

Working Material 2.4

Communication, Internal and External

ISO 14001:2026 · Material date: 25 October 2026

This sheet puts the working parts of subchapter 2.4 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

A hotel can circulate a beautifully written quarterly sustainability newsletter to every employee and still have no way for the one employee who has noticed a real problem for over a year to tell anyone who could actually fix it.

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 strong internal newsletter and briefing programme satisfies clause 7.4's internal communication requirement	No	Clause 7.4.2 specifically requires the process to enable upward contribution to continual improvement, not only effective downward broadcasting	
Informal verbal reporting to a direct supervisor satisfies the standard's communication requirement for staff observations	No	Without any mechanism to track, escalate, or act on an informal observation, the process has not genuinely enabled the contribution the clause requires	
ISO 14001 requires an organisation to publicly disclose all of its significant environmental aspects	No	Clause 7.4.3 requires external communication as established by the organisation's own process and as required by its compliance obligations — not automatic public disclosure of every significant aspect	
An organisation that chooses not to communicate a significant aspect externally has failed to meet clause 7.4.3	No	Where no compliance obligation requires disclosure, choosing not to communicate an aspect externally is consistent with the clause, provided the choice follows the organisation's established communication process	
Communication channels that work well for one direction can be assumed adequate for the other direction as well	No	The Lisbon case demonstrates directly that strength in downward communication carries no implication about the adequacy of upward communication, which the clause addresses as a distinct requirement	
An employee's repeated informal mentions of a problem, if a supervisor acknowledges hearing them, constitute a functioning communication process	No	Acknowledgement without any tracking, escalation, or resolution mechanism is not a functioning process in the sense the clause intends	

A Checklist for the Next Communication Review

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
Can a frontline employee describe, specifically, how to report an environmental observation so it reaches someone with authority to act?	The exact test that would have surfaced Lisbon's gap before fourteen months passed		
Does our organisation track acknowledgement time for staff-raised observations as a standing metric?	An untracked channel is indistinguishable from no channel at all once informal attention fades		
Have we recorded which significant aspects, if any, we communicate externally, why, and who speaks for us?	Without a recorded choice it is hard to show that external communication follows the process and compliance obligations clause 7.4.3 relies on		
Does our upward communication mechanism reach seasonal, contracted, and multilingual staff as effectively as permanent staff in the primary operating language?	A channel that only reaches part of the workforce leaves the same structural gap for everyone it does not reach		
Do we publicise examples of acted-upon staff observations, or does the workforce have no evidence the channel actually works?	Visible proof of function is what converts a new mechanism from a policy announcement into something staff actually trust and use		

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
☐	Building internal communication entirely around downward broadcasting, with no equivalent upward mechanism.	
☐	Treating informal verbal acknowledgement by a supervisor as equivalent to a functioning communication process.	
☐	Assuming strong performance in one communication direction implies adequate performance in the other.	
☐	Failing to track or provide visible status for staff-raised observations, leaving employees uncertain whether raising a concern accomplished anything.	
☐	Believing clause 7.4.3 requires full public disclosure of every significant environmental aspect, rather than external communication planned through the organisation's own process and its compliance obligations.	
☐	Responding to a discovered gap with a general reminder rather than a structural change to how observations are captured and tracked.	
☐	Excluding seasonal, contracted, or agency staff from whatever upward communication mechanism does exist.	

☐	Mistake (from the book)	Where we see it
☐	Providing a reporting mechanism only in a property's primary operating language, excluding staff who communicate more comfortably in another.	
☐	Failing to publicise examples of acted-upon staff observations, leaving the workforce uncertain whether a new channel genuinely functions.	
☐	Measuring communication effectiveness only through staff satisfaction with what they receive, never through whether what they contribute is captured and acted upon.	

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	Ask a frontline employee in an operational role directly whether they know a specific way to report an environmental or maintenance observation that guarantees it reaches someone with authority to act, distinct from mentioning it informally to a supervisor. A hesitant or negative answer identifies the exact gap this subchapter describes.		
Plan for	Introduce a logged, tracked observation-reporting mechanism accessible to every employee regardless of role or employment status, with guaranteed acknowledgement and visible status; and give supervisors an explicit, timed obligation to log observations raised to them, converting informal attention into a tracked responsibility.		
Monitor going forward	Track the time between an observation being logged and its first acknowledgement, and review this metric at the same management review level as any other environmental performance indicator — treating a lengthening delay as an early warning worth acting on before it produces a specific, costly finding.		

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.

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