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Procedure for Recognition of Hygiene Rating Audit Agency

Hygiene Rating Scheme

(For Food Establishments)



QUALITY COUNCIL OF INDIA

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Procedure for Recognition of Hygiene Rating Audit Agency

1. Introduction

This document defines the procedure that has to be followed by the Hygiene Rating Audit Agency (HRAA) seeking Recognition. The general information is contained in this procedure. Any specific information required by the agency will be provided QCI.

- 2. Requirements for Recognition
- 2.1 The requirements for recognition for HRAA is given in document QCI/PADD/HRAA_ Requirements_Ver.2_Oct 2022. The document is available on the website (www.qcin.org/hraa).
- 2.2 Amendment to the requirement / procedure.
- 2.2.1 The requirements for recognition may require amendments based on following conditions individually or severally
 - i. Modification in the HRS document of FSSAI.
 - ii. Feedback from the implementation of the requirements.
 - iii. Any other reason as deemed fit by QCI/FSSAI.
- 2.2.2 QCI may approve the amendeded requirements / procedure or seek the advice of the technical experts, if any, or a representation of HRAAs before approval of the amendment.
- 2.2.3 The amendment in the requirement / procedure shall be notified to the recognised HRAAs and a suitable time frame shall be given for implementing the modified requirement.

3. Assessment Process

- 3.1 Preparation for the Assessment: The application of HRAA is reviewed by QCI in terms of scope, location(s) and an assessment plan are proposed with details of the assessment team as well as man-days for conducting the on-site assessment.
- 3.2 An assessment team comprising of a team leader and member(s) / technical expert(s) will be nominated by QCI for the purpose of assessment at applicant's office and other locations, if required. Under normal circumstances, the assessment at Head Office will be for 1-man days including the TE.
- 3.3 During review of the scope and locations where assessment is to be done, is planned based on evaluation of risks associated for different activities planned at different locations. After acceptance by HRAA, a document review is conducted by the assessment team for verifying compliance and adequacy of the documentation shared with the HRAA for taking necessary corrective actions. Corrective actions are subsequently reviewed and if found adequate the **next assessment will be planned.**
- 3.4 Assessment Date and Plan The date of assessment shall be mutually agreed between the applicant HRAA and the QCI assessment team. The assessment team

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leader shall provide an assessment plan to the applicant HRAA in advance of the assessment.

- 3.5 Office Assessment- The office assessment will be conducted as mentioned in the assessment plan for verifying technical competence of the applicant HRAA for operating under the HRAA Scheme. The assessment shall begin with an opening meeting for explaining the purpose and scope of assessment and the methodology of the assessment. The actual assessment process shall cover review of the documented system of the organization to assess its adequacy in line with the assessment criteria as specified. It will also involve verification of the implementation of the system including scrutiny of the records of personnel competence and other relevant records and demonstration of personnel competence through means like interviews, etc. Office assessment will be ended, through a formal closing meeting, the assessment team shall convey to the applicant HRAA on the non-conformities or concerns observed in the system in accordance with the scheme requirement, and the same will be reported by the assessor to QCI with the recommendation for next assessment.
- 3.6 QCI shall grant provisional recognition, based on the applicant HRAA office assessment report with the following laid conditions:
 - i. The provisional recognition shall be valid for a period of one year, the provisionally recognised HRAA is required to mandatorily inform QCI 15 days in advance about their date of first hygiene rating audit for witnessing the same by QCI.
 - ii. During the period of provisional recognition, if the HRAA fails to organise the above their provisional recognition shall be withdrawn.
 - iii. During the witness assessment, in case of a major non-conformance raised by the assessor their provisional recognition shall be on hold till such time the same is closed by the HRAA and agreed by the assessor.
 - iv. On successful completion of witness assessment QCI shall issue a recognition letter for a period of three years from the date of grant of decision for recognition.
 - v. Only on the grant of recognition by QCI, HRAAs shall perform the Hygiene Rating audits excluding the witness audit during the carried out during the provisional recognition.
- 3.7 Witness Assessment: The witness assessment will begin with an opening meeting for explaining the purpose and scope of assessment. The actual assessment process shall review of the documented system of the organization to assess its adequacy in line with the assessment criteria as specified. It will also involve verification of the implementation of the system relating to the audit process and verification of auditor competence. Witness assessment will be ended, through a formal closing meeting, the assessment team shall convey to the applicant HRAA on the non-conformities or concerns observed in the system in accordance with the scheme requirement, and the same will be reported by the assessor to QCI with the recommendation.
- 3.8 In case the applicant has applied for NABCB accreditation for ISO/IEC 17020 or ISO/IEC 17021 for the scope (03 Food Products, Beverages & Tobacco & 30 Hotel & Restaurant) or ISO/IEC 22003 for the category (C Food Manufacturing

