

REMOTE AUDITING GUIDE

USE OF REMOTE AUDIT IN EXTRAORDINARY
CIRCUMSTANCES, 30 JUNE 2021 UNTIL
FURTHER NOTICE

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Purpose of this guidance note

This document provides guidance to regulatory food safety auditors who are approved under the *Food Act 2003* (the Act) for auditing situations where there is limited, or no access to a food premises or food preparation areas due to extraordinary quarantine measures in place such as during the COVID-19 pandemic.

In such circumstances the auditor may be required to minimise the time spent on-site, or to avoid entering parts of the premises to maintain social distancing, observe hygiene barriers, and minimise opportunities for contact with vulnerable people.

The NSW Food Authority recognises that some auditing activities can occur off-site when the circumstances detailed in this guidance document are met.

COVID-19 information

Current COVID-19 advice and daily updates are available on the NSW [Food Authority website](#).

Further food business advice relating to Food Standards can be found on the [FSANZ website](#).

NSW Health information and advice is on the NSW Health [website](#)

What is a remote audit?

A remote audit is a food safety audit that is conducted outside of the food handling area, and in some circumstances remotely from the premises being audited.

Duration of remote audit arrangements

This guidance is applicable from **30 June 2021 until further notice**

As the situation is constantly evolving, this guidance document will be regularly reviewed by the NSW Food Authority.

When is a remote audit appropriate?

Even though access to the premises may be limited or prevented, in order to make an evaluation of both the adequacy of the food safety program and the business' degree of compliance, the auditor must still be able to gather sufficient objective evidence to form their opinions and justify them in the audit report.

Considering the above, a remote audit approach will only be deemed appropriate when:

- The food business can demonstrate that they are committed and able to support the audit process by supplying the auditor with the required evidence in a timely manner, for example two days ahead of the audit.
- There is appropriate information technology available to supply this evidence to the auditor effectively.
- The auditor is satisfied the information they require can be provided through remote media in a manner that can be readily navigated and understood.
- Personnel with appropriate knowledge are available at the business to support the audit process.
- The auditor has a process to ensure that appropriate confidentiality can be observed regarding any information supplied by the business.

The auditor and the registered food premises need to make specific arrangements to ensure that the audit can occur remotely. The checklist in this guide has been provided to assist both the auditor and the business to ensure clear communication in establishing an agreed plan for the audit, and to determine which options are available to support the audit process.

Only an appointed regulatory food safety auditor approved under the Act can conduct a food safety audit for the purposes of the Act. No part of the audit can be conducted by other personnel or auditors not approved as regulatory food safety auditors under the Act.

Conducting a remote audit

Types of remote audit

A remote audit can be conducted in two ways:

- **Full remote audit**

The auditor is not physically present at the food premises and is conducting the audit from another location. The business is providing full remote support to conduct virtual site tours within an agreed audit plan.

- **Partial remote audit**

The auditor is present at the premises and is conducting an audit with limited or no physical access to the food handling areas, and limited face to face contact with staff.

A remote audit will have several significant limiting factors, but by planning ahead and using appropriate information and communication technology, and with timely provision of information to the auditor in advance of an audit, a food safety audit can still be conducted.

Preparation

The effectiveness of the remote audit relies on both the auditor and auditee being prepared in advance, with several evidence gathering options made available to the auditor.

Auditors should consider that if the remote audit outcomes are ever challenged, they still need to be able to demonstrate that sufficient objective evidence was obtained to justify their opinions regarding the adequacy of the food safety program, and the degree to which the program has been complied with. Obtaining this level of credible evidence is more challenging when the auditor is not able to observe the food handling operation in person, so obtaining evidence through other avenues will require a degree of flexibility and creativity from both auditor and auditee.

It is the auditor's responsibility to plan the audit, and to ensure that the auditee understands in advance:

- the level and nature of evidence that will be required for the audit
- the time, personnel, and information technology that will need to be assigned to the audit, which may prove more demanding and time consuming than having an auditor on site.

It is advisable that this information be supplied to the auditee in advance of an audit in the form of an audit plan. The audit plan should be flexible enough to allow changes to occur as the audit develops.

Gathering evidence

Auditors normally gather and verify objective evidence through a combination of all three of the following methods:

- Observation.
- Interviews.
- Review of documentation.

For remote auditing, the following approaches may be considered:

Remote observation

- The use of live video streaming:
This can be effective if the premises provides an appropriate internet connection throughout the food areas, although filming may also present food safety challenges to the business which need to be controlled.
- Photographs and video:
Video or photographs can be supplied to the auditor, who should note the date and time that the video or photograph was taken and use other methods such as questioning staff to confirm their validity as evidence.

