## SERI COP Advisory 23

### Advisory No. 23: Remote Auditing for Surveillance Audits

**Reference Document:** R2:2013 Code of Practices  
**Date of Release:** March 31, 2021  
**Effective Date:** March 31, 2021

### Purpose of Advisory

This advisory outlines the process to be followed by a Certification Body (CB) where an audit is conducted remotely for one of the R2 Facility’s surveillance audits during the certification cycle. This Advisory may also be referenced by SERI for use in other cases where remote audits are required.

One of the challenges with an on-site audit is that there is a time constraint to finish the audit in the allocated time. This creates time pressures that can impede the auditor’s ability to adequately evaluate all the requirements. However, remote audits provide some new benefits to the process if the process does not try to emulate an on-site audit directly. A remote audit does not have to be a continual interface with the client. More time will likely be spent by the auditor reviewing R2 documents and records offline than is spent face-to-face with the client on a video call. The remote audit can be completed with the same effort but broken up over a longer duration, using both in-person interactions and off-line document and record review.

Remote audits do add some risk to the certification process. Whenever possible, it is good practice for the auditor to be on-site and be able to see everything. When auditing remotely, an auditor may not see the full context of what they are reviewing. This can lead to misunderstandings. On the other side, an R2 Facility may direct the auditor away from areas that they do not want the auditor to see. For remote audits to be successful, there must be full transparency into the entire site and all related operations.

### Scope of Remote Surveillance Audits

At a minimum, the CB shall audit the following R2 Standard requirements in addition to 17021-1 requirements at a remote surveillance audit:

- Provision 1 – EHSMS (Specifically the Scope of operations and certification)  
- Provision 5 – Focus Materials  
- Provision 6 – Reusable Equipment and Components  
- Provision 7 – Tracking Throughput  
- Provision 8 – Data Destruction
Considering both the opportunities and the risks, the Phases in this Advisory take a new approach to incorporate activities with added benefits to both the R2 Facility and the CB. This approach is outlined in the following 4 phases:

- Phase 1 – Pre-Qualification
- Phase 2 - Information Gathering
- Phase 3 – Opening Meeting, Facility Tour, Documentation and Record Review
- Phase 4 – Interviews, Follow-up, Closing Meeting

Typically, each phase is successfully completed before starting the next phase. However, it is understood that Phase 3 and 4 are iterative and may be conducted non-sequentially. In Phase 3 the auditor may be required to interview the R2 Facility to gain a better understanding of reviewed documentation and records. The auditor may also move to Phase 4 interviews to test and verify information assessed through Phase 3.

**Phase 1 – Pre-Qualification**

Phase 1 ensures that the R2 Facility meets the following set of pre-requisites as confirmed by the CB.

The R2 Facility must at a minimum:

- Maintain an R2 Certification and License Agreement in good standing.
- Continue to operate within the verified scope of certification.
- Continue to operate at the same address as listed on the R2 Certificate. For any address changes, the Advisory 18 – Facility Moves shall apply and is not included in this advisory.
- Not have undergone any significant changes. If the R2 Facility has undergone any significant changes in their organization, the CB must plan for an on-site verification of the changes.
- Maintain an electronic file sharing application or system where the R2 Facility can securely share documents with the auditor. (Some examples are DropBox, Box, Google Drive, etc.) and/or applications containing evidence (Some examples are CycleLution, Makor, RazorERP, etc.).
- Collect and allow access to documents and records in the file sharing application, throughout all phases of the audit in accordance with this Advisory, without limitations for the auditor to explore and follow audit trails on their own. A sampling of specific documents and records required are identified in Phase 2 and are only a starting point for the auditor. The auditor may request additional records and documents at any time during the audit process.
- Provide the auditor read access to all relevant documentation and records at least 7 days BEFORE the audit.
- Utilize a portable video sharing application (FaceTime, Google Duo, WhatsApp, MS Teams, etc.) capable of conducting live, on the job, worker interviews, and a visual tour(s) and assessment(s) of all areas indoors and outdoors at the R2 Facility’s location(s).
- Establish and be able to support a reliable and secure connection for all document, record, and video sharing.
• Test all areas of the site for adequate connectivity (cellular or Wi-Fi) and ensure there are no dead spots where video or other information sharing is limited or not possible, including outdoor areas of the property (e.g., storage, parking lot and perimeter).
• Ensure all necessary employees are available for participation in the remote audit to support the audit objectives and scope.

