

WORKING MATERIAL 4.5 · CHAPTER 4 — THE CERTIFIER'S LENS

Stage 2: When the System Speaks Through People Who Did Not Build It

Source: Francesco Dore, *The Helm and the Lens*, Volume 1b — ISO 14001:2026, subchapter 4.5

GUIDING QUESTION

Your environmental coordinator can answer every question about the system. What happens to the audit at eleven at night, when she has gone home?

1 · Verification Pact

Copied from the book. The third column is for your property: what holds here, and how you know.

What is claimed	What actually holds	In our property
"Staff must be able to recite the environmental policy."	The guidance states the opposite: awareness does not mean the commitments are memorised or that people hold a copy. It means knowing the policy exists, what it is for, and one's own role in achieving it.	
"The closing meeting is the verdict."	The audit team gathers evidence and makes a recommendation. The certification decision is taken by the certification body, by people who were not on the audit team.	
"A clean Stage 2 means the property is clean."	Stage 2 samples. A clean result means that sample, taken at those hours, in those departments, found nothing — the same asymmetry that governs internal sampling.	
"Audits happen during office hours."	Where the operation runs on shifts, at least one shift is to be audited and the justification for not auditing the others must be documented. In a hotel the operation does not stop when the office does.	
"Our procedures are written, so operational control is satisfied."	The requirement is to establish operating criteria and to implement control in accordance with them. A control that lapses outside office hours is not being implemented for those hours, however well it is written.	
"An undocumented practice that works is not a problem."	Where it is part of how the system delivers its results, it needs operating criteria and it needs competence that does not sit in one person's memory. Working is not the same as being controlled.	
"Stage 2 is a bigger version of Stage 1."	Stage 1 asks whether the required things exist and have run. Stage 2 asks whether they work, on site, through the people who operate them.	

2 · Common mistakes — a self-check

Tick each mistake you recognise in your own property. The consequence is the book's.

- ☐ **Preparing the documentation for an audit that has already accepted the documentation** — Stage 1 settled that question; Stage 2 is about the operation.
- ☐ **Training staff to recite the policy** — It trains the one thing the guidance says is not required, and it consumes the hour that could have been spent on the thing that is.
- ☐ **Letting the coordinator answer for departments** — It is comfortable for everyone and it produces an audit of the coordinator, which is not what is being certified.
- ☐ **Assuming the audit will keep office hours in a building that does not** — The hours in which controls lapse are the hours the auditor asks to see, and the property has not seen them first.
- ☐ **Hiding orphan practices** — They are usually good work, the finding is usually small, and the alternative is losing the practice when the person leaves.
- ☐ **Arguing at the closing meeting against findings that are factually correct** — It changes nothing and it costs standing that will be wanted later.
- ☐ **Reading a recommendation as a certificate, or a difficult closing meeting as a refusal** — Neither is the decision, and the decision is made elsewhere.

3 · What an auditor would ask to see

Questions drawn from the subchapter's reading of the standard and its practical application. They are questions to test your own evidence, not additional requirements.

Question	Where the evidence lives	Seen?
Do operating criteria exist for processes that run only at night or at certain hours?	Procedures; operating criteria	
Can people on each shift say what in their work could harm the environment, what they do about it and whom they call?	Recorded staff answers	
Are practices that depend on one person's memory written down and known to a second person?	Procedures; training records	
What evidence of competence exists for those whose work affects environmental performance or compliance obligations?	Training and competence records	
How is control or influence over externally provided processes — laundry, waste carrier, maintenance contractor — defined?	Contracts; supplier controls	
If not every shift is audited, where is the justification documented?	Certification body's audit plan	

4 · From the Operative Synthesis to action

Concrete actions taken from the subchapter's Operative Synthesis. Fill in the owner and the date in your property.

Action	Owner	Due date
1. Walk the property at the hours the auditor will walk it, including at night.		

Action	Owner	Due date
2. Ask the three questions of staff on every shift before the auditor does.		
3. Where someone runs an undocumented arrangement that works, write it down and teach it to a second person rather than stopping it.		
4. Prepare the operation rather than the documentation.		

What this sheet is not: ISO 14001 does not prescribe this form. It is a working aid drawn from the book; the standard and, in Chapter 4, the certification body's own rules and contract govern the real case.