



BRCGS Certificate Extension Report

Standard	Packaging & Packaging Materials – Issue 5	Product Category	<i>Flexible Plastics</i>
Scope	<i>The slitting, rewinding, hot needle perforation, core cutting and centre folding (subcontracted processes of gravure, digital and flexographic printing, lamination and die-cutting) of polypropylene, polyethylene, amorphous polyethylene, terephthalate, polyamide, ionmer (Surlyn), metallised APET, OPA, EVOH, OPP, LLDPE, PVdC for films on the reel, pouches and lids for food contact use</i>		
Exclusions from scope	None		
Risk assessment result	<i>Certificate Extended</i>	Risk assessment date(s)	4 th January 2021

Company Details			
BRCGS site code	2113728		
Company name	National Flexibles Ltd		
Site name	Bradford		
Address	2 Battlefield View, Birkenshaw, Bradford, BD11 2PT		
Country	UK	Postcode	BD11 2PT



Company description	<p>The company was established over 40 years ago and became part of the Charles Baynes group in 1993. In 1998 Barry Twigg the current chairman undertook an MBO and National Flexible has evolved into a high-quality supplier of flexible films owned by its management and staff and is located on a light industrial estate in Birkenshaw, to the south-east of Bradford. The site supplies a wide range of laminated, polypropylene, polyethylene, amorphous polyethylene Terephthalate, polyamide, metallised; APET, OPA, EVOH, OPP, LLDPE, PVdC plain and printed film primarily for the UK and the EU. Films are purchased, the artwork process is managed in-house and printing centre fold, die cutting and lamination is outsourced to meet customers' specific needs. The machinery on site includes slitting, rewinding and perforating equipment. Stock is held on site and called off by customers when required to give a rapid response. The site support and fund both on the job training and general interest training for all employees and have excellent staff engagement. The buildings comprise an area of 2,525 square metres. The site is entirely suited to the production and supply of food grade packaging products. There are 50 personnel operating a rotating 2-shift system and are no more than 45 employees on site at any one time.</p> <p>The site has developed and implemented quality management and GMP compliance systems that meet the requirements of the BRC Global Standard for Packaging and Packaging Materials.</p>		
Certification Body Details			
Name of Certification Body	QA International Certification Limited		
Auditor(s) number	110034	Auditor names and roles	Laurence Powell - Auditor

Key site personnel involved in risk assessment	
Caroline Clay - QA Manager	



AGREED ACTION POINTS - SUMMARY SHEET

Any concerns following the discussion with the site that could raise doubts to continuing certification shall be documented in a similar format to 'non-conformities' and the certification body shall agree a process with the site to action these, where appropriate, so that certification can be extended. This should include an appropriate timeline (as short as possible).

Agreed action points			
No.	Details of area of concern	Agreed Action Plan (where applicable)	Confirmation that action is completed
	None		

Comments on any areas of concern (where applicable)
<i>Free text box for example may be used for commentary on action plan where appropriate or any information regarding late or no submission of confirmation of completion of action plan.</i>

Summary of each area of the risk assessment Not Applicable (N/A) should only be used where a specific topic is not relevant to the specific Standard, for example, production line cleaning is not relevant to Agents & Brokers). Include references to any documents seen.	
1. Summary of risk assessment information obtained from the site (as detailed in BRCGS072)	
1.1 History of certification	
Previous audit date: 9 th & 10 th January 2020 Previous audit grade: A Certified since 2002	
1.2 History and maturity of the BRCGS systems at the site	
Been certified for 18 years with no major or critical NCs raised	
1.3 Other management systems/ certification in place	
ISO 9001:2015	
1.4 Critical situations throughout the site's certification history relating to BRCGS standards	
None	
1.5 Pending compliance activities/legal proceedings	
None	
1.6 Significant changes since the last BRCGS onsite audit	
None	
2. Summary of discussion and site procedures to manage the impact of Covid-19, including any extraordinary circumstances to the site operations and the effective implementation of any emergency response plan	
2.1 Site's emergency response plan to Covid-19	
Covered in RA059 COVID19 Workplace Risk Assessment update 02.11.2020, COVID-19 Response Plan, COVID-19 NF Procedures Document and COVID-19 Site Procedures. Systems and procedures include enhanced cleaning regimes, clear guidelines issued to employees advising of symptoms and procedure to follow in circumstances of risk, social distancing measures implemented in all areas of the factory. All staff have been made aware of their responsibilities to ensure safe practice both on site and off site. Systems and procedures implemented include a notice has been placed in reception for staff entering site. The notice is sent to all visitors prior to their arrival so they are aware of site rules and procedures in advance. There are markings on the floor indicating walk-way areas and no hot-desking is allowed. Hands must be sanitised both upon entry and exit. Kettle, microwave and fridge handle are cleaned with wipes provided.	

