effective 28 September) in response to the Coronavirus pandemic which allows Chain of Custody audits to be carried out remotely until 27 March 2021 where Covid-19 restrictions apply.

The intention of these additional guidelines for CABs is to ensure consistency in interpretation of this derogation.

CABs should continue to send questions in to supplychain@msc.org and we will respond as quickly as we can.

This document is guidance to the derogation and is not directly auditable. It is, however, expected that the guidance included in this document will be applied by CABs, where applicable, unless there is a justification for not doing so.

Version table

Version	Effective date	Description of amendment	Affected section/ page
1.0	28 February 2020	N/A – new document	N/A
1.1	20 May 2020	Introduction and format	1
2.0	7 December 2020	Document updated to reflect derogation published Sep 2020	Introduction, Conducting the audit

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Overview

As per CoC Certification Requirement 8.2.1 remote audits shall assess applicants against the same criteria and requirements as an on-site audit. While we acknowledge that auditing remotely might not always be as effective as an in-person audit, we would still expect all requirements of the Standard to be audited as completely as possible. The way that the evidence is obtained can be different and this is outlined in the ‘Guidance on Remote Auditing the CoC Standards’ excel file. The expectation is that all sites will have access to provide documents, records and images by email and to participate by telephone or online. If this is not the case the CAB would need to apply for a specific variation on this basis. This covers initial, surveillance and re-certification audits as well as subcontractor visits, post suspension verification audits and Consumer Facing sites follow up visits.

Document name	MSC COVID 19 Guidance for CABs - remote auditing	Date effective	7 December 2020
Approved by	Supply Chain Standards Director	Date of expiry	27 March 2021



Planning the audit

The planning phase is even more important for a remote audit than with an in-person audit. This is due to the auditor not being able to immediately access information and documents as they would if on-site.

A remote audit shall be scheduled for a specific date with confirmation that on that day the relevant people will be available to participate by phone or online and to email information as requested. Remote audits shall be arranged to cover all sites in a multisite certificate, subcontractors as required by the CoC Certification Requirements section 8.4 and the sample of sites required for a CFO or Group audit as per the CoC Certification Requirements section 7.2 and 10.4.

Conducting the audit

As per 1.4 of the September 2020 Covid-19 Pandemic Derogation – Requirements and guidance document remote audits shall be conducted in alignment with [IAF MD 4:2018](#)

During the audit itself opening, closing meetings and interviews should be conducted by video conference, or where not available by telephone. The relevant documents, records and images shall be provided by email or through sharing the screen in an online call (e.g. showing an internal traceability database) and other technologies may be used where available.

There are various ways in which independence in sampling can be assured outlined in 'Guidance on Remote Auditing the CoC Standards' excel file, these may include:

- Selecting people to interview based on an organisation chart and where video interviews are possible cross referencing with photocards.
- Conducting the record-verification exercises of the auditor's choice (as per CoC Certification Requirement 8.2.1) by requesting a list of purchases and/or sales for a defined period and picking the batch/es to request full traceability/ volume records of.

Reporting on the audit

The general tab of the checklists allows confirmation of whether the audit is remote. Other sections of the checklist including sites visited and date should therefore still be completed noting in comments where practical that the audit was remote. All sections of the checklist that would be completed for an on-site audit can be completed for the remote audit.

Further information

Please also refer to ISO 19011:2018 for further guidance on auditing virtual or remote locations.

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