CB’s responsibilities

The CB carries out the following prior to scheduling a remote audit:

• CB must justify why an R2 Facility qualifies for a remote audit and that the R2 Facility has not had major nonconformity(s) on the last audit or have formal complaints filed against them, that otherwise would require on-site verification.
• Confirm operation is within the verified scope of certification.
• Confirm operations at the same address as listed on the R2 Certificate. For any address changes, the Advisory 18 – Facility Moves shall apply and is not included in this advisory.
• Confirm that no significant changes in the facility or its operations have taken place. If the R2 Facility has undergone any significant changes in their organization or operations, the CB must plan for an on-site verification of the changes.
• Test and confirm suitable functionality of file sharing applications.
• Test and confirm suitable functionality of video sharing applications.
• Verify the accuracy of Names, Addresses/Locations, Employee Count, DSV Count
• Ensure that the R2 Facility will provide online access to documents and records 7 days prior to the opening meeting of the scheduled remote audit.
• Verify the audit time allocated for the remote surveillance audit is adequate. It is imperative to be able to add time as needed, to ensure an effective audit.

Breaks, pauses or other adjustments in audit time or format may be necessary to fully complete the remote surveillance audit, especially when there are technical issues. The CB must add time to the audit to accommodate adjustments and ensure full audit time is accomplished. Timely R2 Facility responses for information are required throughout the audit process.

Milestone: Pre-qualification authorization completed. A record of review that the R2 Facility qualifies for a remote surveillance audit is to be maintained by the CB.

Phase 2 – Information Gathering

The R2 Facility gathers and uploads the documents in Table 1 for the auditor to access. The auditor in Phase 2 is only ensuring the documents are accessible to be able to begin Phase 3. If some documents and records are in paper copy format, the R2 Facility scans and uploads these documents to the File Sharing application.

Table 1 lists the expected documentation and records that are to be uploaded, by the R2 Facility, at least 7 days prior to the opening meeting. These documents and records must be made available during Phases 2-4. Sharing documents and records, as required in Table 1, via video conferencing is not permitted.
The CB shall provide **0.25 days** to the auditor to verify that the required information has been uploaded prior to Phase 3 (the auditor is not expected to check for the completeness of the documents/records). This audit time is in addition to the calculated surveillance time. The auditor ensures all required documents and records are uploaded at least 7 days before Phase 3. The auditor may also request additional documents and records not listed in Table 1. Table 1 is meant to be a representative list, not a comprehensive list of documents that will be reviewed during the audit process.

**Table 1: Electronic Documents**

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<tr>
<th>R2 Requirement</th>
<th>Documents to Review</th>
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| 1              | • EHSMS Manuals/Procedures/Work Instructions  
                 • R2 List of Activities |
| 2              | • Hierarchy of Responsible Management Strategies Policy |
| 3              | • Legal Compliance Plan with list of applicable legal requirements  
                 • Legal Compliance Audits (not facility inspection reports)  
                 • Evidence supporting the legality of transboundary shipments made by the R2 Facility and its downstream vendors through the entire recycling chain. This includes shipments of non-working or untested equipment and components. |
| 4              | • Hazards Identification and Assessment |
| 5              | • FM Management Plan  
                 • DSV Flow (list of vendors through the entire recycling chain – this includes all equipment and components containing FMs).  
                 • Qualification Records for DSVs |
| 6              | • Summary list of sales records for last 12 months. Where a summary report is not available sales records must be scanned and uploaded.  
                 • Testing and Repair Work Instructions |
| 7              | • Summary list of all incoming and outgoing transactions (shipments, invoices, sales, etc.) for the last 12 months. Where a list is not available, transaction records must be scanned and uploaded. |
R2 Requirement | Documents to Review
---|---
8 | • Data Destruction Procedures – All Forms of Destruction (Physical and Logical)
   • Records of Data Destruction Process Validation for the last 12 months. (not to be interchanged with data destruction records or quality control records).
   • DSV Qualification Records for Data Destruction

11 | • Closure Plan
   • Financial Instrument
   • Insurance Policy Declaration

Phase 2 information gathering, and compilation process is not part of the calculated audit time because this is completed by the R2 Facility; the added time for Phase 2 covers only the verification of the upload of the required documentation by the auditor.

