TAPA Facility Security Requirements Certification Framework Document - 2020

A TAPA FSR 2020 Guidance Document

References: TAPA FSR 2020 Standard
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1. Purpose of this Certification Framework Document

This TAPA FSR Certification Framework Document is the official TAPA guidance for Authorized Auditors and LSPs/Applicants to conduct audits to meet the TAPA FSR 2020 Standard and to obtain certification for all applicable facilities. The certification process is intended to be both functional and practical in economic and operative terms.

The document has been developed exclusively for the TAPA Organization with intent to achieve conformance and certification to one or more of the following FSR certification options:

2. Scope

To provide additional flexibility and encourage TAPA certifications, TAPA has developed three options to support certification:

a) Single-site Certification by Independent Audit Body (IAB). Each facility independently certified to the current FSR revision.

b) Multi-site Certification by IAB. Facility operators of 3 or more sites can achieve a Multi-site Certification (a single certificate) for all sites registered in the certification system.

c) Self-audit Certification by Authorized Auditors (AA) by LSP/Applicant or IAB. Each facility independently self-certified by the operator to Level C of the current FSR revision.

3. Application of the TAPA FSR Certification Framework Document

In the development of this TAPA FSR Certification Framework Document, TAPA recognizes the differences in how storage services are provided globally, regionally, and even within companies, and that the various TAPA Standards may apply to all or part of the services provided by an LSP/Applicant. Depending on the complexity and size of the supply chain, compliance with TAPA Standards may be achieved through a single LSP/Applicant or Multiple LSPs/Applicants and qualified subcontractors.

This Certification Framework Document may apply to the following:

a) Any or all storage locations within the global supply chain, depending on risk and/or Buyer or LSP/Applicant requirements;

b) LSP/Applicant owned or operated facilities;

c) Buyer-owned or operated facilities.

Typical users of this Certification Framework Document include:

a) Buyers/Manufacturers/Distributors

b) LSPs/Applicants

c) IABs

d) Law Enforcement or other Government Organizations

e) Professional Supply Chain Organizations.

f) Insurers

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4. TAPA Requirements for Certification and Audit

Facilities are classified into one of three Security Levels, based on the level of protection needed:

a) Level A = Elevated Security Protection
b) Level B = Moderate Security Protection
c) Level C = Standard Security Protection

LSPs/Applicants or Buyers may initially achieve certification at Level C, and then progress up to Level B or A, as improvements are made. Additionally, as negotiated between Buyer and LSP/Applicant, facilities located in high-risk countries may be classified at Level A, while all other countries are classified at Level B or C. In all cases, it is the responsibility of the Buyer to negotiate the Security Level directly with the LSP/Applicant, depending on their specific cargo and risks.

Organization may choose the following three options (Table 1) to demonstrate compliance and be certified to TAPA Security Standards.

The LSPs/Applicants shall ensure either an IAB or AA, is engaged to complete the audit and certification process.

Before the certification audit is scheduled/commences, LSPs/Applicants must inform the IAB or AA which Security Level they are seeking in their certification process.

<table>
<thead>
<tr>
<th>Type</th>
<th>Options</th>
<th>Level</th>
<th>Auditor Type*</th>
</tr>
</thead>
<tbody>
<tr>
<td>IAB Audit</td>
<td>Single-site Certification</td>
<td>A, B or C</td>
<td>TAPA IAB AA</td>
</tr>
<tr>
<td></td>
<td>Multi-site Certification</td>
<td>A, B or C</td>
<td>TAPA IAB AA</td>
</tr>
<tr>
<td>Self-Audit</td>
<td>Self-Certification.</td>
<td>C</td>
<td>LSP/Applicant AA or IAB AA</td>
</tr>
</tbody>
</table>

4.1 Single-site Certification

The single-site scope shall be clearly defined and the IAB will perform an audit based on the scope for the single site. In this situation, the TAPA IAB certifications are site/facility specific. If the TAPA Security Standards audit requirements are all met, the LSP/Applicant shall be deemed to have passed the audit and the IAB will issue a certificate indicating the LSP's/Applicant's particular site is now certified to the applicable TAPA Security Standard and level (A, B or C). The IAB will provide TAPA with audit results in the form of copies of certificates issued or notification of failed audits.
4.2 Multi-site Certification
The Multi-site Certification requires the LSP/Applicant to put in place a single security management system intended to provide confidence and assurance that all sites included in the management system are meeting the requirements of the applicable Standard. The elements required are:

- An identified central function.
- All sites identified and listed in the certification.
- Subject to continuous surveillance and internal audits.

4.2.1 The Central Function
The central function can, but does not have to be, the headquarters of the LSP/Applicant. However, it must:

- Be accountable for the single management system.
- Have the responsibility to ensure that all its sites within the management system are meeting the requirements of the FSR Standard.
- Have the right to issue corrective and preventative actions when needed at any site.
- Have a documented formal agreement or policy in place detailing the roles and responsibilities of central function and the sites.

4.2.2 The Sites
All sites included in the single security management system shall have a relationship amongst each other which can be a legal or contractual relationship with the central function of the organization. The relationship cannot be extended to subcontractor sites or facilities being included in the Multi-site Certification System of the central function.