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(CI & CIV) and E – Catering) shall be recognised as HRAA by the submission of application with prescribed fee wherein the applicant shall undergo the following stages (document review, office assessment and witness assessment). However, the recognised HRAA shall abide to the surveillance assessment and witness assessment conducted by QCI. If agency provides the NABCB approved WA report relevant to the category / scope of HR scheme, then WA may be waived off.

- 3.9 In case the applicant HRAA holds NABCB accreditation for ISO/IEC 17020 or ISO/IEC 17021 for the scope (03 Food Products, Beverages and Tobacco & 30 Hotel & Restaurant) or ISO/TS 22003 for the category (C Food Manufacturing (CI & CIV) and E Catering), shall be recognised as HRAA by the submission of application with prescribed fee wherein the applicant is excluded from the following stages (document review, office assessment and witness assessment) for the grant of initial recognition However, the recognised HRAA shall abide to the surveillance assessment and witness assessment conducted by QCI. If agency provides the NABCB approved WA report relevant to the category / scope of HR scheme, then WA may be waived off.
- 3.10 In case the applicants HRAA holds NABCB accreditation or applied for ISO/IEC 17020 or ISO/IEC 17021 or ISO/TS 22003 for specific scope, they shall be recognised as HRAA to operate audits in the relevant categories of Hygiene Rating Scheme (Catering / Bakery / Sweet shops / Meat retail) as mentioned in the below table:

S. No	Standards Under NABCB Accreditation	Scopes (IAF Code)	Category	Sub - Category	Relevant HR category
1.	ISO/IEC 17020 or ISO/IEC 17021	03	Food Products, Beverages & Tobacco		Sweet Shops Meat retails
		30	Hotel & Restaurant		Catering
2.	ISO/TS 22003		C - Food Manufacturing	CI – Processing of Perishable products	Meat retail
				CIV – Processing of ambient stable products	Bakery
					Sweet Shop
			E- Catering		Catering



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3.11 Assessment Cycle

3.11.1 The below assessment cycle shall be applicable to all the recognised HRAA during the period of HRAA recognition:

Assessment Heads	Timeline (in months)		
1 st Surveillance assessment	06 th Month		
1 st Witness assessment	12 th Month		
2 nd Surveillance assessment	18 th Month		
2 nd Witness assessment	24 th Month		
3 rd Surveillance assessment	30 th Month		
Renewal of recognition	33 – 36 th Month		

- 3.11.2 QCI shall conduct unannounced assessment due to any operational exigency and to monitor the level of compliance by the HRAA.
- 4. Decision
- 4.1 Based on the reports of assessments, and the action taken by the applicant on the non-conformities / concerns, if any, QCI shall take a decision to grant / reject the recognition under the HRAA scheme.
- 5 Validity of Approval
- 5.1 The recognition shall be valid for a period of three years, after ensuring
 - a. Complete compliance to the scheme requirements based on assessment reports,
 - b. Satisfactory resolution of non-conformities and concerns raised, if any.
- 5.2 The recognition shall be subject to suspension / withdrawal with due notice of 15 days in the event of any non compliance to the requirements of the scheme.
- 5.3 The recognised HRAA shall inform QCI without delay about any changes relevant to its recognition, in any aspect of its status or operation relating to;
 - a. Its legal, commercial, ownership or organizational status,
 - b. The organization, top management and key personnel,

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- c. Main policies, resources, premises and scope of approval, and
- d. Other such matters that may affect the ability of the HRAA to fulfill requirements for recognition.
- 5.4 QCI shall examine such information and decide on the issue on merits with or without an on-site verification.

