

Your ISO Certification and the Gaps Nobody Audits

For businesses holding ISO 9001, ISO 45001 or a supply chain accreditation

If you hold ISO certification because a large customer insists on it, this document is worth twenty minutes of your time. The risk is not usually that your certificate is wrong. It is that the part of your business your customer cares least about is the part that will fail an audit, and the certificate is what keeps you on their approved list.

Scope and limitations — read before use

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1. First, understand what your certificate actually covers

Every ISO certificate has a defined SCOPE, printed on it. It might read something like 'design and manufacture of fabricated steel components at [address]'. That scope is what was audited. Activities outside it were not.

Question	Why it matters
What exactly does the scope statement on your certificate say?	It defines what the certification body actually assessed.
Does it cover the whole site, or one process or building?	A yard, a warehouse or a maintenance workshop is often outside a scope written around production.
Which standard is it — 9001, 45001, 14001, or several?	This changes everything. See section 2.
Does your customer believe it covers more than it does?	This is the commercial exposure. They assume the certificate means the whole operation is managed.

The common position we see: a firm holds ISO 9001 covering manufacturing, because a large customer demanded it. Production is genuinely well run. The yard, where lorries reverse among people on foot, has no risk assessment, no traffic plan and no training records — and nobody has ever looked at it, because it was never in scope.

2. What each standard actually requires of you

Standard	What it is	Does it require health and safety management?
ISO 9001	Quality management system	Not directly. It is about consistently meeting customer and applicable statutory requirements for your product or service. It does not impose an occupational health and safety management system. A yard safety gap is not automatically a 9001 nonconformity.

ISO 45001	Occupational health and safety management system	YES, and comprehensively. This is the one where a yard gap is a direct problem. See section 3.
ISO 14001	Environmental management system	Environmental compliance obligations, not worker safety, though dust, noise and spillage can overlap.
SSIP schemes (CHAS, SafeContractor, Constructionline and similar)	Supply chain pre-qualification for health and safety	YES. These assess your health and safety arrangements directly and are usually renewed annually.

So the honest answer to 'am I in breach?' is: it depends which certificate you hold and what its scope says. If you hold only ISO 9001 for a production process, a yard gap is probably not a certificate nonconformity — but it is still a breach of the LAW, and it is still the thing that loses you the customer when they audit you themselves.

3. If you hold ISO 45001, these are the clauses a yard gap hits

Clause	Requirement	How a yard or workshop gap fails it
6.1.2	Hazard identification and assessment of risks	No risk assessment for vehicle movements, dust, vibration or work at height means hazards have not been identified.
6.1.3	Determination of legal and other requirements	You have not identified that regulation 17 of the Workplace Regulations, PUWER regulation 9, COSHH or LOLER apply to you.
7.2	Competence	No training matrix, no certificates on file, no written authorisation for machine operators.
7.3 / 7.4	Awareness and communication	Operatives and visiting drivers never told the rules.
8.1.2	Eliminating hazards and reducing risks	No evidence you worked down the hierarchy of control.
8.1.4	Procurement and contractors	No competence checks on agency, contractors or visiting drivers.
9.1.2	Evaluation of compliance	You must establish a process to evaluate compliance with legal requirements AND RETAIN DOCUMENTED INFORMATION OF THE RESULTS. If you have never evaluated your yard against the law, you cannot evidence this clause at all.
10.2	Incident, nonconformity and corrective action	Near misses not recorded or acted on.

Clause 9.1.2 is the one that catches people. It is not enough to be compliant. You have to have a process for CHECKING that you are compliant, and you have to keep the records of having checked. An auditor can ask to see that evidence for any part of your operation inside the scope.

4. What a nonconformity actually costs

Finding	What happens
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Observation or opportunity for improvement	Noted. No immediate consequence.
Minor nonconformity	Corrective action required within an agreed period, verified at or before the next audit.
Major nonconformity	A serious failure, or a total absence of a required process. Can block initial certification, and at surveillance can lead to suspension or withdrawal of the certificate if not corrected in time.
Certificate suspended or withdrawn	You come off your customer's approved supplier list. For many SMEs that is the end of the contract, and sometimes the end of the business.

For most small suppliers the fine is not the frightening part. Losing the certificate that keeps you on the approved list is.

5. Where the gaps usually are

In our experience the certified process is genuinely well managed. The gaps sit in the parts nobody thinks of as 'the business':

- The yard — vehicle movements, reversing, deliveries, pedestrians, visiting drivers.
- Loading and unloading, which is often done by whoever is nearest.
- The maintenance workshop, the compressor, the welding bay, the abrasive wheel.
- Forklift and plant operators with a certificate from years ago and no written authorisation.
- Contractors and agency staff, whose competence nobody has checked.
- Health surveillance for noise, vibration, dust and skin — almost universally absent.
- Statutory examinations: LOLER for lifting equipment, PSSR for air receivers, LEV examinations.
- Storage areas, racking, and work at height when someone climbs to reach stock.

6. What your customer will do, whatever your certificate says

Large customers increasingly audit their supply chain directly, or require SSIP pre-qualification alongside ISO. They ask for exactly the documents in this pack: risk assessments, method statements, training matrix, competence records, accident records, insurance, and evidence of statutory examinations. A certificate does not answer those questions. The file does.

Being able to produce that file quickly, for the whole operation and not just the certified process, is a genuine commercial advantage. It is also, increasingly, the price of staying on the list.

7. Self-check before your next audit

Question	Yes / No	Evidence
Do I know exactly what the scope on my certificate says?		
Are there significant activities on site outside that scope?		
If I hold 45001, have I evaluated legal compliance for ALL of them, with records? (9.1.2)		
Is there a written risk assessment for vehicle movements in the yard?		

Is there a training matrix showing who is authorised for what?		
Does every machine operator have written authorisation?		
Are all statutory examinations in date, with reports? (LOLER, PSSR, LEV)		
Is health surveillance in place where the assessments require it?		
Are contractor and agency competence checks documented?		
Are near misses recorded and acted on?		
Could I produce all of this within an hour if a customer arrived to audit?		

Any 'no' above is a gap. It may not be a certificate nonconformity, depending on your scope and standard — but it is a legal exposure, and it is the sort of thing that turns up in a customer audit at the worst possible moment.

This document is general guidance. It is not a certification audit and it is not an opinion on your particular certificate. Check your scope statement, your standard and your findings with your certification body or your own competent adviser.