

Working Material 2.2

Competence: Building an Environmentally Literate Team

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This sheet puts the working parts of subchapter 2.2 into editable form: the Verification Pact, the review questions, the common mistakes as a self-check and the Operative Synthesis as an action plan. The empty columns are for your property. The reasoning behind each row is in the book.

GUIDING QUESTION

An attendance sheet proves a person sat in a room while training happened. What proves they actually understood the one procedure that, done wrong, could send everyone in that room to hospital?

Verification Pact: Market Claims Against the Standard

The first three columns are copied from the book. In the last one, note whether this claim circulates in your property — in a proposal, a brochure, a supplier's pitch or your own documents — and what you now hold instead.

What is claimed	Binding?	What actually holds	In our property
A signed attendance sheet is sufficient evidence of competence under clause 7.2	No	The clause requires evidence of competence itself, not evidence that a training session occurred — attendance documents the action taken, not its effectiveness	
Seasonal or agency staff, because they are not directly employed, fall outside the organisation's competence obligations	No	Annex A explicitly includes contracted persons performing work related to significant environmental aspects, regardless of employment structure	
A lighter training standard for seasonal staff is acceptable because their assignments are temporary	No	The clause's requirement is tied to whether the work affects environmental performance, not to the duration of the person's employment	
Evaluating training effectiveness requires a formal, resource-intensive assessment process for every role	Not necessarily	Effectiveness evaluation should be proportionate to the risk the role carries — a practical demonstration for a chemical-handling task is proportionate; the same rigor for a low-risk role may not be necessary	
Once a training programme exists and has been delivered consistently, it is presumed effective unless an incident proves otherwise	No	The clause requires evaluation as an active step, not a passive presumption tested only after something has already gone wrong	
Verbal handover between departing and arriving staff satisfies the organisation's competence obligation for a technical task	No	An undocumented, unverified verbal handover gives the organisation no basis for ensuring competence or evaluating the effectiveness of the action taken, which is what the clause asks for	

A Checklist for the Next Seasonal Onboarding Cycle

Answer each question with Yes, Partly, No or N.A., and name the evidence: a record, a date, a person, a place someone can go and look. An answer without evidence is an opinion.

Question	Why it matters	Answer	Evidence
Which tasks performed by seasonal or agency staff carry genuine environmental or safety consequence if done incorrectly?	The list this entire subchapter turns on — Mykonos never compiled it before the incident forced the question		
For each high-consequence task, does current verification amount to more than a signed attendance sheet?	The single test that would have caught the gap before a seasonal worker was ever deployed unsupervised		
Does our staffing agency's contract measure competence verification, or only placement throughput?	An agency optimising for speed alone will structurally under-deliver on verification unless the contract requires otherwise		
Do returning seasonal staff receive credit for genuinely verified prior experience, or does every season restart from zero?	Distinguishing the two, per clause 7.2's own three routes, avoids both under-verification and wasted redundant effort		
Is our training documentation capable of showing what was specifically demonstrated and verified, or only that a session occurred?	This is the evidence an auditor, or an incident investigation, will actually need		

Common Mistakes — Self-Check

Tick every mistake you recognise in your own property today, and write next to it where you saw it. A ticked box is not a nonconformity; it is a place to look before an auditor or an incident does.

☐	Mistake (from the book)	Where we see it
☐	Treating attendance at a training session as equivalent to verified competence.	
☐	Applying a lighter competence standard to seasonal or agency staff based on employment status rather than actual task consequence.	
☐	Failing to distinguish high-consequence tasks from general orientation content within a single training programme.	
☐	Relying on informal verbal handover between departing and arriving staff for technical procedures.	
☐	Measuring seasonal onboarding success purely by throughput, without any competence-verification milestone.	
☐	Assuming a longer or more detailed lecture substitutes for a demonstration-based verification component.	
☐	Documenting only that training occurred, without recording what was specifically demonstrated or verified.	
☐	Waiting for an incident to reveal a competence gap that a proportionate verification step would have caught in advance.	
☐	Excluding contracted or agency-supplied workers from competence requirements that apply fully under the standard regardless of employment structure.	

☐	Mistake (from the book)	Where we see it
☐	Applying uniform verification rigor across all roles regardless of actual environmental consequence, wasting effort on low-risk tasks while under-verifying high-risk ones.	

Operative Synthesis — Action Plan

The three horizons and their actions are copied from the book. Owner and due date are yours to fill: an action without both is a wish.

Horizon	Action from the book	Owner	Due date
Act on immediately	List every task performed by seasonal, agency, or contracted staff that carries genuine environmental or safety consequence if done incorrectly, and confirm directly whether current competence verification for each amounts to more than a signed attendance sheet.		
Plan for	Separate high-consequence tasks from general orientation content, building a dedicated verification step for each — at Mykonos, a supervised demonstration, other properties may choose other proportionate evidence; and renegotiate any staffing agency relationship to include a competence-verification milestone for designated roles, not throughput alone.		
Monitor going forward	Redesign training documentation to capture what was demonstrated and verified, by whom, and when — not only that a session occurred — and review this record specifically before permitting independent performance of any high-consequence task.		

WHAT THIS SHEET IS NOT

ISO 14001 does not prescribe this form. No clause asks for this worksheet, its columns or a register of market claims; the standard sets requirements and leaves the means to the organisation. This sheet is a working aid drawn from the book: use it, change it or set it aside. Where it touches a requirement, the text of ISO 14001:2026 is the authority, not this page — and nothing on it replaces your own reading of that text.

Source: Francesco Dore, The Helm and the Lens, Volume 1a — ISO 14001:2026, subchapter 2.2. Edizioni Effedore 2026. © 2026 Francesco Dore. Free to adapt for use in your own property. enbooks.effedore.com