Technical guidance for conducting remote audits

Version: TG-READ-en-1.0
Date: 15.10.2020
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1 Remote audits

Remote audits will play an ever more important role in the future due to increasing digitalisation and unusual situations such as the coronavirus pandemic in 2020. These audits affect quality and product management as well as the related audit and certification activities.

A remote audit is a method, permitted only under certain conditions, of carrying out an audit no longer solely on site with the physical presence of the people involved, but virtually with the aid of suitable information and communication technologies (ICT).

Since it is only a method for conducting audits and not a separate type of audit (as per ISO 19011 Guidelines for auditing management systems), the requirements for a SURE audit as described in the valid scheme documentation remain unaffected.

SURE assumes that remote audits are not the norm, as they cannot replace face-to-face contact and on-site assessment.

However, if a remote audit is considered in certain situations, the opportunities and limitations of the remote audit must be assessed and included in the decision-making process. The assessment should consider the following aspects (not exhaustive):

- Integrity of the audit process
- Effectiveness and efficiency of the audit
- Feasibility in relation to information and communication technologies
  - Information and data security
  - Limits to the objectivity of the information gathered
  - Feasibility in relation to selected ICT instruments
  - Reliable energy supply
  - Reliable internet access
  - Uninterrupted, high sound/picture quality
  - Adequate bandwidth for data transmission

Examples of the use of ICT during a remote audit/assessment may include (but are not limited to) the following:

- Meetings; via teleconferencing systems, including audio, video and shared data use
- Remote audit/review of documents and records, both synchronously (in real time) and asynchronously (when required)
Recording of information and documents by means of video stills, video or audio
Providing visual/auditory access to remote or potentially dangerous locations

2 Opportunities of a remote audit

Under certain conditions, remote audits can be a useful complement to on-site audits. However, remote audits can by no means completely replace traditional processes. They may, for example, be considered in unusual circumstances (e.g. such as the 2020 coronavirus pandemic) or if travelling to the operation being audited or to a specific location is not practical (e.g. for safety reasons, travel restrictions or excessively long travel times).

Remote audits can, for example, also be used as an alternative for inspecting the documentation.

Remote audits and on-site audits can happen at the same time, e.g. when a team of auditors is deployed, whereby one auditor is physically present on site and (the possibly geographically distant) co-auditor/technical expert performs their audit duties virtually.

Not only can this save travel costs and time, but audits can also be planned more flexibly. This also allows highly qualified technical experts who cannot be physically present to be involved in the audit, thus increasing the overall audit quality.

3 Limitations of a remote audit

There are limitations to remote audits as well. Whether or not a remote audit should be conducted needs to be carefully considered. Not every situation can be adequately assessed from a distance.

The success of any audit, but especially of a remote audit, is based on the trust that exists between the operation being audited and the auditor. It is essential that all parties involved accept the audit method.

For this reason, the certification body that performed the last regular scheme audit should perform the remote audit. Ideally, the auditor who carried out the last audit is assigned to perform the remote audit, and is therefore already familiar with the company, the people involved, the site-specific conditions and the procedures. However, should the certification body change, the possibility that the new certification carries out the remote audit cannot be ruled out.
Remote audits are not permitted if

- the scheme participant is being audited to verify conformity with the requirements of the SURE-EU system for the first time (initial audit), or
- considerable non-conformities were found during the last audit, or
- significant changes have occurred, e.g. in site management, processes, activities or responsibilities for relevant processes, or
- there are risks that jeopardise the effectiveness of the audit (e.g. classified information)

The audit times are calculated at the discretion of the certification body. It is important to keep in mind that the use of ICT for audit purposes may, under certain circumstances, influence the overall audit time, as additional planning and follow-up work may be necessary (e.g. configuration/start-up of the necessary technical infrastructure, delays due to internet connection, additional work involved in checking documents, etc.).

