

WORKING MATERIAL 4.7 · CHAPTER 4 — THE CERTIFIER'S LENS

Surveillance: The Audit of the Interval

Source: Francesco Dore, *The Helm and the Lens*, Volume 1b — ISO 14001:2026, subchapter 4.7

GUIDING QUESTION

You have passed eight surveillance audits in eight years. How many different versions of your hotel have actually been examined?

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
"A surveillance audit is a smaller version of the certification audit."	It has a fixed core examined every time — internal audits and management review, action on previous findings, complaints, achievement of objectives, improvement, continuing operational control, changes, and use of marks — with the remainder sampled. It is aimed at the interval, not at the system.	
"ISO 14001 requires an annual surveillance audit."	It requires internal audits and management review at planned intervals and says nothing about surveillance, cycles or anniversaries. That rhythm comes from the certification framework.	
"The audit date is fixed and nothing can be done about it."	Visits are annual, which does not mean identical. The audit time is itself required to be reviewed at each surveillance to take account of changes in the organisation and system maturity, and the date is a planning matter open to discussion.	
"Our seasonal peak is an abnormal condition."	A recurring, planned peak is not abnormal in the guidance's sense. It is a modified activity and a start-up phase, which the organisation is required to have taken into account when determining its aspects — a higher bar, not a lower one.	
"Temporary and agency staff are not our people."	Competence and awareness apply to persons doing work under the organisation's control, including those working on its behalf for which it has responsibility. The audit-time framework counts them at peak season.	
"Eight clean surveillance audits prove the system is stable."	They prove that eight samples, taken at the same point in the year, found little. Repeated readings of one season are not independent evidence about the rest of it.	
"We keep the paperwork current for the visit."	The fixed core examines the interval. Internal audits and reviews clustered in the weeks before each audit are themselves visible, and the pattern says more than any single record.	

2 · Common mistakes — a self-check

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

- ☐ **Treating surveillance as a reduced certification audit and preparing the documentation** — The fixed core asks what happened during the year, and documentation cannot answer that retrospectively.
- ☐ **Scheduling internal audits and the management review to feed the external visit** — Each decision is sensible and the three together lock the whole assurance function to one calendar position.
- ☐ **Accepting the anniversary as immovable** — It was set by the date of a certification decision and has no operational meaning whatever.
- ☐ **Treating a recurring seasonal peak as an exception** — It is planned, predictable and annual, which makes it harder to justify leaving out of the aspects register, not easier.
- ☐ **Leaving temporary staff out of the environmental induction because they are temporary** — They are within the requirement and they are working in the busiest period.
- ☐ **Reading a run of clean audits as proof of stability without asking when they were taken** — Nine readings of one season are taken for nine readings.
- ☐ **Forgetting that the certification mark is examined every single time, and never telling marketing** — The cheapest finding in the cycle to prevent is left to happen.

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?
Does the aspects register describe the seasonal peak — extra services, people, temporary plant and structures, waste and water volumes?	Aspects register	
How are recurring seasonal changes planned and managed?	Change planning records	
Do temporary and agency staff receive the environmental part of the induction?	Induction records	
Do operating criteria cover peak volumes, for example in the waste arrangements?	Procedures; waste contracts	
In which months have internal audits, management reviews and external audits taken place since certification?	Audit programme; review minutes; audit reports	
What evidence of the interval — internal audits, closure of findings, objectives, changes — is ready to show?	Finding log; objectives; list of changes	

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. Prepare the interval rather than the visit: internal audits and review, closure of previous findings, complaints, objectives, improvement, control, changes, use of marks.		
2. Plot internal audits, reviews and external audits by month and check whether they cluster in the same weeks.		
3. Move the internal audit programme, which is the property's own, so that it reaches the peak.		
4. Ask the certification body once a cycle whether surveillance can fall at a different point in the year.		

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.