4.2.3 Auditing the Central Function
- The Certification system audit of the central function requires;
- The selection and use of a TAPA Approved IAB for certification auditing of the security management system.
- That the IAB audits the central function of the LSP/Applicant annually and its conformance to the single security management system which shall include but is not limited to:
  o Central function security management system records procedures, policies are sampled.
  o Records available for sites registered in security management system that include hard and/or soft copy audit results and non-conformance management.
- That the IAB shall issue a TAPA FSR Multi-site certificate to the LSP/Applicant meeting all the conformance requirements.
- That the Multi-site certificate shall contain the valid from/to dates, the number of sites registered in the security management system security levels at the time of audit and any waivers that may have been granted.
- The certificate will be valid for 3 years. Years 2 and 3 audits do not require a new certificate to be issued unless the single security management system has significantly changed.
- The Multi-site certificate shall list all the sites that are part of the management system and the levels of standard that are part of the system.
• It is not permitted to have sites operating to different versions of the FSR. All sites listed under the certificate will conform to the FSR version specified on the official Multi-site certificate.
• Should an LSP/Applicant want to upgrade to the latest version on the FSR before expiry of their existing certificate, then a new certification audit shall be required.

4.2.4 Auditing the Sites
Physical sampling audits of the sites will require;
• That all sites registered in the central function single security management system be available for auditing when selected. Note: Any site selected for audit in a 3 year cycle of the certification will not be re-audited.
• Sites will be physically audited against a sampling basis (Table 2).
• The sampling consideration will be based on a random selection of 10% of the registered sites per annum.

| Table 2 |
| Year 1 | Year 2 | Year 3 |
| Sample size | 10 % + CF* | 10 % + CF* | 10 % + CF* |

CF – Central Function that is carrying out the central role of managing the security management system.

4.2.5 Inclusion of New Sites
The LSP/ Applicant can request the IAB for inclusion of new sites or a new group of sites to join an already certified Multi-site organization, on or before the annual cycle of the IAB site sampling. The IAB shall include these additional sites into the total sites for selection when selecting the sample to be audited.

The LSP/Applicant shall ensure all new sites have been self-audited and meet the required security level before requesting their addition to the management system. This process must be documented and available to the IAB on request.

If the IAB audit is completed successfully, the IAB re-issues certificates to the central function with the new sites included.

4.2.6 Removal of Sites
The LSP/Applicant can remove sites from the single security management system by removing them from the listing of sites and formally informing the IAB. The IAB shall revoke the individual site certifications and adjust and reissue the Multi-site certificate. The IAB shall note the removal of sites in the total sites for selection when selecting the sample to be audited.
4.2.7 Change of Status to Existing Sites
The LSP/Applicant can adjust the security level of existing sites included in the security management system. A request to change the status must be formally sent to the IAB. Sites that are downgraded will be automatically accepted to the lower security level. Sites that are to be upgraded will either be included in that year’s sampling audits or require an audit by the IAB if the sampling audits have already been completed or cannot be completed within 60 days.

4.2.8 Transition from Single-site to Multi-site
LSPs/Applicants that wish to combine any existing single sites into an existing Multi-site security management system must ensure the sites are fully compliant with the same FSR version as listed on the Multi-site certificate. Multi-site cannot incorporate different versions of the FSR standard.

4.3 Self-Certification (Level C Only)
Self-Certification is only applicable to Level C. Self-Certification (Table 3) must be performed by an LSP/Applicant AA or an IAB AA. An LSP/Applicant AA can be an internal employee/associate, trained against the current version of the TAPA FSR and registered and authorized by TAPA as an AA. Regardless of which type of auditor is used to conduct the Self-Certification, the completed Audit Form must be submitted to TAPA to receive the Level C certification.

<table>
<thead>
<tr>
<th>Option</th>
<th>Description</th>
<th>Level</th>
<th>Auditor Type*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Self-Certified</td>
<td>Self-Certification.</td>
<td>C</td>
<td>LSP/Applicant IAB or AA</td>
</tr>
</tbody>
</table>

The audit is carried out using the current TAPA audit tool and providing sufficient information/evidence to provide assurance to TAPA that they are meeting the requirements of the applicable TAPA Security Standard. Self-Certification is site/facility specific. If the TAPA audit requirements are all met, the LSP/Applicant shall be deemed to have passed the audit and will be certified to level C of the applicable Security Standard for that specific facility location.

5. Re-Certification
All TAPA FSR Security Certifications shall be valid for a period of three (3) years with no extension permitted.
To prevent any lapse in certification, a re-certification audit must be performed prior to the expiration date of the current certificate. Completion of any SCARs must also occur within the original 60-day allotted period and prior to the current certificate’s expiration date.

Therefore, to assure adequate planning and preparation, it is recommended that the LSP/Applicant schedule the re-certification audit three (3) months before the current certificate expiration date. If the TAPA Security Standard’s certificate is issued within the aforementioned three-month period, the date of the new certificate will be the expiration date of the current certification. If corrective actions
are not closed prior to the expiration date, and there is no waiver granted, the certification will expire.