Single-use paper towels used to dry hands and hand-dryers are turned off. Transport Methods have been put in place to reduce contact, and include, no car sharing and no public transport used. Where practical safe distancing implemented between parking cars. The site has cancelled all visitor & contractors visits unless critical to the working of the site. Temperature checks carried out on all employees, visitors or contractors on entry with sign in entry system with health check sheet Visitor & Contractors completed. Entry Point is through warehouse, with wash station available to wash hands and temperature checks logs in designated check points. A clocking in system is used to track staff on site. Company hand washing procedures is followed on entry to production, hand sanitisers used at regular intervals throughout the day and sanitiser used on surfaces and equipment. Social distancing measures include machine operators keep to their own machine and only use their own equipment and stay within production area, unless using canteen or toilets. The site has reduced the number of staff working on any one day implemented split shifts. Only one person in canteen at any one time and one person allowed on a table. Notice in all area's for number of staff in each area at one time put in place. Internal fire doors left open during working hours to prevent people touching doors and social distancing of 2 metres always observed. There is one person allowed on the stairs at a time wherever possible and a maximum of 2 people allowed in the locker room at any one time. In addition a new cleaning procedures has been put in place to cover all areas identified within the risk assessment, method statements have been identified for all areas, equipment, PPE, people, and time allocated and cleaning methods identified and training given to allocated staff members. The cleaning schedule is in place for high touch areas of the site e.g .door handles, cupboard handles, light switches. Dorota contract cleaner carries out the first clean in the morning. Additional cleans are also carried out by NatFlex at 11:00 and 14:00 with a rota in place. Door foot openers ordered for several doors around the building to allow doors to be opened without the need to touch the handles reducing high touch areas. Sanitiser spray is used every time after using any of the trucks and wipes available on every desk Instructions to wash hands before entry to main office areas implemented and carried out every time after re-entering the building, breaks, or smoking and sanitising of hands both before and after using the BioTime clocking-in system and water dispenser. All Suppliers have been issued with delivery instruction to National Flexible Ltd and agreed to new procedures in place during COVID-19 drivers remain in cabs, and have temperature taken and recorded. Company procedure and instruction posters put up on entry to all internal areas. The Tuck Shop has been removed and brew rounds are not allowed, self-brewing only. First-Aiders have been issued the government guidance document 'COVID-19: guidance for first responders. Evidence reviewed included site visitors records, employee temperature checks, pest control service visit, cleaning records and photographs of the site taken during the risk assessment to ensure adequate housekeeping standards are maintained and effective social distancing and handwashing is in place

2.2 Significant changes to site operation in response to Covid-19/whether the site operating normally

No significant changes to the sites operations which is operating normally with full time experienced staff

2.3 Summary of contingency plans including contingency supply of raw materials and any changes to processes or services outsourced following the COVID-19 emergency

The site contacted all of their approved suppliers and they confirmed they can continue ongoing supply and this forms the contingency plan as no unapproved suppliers are needed. Covered under normal supplier approval procedures and the site does not foresee or had any disruptions to supply or production arising from the global outbreak of the Coronavirus. Approved critical service suppliers are being used. The site has assessed risks across the supply chain and no

issues identified and no contingency is needed. Suppliers have been issued with delivery instruction to National Flexible Ltd and agreed to new procedures in place during COVID-19 drivers remain in cabs, and have temperature taken and recorded. Viewed approved suppliers register. No change to service providers with critical services maintained evidenced in pest control visit and report viewed dated 17.11.2020