6 Conditions for Recognition of HRAA

6.1 Granting of Recognition to HRAA

The recognition is granted to an applicant after meeting the following conditions:

- The applicant meets the requirements of recognition and all non-conformities and concerns found against the requirements of recognition during assessment have been closed to the satisfaction of the QCI assessor.
- ii. There are no adverse reports / information / complaints about the applicant regarding the quality and effectiveness of implementation of audit system as per the requirements of QCI.
- iii. The hygiene rated clients (FEs) of the HRAAs are satisfied by the conduct of the HRAA and its audit system. QCI may request feedback from selected clients of the HRAA / publicise receipt of application and seek a feedback from stakeholders.
- iv. The applicant has cleared all the outstanding dues to QCI.
- 6.2 In the event of any adverse issue arising from the reasons specified at points ii and iii, the applicant will be given an opportunity to explain its position to the recognition committee before a decision is taken in respect of granting of the recognition.

7 Maintenance of Recognition

- 7.1 The recognition shall be granted for three years with the following conditions which is applicable for all routes of recognition:
 - i. The recognised HRAA shall undergo the assessment cycle as mentioned in the clause 3.11. In case of witness assessment, HRAA shall offer the scope of audit as recommended by the QCI assessor during the initial witness assessment conducted before the grant of recognition and respectively. If any nonconformities or concerns raised during the respective assessment the same has to closed successfully for the continuation of the recognition.
 - ii. There are no adverse reports / information / complaint with QCI about the HRAA regarding the implementation of audit system as per the requirements of the scheme.
 - iii. The FEs (clients) of the HRAA are satisfied by the conduct of the HRAA and its audit system.
 - iv. The HRAA shall timely submit the planned audit details, for the ensuing fortnight (in prescribed format) to QCI (on 1st and 15th of every month) and as desired by QCI as a means to monitor the activities of HRAA. This also includes any information as desired by the regulator.
 - v. The recognised HRAAs shall clear all the outstanding dues.



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7.2 In the event of any adverse issue arising from the reasons specified at points iii and iv, the applicant body will be given an opportunity to explain its position to the recognition committee before a decision is taken in respect of maintenance of the recognition.

8. Suspension of Recognition

- 8.1 The Recognition is suspended either fully or partially based on the following conditions individually or severally
 - No / ineffective corrective action in response to the non-conformities observed during surveillance assessment or reassessment.
 - ii. Non-payment of outstanding dues to QCI
 - iii. Any major change has taken place in the legal status, ownership, impartiality etc. without information to QCI.
 - iv. Any wilful mis-declaration in the application form
 - v. Wilful non-compliance to the Recognition agreement
 - vi. Excessive and or serious complaints against the audit system of the HRAA.
 - vii. Non availability of resources with HRAA.
 - viii. Any other condition deemed appropriate by QCI.

9. Withdrawal of Recognition

- 9.1 The recognition is withdrawn from the HRAA under the following conditions individually or severally
 - i. If the recognized HRAA wilfully relinquishes its **recognised status**.
 - ii. If the non-conformities are not addressed in spite of suspension for a period more than six months.
 - iii. If no action is taken by the recognized HRAA in response to the suspension on any other grounds.
 - iv. If there is evidence of fraudulent behaviour, or the HRAA intentionally provides false information or conceals information.

10. Renewal

The recognised HRAA shall apply to QCI for the renewal before three months of the expiry of recognition.

11. Application for Recognition

- 11.1 The applicant established as a legal entity or identifiable part of larger legal entity in India such that it can be held legally responsible for its inspection/auditing services shall apply for HRAA recognition scheme.
- 11.2 In legal terms, it shall be an organization which can sue and be sued in its own name as per the legal interpretation in India. It could be a public or private limited company, LLP, a trust or a society. Partnership firms and proprietary companies are not eligible.

