



Procedure:
BCC audits

Number: SHE P-002

Date: 1-11-2022

Owner: RS

Approved: HH

1.0 Objective:

The purpose of the BCC audits is to assess, whether all drivers of activities (with its employees, visitors and assets) on BCC have effectively implemented the requirements below.

- BCC regulations,
- BCC Environmental permit(s), water law permit.
- Contractual agreements with regard to SHE&S.

Hereafter referred to as “BCC regulations”

In addition, if desired, points for improvement for the management system of the audited organization can be identified.

The BCC audits are included in the BCC regulations as a “compliance tool”.

This procedure is based on ISO 17021-1 “Conformity assessment - Requirements for bodies providing audits and certification of management systems - Part 1: Requirements”

2.0 Scope:

All drivers of activities on the Brightlands Chemelot Campus.

3.0 Referents:

Referent:	Referent description:
	CSP/PB Site Regulations Chemelot
	Chapter 6 "General Regulations Chemelot Site, version 2020" from: Update Environmental Permit Chemelot Site Permit B.V, 24-08-2020.
	Signed policy memorandum on the BCC Site regulations 28-01-2016 V.1.6 (exceptions and additions to Site Regulations Chemelot);
	Permit for Environmental Management Act, partial layout "Chemelot Research & Business Campus" 03-07-2007
	Regulations Brightlands Chemelot Campus
	Water Act permit, Discharge of waste water from the Integral Wastewater Treatment Plant, located at Dalerveltweg 5 in Stein, into the surface water called the Zijtak Ur, December 15, 2020

4.0 Definitions

Term:	Descriptions:
Audit	Systematic, independent and documented process for obtaining objective evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled.
Audit Criteria	Set of policies, procedures or requirements used as a reference against which objective evidence is compared.
Audit objectives	Result to be achieved with the audit.

5.0 RASCI-table

Role/Task:	Responsible:	Accountable:	Supportive:	Consulted:	Informed:
BCC site manager		X			
SHE&S-Manager	X				
SHE&S-Officer	X				
Senior management driver of activities			X		
SHE&S team				X	X
Property managers				X	X

6.0 Process

6.1 Planning and preparation of BCC Audits

BCC audit planning for the organizations to be audited over 3 years:

A BCC risks based audit plan will be made/adjusted over 3 years by BCC-SHE&S. This planning is approved by the BCC site manager. The organizations to be audited are informed in advance.

If there is reason to do so, the BCC site manager can decide to adjust the BCC audit planning on an ad hoc basis. In the event of such a change, the party to be audited will be notified.

The audit frequency is determined on the basis of the risks. Guideline for the audit frequency is:

- Mini Plants once a year.
- Laboratories 1 time every 3 years.
- Office organizations 1 time after establishment. Then determine frequency.

Factors that influence the risk assessment (not exhaustive):

- Organizational maturity,
- Environmental impact,
- Safety risks, also related to major accidents,
- Nonconformities from previous audit(s),
- Incidents that have occurred,
- Actions from MOC,
- Reason from A2 assessment or permit(s),
- Complexity processes,
- Complexity organization, including many employees or students,
- Storage of hazardous substances,
- Other inputs.

Schedule an organization to be audited:

At least 3 months in advance, BCC-SHE&S will agree a date with the organization to be audited when the audit will be performed. The duration of the audit is in principle half a day, but it can be shorter or longer based on the complexity of the organization or the size of the audit criteria. The basic principle is that the audit program is completed in full.

Requests for postponement with regard to the BCC audits are assessed by BCC-SHE&S and approved by the BCC site manager.

No later than 2 weeks before the audit, in addition to the standard audit criteria (consisting of BCC regulations, BCC environmental permit(s) and contractual agreements), the BCC SHE&S team will determine whether there are in-depth audit criteria as a result of any:

- Incidents,
- A2 assessment / permit requirements,
- MOC process,
- Findings of previous audits,
- Other inputs.

