



Procedure:

Guideline BCC Compliance Policy

- BCC regulations,
- BCC Environmental permit(s) and water law permit.
- Contractual agreements.

Number: SHE P-001

Date: 1-11-2022

Owner: RS

Approved: HH

1.0 Objective:

This guideline describes the BCC compliance policy (not exhaustive), applicable to organizations located on the Brightlands Chemelot Campus that are not compliant with regard to the following requirements:

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

Hereinafter named as "BCC Regulations"

For individuals, "[GuidelineCompliance Policy Regulation Chemelot Site](#)" is applied and is excluded from this procedure.

2.0 Scope:

Applicable to all organizations located on the Brightlands Chemelot Campus.

For individual nonconformities by persons, reference is made to

""[GuidelineCompliance Policy Regulation Chemelot Site](#)

3.0 Referents

Referents:	Referent description:
	- BCC regulations,
	- BCC Environmental permit(s) and water law permit.
	- Contractual agreements.

4.0 Definitions

Term:	Description:
Nonconformity	non-fulfilment of a requirement of the "BCC regulations"
BCC owner of determined nonconformity	This is the owner of the "nonconformity" within BCC. This will usually be the owner of the associated BCC process or delegated to a designated employee. The nonconformity does not have to be determined by these employee(s).
Owner of the determined nonconformity at the tenant.	This is the owner of the "nonconformity" within the organization of the tenant. The nonconformity is not necessary determined at these employee(s).

5.0 RASCI-table

Role/Task:	Responsible:	Accountable:	Supportive:	Consulted:	Informed:
BCC site manager		X			
BCC owner of determined nonconformity	X				
Owner of the determined nonconformity at the tenant.	X				
Hierarchical manager (MT member) of owner of determined nonconformity at the tenant.	X				
Landlord tenant		X			

6.0 Process

6.1 Process flow

The process flow related to the determined nonconformity to the BCC regulations for a tenant is described below.

The BCC site manager can decide to waive the process flow below and skip steps.

The process flow ends if the organization provides evidence for solving of the nonconformity to the BCC regulations.

The follow-up action is increased per follow-up step.

	Follow-up action	Dealing with BCC-employee	Dealing with tenant employee
1	Initiating “awareness improvement” after determining nonconformity to the “BCC regulations” at the tenant Agree on a deadline when the nonconformity must be resolved.	BCC owner of determined nonconformity.	Owner of the determined nonconformity at the tenant.
2	After exceeding the agreed deadline from step 1: “Awareness improvement” reminder, with the owner of the detected nonconformity at the tenant and hierarchical manager (MT member) Agree to a new deadline.	BCC owner of determined nonconformity and CC: BCC site manager.	Owner of the determined nonconformity at the tenant and CC: hierarchical manager (MT member) tenant.
3	After exceeding the agreed deadline from step 2: Warning letter to landlord organization. Impose a new deadline.	BCC site manager and CC: BCC owner of determined nonconformity	landlord organization and CC: Owner of the determined nonconformity at the tenant and hierarchical manager (MT member) tenant.
4	After exceeding the imposed new deadline from step 3:	BCC site manager and CC: BCC owner of	landlord organization and CC: Owner of the determined nonconformity at the

	Sanction in accordance to the contract penalty clause.	determined nonconformity	tenant and hierarchical manager (MT member) tenant.
5	If the nonconformity is not solved after effecting step 4 within the agreed term, the DT BCC may, after obtaining legal advice, in exceptional situations decide to (temporarily) suspend the activity of the tenant if a last request for solving the nonconformity is not met. This will be announced with a warning letter to the landlord.	BCC site manager	landlord organization
6	If the warning letter from step 5 has not been followed within the prescribed period, the DT BCC will decide to (temporarily) suspend the activities at the tenant. In the event of an acute dangerous situation or if a dangerous situation is suspected, the DT BCC may decide to immediately (temporarily) stop the activities until the dangerous situation has been ended or it has been established that in the event of a suspicion this is not the case.	BCC site manager	landlord organization

6.1 Complaints, objection and appeal

Complaints about the compliance process can be submitted via Facilitor and will be handled according to the BCC complaints procedure.

Objections to the decision, resulting from step 1 of the process flow, regarding the observed nonconformity, can be submitted in writing to the BCC Site Manager within 1 week after the determination.

According to the “four eyes principle” the objection to the decision regarding the observed nonconformity will be discussed and assessed.

Within 2 weeks after submitting the objection, the decision regarding the objection will be communicated in writing to the submitter.

A written appeal can be lodged with the BCC site manager against the decision of the submitted objection within 2 weeks of the decision of the objection. The decision on the appeal submitted will be taken by the DT BCC on the basis of the arguments presented. The DT (Directors team) BCC will make a written decision about the filed appeal within 6 weeks

6.2 Evaluation

Nonconformities are periodically analyzed to improve any BCC processes and BCC awareness processes towards tenants

7.0 Process monitoring, monitoring

Process monitoring by BCC owner determined nonconformity.

8.0 Registrations/ forms/ documents

Registrations will take place at the BCC process, where the nonconformity is determined.

9.0 Change history

Date:	Change:
1 November 2022	First issue