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- 11.3 Agencies interested in HRAA recognition scheme shall submit the application form to hraa@qcin.org. The application form and other related documents are available on the website (www.qcin.org/hraa) for reference.
- 11.4 Before applying for HRAA Recognition, the applicant may decide the route of recognition as mentioned in the below clauses 11.4.1 / 11.4.2 / 11.4.3 / 11.4.4 based on which the applicant shall submit the HRAA application:
- 11.4.1 Operated in schedule IV of FSS in the food sector for at least 6 months and completed at least two auditing any of the following sectors namely- Food Service Establishments (restaurants/ cafeteria/ dhabas), bakeries, meat retail shops and sweet (mithai) shops.
 - a. Carried out minimum one internal audit against the applicable requirements for recognition and one management review.
- 11.4.2 For start-ups while the technical requirements remain the same the administrative documents need to be submitted in accordance to the notification issued by the DPIIT, Gol.
- 11.4.3 In case the applicant has applied for NABCB accreditation for ISO/IEC 17020 or ISO/IEC 17021 or ISO/IEC 22003 shall be recognised as HRAA (please refer to clause 3.8 and 14).
- 11.4.4 In case the applicant holds NABCB accreditation for ISO/IEC 17020 or ISO/IEC 17021 or ISO/IEC 22003 shall be recognsied as HRAA (please refer to clause 3.9 and 14).
- 11.5 Reference to the clause 11.4.1 /11.4.2 / 11.4.3 the following are the documents which the applicant should review prior to submission of application:
 - a) Application Form QCI/PADD/HRAA_ Application_ Oct 2022 with clear description of scope.
 - b) Fee structure QCI/PADD/HRAA_ Procedure_Ver.2_Oct 2022
 - c) Requirements for Recognition of Hygiene Rating Audit Agencies QCI/PADD/HRAA Requirements Ver.2 Oct 2022
 - d) Procedure for Recognition of Hygiene Rating Audit Agencies QCI/PADD/HRAA_ Procedure_Ver.2_Oct 2022
 - e) A blank copy of the Cross-reference matrix- QCI/PADD/HRAA_CRM cum DRR_Ver.2_Oct 2022.

The applicant HRAA should submit the application form with the prescribed fee, duly filled cross reference matrix and relevant documentation (that addresses requirements of QCI/PADD/HRAA_ Requirements_ Ver.2_Oct 2022).

11.6 HRAA that is registered as a legal entity in India can apply for the recognition.

There would be HRAAs who are registered overseas shall have a legal entity in India.

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- 11.7 QCI reserves the right to seek information on the antecedents of the owners those manage the **audit activities** before deciding to accept the application for further processing. Adverse decision of QCI would be communicated with reasons for rejecting the application in case any feedback of fraudulent behaviour or incorrect information is received. The applicant is free to appeal against such a decision QCI.
- 11.8 The applicant must also enclose the required information and documents as specified in the application form.
- 11.9 The application is reviewed by QCI for completeness and clarity of recognition requirements. Any mismatch is clarified and the outcome of the review is communicated to the applicant regarding acceptance of the application for further processing, or to complete any further requirements identified during the review. Once accepted the application fee is non-refundable.
- 11.10 In case the application is accepted for further processing, acknowledgement of acceptance is sent to applicant with details of the man days likely for the assessment with the assessment team details.
- 11.11 Reference to the clauses 11.4.1 / 11.4.2 / 11.4.3 the process of recognition are as follows read with clause 3:
 - i. Document review
 - ii. Office assessment
 - iii. Provisional Recognition: In case the HRAA wishes to apply for provisional recognition, QCI may consider to grant the applicant HRAA as mentioned in the clause 3.6. or if the applicant is willing to offer witness assessment within 15 days from date of completion of office assessment they shall approach QCI to conduct witness assessment for the grant of final recognition.
 - iv. Witness assessment
- 11.12 During processing of the application, the applicant HRAA is informed about the assessment team comprising of one lead assessor and one observer shall be accompanied wherever required as a minimum. HRAA has the normal right to object against a specific assessor for reasons of conflict of interest.
- 11.13 Appointment of the Assessment Team: The assessment team, consisting of a team leader and a member, is identified by QCI, from the pool of assessors and experts. The assessment team for each stage of the initial assessment normally consists of two members and the team for witness assessment will be based on scope for which witness has to be conducted. Technical Expert, if required, could be additional to the number of team members.
- 11.14 After application is accepted for further processing, a formal acknowledgement is sent to the applicant HRAA for carrying out the assessment with man-days (assessment fee). The assessment team members for carrying out activity / assessments are communicated to the applicant HRAA. The HRAA is requested to inform QCI about acceptance / objection against the appointment of any of the team members. Any objection by the applicant HRAA against any of the team members must