When using photographs or video, both near and far shots should be used to contextualise the evidence.

Remote interviews

- Video calls may be considered when interviewing staff and conducting opening and closing meetings.
- Telephone calls could be used if video calling is unavailable.
- Staff interviews can be used to assess their skills and knowledge, as well as to help the auditor understand and explore day-to-day operations and the food safety controls being followed.

Review of documentation

- Remote access to the business' food safety program and/or records may be valuable if available.
- Cloud based systems may be used to review large quantities of documentation and records.

- Pre-planning will be required as it may present a significant investment of time for the business to provide this documentation electronically.
- Premises will need to consider how to best organise their information for sharing so that the auditor can find what they need efficiently. A document list may also be useful if parts of a program are saved in different files.
- Documents could be supplied ahead of the audit date.

The above points are not exhaustive, and businesses may have other methods to provide information to the auditor.

The auditor should make detailed notes of the evidence gathered through remote methods, noting the method used in each case.

Raising deficiencies

Deficiencies should be raised as per normal auditing practices under the Act.

The auditor will determine on a case-by-case basis whether they need to visit the premises to close out deficiencies, or if remote methods will be sufficient.

The auditor must submit audits within the required competition period of 21 days in line with normal procedure.

Reporting

The audit report must clearly indicate to the NSWFA the extent to which the remote auditing methods were used in carrying out the audit, and the auditor's opinion regarding the effectiveness of the process in achieving the stated audit objectives.

Within the notes 'section' of the audit report, the following details must be recorded:

- The parts of the audit that were conducted remotely.
- The techniques that were used to remotely collect the evidence.
- The amount of time spent on-site if the audit was only partially remote.
- All objective evidence in the audit report must state the method(s) used to obtain it.

Food Act 2003 remote audit arrangement checklist

GENERAL INFORMATION	
Name of premises	
Licence number	
Facility number	
Address of premises	
Premise contact information	Email: Phone number:
Previous audit date	
Previous report available	<input type="checkbox"/> Yes <input type="checkbox"/> No
Site(s) audited remotely	<input type="checkbox"/> Partial remote audit <input type="checkbox"/> Full remote audit
Reason for remote audit	
Technology available to support the remote audit	
<input type="checkbox"/> Access to the premises network from another associated IT providers site <input type="checkbox"/> Access to the client's network from certification company office <input type="checkbox"/> Access to client's network from auditor's home <input type="checkbox"/> Cloud facilities: Google drive/ Dropbox/ other	<input type="checkbox"/> Documentation/photographs/screenshots emailed to auditor, or USB provided. <input type="checkbox"/> Telephone interviews - remote video/camera (e.g. Facetime) <input type="checkbox"/> Teleconference (e.g. Google meeting, Zoom) <input type="checkbox"/> Shared screen with client/auditor <input type="checkbox"/> Security footage – (must be relevant to operational food safety)
Other:	
Preaudit arrangements and conditions:	
Areas of interest that could not be audited due to remote practices, but to be reviewed at next on-site audit:	

Client agreement:	
<input type="checkbox"/> Client confirmation of remote auditing techniques <input type="checkbox"/> Client agreed by email (mandatory) <input type="checkbox"/> Site provides all information in an accurate and timely manner	
Audit plan:	
<p>In addition to standard information required in the audit plan, the following information has been incorporated:</p> <input type="checkbox"/> site layout provided with product flow (basic drawing along with site plan could be acceptable) <input type="checkbox"/> scope of audit (reference that a remote / partial audit will be undertaken) <input type="checkbox"/> evidence that CAR's from previous audit are closed out <input type="checkbox"/> remote / off-site auditing techniques agreed <input type="checkbox"/> location of the auditor when conducting the remote / off-site audit <input type="checkbox"/> time involved in different areas covered by remote / off-site audit <input type="checkbox"/> staffing numbers and names of staff for selection for interview <input type="checkbox"/> agreed timetable for meetings, interviews <input type="checkbox"/> information security measures agreed with the client <input type="checkbox"/> audit plan provided to the premises and council <input type="checkbox"/> site provides all information in an accurate and timely manner.	
Prepared by (name):	Date:
Position:	Phone number:

If you have further information please contact 1300 552 406 or audit.admin@dpi.nsw.gov.au

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Available on the NSW Food Authority [website](#)



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