WORKSHEET 2.2

The Hierarchy of Controls

Subchapter 2.2 · case in the book: Tallinn

GUIDING QUESTION

Take the last three things your hotel did about a hazard. Which rung of the hierarchy was each of them on, and did anybody ever ask whether the work had to be done that way at all?

This worksheet turns the tools of the subchapter into a form you can fill in. The texts come from the book; the empty columns are for your own property. Adapt it before use: an unadapted checklist is exactly what the book warns against.

Practical application: what to do in your property

Step (from the book)	Done?	What we found / owner
Label your last twenty controls with a rung. The distribution is the finding, it takes ten minutes, and no hotel has ever done it and been pleased with the result.		
Add the rung as a field wherever you record what you decided to do. It is one column and it makes the pattern visible permanently.		
Before accepting any level four or five control, write down what a level three would have been. Often it exists, costs nothing, and is inside the authority of the person holding the meeting.		
Treat the rota, the route, the sequence and the delivery time as controls, because the standard does. The strongest thing an operational manager can do without capital sits at the third rung.		
Ask the elimination question out loud even when the answer is no. Does this have to be carried down there at all? At Tallinn nobody had asked it in four years, and the answer turned out to be interesting.		
Combine rather than wait. Protect people at the lower rungs today while the higher ones are being built, which is what the guidance describes as usual practice.		

These steps are the book's method, not requirements of ISO 45001. Evidence can take whatever form suits the property; a separate document is needed only where an applicable requirement, or the property's own system, makes it necessary.

Verification Pact: what is believed, tested against the standard

What the property took to be true	What actually holds	Our position
"We responded to the hazard every year: talk, boots, sign, handrail."	Four responses at the two lowest rungs and one at the third, over four years. The hierarchy is an order and each control is considered less effective than the one before it.	
"The hierarchy is a list of five options; we choose what is practicable."	The order is the requirement. Practicability governs how far up you get, not whether the upper rungs are examined.	
"Reorganising work is a soft measure for when we cannot afford a real control."	Reorganisation of work sits at the third rung, alongside engineering controls, and therefore above every administrative measure and all protective equipment.	

What the property took to be true	What actually holds	Our position
“Elimination means removing a physical hazard.”	The guidance places ergonomic approaches at the design stage, and the elimination of monotonous work or work causing negative stress, at the first rung.	
“Until we can eliminate it, there is nothing worth doing.”	It is usual to combine several controls to reduce risk as low as reasonably practicable. Protect today at the lower rungs while working on the higher ones.	
“The standard requires us to provide protective equipment free of charge.”	The standard notes that in many countries this is a legal requirement. It is an observation about law, not a requirement of the document, and a property should establish where it stands.	

Common mistakes: a self-check

Mistake (from the book)	Present here?	Action / owner
Starting at the bottom because the bottom is procurable. Boots and talks have suppliers, budget lines and records; the four rungs above them have none of those and are more effective.		
Reading the hierarchy as a menu. It is an order, and each control is considered less effective than the one before it.		
Not knowing that reorganisation of work is at the third rung. It is the strongest control most hotel managers can exercise and they exercise it for every reason except safety.		
Confining elimination to physical hazards. Ergonomics at the design stage and the removal of work that causes negative stress are at the first rung in the standard’s own examples.		
Waiting for elimination before protecting anybody. Controls are usually combined, and purity at the top of the hierarchy is paid for at the bottom by the people exposed.		
Reading the note on protective equipment as an ISO requirement. It is an observation about the law in many countries and it deserves checking rather than assuming.		

Operative synthesis

- The hierarchy is ordered and the order is the requirement: eliminate, substitute, engineering controls and reorganisation of work, administrative controls including training, personal protective equipment, each considered less effective than the one before. Hospitality starts at the bottom because the bottom is procurable, and climbs only when an injury forces it.
- **The third rung is the discovery.** Reorganisation of work sits alongside engineering controls, above all training and all equipment, and it consists precisely of what an operational manager already controls: who works when, in what order, along which route, at what hour. It usually costs nothing. Above it, elimination in this standard reaches ergonomic design and work that causes negative stress, which is where the psychosocial material of 2.14 gets its authority. And the whole hierarchy is a direction of effort rather than a rule of purity: controls are usually combined, and a property that refuses the lower rungs while preparing the higher ones has made its people pay for its rigour.

- **A talk, then boots, then a sign for a handrail that did not exist, then, after somebody fell, the handrail.** Four years of paying attention, in the wrong order, and not one line anywhere asking why the kegs went down those steps at all.
- **The hierarchy answers what to do about a hazard the property already has.** What it does not address is the moment a hotel creates new ones on purpose (a new outlet, a new machine, a new supplier, a floor closed for refurbishment), which is the most reliable generator of hazards in the industry and the subject of what follows.

Action plan for our property

Action	Owner	Due	How we will know it worked

Source: Francesco Dore, The Helm and the Lens, Volume 3a «The Helm», subchapter 2.2. Edizioni Effedore, 2026. Clause references are paraphrased; this sheet does not reproduce the text of ISO 45001. It is not legal advice: health and safety law is that of the place where the property operates.