**Milestone:** Documentation and records are gathered electronically and made accessible to the auditor by the R2 Facility and the auditor has confirmed all required documents are available.

**Phase 3 – Opening Meeting, Facility Tour, Documentation and Record Review**

Phase 3 begins when the Phase 2 milestone is achieved and will officially start with the Opening Meeting. After the opening meeting, the auditor conducts a comprehensive virtual tour of the facility. The tour is meant to be a thorough review of the activities and processes of the R2 Facility. The auditor should be clear about the operations and scope upon finishing of the tour. After the tour, the auditor should notify the R2 Facility of any additional records or documents that may need to be reviewed.

Phase 3 is intended to provide the auditor time to review the records and documentation that have been uploaded and document conformance in the R2 Audit Report. The intent is for the auditor to conduct a detailed enough review in Phase 3 to gather sufficient background information and identify audit trails in order to plan and guide the follow-up interviews and other assessments. Auditors will also begin sampling from summary reports of transactions or the actual transactional records (shipments, sales, invoices, etc.) to identify audit trails for verification.

Transaction samples for each audit trail are documented on the SERI provided “Transaction Sheet” audit trails template. All shipment and transaction samples and reviewed records are verified to be consistent with both the Scope statement on the R2 Certificate, the documented activities in Provision 1(c) and any other written risk analysis, policies, and process documentation.

Majority of the auditor’s time is expected to be used in Phase 3. Phase 3 and 4 are iterative and may be conducted non-sequentially to enable the auditor to move to Phase 4 interviews to test and verify
information assessed through Phase 3. Phase 4 time may require adjustment based on Phase 3 based on quality and complexity of the documentation and records uploaded by the R2 Facility.

**Milestone:** Opening meeting and virtual facility tour have been completed. Uploaded Phase 2 documents and records have been reviewed by the auditor. Audit trails are identified in the Transaction Sheet template and audit report. Audit report is intended to be partially completed in Phase 3. Updated audit plan and schedule interviews based on audit trails.

**Phase 4 – Interviews, Follow-up, and Closing Meeting**

Using the audit trails identified in Phase 3, the auditor will further inspect the information reviewed in Phase 3, verify the records sampled, and confirm the information with interviews and virtual tours. The length of Phase 4 is dependent upon the audit trails requiring follow-up from Phase 3.

Auditor reviews live operations to corroborate already reviewed records, and documents from Phase 3. Time spent auditing live processes is intended to focus on follow-up of audit trails from Phase 3.

All operations must be actively running, as applicable to the scope of the audit, and it is the auditor’s responsibility to ensure adequate evidence is reviewed to demonstrate conformance to the R2 Standard and R2 Facility’s scope. If operations are unavailable or not evident, the auditor will record a nonconformity to ensure sufficient evidence will be provided during the next audit.

The outcomes of the auditor’s assessment from Phase 3 and 4 are provided during the Closing Meeting.

**Milestones:** Interviews and tours are complete. All evidence of conformance is recorded in the audit documentation and audit report. Closing meeting is complete.

Corrective actions and technical review process will follow requirements in the Code of Practices and the CB’s procedures.

**Additional Expectations at a Remote Surveillance audit**

- A virtual tour of the site and all processing operations is completed, as directed by the auditor, through a live video stream. This includes all campus locations and controlled activities not at the R2 facility.
- The auditor interviews any applicable personnel as appropriate throughout the audit process.
- R2 Facility makes available any employee the auditor chooses to speak to during the remote audit.
- During any phase of the remote surveillance process, the auditor or the CB may choose to verify additional records and therefore has the discretion to add additional time, and/or determine an on-site audit is necessary.
- SERI may witness any remote surveillance audit to monitor effectiveness.
Additional Expectations for Confidentiality

To make remote auditing successful, R2 Facilities need to electronically share records and documentation to allow the auditor to remotely review. The auditor may need to take copies of some records to include in the audit documentation as evidence of conformity. The auditor will treat all audit evidence as confidential.