Certification Department
Brilliant Certification
Entrance 1, El Mehwar El Markazy,
Building #24 District 1, Area 2,
El Sheikh Zayed City, Egypt

Issue no. 1
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Revision no. 2
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Transition Policy and Auditor Guidance (ISO 45001:2018 And ISO 22000:2018)

BRILLIANT TRANSITION PHILOSOPHY

- ▲BRILLIANT considers ISO 45001:2018 And ISO 22000:2018 revisions to be significant in nature, primarily due to changes in structure, along with introduction of some additional concepts and themes. It is our goal to ensure that we perform value added audits that establish an organization's level of conformity to these standards and in doing so help our clients understand both the intent and the philosophy behind the changes.

- This policy relates to BRILLIANT's certification services covered under its ACCREDIA and EGAC accreditation.

- BRILLIANT's philosophy is to maintain a simplistic transition approach that is easy for our clients and auditors to comprehend.

GENERAL TRANSITION GUIDELINES

1. ▲All current existing certificates to OHSAS 18001:2007 and ISO 22000:2005 will expire three years after release and publication of the 2018 versions of ISO 45001 and ISO 22000

2. ▲Transition from the last versions to the latest versions will be accomplished during a single visit with a potential for some additional audit time added to effectively evaluate the changes and effectiveness of implementation. See Transition Process below.

3. ▲A new certificate to the latest versions will be issued when it can be satisfactorily shown that a client has fully met the requirements of the new standard. As is the current practice, all major non-conformities must be formally closed out and corrective actions for any minor non-conformances must be received and accepted by BRILLIANT, prior to issuance of a certificate.

4. Prior to the Transition Audit being undertaken, clients are encouraged to complete an internal audit and management review against the new standards as this exercise serves both to ensure that all requirements have been addressed in the management systems and to provide easy reference to these requirements during the transition audit. As a minimum, the client must have completed a formal gap analysis and reviewed the output with Top Management.

Background for the Change- The Impact of Annex SL

- In April 2012, the International Standards Organization (ISO) published Annex SL (previously ISO Guide 83) of the Consolidated ISO Supplement of the ISO/IEC Directives. This document provides identical

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structure, text and common terms and definitions for management systems standards to follow for future revisions.

- ▲Over the years ISO has published many management system standards for topics ranging from quality and environment to information security, business continuity management and records management. Despite sharing common elements, ISO management system standards come in many different shapes and structures. This, in turn, results in some confusion and difficulties at the implementation stage. This new approach will ensure consistency among future and revised management system standards and make integrated use of these standards far simpler. It will also make the standards easier to read and better understood by the users.

TRANSITION PROCESS

- BRILLIANT appreciates that in order to facilitate a successful transition, all parties must work together to ensure solid planning is performed, proper and effective communication occurs, everyone understands the areas of significant focus, and that the responsibilities are understood.

Transition Options
- ▲The International Accreditation Forum (IAF) has stated that organizations will have 3 years to transition their QMS, EMS, OHSAS and FSMS to become compliant to the new standards. Based on this timeframe BRILLIANT has developed three (3) transition options.

OPTION 1 (Re-Assessment Transition) Recommended Option
- Full transition conducted at the time of re-assessment audit. BRILLIANT recommends that clients use this opportunity to undertake their transition audit.
- If the client wishes to bring forward their next reassessment visit, they must contact BRILLIANT in advance, if successful, allowing BRILLIANT to issue a new certificate and will reset the three-certification cycle and the certificate valid until date (VUD).
- ▲If the client's reassessment visit is between March 2018 and March 2019 for version of ISO 45001:2018 or between June 2018 and June 2019 for version ISO 22000:2018 and they are not ready to transition it would be best for them to consider option 2 or 3.

OPTION 2 (Surveillance Transition)
- Full transition conducted at the time of existing surveillance audit; additional time will be added to the audit activity to allow time to complete a full assessment against the new standard. This additional time will equate, as a minimum, to the duration of a re-assessment.
- If successful, BRILLIANT will issue a new certificate and will supersede the current certificate and the certificate will be valid until date (VUD) in the current certification cycle.

OPTION 3 (Special/Any-time Visit Transition)
- Special Visit conducted as a stand-alone visit (out of the annual sequence at the client's request) or where the current certificate has expired prior to a transition audit being conducted
- If successful, BRILLIANT will issue a new certificate and will supersede the current certificate and the certificate will be valid until date (VUD) in the current certification cycle.

