GUIDANCE ON NSO-NAP 12 GLUTEN-FREE CRITERIA AUDITOR-SELECTION-TRAINING AND CONTROL

Issue No 1

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1. INTRODUCTION

1.1 PURPOSE

To define the selection, scoping and performance evaluation method and to ensure the competency of NSO-NAP 12 Gluten-Free Auditors.

1.2 SCOPE

The guide applies to on – job and new – hire training and for re – evaluation of performance.

2. RELATED DOCUMENTS

2.1 ISO 19011:2011 Guidelines for auditing management systems.
2.2 17021-1:2015 Conformity assessment — Requirements for bodies providing audit and certification of management systems — Part 1: Requirements.
2.3 ISO/IEC 17065, Conformity assessment -- Requirements for bodies certifying products, processes and services.
2.4 ISO 22003 Food safety management systems — Requirements for bodies providing audit and certification of food safety management systems.
2.5 ISO 22716:2007: Cosmetics — Good Manufacturing Practices (GMP) — Guidelines on Good Manufacturing Practices
2.5 NSO-NAP 12:2019 Gluten Free Product/Service Standard for Life Chain.
2.6 IPC-PL-11-006 IPC Certification Scheme "IPC Management System Auditors".
2.7 ISO 21001:2018 Educational Organizations Quality Management Systems.

3. DEFINITIONS AND ABBREVIATIONS

3.1 GFCB:

Gluten-Free Certification Body.
(***NOTE:*** *GFCB accredited by the i-NAF member Natural Accreditation Body.*)

3.2 MS:

Management System.

3.3 Internal Training:

Training that is conducted within the Gluten-Free Certification Body (GFCB).

3.4 External Training:

Training that is conducted outside Gluten-Free Certification Body (GFCB).

3.5 Auditor:

Competent auditor is a person who is already qualified to be a GFCB auditor in accordance with this procedure.

4. RESPONSIBILITIES

GFCB Quality Manager is responsible to implement this guide and to control all records generated according to this guide.

5. GUIDANCE

5.1 Competence for MS AUDITORS

GENERAL COMPETENCE	AUDITOR	LEAD AUDITOR
Education	Secondary	Secondary
Personal Attributes	Yes	Yes
Professional Experience	3-5 years	3-5 years
MS work Experience	2 years	2 years
MS Professional Training	40 hours MS (ISO 22000) +6 Hours Cosmetic GMP Criteria (ISO 22716) +6 Hours Gluten-Free Criteria (NSO-NAP 12)	40 hours MS (ISO 22000) +6 Hours Cosmetic GMP Criteria (ISO 22716) +6 Hours Gluten-Free Criteria (NSO-NAP 12)
MS Auditing Experience	20 audit days (4 Full Audit) (ISO 22000), 1 Full Audit GMP Criteria (ISO 22716), 1 Full Audit Gluten-Free Criteria (NSO-NAP 12)	35 audit days from which 15 as Lead Auditor (3 Full Audit) (ISO 22000), 1 Full Audit GMP Criteria (ISO 22716), 1 Full Audit Gluten-Free Criteria (NSO-NAP 12)

5.1.1 Education:

Auditors should have completed at least secondary education (typically all the years full-time schooling prior to university entrance).
Documented evidence of the education will be in personal files.

5.1.2 Work Experience:

5.1.2.1 Auditors with post-secondary education degree shall have at least 4 years full-time (or part time work that totals 4 years) work experience in a technical, professional or management position of accountability involving the exercise of judgement. This period shall be increased to 5 years for applicants with secondary education.

5.1.2.2 Auditors shall provide documentary evidence of work experience; this evidence may be presented in the form of employer references giving information on work actually carried out and positions held.
As an alternative the applicants can provide self-declaration, giving information on work actually carried out and positions held.

5.1.3 Management System Work Experience:

Auditors shall have a minimum of 2 years relevant experience in the implementation, operation, and/or auditing of management systems, which provides the practical knowledge necessary to effectively audit such management systems.

5.1.4 Training and certification:

Auditors shall have completed relevant auditor training. The training targets shall be defined and shall comply to actual knowledge competence required for MS Auditors. The training course shall consist of a sum of at least 40 hours clearly defined learning units (Including on-site training, self-learning, distance learning, e-learning). NSO-NAP 12 Gluten-Free Criteria training shall be taken from GFCB accredited by the i-NAF member Natural Accreditation Body.

