



OFFICIAL NOTICE 2020-02
IOAS Guidelines for remote assessments of CBs and CB client sites
September 10, 2020

IOAS started using remote assessment to perform CB assessment and surveillance since 2018. It was found to be a useful tool in certain situations in which it may be inappropriate or not possible for an IOAS assessor/technical expert to carry out a physical on-site visit to a CB office or CB client site. In those cases where postponing or re-scheduling the visit are not feasible or desirable options, IOAS could conduct or join a remote assessment according to the case, in order to partially or fully comply with scheme requirements. Scheme owners' requirements will influence how IOAS proceeds. This document is a guide to CBs to assist in the effective use of remote assessment when applied.

We recognise various scenarios where remote assessment may be used, and each calls for slightly different approach in terms of connection, preparation and implementation. IOAS shall discuss and confirm with the CB in advance what type of assessment will be carried out. The options are the following:

1. Remote assessment by IOAS of a CB office including virtual sites¹
2. Remote assessment by IOAS of a remote inspection by a CB of a client site
3. Remote assessment by IOAS of an on-site inspection by a CB at a client site

1. Remote assessment by IOAS of a CB office or virtual site:

Connection requirements: The CB may normally choose the Information and Communication Technology (ICT) platform it wishes to use (e.g. ZOOM, WEBEX, TEAMS, SKYPE etc) but it must allow for optimal quality of videoconference in combination with screen sharing such that the IOAS assessor/technical expert and the CB personnel can see each other, interviews can be conducted and CB documents and records can be shown to the assessor (see additional comments on ICT at 4. Below). Where only paper copies of certain CB documents are available, CB facilities shall allow these to be scanned or be photographed and sent by email to the assessor.

Preparation: IOAS shall arrange the remote assessment with the CB similarly to how the on-site visits are arranged, sending in advance a "Remote assessment plan" including the purpose of the assessment, the name of the assessor, the dates and the activities for each day as well as the applicable fee. To help with effective planning by the CB, the assessment plan may give more detail, but the assessor shall still have flexibility on timing and approach. Given that the CB and the assessor might be in different time zones, the IOAS Client Manager (CM) or IOAS assigned assessor/technical expert shall contact the CB for confirming the assessment hours. When the time difference is wide, full day assessments will be split in half for convenience of both parties. At a pre-arranged time a few days before the assessment, IOAS CM or the assessor/technical expert will arrange a test call to check the selected ICT, to verify the quality of the connection is good, fast, with no background noises and ensure the screen sharing feature is working

¹ A virtual site is an online environment allowing persons to execute processes. This is typically a CB staff member working from home or another location other than a CB office.

properly. All CB personnel expected to be involved in the assessment shall join this call to ensure that the ICT will allow the intended group to connect and interact without problem during the assessment. At that call, the IOAS assessor/technical expert will finalise all the arrangement details with the CB including any explanation of how the process will work, what facilities and access are required, which CB personnel are requested to attend and when, who will be the translator in case of need, and agree on possible back-up options in case the proposed ICT fails or there is a power cut, etc.

Implementation: Apart from the remote nature of the assessment it will be carried out exactly as any on-site visit according to IOAS procedures and according to the visit plan previously provided allowing for any on-site decision by the assessor to change focus as needed. It is recommended that for the opening meeting, for staff interviews and the exit meeting, videos are turned on so that all parties can see each other. To ensure the quality of the audio, it may however be necessary to turn off video for the main part of the meeting during screen sharing.

2. Remote assessment by IOAS of a remote inspection by a CB of a client site

Connection requirements: IOAS recognises that inspection of both farms and manufacturing sites is normally divided into two main parts:

- a. 'office' or documentary part where the inspector is reviewing the client's documentation and carrying out traceability and mass balances, etc. and
- b. tour of the farm, processing plant, facilities or any other premises which may include interviewing workers where relevant.

ICT is therefore required such that

- the CB inspector and CB client can see each other and interact,
- the client can show the inspector documentation and records (unless the CB has requested that the client sends documentation and records to them before the inspection),
- the client can take the inspector on a farm or factory tour using video. The latter requires the CB client to have a mobile device (smart phone or tablet) using one of the above ICT platforms or similar as well as good connectivity. Other options might be available such as for example using the live transmission of the cameras placed in a processing plant,
- the IOAS assessor/technical expert can join the call between the inspector and CB client remotely and be able to listen and see both parties and the video shown by the client.

Preparation: The IOAS assessor will contact the CB to check how the CB is conducting the inspection/audit that IOAS is wanting to witness and confirm all the above requirements are fulfilled. If the CB required the client's documentation to be sent before the 'visit', these documents shall be sent to the IOAS along with any review performed by the CB at least 1 week before the remote inspection. It is expected that the CB will perform a pre-call with the client to make sure the client is familiar with the technology and to check the connection. At this call or before, the CB shall inform their client that the inspection will be joined by the IOAS and any other participants (e.g. CB representative, IOAS observer, scheme owner observer) and explain the reason for their presence. Similarly, the CB inspector and the IOAS assessor/technical expert should also do a pre-call to ensure good connectivity. At this latter meeting the IOAS assessor will want to clarify the scope and approach to the inspection and any limitations that the remote nature of the inspection presents.