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Audit Durations

- ▲Each of the transition options has different implications for the client in terms of duration and cost. The minimum time for all transition audits is the equivalent audit time of a reassessment audit for that client. This will allow sufficient time for the BRILLIANT's Lead Auditor to examine the whole of the management system against the requirements of ISO 45001:2018 and/or ISO 22000:2018.

▲***Note:** Where transition audits are carried out in conjunction with scheduled surveillance or recertification (i.e. progressive or staged approach) then a minimum of 1 auditor man-day is required to be added to cover existing and new requirements implied by ISO 45001:2018. Recognizing that each client and transition audit is unique and audit duration will be increased above the minimum as needed to sufficiently demonstrate conformity to ISO 45001:2018.

- Nonetheless, the exact transition audit duration will depend upon several factors. Audit time can be reduced or increased depending the size and complexity of the client's processes and management systems. These factors are outlined in the table below.
- However, the minimum audit transition duration for all clients will not be less than the equivalent audit time of a recertification visit.

Approach to Client Communications

- ▲ Our latest transition policy will be available to all clients in our official website www.briliantcert.com to understand our transition process.
- It is BRILLIANT's position that it is best for client for transition at their next reassessment visit, therefore, we will be writing to all customers to tell them that we have by default allocated this as their transition audit in our scheduling system. If the client wishes transition earlier or later than this audit, they will be asked to contact BRILLIANT to make suitable arrangements.
- We will also be asking all BRILLIANT auditors to guide clients to make suitable transition arrangements as soon as possible.
- At the point of scheduling a transition audit, clients will be informed of the audit duration.

▲**Factors for The Adjustment of Audit Time for Transition Visits**
Additional Time

a. Complicated logistics involving more than one building or location where work is carried out. e.g.,
b. Staff speaking in more than one language (requiring interpreter(s) or preventing individual auditors from working independently).
c. Very small/large site for the number of personnel.
d. High degree of regulation (e.g. food, drugs, aerospace, nuclear power, etc.).
e. System covers highly complex processes or relatively high number of unique activities.
f. Activities that require visiting temporary sites to confirm the activities of the permanent site(s) whose management system is subject to certification.
g. Outsourced functions or processes.
h. Maturity of the management system.
i. Prior knowledge of the client organization's management system (e.g. already certified in another voluntary scheme by us)

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j.   Client preparedness for related scheme certification .

OHSMS Only, where applicable
   a.   Indirect aspects necessitating increase in audit time.
   b.   Rate of accidents and occupational diseases higher than average for the business sector e.g. Lost Time Injury Frequency Rate (LTIFR)

*Note: LTIFR calculations measure the number of lost-time injuries per million hours worked during an accounting period.
   c.   If the members of the public are present on the organization's site.
   d.   The organization is facing legal proceedings related to OH&S (depending on the severity and impact of risk involved)
   e.   The temporary large presence of many (sub)contractors' companies and their employees causing an increase in complexity or OH&S risks.
   f.   Where dangerous substances are present in quantities exposing the plant to the risk of major industrial accidents, in accordance with the applicable national regulations, and/or risk assessment documentation.
   g.   Organization with sites included in the scope in other countries than the mother site country (if legislation and language are not well known).

TRANSITION DOCUMENTATION
To assist all parties, understand their role within the transition process BRILLIANT has produced two transition packages, one for the client and one for the auditor.
Customer Transition Documentation
The Transition Package shall be mailed to all clients and comprises of 2 documents, including:
   -   Management System Questionnaire
   -   ▲Client Transition a Formal Gap Analysis ISO 45001 /ISO 22000

▲The client a Formal Gap Analysis maps the requirements of the current version of the standards to help clients identify where gaps may **exist.**
Auditor Transition Documentation
All auditor transition documentation can be found on our network sharing.
   -   Transition Policy and Auditor Guide
   -   ▲Client Transition Formal Gap Analysis ISO 45001/ISO 22000
   -   ▲Audit Report (P2F04/L3)

Client Transition Readiness
If clients are unsure as to whether they are ready to proceed with a transition audit they may request for BRILLIANT to conduct a pre-assessment to establish their current level of conformity with the revised standard.
Pre-Assessments
During the implementation of the revised standards BRILLIANT can provide preliminary evaluations of an organizations level of conformity. This activity has no bearing on formal certification transition process (i.e. neither towards audit time, nor determination of conformance).