Either the LSP/Applicant or Buyer may request re-certification if either party considers the Classification Level to have changed. Costs for TAPA re-certification are the responsibility of the LSP/Applicant, unless otherwise negotiated with the Buyer(s).

6. Audit Follow Up
The LSP/Applicant will ensure that they have an internal process in place to monitor compliance, in years between formal audits (see table 4) conducted by an IAB AA or LSP/Applicant AA as appropriate.

6.1 Corrective Action / SCAR
An informal summary of the findings/results should be shared with the LSP/Applicant during the audit closing conference. The IAB or AA shall inform the LSP/Applicant of audit results within ten (10) business days following the completion of the audit. Any delays in issuing the audit results must be promptly communicated to the LSP/Applicant and negotiated between the IAB or AA and LSP/Applicant.

If any of the requirements are not met as discovered during the audit, the AA submits a Security Corrective Action Requirement (SCAR) to the relevant LSP/Applicant. The LSP/Applicant shall respond to the IAB or AA within ten (10) business days, documenting the actions to be taken and the date the action will be completed. SCAR completion dates may be negotiated between the IAB or AA and the LSP/Applicant. However, SCAR completion dates shall not exceed sixty (60) days from the date of notification to the LSP/Applicant unless the Regional TAPA Waiver Committee approves a waiver. The LSP/Applicant cannot seek to exclude a site with an open SCAR from the total list of sites in the multi-site certification scheme.

In all cases, the LSP/Applicant shall submit progress updates/reports on all outstanding SCARs to the IAB or AA. Any SCAR not completed before the due date shall be escalated by the LSP's/Applicant's Security Representative to the LSP's/Applicant's Management. The reason(s) for noncompliance shall be documented and communicated to the IAB or AA. The LSP's/Applicant's failure to address a SCAR may result in the withholding of the TAPA certification. The LSP/Applicant has the right to appeal directly to TAPA if the certification is withheld. TAPA shall arbitrate the dispute between the LSP/Applicant and the IAB or AA and retains the right to issue a binding resolution to the dispute.

Note 1: It is not necessary for the IAB or AA to re-audit the facility in order to close a SCAR. Evidence of SCAR closure (i.e., achieving compliance) may be presented to the IAB or AA in the form of written correspondence, web meetings or conference calls, photographs, etc.

Note 2: For Multi-site security management system certification, any SCARs not closed or subject to an approved extension may result in the suspension or revocation of the LSP's/Applicant's Multi-site certification status and therefore all sites will no longer be considered certified.

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6.2 Compliance Monitoring

Interim Self-Audits by the LSP/Applicant must be completed as per Table 4 Audit & Compliance Monitoring Schedule. The interim Self-Audit requirement applies to all sites in all certification options and must be documented on official TAPA Audit Forms and submitted to the IAB or for self-certification to TAPA within 30 days of the anniversary date of the current certification.

Interim Self Audit’s must be carried out by LSP’s/Applicant’s own AA. All AAs must have taken and passed the applicable exam for the TAPA Standard and version they are required to audit against.

Failure to comply will result in suspension of the original certification until the interim Self-Audit is properly completed. Gaps identified must be documented, assigned a due date for completion of corrective action(s), and tracked to closure within 60 days.

<table>
<thead>
<tr>
<th>Ref</th>
<th>Action</th>
<th>Frequency</th>
<th>A</th>
<th>B</th>
<th>C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single-site certification:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.2.1</td>
<td>Single-site Certification Audit (IAB/AA Certification Audit)</td>
<td>Every three (3) years</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>6.2.2</td>
<td>Single-site Interim Self-Audits (LSP/Applicant AA)</td>
<td>Annually at 1st and 2nd Anniversary</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Multi-site certification:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.2.3</td>
<td>Multi-site Central Function Certification Audit (IAB/AA)</td>
<td>Every three (3) years</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>6.2.4</td>
<td>Multi-site Central Function Audit (IAB/AA)</td>
<td>Annually at 1st and 2nd Anniversary</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>6.2.5</td>
<td>Multi-site Interim Self-Audits (LSP/Applicant AA for all sites in a Multi-Site Certification)</td>
<td>Every year</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>6.2.6</td>
<td>Multi-site Sampling Audits (IAB/AA for 10% of sites in a Multi-site Certification)</td>
<td>Every year</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>
7. Waivers

Overview

A waiver is a written approval to exempt an LSP/Applicant from a specific TAPA requirement or to accept an alternative compliance solution. A waiver may be requested if an LSP/Applicant cannot meet a specific requirement in the FSR and can justify alternative measures to address the Security Standard requirement. Waivers are valid for the period of the certification. See the current FSR for the waiver request process.

<table>
<thead>
<tr>
<th>Self-Certification</th>
<th>Every three (3) years</th>
<th>✓</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.2.7 LSP/Applicant Self-Certification Audit</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>6.2.8 Interim Self-Audits</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>(LSP/Applicant AA for Self-Certification only)</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Annually at 1st and 2nd Anniversary</td>
<td>✓</td>
<td></td>
</tr>
</tbody>
</table>

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