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be in writing, accompanied with adequate grounds for the objection. **QCI** will evaluate the objection and decide whether to change the team member or to overrule the objection raised by the applicant HRAA. The assessment team is then formally appointed. Efforts are made to ensure that the team is kept intact throughout the assessment process, however there could be changes based in team depending upon the circumstances. The team members are asked to commit and disclose that they do not have relationship direct/indirect with the applicant body or any of the employee of the applicant HRAA that can affect the objectivity of the assessment at the time of their appointment as QCI assessor / technical expert. The team members are required to maintain confidentiality of the information about the operations of the applicant HRAA obtained as part of the assessment process unless required by law, the same will be done under intimation to the HRAA. In case QCI assessors commits to disclose information after submitting the declaration / identified having conflict of interest with the applicant in such situation QCI shall take appropriate decision.

- 11.15 On receipt of acceptance on the assessment team and fee, further processing of application shall be carried out by QCI.
- 11.16 QCI shall publishes the new applicants for recognition on its website, for information and for receiving feedback from the industry / other stakeholders.
- 12. Publishing of the Information for Public & availability of Recognition schemes
- 12.1 QCI makes public announcement of the recognition schemes, application for recognition, fee structure, requirements and procedure for recognition, and other related documents on its website and on specific request by the applicant HRAA / interested organisation.
- 12.2 QCI maintains a list of the applicant HRAAs, recognised HRAAs, provisionally recognised HRAAs, suspended HRAAs, expired HRAAs, withdrawn HRAAs on its website.
- 12.3 The recognition scheme is open to all applicants within the capability and scope of the scheme.
- 13. Confidentiality and Disclosure
- 13.1 The information obtained regarding the audit system of the applicant HRAAs and recognised HRAAs, that is not of the nature of public information, is kept confidential by all the professionals of QCI, panel of assessors, experts and the committee members. Confidentiality is assured by the professionals, assessors, experts, and committee members by an undertaking submitted before assigning the responsibilities /activities.
- 13.2 If QCI has to share any confidential information due to any legal situation, the concerned HRAA will be informed of the extent of disclosure and the body to whom the disclosure has been made.

14. Fee Structure



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14.1 The following fee structure shall apply as mentioned in the below table:

S. No.	Heads	New applicant	Applicant applied for NABCB accreditation	Applicant accredited by NABCB
1	Application	Rs.20,000/-	Rs.10,000/-	Rs.10,000/-
2	Document Review Report	Rs.20,000/-	Rs.20,000/-	NA
3	Office Assessment	Rs.20,000/-	Rs.20,000/-	NA
4	Initial Witness assessment	Rs.20,000/-	Rs.20,000/-	NA
5	Surveillance assessment	Rs.20,000/-	Rs.20,000/-	Rs.20,000/-
6	Witness assessment	Rs.20,000/-	Rs.20,000/-	Rs.20,000/-
6	Renewal	Same as initial recognition	Rs. 10,000/- + additional MDs in line with application status with NABCB accreditation	Rs. 10,000/-

Note:

In addition to above man-day and fee structure, if additional man-days are to be conducted for change/extension in scope, risk based **assessment or assessment to verify any complaint or unannounced assessment** shall be chargeable @ 1 man-day (Rs. 20,000/-).

14.2 QCI at its discretion may revise/ levy any other fee necessary with due notice to the HRAA.