Integration with Quality, Environment, Safety and Privacy

GUIDING QUESTION *If your hotel holds more than one management system certificate, put their risk registers side by side and look for the same room, the same supplier or the same night procedure in more than one of them. Then check whether they say the same thing. Where they disagree, or where a risk appears in none because it sits between them, the hotel is running several systems where it should be running one.*

Property: _____ Completed by: _____ Date: _____

How to use this sheet: work through the five parts with the people who own the process. The text in the left-hand columns comes from the book; the empty columns are for what is true in your property.

1. Verification Pact: what is commonly believed, what actually holds, and your property

What is commonly believed	What actually holds	In our property
«Each standard needs its own system.»	The standards share a common structure designed to be run as one system.	
«Separate registers are more thorough.»	Separate registers miss the risks that sit between them.	
«Combined audits cut corners.»	They require auditors competent in each standard and time sufficient for each.	
«Privacy certification needs information security certification first.»	The 2025 edition stands alone; for a hotel with information security, extending is still the natural route.	
«Privacy management is information security with another name.»	It adds the risks to guests, not only to the hotel, and the hotel's role for each kind of data.	

2. What the standard requires, and what demonstrates it

From Table 4.11.a. The third column of the book (what is method, not requirement) is left out here: write what your property actually holds as evidence.

What is required	What demonstrates it in an integrated hotel	In our property
Common core requirements met	One context, one policy framework, one set of roles, one audit programme and review	
Specific requirements met	Statement of controls, aspects, hazard assessment and privacy controls each maintained	
Integration with the hotel's processes	Controls built into the desk, housekeeping and suppliers, not held in a separate office	
Competent combined audit	Audit team qualified for every standard; time shown for each	
Privacy risks to individuals	Risk register lines considering guests' interests, not only the hotel's	
Role for each processing determined	A note of controller or processor role for each kind of data, with advice	

3. The instrument: Table 4.11.b, One system, several standards

The instrument of this subchapter. What the Lyon hotel integrated, what it kept specific, and what it found in doing so.

Element	Integrated across all standards	Kept specific	What Lyon found
Context and interested parties	One analysis, including climate where relevant	Privacy: guests as individuals with their own interests	Four analyses, each partial

Element	Integrated across all standards	Kept specific	What Lyon found
Risk process	One register by place, process and supplier	Statement of controls; aspects; hazards; privacy controls	Equipment room a chemical store; contractor with server access
Suppliers	One register, each supplier assessed for all it touches	Security and privacy clauses where data is shared	Laundry receiving room lists absent from security register
Emergencies and incidents	One card: people's safety first, then the calls for each kind of event	Additional calls by type of event	Two cards with different first calls
Competence and awareness	One induction, one training record	Specific modules per standard	Staff trained four times on overlapping topics
Internal audit	One programme over the cycle	Auditors competent for each standard	Four programmes, eight interviews per head a year
Management review	One review of the whole system	Specific inputs per standard	Four reviews, no view of the whole

The rows above are the book's; the empty rows are for lines your property needs to add.

4. Common mistakes: self-check

Common mistake	Present here? (Yes / Partly / No)	Where we see it
Running a separate management system for each certificate.		
Assessing risks through one standard's lens, so that risks between standards are missed.		
Keeping emergency and incident procedures that conflict at the moment they coincide.		
Holding separate management reviews that never see the whole hotel.		
Adding privacy as a new separate system instead of extending the existing one.		
Treating privacy risks as risks to the hotel only, not to guests.		
Integrating so far that a standard's specific requirements or audit time are lost.		

5. Action plan

Step from the book / gap found	Action in our property	Owner	Deadline
Map all certified systems side by side and mark duplication, conflict and gaps.			
Build one risk register by place, process and supplier, with a column for each standard.			
Unify emergency, supplier, competence and document procedures.			
Hold one internal audit programme and one management review for all standards.			
Ask for a combined certification audit with competent auditors and time shown for each standard.			

Step from the book / gap found	Action in our property	Owner	Deadline
Keep an index of where each standard's specific requirements are met.			
For privacy, extend the existing system and add the risks to guests.			
Record the hotel's role for each kind of personal data, with legal advice.			

In brief

A hotel runs one management system that meets several standards. It integrates what the standards share (context, policy, roles, the risk process, procedures, competence, audit and review), keeps visible what each specifically requires, and asks for combined audits by teams competent in each standard with time sufficient for each. For privacy, it extends the existing system, adding the risks to guests and a clear view of its role for each kind of data.

Source: The Helm and the Lens, Volume 5b: The Lens, subchapter 4.11. This sheet does not reproduce the text of the standard; work with your own copy of ISO/IEC 27001:2022 from an authorised source.