WORKSHEET 3.3

Criteria, and the Obligations Nobody Has Questioned

Subchapter 3.3 · case in the book: Belfast

GUIDING QUESTION

Take the register your audits are conducted against. Ask who compiled it, when, and from what. Then ask which audit in the property's history has examined the register itself rather than conformity to it.

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
Audit the register itself, once, with its own scope. Who built it, from what, what has changed since, and what has never been tested.		
Write criteria specific to each audit: the relevant requirements of the standard, the property's own documents, and the applicable obligations.		
Spend an hour with commercial, with whoever deals with the insurer, and with whoever holds the brand standards. Collect the obligations nobody wrote down.		
Replace the annual review with a short list of triggers the property already recognises: refurbishment, new contractor, new outlet, season, young worker, new substance.		
Add the two missing columns (what it means here, and what takes account of it) and delete the reproduced text.		
Test applicability both ways: five entries against the building, and five activities against the register.		
If obligations arrive by subscription, check that somebody translates them. A current register that nobody has applied is not a determination.		
Keep the findings about the process. Leave the interpretation of obligations to the people whose profession it is.		

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 is commonly believed	What actually holds	Our position
«Our criteria are ISO 45001.»	The clause requires criteria to be defined for each audit, and names the organisation's own requirements alongside the standard's. A single line reading ISO 45001 defines neither.	
«The compliance register is the criterion.»	The register records a determination the property made. Auditing against it measures consistency with that determination and cannot test it.	

What is commonly believed	What actually holds	Our position
«The register was produced by a specialist, so it is correct.»	It was correct for the property that existed on the two days it was compiled. The requirement is that obligations be kept up to date, which is a process rather than a document.	
«Obligations means the law.»	It means legal requirements and other requirements. Brand standards, client contract conditions and insurer undertakings bind the property and are often missing from the register.	
«An internal auditor cannot audit legal compliance without legal training.»	Correct, and it is not what the audit does. The auditor tests whether the property has a working way of determining what applies, not whether a given interpretation is right.	
«The annual review of the register satisfies the requirement.»	Only if something was determined. A review that advances a date has produced the documentary evidence of a process that did not occur.	

Common mistakes: a self-check

Mistake (from the book)	Present here?	Action / owner
Writing «ISO 45001» in the criteria box. It defines nothing and guarantees findings shaped like clauses.		
Auditing against the register without ever auditing the register. It measures consistency and reports it as compliance.		
Treating obligations as legal only. The commercial and brand commitments bind the property and live in other departments.		
Maintaining the register by advancing review dates. It produces the evidence of a process that did not happen.		
Reproducing the text of obligations instead of stating what they mean for this property.		
Crossing into interpretation. An auditor who argues law stops producing the findings only they can produce.		

Operative synthesis

- Criteria decide what an audit is comparing the property with, and in most properties they are inherited rather than chosen. The register is treated as the criterion, which means the audit can establish only whether the property does what the property believes it must, and the more rigorous the audit, the more firmly an error in that belief is confirmed.
- The clause asks for criteria to be defined for each audit and names two objects of conformity, the standard's requirements and the property's own. The planning requirements ask for obligations to be determined, accessed, kept up to date, applied, communicated and taken into account. A register satisfies the first two of those six verbs, and obligations include what the property accepted voluntarily (from a client, a brand, an insurer) which registers in this industry seldom contain.
- **The register is therefore not the criterion.** It is a determination, it is a legitimate object of audit, and the process that produces it can be examined by anybody competent to examine a process. Whether a particular obligation was correctly interpreted cannot, and does not need to be.
- **One caution belongs here because this subchapter can be read as an argument for a bigger register, and it is not.** The property with forty-one entries had a manageable document that was

wrong in identifiable ways. A property that responds by adding every obligation it can find will have a document that is comprehensive, unread, and impossible to maintain, and the auditor will then be sampling a longer list with the same defect. What the clause asks for is that the property know what applies to it and what that means here. A short register that is current, translated and connected to controls satisfies it. A long one that is none of those things satisfies nothing, and costs more.

- Forty-one entries, six of which applied to a different kind of operation, and no entry at all for the arrangement the scaffolding contractor asked about. Ninety-six per cent, for four years, measured against a list nobody had read since the two days it was written.
- All of which assumes an auditor able to recognise that a register is a determination rather than a fact, which is a question about the auditor, and the next one this chapter has to answer.

Action plan for our property

Action	Owner	Due	How we will know it worked

Source: Francesco Dore, The Helm and the Lens, Volume 3b «The Lens», subchapter 3.3. 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.