WORKSHEET 3.7

Auditing the Hierarchy of Controls

Subchapter 3.7 · case in the book: Antalya

GUIDING QUESTION

Take any hazard in your register and look at the controls against it. Now find the record of the higher rungs being considered and rejected. If there is none, you may be looking at a control that was chosen rather than at a hierarchy that was applied, and from the control alone you cannot tell which.

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
Classify the controls on one hazard by rung. If they all sit on one, that is the finding.		
Ask what happened to elimination. Never asked, rejected unrecorded, or rejected with reasons: only the third can be shown once the people involved have moved on.		
Open the third rung. Rostering, sequencing, splitting a solo task and shortening a run are controls, and they outrank training.		
Test any equipment-only control by asking what happens on the day it is not worn. If the hazard operates fully, there is one control and its reliability is a person.		
Write the finding about the process, not about the commercial decision. It is within your competence and much harder to dismiss.		
Ask who selected the control and what rung their authority reaches. A control that matches the selector's authority rather than the hierarchy is a finding.		
Keep two lines per hazard on what was considered and rejected. They survive the person who decided.		

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
«The hierarchy is a list of options to choose from.»	It is named as a hierarchy and stated in order. Choosing from it and working through it are different processes and only one of them is described.	
«We have five controls on that hazard, so it is well controlled.»	Count the rungs, not the controls. Five administrative controls are one rung, and they fail in the same circumstances.	
«Personal protective equipment is a control like any other.»	It is the last rung, and the one whose effectiveness depends most directly on the person who would be harmed, every time.	

What is commonly believed	What actually holds	Our position
«Elimination is not realistic in a hotel.»	Sometimes true and frequently untested. The requirement is that the rung be considered, not that it be adopted.	
«The standard requires the reasoning to be documented.»	It requires a process. A short written record is the simplest way to show that the process operated; other verifiable evidence will serve, but a consideration that left no trace at all is indistinguishable from none.	
«Training is a strong control when it is done well.»	It is a fourth-rung control however well it is done. Rostering the work differently sits a rung above it, and almost nobody looks there.	

Common mistakes: a self-check

Mistake (from the book)	Present here?	Action / owner
Counting controls rather than classifying them. Five entries on one rung read as depth and are not.		
Auditing the control instead of the decision. From the control alone, a hierarchy applied and a hierarchy skipped look identical.		
Skipping the third rung. Reorganisation of work is a control and sits above training in the standard's own ordering.		
Treating protective equipment as equivalent. It is the rung whose effectiveness depends most directly on the exposed person.		
Writing findings about the commercial decision. The auditor establishes whether the trade-off was made and whether the controls retained work, not what the trade-off should be.		
Letting the rung be decided by who noticed the hazard. Nothing in most systems sends it up to somebody whose authority reaches higher.		
Turning the hierarchy into an authorisation form. It is a way of thinking about a hazard, and it stops working when it becomes paperwork.		

Operative synthesis

- **The hierarchy is the one requirement in this part of the standard whose application cannot be read off its output.** A control at the fourth rung reached after the first three were examined looks exactly like one reached by starting there, and the only thing that distinguishes them is a record of what was rejected, which is precisely what properties do not keep.
- **The evidence system makes this worse rather than better.** Removing a hazard leaves nothing behind; a procedure with a training matrix and signed attendance leaves a file. A property under pressure to demonstrate that it manages safety drifts toward the rungs that generate evidence, and the file grows fullest where the protection is thinnest.
- **So the audit asks three things, none of which requires a technical judgement.** What rung does each control sit on. What happened to the rungs above it. And has anybody opened the third rung, where reorganisation of work sits, which in a hotel means rostering, sequencing and the removal of solo tasks: all entirely within the property's gift and all outranking the briefing that was chosen instead.

- And the rung a hazard reaches is frequently decided by who noticed it rather than by what is available, because a supervisor can add a briefing and cannot change what the property serves. Nothing in most systems sends a hazard upward to somebody whose authority reaches a higher rung, which is why so many hazards in hospitality come to rest on the fourth one and stay there for years.
- **Five years of controls, every one implemented, every one current, every one recorded.** A top rung closed by a conversation in the first year, by a director who has since left, that nobody wrote down. And a pool full of guests with bare feet, whom none of the five controls reaches.
- Some hazards, though, leave nothing on the floor for a hierarchy to be applied to until somebody goes looking in the roster, which is where this chapter goes next.

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 3.7. 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.