COVID-19 Announcement, Derogation 2020-3

Amendment to COVID-19 Announcement, Derogation sent on 7 April 2020 by GSTC.

Date: 10th July 2020
To: GSTC Accredited Certification Bodies
CC: Assurance Services International

Given the further developments around the global outbreak of COVID-19 and considering that many countries are moving toward the gradual lifting of travel restrictions and opening of borders, the GSTC has amended the derogation sent on 07 April 2020. This derogation replaces the previous derogation dated 7 April 2020.

This derogation applies to all GSTC audits planned by accredited CBs and requires CBs to:

1. Postpone the audit when the CB’s client is non-operational. This derogation allows the CB to postpone the audit for a period of six (6) months from the date of this derogation. If a GSTC certificate is due to expire in 2020, it may be extended for up to twelve (12) months beyond its original expiry date. A recertification audit shall then be performed before the maximum 12-month extension expires in order to renew certification.

2. Conduct remote audits when the CB’s client is operational, traveling to and from the client’s location is not legally allowed or logistically impossible while travel restrictions in the client’s country of operation remain in place. CBs shall retain evidence of any official domestic government travel restrictions that prevent on-site audits. The CB shall document in audit reports whether this derogation has been applied and shall justify any instances where requirements were not evaluated due to remote auditing. The remote audit option shall only be applied in the case of surveillance audits. Remote audits shall not be conducted in the event where the CB’s client is non-operational.

3. Conduct hybrid audits only when the CB’s client is operational, but CBs are unable to conduct a normal on-site audit due to travel restrictions in the client’s country of operation. The CBs shall retain documented evidence for the reasons to conduct a hybrid audit. The CBs shall use a risk-based approach to determine the requirements to be evaluated remote and on-site. The timeline for conducting remote and on-site audits shall be based on the risk-based approach, feasibility to assemble an audit team and travel restrictions in the client’s country of operation. The CBs shall document in audit reports whether this derogation has been applied and shall provide clear justification of the chosen methods for remote and on-site audits. The hybrid audit option shall only be applied in the case of initial certification.
audits. Hybrid audits shall not be conducted in the event where the CB’s client is non-operational.

The following definitions applies to this derogation:

- **Operational**: When CBs client’s activities and functions are up and running normally.
- **Hybrid Audit**: Combination of on-site audit (activities performed at the location such as inspections) and remote audit (activities performed at any place other than the location of the auditee).

For conducting remote and hybrid audits, the following documents should be considered:

- IAF ID 3: 2011: Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations
- IAF MD 4: 2018: The Use of Information and Communication Technology (ICT) for Auditing/ Assessment Purposes

The CBs shall retain documented evidence for each case where this derogation has been applied and specify clearly if the audit was conducted remotely, on-site or hybrid.

CBs are advised to regularly monitor official government travel instructions/advice. As soon as official domestic government travel restrictions are lifted, audits shall be conducted according to regular GSTC audit and certification requirements. It is important however, that CBs ensure that the sources of official travel announcements are consistent with the legal reference made by the CB’s travel insurance.

The GSTC will continue to monitor the situation and provide any updates. For any other questions please contact GSTC Technical Team (td@gstcouncil.org).

Sincerely,

Randy Durband
GSTC CEO