2.4 Summary of any site requirements for additional or increased cleaning and housekeeping including any defined minimum criteria for cleaning

Covered in RA059 COVID19 Workplace Risk Assessment update 02.11.2020, COVID-19 Response Plan, COVID-19 NF Procedures Document and COVID-19 Site Procedures. Systems and procedures include enhanced cleaning regimes. All staff have been made aware of their responsibilities to ensure safe practice. New cleaning procedures has been put in place to cover all areas identified within the risk assessment, method statements have been identified for all areas, equipment, PPE, people, and time allocated and cleaning methods identified and training given to allocated staff members. The cleaning schedule is in place for high touch areas of the site e.g .door handles, cupboard handles, light switches. Dorota contract cleaner carries out the first clean in the morning. Additional cleans are also carried out by NatFlex at 11:00 and 14:00 with a rota in place. Evidenced in completed daily Covid 19 Cleaning Records dated w/c 09.11.2020, 23.11.2020, and 24.12.2020 viewed, Covid 109 Cleaning Schedule Offices and Communal Areas dated 23.11.2020 and photographs of site taken during the audit demonstrating acceptable housekeeping is maintained and verified visually by managers

3. Any changes to site operations due to staff shortages or the need to manage staff access, hygiene, sickness or movements

3.1 Impact of staff availability

No significant changes to the sites operations which is operating normally with full time experienced staff

3.2 Any additional screening or security processes for staff on arrival at site

Covered in RA059 COVID19 Workplace Risk Assessment update 02.11.2020, COVID-19 Response Plan, COVID-19 NF Procedures Document and COVID-19 Site Procedures. In addition to the normal robust security and screening processes all staff and visitors have their temperature checked on arrival evidenced in daily temperature check records for operations and office dated w/c 16.11.2020. Systems and procedures implemented include a notice has been placed in reception for staff entering site. The notice is sent to all visitors prior to their arrival so they are aware of site rules and procedures in advance. All Suppliers have been issued with delivery instruction to National Flexible Ltd and agreed to new procedures in place during COVID-19 drivers remain in cabs, and have temperature taken and recorded

3.3 Policy for staff members who fall ill or may have been exposed to Covid-19

Covered in RA059 COVID19 Workplace Risk Assessment update 02.11.2020, COVID-19 Response Plan, COVID-19 NF Procedures Document, Internal memo dated June 2020 and COVID-19 Site Procedures and the site is following government guidance and includes staff to stay at home if they have coronavirus symptoms or have either a high temperature or a new, continuous cough. Anyone with symptoms should stay at home for at least 7 days and if they live with others and they or one of them have symptoms, then all household members must stay at home and not leave the house for 14 days. The 14 day period starts from the day when the first person in the

house became ill. If someone has symptoms the company send them home immediately and clean and disinfect the workplace

3.4 Any requirements for additional or increased hand washing

Covered in RA059 COVID19 Workplace Risk Assessment update 02.11.2020, COVID-19 Response Plan, COVID-19 NF Procedures Document and COVID-19 Site Procedures. Hands must be sanitised both upon entry and exit. Kettle, microwave and fridge handle are cleaned with wipes provided. Single-use paper towels used to dry hands and hand-dryers are turned off. Company hand washing procedures is followed on entry to production, hand sanitisers used at regular intervals throughout the day and sanitiser used on surfaces and equipment. Door foot openers ordered for several doors around the building to allow doors to be opened without the need to touch the handles reducing high touch areas. Sanitiser spray is used every time after using any of the trucks and wipes are available on every desk. Instructions to wash hands before entry to main office areas implemented and carried out every time after re-entering the building, breaks, or smoking and sanitising of hands both before and after using the BioTime clocking-in system and water dispenser