4 Requirements for a remote audit

4.1 Security and confidentiality

The use of appropriate tools for the purpose of the audit (ICT) shall be mutually agreed in advance between the operation being audited and the certification body. This must take into account the security, confidentiality and data protection measures and provisions related to electronic or electronically transmitted information.

The requirements of EU Regulation 2016/679\(^1\) of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data, on the free movement of such data and repealing Directive 95/46/EC (Basic Data Protection Regulation) must be satisfied.

If agreement cannot be reached on the use of ICT or on security, confidentiality and data protection measures, the audit shall be carried out using other methods.

4.2 Technology

Prior to a remote audit, it must be ensured that both sides have the necessary electronic infrastructure. It shall also be ensured that this infrastructure is operational for the intended
purpose and audit period. This includes testing the infrastructure before the remote audit. If necessary, plans must be drawn up for alternatives.

If during a remote audit, despite careful preparations, persistent technical problems occur, the auditor can cancel the remote audit. If this occurs, the audit must be repeated.

4.3 Procedure

The certification body shall identify and document the opportunities and limitations that affect the effectiveness of the audit, including which technical tools are selected.

If the use of ICT is proposed, the certification body must verify that the customer has the necessary infrastructure when reviewing the request. This includes all necessary aspects such as data security, data integrity, media equipment and bandwidth as well as data and proof and specifications that can be accessed at that location, regardless of where the work is done.

Taking into account the opportunities and limitations, the certification body shall explain in the audit plan how ICT will be used for the audit to optimise the efficiency of the audit and maintain the integrity of the audit process.

When using ICT, all participants must have the expertise and skills to understand and use the technologies to achieve the desired result.

The additional qualification requirements of the assigned auditors remain unaffected.

The audit reports/checklists shall indicate the extent to which ICT has been used to conduct the audit.

For the objective proof of the remote audit, a screenshot can be used, for example, which clearly documents the duration and participants.

All other requirements for SURE-EU certification are not affected by this regulation.
5 Summary

✓ Remote audits are “only” a new audit method and not an audit type. According to ISO 19011, they are not an alternative to on-site audits.

✓ Whether or not a remote audit is conducted should be carefully considered, including the opportunities and limitations associated with them.

✓ Information and communication technologies (ICT) must be suitable for conducting a remote audit.

✓ On-site and remote audits can happen at the same time. (for audit teams)

✓ Everyone involved in a remote audit must have the expertise and skills to use ICT in such a way that the desired results can be achieved.

✓ Whether or not a remote audit is feasible depends, among other things, on whether audit objectives are jeopardised or whether official requirements play a role.

6 Checklist for preparing a remote audit

The following checklist (not exhaustive) is intended to help scheme participants and certification bodies prepare for a remote audit. Scheme participants and certification bodies are free to extend this checklist as required to meet their individual needs.

| The opportunities and limitations were considered. | ☐ |
| All participants involved accept the named method. | ☐ |
| The premises are adequate for a remote audit. | ☐ |
| The computer / laptop is suitable for a remote audit. | ☐ |
| The power connection is stable. | ☐ |
| The internet connection is stable. | ☐ |
| The necessary software has been installed. | ☐ |
| An audio system is available and functional. | ☐ |
| A camera system is available and functional. | ☐ |
| A test run was performed before the remote audit. | ☐ |
| All participants involved were informed. / Availability for possible additional information is assured. | ☐ |
| All necessary documents are available in digital form. | ☐ |
| The protection of data and information is guaranteed. | ☐ |
7 Relevant documents

With regard to the documentation (scheme documents) in the SURE-EU system, reference is made here to the document “Scope and basic scheme requirements”.

SURE reserves the right to create and publish additional supplementary scheme principles if necessary.

The legal EU regulations and provisions for sustainable biomass and biomass fuels including other relevant references that represent the basis of the SURE documentation are published separately on SURE’s website at www.sure-system.org. References to legal regulations always relate to the current version.
8 References