Implementation: As is normal with a witness audit, the CB inspector will control the event and the IOAS assessor remains quiet throughout (apart from informing on and resolving connection issues) until after the exit meeting with the CB client. Also, as for a normal witness audit, once the CB client has left the

meeting, the IOAS assessor shall provide a verbal feedback to the inspector. If, due to the remote nature of the inspection, the inspector requests that the client provides further documentation after the inspection, this documentation and any review by the inspector shall be shared with the IOAS assessor.

3. Remote assessment by IOAS of an on-site inspection by a CB at a client site

Connection requirements: Although the structure of the inspection is likely to be the same as described in 2 a and b above with the inspector on-site with their client, the key remote connection is with the IOAS assessor/technical expert.

In this circumstance, IOAS requires an additional CB representative to be present at the client site using a mobile phone or tablet connected to an appropriate web platform to act as camera operator such that:

- the IOAS assessor/technical expert can see and hear the conversation between the inspector and client (where translation is required see below at 5),
- the camera operator needs to be connected to a headphone so that the IOAS assessor/technical expert can ask him/her to direct the device to view a person, document or view during the farm or facility tour without disturbing the inspection process,
- even where there is no need for translation, in noisy factory situations, the camera operator may also need to take on the role of transmitting the conversation between the inspector and the client and any worker interviews that might be conducted on the factory floor,

Preparation: The CB needs to verify that a remote connection to the CB client location is robust enough to allow connection by the IOAS assessor, particularly during an on-site tour of the farm or facility. Under these circumstances the most practical option is for the CB to do a pre-call with their client to test the connection and separately a call with the IOAS assessor with the device that the camera operator will use. The camera operator should do the call with the IOAS assessor so that both parties can discuss how to proceed during the actual inspection.

Implementation: once the inspector and camera operator are set up at the CB client premises, the camera operator shall establish the remote meeting with the IOAS assessor. Normal introductions are allowed and then the inspector proceeds as normal. The camera operator shall remain quiet and not interfere with the inspection but, when asked by the assessor, may need to ask for a document that the inspector has looked at to show the assessor or in noisy situations during the tour of the farm or facility confirm what was said and pass onto the assessor.

4. Choice of ICT

The choice of ICT will normally be the responsibility of the CB and should be one with which the CB personnel and CB client are familiar. If the CB does not have a preferred ICT and would prefer that the IOAS assessor/technical expert will propose one, the CB needs to communicate this to IOAS within 7 days of having received the remote assessment plan. IOAS shall normally choose to use ZOOM or Teams. In cases where an interpreter is required to join a remote meeting, IOAS may need to insist on use of its own web platform to allow for that facility (see 5 below) unless the CB's system also has that capability.

5. Use of an interpreter at remote assessments

An interpreter may join any of the scenarios described above and maybe on-site or remote. For CB office 'visits' when the interpreter is on-site at the CB office, then they can simply translate the words of the interviewee. If the interpreter is remote IOAS may need to insist on use of its own ICT platform to allow for that facility using ZOOM.

For witness audits at client sites in cases where an interpreter is at the client site with the inspector, it is ideal if the interpreter can also function as the camera operator and has an earphone to be able to relate the conversation between inspector and client without disturbing the inspection.

If the interpreter is joining the inspection remotely, IOAS may again need to insist on use of its own ICT platform to allow for that facility. In that case the additional CB representative will be required to act as camera operator as noted at 3 above.

6. Time zones

IOAS has assessors and technical experts in various locations and we are looking at solutions to be able to expand our range but time differences between the assessor and the CB or operator site are inevitable. This may mean that full day 'visits' have to be split into two half days for example to avoid unsociable working hours for all parties. We appreciate your cooperation in facilitating these adaptations.

7. Connection failures

Although the CB and IOAS shall do their best to provide good connectivity, it is possible that connections may fail. This is more likely with CB inspections resulting in the inspection being abandoned or when the connection to the IOAS assessor fails that the witness audit cannot be completed. If the inspection has to be rescheduled and the connection issues are no fault of the CB, then IOAS will add no further charge. In the latter case if the assessor is disconnected but the inspection is completed, IOAS shall determine whether the witness audit can be considered valid or not depending on the timing and duration of the disconnection.

8. Recording the inspection

IOAS will not normally ask to record a remote meeting but there may be circumstances when it may be necessary. All involved parties will need to agree to doing so. Such recordings are subject to IOAS normal confidentiality policy.

9. Fees

Remote assessments of CB offices or CB inspections will be charged without travel time and costs. In all cases however, 0.5 day is charged to allow for preparation and 1 day is charged for reporting. For CB office visits and operator visits under the same visit plan and happening close together, these are combined.

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