Non-Conformance Management
   -   ▲Non-conformances raised during a transition audit will be written against ISO 45001:2018 and ISO 22000:2018
   -   Corrective action response requirements will remain the same

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- Where a minor non-conformity raised, the auditee shall to prepare their root causes and the proposed corrective actions and then send to the BRILLIANT's audit team leader within 7 calendar days as a maximum from the last date of audit. Once the auditee has approval from the BRILLIANT's auditor (within 2 days) against the submitted root causes and the proposed corrective actions, the auditee shall submit the corrective actions and its related objective evidences to the BRILLIANT's audit team leader within 60 calendar days or need to be reduced as appropriate to ensure certification decision prior to current certificate expiry.
- Where a major non-conformity raised, this shall be reported in the audit report and a recommendation for suspension indicated. The organization shall be notified that situation will be reported to BRILLIANT management and will lead to a suspension (and potentially withdrawal) of certification. In case of suspension or withdrawal, the head of certification is notified and the reason for the suspension, necessary action and a due date by which all corrective action and follow-up visits must occur and documented (the maximum allowable suspension period is 6 months).

Certificates

- ▲OHSAS 18001:2007 , ISO 22000:2005 certificates can be re-issued if the client's current certificate expires before they can be fully transitioned to the ISO 45001:2018 , ISO 22000:2018 standards
- ▲If OHSAS 18001:2007 , ISO 22000:2005 certificate is re-issued, Valid Until Date will not go beyond the Fixed Expiration Date (March 2021 for ISO 45001:2018 and June 2021 for ISO 22000:2018 version).
- ▲If the client has been successful in their transition audit, a new "ISO 45001:2018 , ISO 22000:2018" certificate will be issued and the mentioned transition options (Option 1 or 2 or 3) conditions will be applied.

Multisite

- For clients that are registered with a multisite certification the transition approach will be similar, however due to the potential for additional complexity the process will be coordinated differently.
- The transition process for multisite organizations will be managed by the assigned BRILLIANT's Certification Manager.
- The transition audit duration for an individual site shall be that of a standard surveillance audit to that site as per the current multisite schedule.
- The transition shall only be processed once all required audits have been satisfactorily completed.
- ▲During the transition audit of a multisite client the auditor should ensure that that the when planning the changes to the client's management system to address the new requirements of the ISO 45001:2018 , ISO 22000:2018 standard have taken the site locations into account, and that the changes made extend to the site locations. This shall include ensuring that:
    - The processes for determining internal and external issues and the needs and expectations of interested parties have considered and considered issues and parties relevant to the site locations;
    - The determination of risks and opportunities has considered and considered risks and opportunities relevant to site locations;

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- - Planning for any new operational controls have considered and considered site-based activities;
  - Any new or amended monitoring, measurement, analysis and evaluation processes, such as those necessary for evaluating the performance and effectiveness of the management system, have taken site-based activities into account;
  - The planning processes for internal auditing have taken the extent to which sites need to be subjected to internal audit into account and that the internal audit process can demonstrate that the changes made extend to the site locations and are effective.
- During the review of a multisite client transition audit report the Certification Manager shall ensure that the auditor has satisfactorily addressed the above.

Commitment and Migration/Transition Plan from Brilliant CB

Our CB has the commitment to

1. Train its auditors and check the achievement of results for an adequate level of competence.
2. Inform clients and share with them a guide for the management of the transition.
3. Plan the timeframes for audit activities and the issuance of certificates against the revised standard.
4. Take into consideration both the transition period and the ongoing certification period.
5. Schedule the audits at the client organizations.
6. Brilliant Certification will ensure that the clients' ongoing conformity to OHSAS 18001:2007 , ISO 22000:2005 will be maintained through the migration/Transition process.
7. Plan the timeframes for decisions regarding certification for the prompt updating of the certificates.
8. Encourage organizations certified against the previous version to adopt the new version from the first steps.
9. Encourage organizations without accreditation to adopt the new version directly.

YASSER FAROUK MOUSTAFA / 10.11.2018
The Managing Director / Signature