

WORKING MATERIAL 4.9 · CHAPTER 4 — THE CERTIFIER'S LENS

Scope Extensions and Multi-Site: Buying a Hotel Is Not Adding a Site

Source: Francesco Dore, *The Helm and the Lens*, Volume 1b — ISO 14001:2026, subchapter 4.9

GUIDING QUESTION

Your group certificate covers three hotels. You have just bought a fourth. How much of it is already certified?

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
"We bought it, so it is covered by our certificate."	A site is covered when it operates the group's system under the central function's authority, has been through the group's internal audit programme, and has been evaluated and listed by the certification body. Ownership establishes none of those.	
"A scope extension is a paperwork amendment."	It is an audit of what is being added — aspects, obligations, controls, people — followed by a decision, and it changes the audit time calculation for the remainder of the cycle.	
"Multi-site means several hotels on one certificate."	It means one management system operating in several places under a central function that plans and controls it. Common ownership does not create that condition.	
"Only the sampled sites really matter."	All sites must be subject to the organisation's internal audit programme every cycle, and the central function must collect and analyse data from all of them. Sampling governs the external visit, not the internal obligation.	
"A finding at one property is that property's problem."	The organisation must investigate whether other sites are affected, correct at the central function and the affected sites where they are, and justify any limitation where they are not.	
"Our best hotels carry the weaker ones."	At the decision point, a major nonconformity at any single site means certification is denied to the whole listed organisation pending correction. The exposure is pooled, not averaged.	
"Any group of hotels can be sampled."	Sampling applies where sites carry out substantially similar processes. A city hotel, a spa, a manor house and a lodge with a wood boiler and a septic system are not obviously similar in aspects terms, and a different and heavier programme then applies.	

2 · Common mistakes — a self-check

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

- ☐ **Assuming ownership equals coverage** — The test is authority and ability to exercise control, not the share register.
- ☐ **Announcing a new property as certified before the certification body has evaluated and listed it** — A claim is made for a property that the certificate does not yet cover.
- ☐ **Letting the external sampling pattern shape the internal audit programme** — A site can be lost entirely within two cycles.
- ☐ **Treating a finding at one property as local** — Under a multi-site certificate the question of whether it travels is mandatory, and the answer has to be recorded either way.
- ☐ **Claiming a central function that exists on an organisation chart and nowhere else** — It will be tested by the first travelling finding.
- ☐ **Assuming a portfolio of characterful hotels qualifies for sampling** — Similarity of process is the condition, and a varied portfolio is a weaker case, not a stronger one.
- ☐ **Doing the environmental due diligence after completion** — It can no longer change anything except the certificate.

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 a central function with authority over every site operate one system with a centralised management review?	Organisation chart; group procedures; review minutes	
Has every site, including a newly acquired one, been covered by the internal audit programme this cycle?	Internal audit programme	
Where a nonconformity was found at one site, what was asked of the others, and what justification is recorded where follow-up was limited?	Corrective action records	
Does the central function collect and analyse data from every site?	Group data reports	
Was any new property evaluated and listed by the certification body before being described as certified?	Certificate annex; correspondence	

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. Decide, where the group is governed, whether it is one system in several places or several systems under one owner.		
2. Do not describe a new property as certified until it runs the group's system, has been internally audited, and has been evaluated and listed.		

Action	Owner	Due date
3. Run the internal audit programme at every site every cycle, regardless of external sampling.		
4. Treat a scope extension as an audit and a change to the calculation, not as an amendment to a document.		

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.