5.1.5 Auditing Experience:

Auditors:

5.1.5.1 Shall have conducted and managed 4 complete MS Audits, with a total duration of at least twenty (20) days with a minimum of 8 days on site. The entire audit process from preparation to reporting in accordance with ISO 19011 or ISO/IEC 17021. Full NSO-NAP 12 Gluten-Free Audit shall be completed as Auditor 2nd Stage.

5.1.5.2 MS Lead Auditors:

- Shall have satisfactorily performed as a team leader under the direction of a competent MS Lead Auditor.

- Conducting and managing 3 complete MS Audits, with a total duration of at least fifteen (15) days with a minimum of 12 days on site., Full NSO-NAP 12 Gluten-Free Audit shall be completed as Lead Auditor 2nd Stage.

Measurement of the knowledge for the Auditors of GFCB is by the NSO-NAP 12 Gluten-Free Standard Criteria;

The requirements based on ISO 22003 Food Safety Management Systems — Requirements for Bodies Providing Audit and Certification of Food Safety Management Systems, ISO 22716 Cosmetic GMP and NSO-NAP 12 Gluten Free Standard.

Competence (knowledge and skills)	**Auditing**
1. Ability to apply the application review requirements in ISO/IEC 17021, this Technical Specification, specific scheme rules and certification body procedures, including: — multisite sampling requirements and their application; — audit duration requirements and their application; — evaluate number of applicable HACCP studies; ability to categorize an organization into a food category and subcategory, in accordance with Annex A. — evaluating GMP practices	**X**
2. Ability to identify relevant to food/cosmetic chain category(ies): — PRP; — food safety hazards; — ISO 22716 GMP requirements; — legal requirements;	**X**
3. Ability to determine if there are: — any specific seasonality factors related to the organization and its food category or products; — specific cultural and social customs related to the categories and geographic areas to be assessed; — specific factors required to audit the FSMS, food product, process or service. — specific factors required to audit the ISO 22716 Good Manufacturing Practice, cosmetic product, process or service.	**X**
4. Ability to identify the competence required for the audit team, in accordance with this table and GFCB procedures.	**X**

5. Ability to develop an audit plan that ensures: — audit team members audit those product and processes that they are technically competent to audit; — audit time is optimized; — audit objectives defined in this Technical Specification can be realized; — specific FSMS and/or Cosmetic GMP scheme requirements are met.	X
6. Ability to interpret and apply normative documents relevant to the scope of certification sought and cosmetic and the food chain category (see Annex A), e.g. ISO 22000, ISO/TS 22002 and/or cosmetic (ISO 22716 GMP) and/or other scheme certification standards. Knowledge shall include all normative references and their technical terms and definitions.	
7. Ability to identify: — food/cosmetic-borne microbiological hazards; — chemical hazards; — physical hazards; — allergens; — food/cosmetic safety labelling requirements; — food/cosmetic safety regulations that are relevant to the food chain category (see Annex A) and their recognized control mechanisms. Ability to evaluate the organization's capacity to identify and meet applicable (country of production/country of destination) food/cosmetic safety regulation and labelling requirements.	
8. Gluten-Free Criteria (NSO-NAP 12 Standard) – Gluten-free product Structure – Content conditions for Gluten-free products (NSO-NAP 12 Standard of Clauses 4, 5)	

5.2 Continuous Improvement of Auditors:

The performance of auditors and technical experts should be evaluated and recorded.
If the performance evaluation is not approved by GFCB Quality Manager and CEO Corrective and preventive action should be started according to the size of non-conformance.

The trainings for the Auditors and technical experts should be planned regarding to Performance Evaluation, Market needs, revised standards, corrective preventive actions and the opinion of CEO.

The performance of Auditors and Technical experts should be evaluated annually. The Auditors and technical experts should evaluate each other's performance by observing each other at audit processes.

If the Auditor didn't participate any Audits during the year the records of the performance evaluation should be requested from the auditor. If the auditor didn't respond the request. The status of the Auditor is changed from Active to Passive at the Customer Management System by Quality Manager. A written or oral information is given to the Auditor. If the auditor does not respond this information within 3 months the auditor should be out of system. If the auditor provide the objective evidence than s/he should be activated again by Quality Manager.
The scopes of the Auditors are yearly overviewed. Regarding to objective evidences (if responded) scopes of the Auditors are updated.