3.5 Any procedures relating to staff movement

Covered in RA059 COVID19 Workplace Risk Assessment update 02.11.2020, COVID-19 Response Plan, COVID-19 NF Procedures Document and COVID-19 Site Procedures with social distancing measures implemented in all areas of the factory. All staff have been made aware of their responsibilities to ensure safe practice both on site and off site. Systems and procedures implemented include markings on the floor indicating walk-way areas and no hot-desking is allowed. Transport Methods have been put in place to reduce contact, and include, no car sharing and no public transport used. Where practical safe distancing implemented between parking cars. The site has cancelled all visitor & contractors visits unless critical to the working of the site. Social distancing measures include machine operators keep to their own machine and only use their own equipment and stay within production area, unless using canteen or toilets. The site has reduced the number of staff working on any one day implemented split shifts. Only one person in canteen at any one time and one person allowed on a table. Notice in all area's for number of staff in each area at one time put in place. Internal fire doors left open during working hours to prevent people touching doors and social distancing of 2 metres always observed. There is one person allowed on the stairs at a time wherever possible and a maximum of 2 people allowed in the locker room at any one time. Evidenced in photographs viewed and taken during the audit

3.6 Policy on access to the site and the impact on any service provision (e.g. pest control, external maintenance)

Covered in RA059 COVID19 Workplace Risk Assessment update 02.11.2020, COVID-19 Response Plan, COVID-19 NF Procedures Document and COVID-19 Site Procedures .Only the Pest controller, emergency maintenance engineers, hauliers and critical suppliers are allowed to visit site. Drivers remain in cabs, and have temperature taken and recorded. Visitor questionnaire is completed before access can be granted. Appropriate PPE must be worn for the duration of the visit and visitors must adhere to site rules during visit. Viewed coronavirus visitors screening questionnaire for visits to site by the pest control contractor and pest control service report dated 17.11.2020

4. Internal audits	
4.1 Review of internal audits schedules and implementation, to ensure that product safety systems continue to operate effectively under pressure (the auditor should review a documented internal audit report as well as information on the schedule/process)	
Reviewed Internal Audit Schedule 2020 SOP012.1. Schedule and audits were compliant with the requirements of the standard and up to date including regular hygiene audits as well BRCGS standard, GMP and HARM audits demonstrating effective internal auditing controls in place and being maintained. Reviewed glass, ceramics & brittle plastic monthly audit dated 15.12.2020 and SOP014 approved supplier internal audit dated 18.12.2020 documenting conformance and no non-conformances identified	
5. Review of complaints, recalls and withdrawals and the management of these	
5.1 Recent customer complaint levels or trends	
Reviewed site complaints excel detailing trends and performance with no significant issues or adverse trends recorded. Customer Complaints reviewed as part of management review dated 24.09.2020 including complaints in Q.1 actual 1.96% against target of 1.0% and Q.2: actual 0.96% against target of 1.0%.The main errors year-to-date were 6.8% picking & goods-in with 3 complaints in total YTD against x13 in same period last year, 4.5% Production with 2 complaints in total YTD against 4 in same period last year	
5.2 Product recalls since the last BRCGS audit	
None	
5.3 Any root cause and corrective actions as a consequence of complaints, recalls or withdrawals (where appropriate)	
No product withdrawals or recalls since the last audit and no significant quality issues. Complaints are analysed and adequately investigated evidenced in compliant number D8899 dated 01.10.2020 for print defect with root cause and preventative action recorded and included cleaning viscometers and implementing schedule maintenance systems and SOP012.5 Quality Management Review minutes dated 24.09.2020 and Covid 19 board minutes dated 23.07.2020	
6. Management Meetings	
6.1 Evidence of appropriate management meetings/discussion/actions	
Evidence of appropriate management meetings was observed in SOP012.5 Quality Management Review minutes dated 24.09.2020 and Covid 19 board minutes dated 23.07.2020 with Covid 19 and quality, safety and legality issues effectively managed	
7. Additional information	
7.1 Any other additional information collected during the risk assessment process	
None	