The detailed planning of the BCC audit is communicated to the party to be audited at least 2 weeks in advance and contains:

- audit objectives,
- audit criteria,
- The scope of the audit,
- The locations,
- The auditors + roles of auditors,
- The date(s) and planned schedule in time.

If there is reason to do so, the BCC site manager can decide to schedule a "Special audit". This audit is separate from the planned audits and may contain special "audit criteria".

If necessary, BCC can hire external technical experts to be part of the audit team.

The client will provide guidance for the audit, schedule the audit internally with the right auditees and inform the auditor(s) beforehand which PPE is necessary and whether there is a specific safety procedure that the auditor(s) must adhere to.

6.2 Conducting BCC audits

Each audit starts with an opening with the customer's management, where, if necessary, a proposal round takes place and the roles of the participants will be explained.

At the opening, confidentiality, the audit criteria, audit objectives, the scope of the audit and the audit planning will be discussed.

The customer instructs the auditor(s) about any health, safety and safety procedures of the organization.

The audit approach is explained. By means of a plant tour, documentation assessments and interviews, positive evidence is randomly collected that the audit criteria are met. Furthermore the procedure with several levels of nonconformities will be explained when the audit criteria are not met.

During the audit, any findings will be communicated to the auditee and the guidance after each interview.

The audit will be closed with a closing meeting in which the audit conclusion with regard to the achievement of the audit objectives (in relation to the audit criteria) will be discussed with the client's management. The findings are discussed in such a way that the customer accepts them as understood.

At the feedback is discussed:

- When the customer receives the report
- The processing time for any findings
- Consequences of not following the agreement regarding solving the nonconformities within the agreed due date.
- Procedure related to complaints, objections and appeals.

6.3 Audit Findings.

The audit findings may result in points for improvement, points for attention and nonconformities (non-compliance with audit criteria)

There are 2 types of deviations:

- Minor: Nonconformity (Failure to meet a requirement) that does not affect the management system's ability to achieve the intended effective implementation of the requirements of the audit criteria.
- Major: Nonconformity (Failure to meet a requirement) that affects the management system's ability to achieve the intended effective implementation of the requirements of the audit criteria.

For a minor nonconformity a processing period of 6 months applies. For a major nonconformity a processing period of 3 months applies.

The settlement takes place with:

- a root cause investigation,
- a extension analysis,
- a correction,

- a plan of action to remove the root cause,
- verification of the root cause-elimination measures.

For a minor nonconformity, the action plan must be implemented within 6 months. For a major nonconformity, the action plan must be implemented within 3 months.

Evidence of solving the nonconformity should be sent to the auditor. The auditor assesses whether the nonconformity can be closed. A follow up visit may be necessary.

In consultation, the due date of handling the nonconformity can be extended if this is not realistic for the specific situation or circumstances.

6.4 Audit rapport

The customer receives the report within a week after the closing meeting.

The audit report contains:

- Audit conclusion regarding the audit objectives,
- audit trail,
- Audit findings,
- Due date for the nonconformities.

6.5 Follow-up of any findings

The monitoring of closing the nonconformities is followed up by the BCC-SHE&S team.

If the nonconformities are not followed up within the communicated period, BCC-SHE&S will contact the customer. If postponement is acceptable and there is no violation of legislation, a new due date will be agreed once.

In case of discussion, the BCC site manager will decide on the new due date.

In the event a nonconformity is not dealt with in a timely manner by the audited company, the "Guideline BCC Compliance Policy" will be applied.

6.6 Complaints, objections and appeals..

Complaints about the audit process can be submitted via Facilitator and will be handled in accordance with the BCC complaints procedure.

Objection and appeal procedures regarding the audit findings will be handled in accordance with the BCC procedure "Guideline BCC Compliance Policy".

7.0 Process monitoring, monitoring

- Status follow-up audit planning periodically in SHE&S meeting and SHE&S/COO meeting,

- Status action list audit findings periodically in SHE&S meeting and SHE&S/COO meeting.

8.0 Registrations/ forms/ documents

- Planning overview BCC audits,
- Audit reporting,
- Action list audit findings.

9.0 Change history

Date:	Change:
1 November 2022	First version.