WORKSHEET 1.3

Who Counts as a Worker

Subchapter 1.3 · case in the book: Da Nang

GUIDING QUESTION

How many people performed work in your hotel yesterday, and how far is that number from the one on your payroll?

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
Count everybody once. Take a single ordinary day and count every person who performed work on the premises, from the access control system, the contractor register, the gate log and the agency's timesheet. Compare with the payroll. The gap is the size of the problem and it is the only number you need to open the conversation with an owner.		
Sort the gap into the three relations: our work under our direction, their work in our workplace, and people who are not working for anyone here. Almost every practical decision in the rest of this volume depends on which of the three a person is in.		
Fix the first group first, because it is both the largest exposure and the easiest to correct. Agency staff working your shifts to your procedures belong in your induction, your consultation and your incident reporting, and adding them costs the time of the person who already runs those things.		
For the second group, replace the signature at the gate with an exchange. They tell you what they are doing, where and for how long; you tell them what is dangerous about the place they have entered and who to call. Fifteen minutes, both directions, recorded. That exchange is coordination, and a register of names is not.		
Overlay the population list on the geography from 1.2. Where a concentration of events meets a concentration of non-employees, you have found the part of the property that is least known to your system, and it should be the first place your attention goes.		
Check the concession agreements against what actually happens. Where the property sets hours, workload or location, it is directing the work regardless of what the agreement says, and it is better to know that before an investigator points it out.		

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
“Our workforce is the two hundred and fourteen people on the payroll.”	The standard’s term is worker, not employee, and turns on control of the work. Its notes cover paid and unpaid arrangements and include employees, external-provider workers, contractors, individuals, agency workers and others where control is shared.	
“The agency inducts its own housekeepers. That is what we pay it for.”	Where the organisation controls the work, competence and awareness requirements apply, as do worker consultation and participation. A briefing whose content the property cannot describe is not evidence of communication.	
“The lift engineers work to their own method statement, so they are outside our system.”	Correct as to method and wrong as to interface. Procurement processes must be coordinated with contractors, outsourced functions and processes controlled, and conformity remains the organisation’s responsibility.	
“The spa therapists are the concessionaire’s employees.”	Employment is not the test. Where the property sets the hours, the bookings, the workload and the location of the work, it is controlling the work, and the standard follows control rather than contract.	
“Guests and visitors are not our concern under a health and safety standard.”	They are not workers, but hazard identification covers their access and activities as visitors or others, and people nearby who may be affected by the organisation’s activities.	
“The interns are students, so they are the college’s responsibility.”	A person performing work under the organisation’s control is a worker whatever the arrangement is called. At Non Nước the interns were the only group properly inducted, by the college, not by the resort.	

Common mistakes: a self-check

Mistake (from the book)	Present here?	Action / owner
Building the system on the payroll. It is complete, authoritative, already written, and about the wrong population.		
Treating the three relations as one. Either everyone is excluded because they are somebody else’s employees, or everyone is absorbed and the property starts directing work it is not competent to direct.		
Accepting an induction you cannot describe. A briefing delivered by an agency, of unknown content and unrecorded, is not evidence that anything was communicated; it is evidence that somebody was invoiced.		
Mistaking a signature for coordination. The contractor register records that a person entered. It does not record that either party learned anything about the other.		
Reading the concession agreement instead of the operation. Direction is a fact about how the work is actually organised, and it does not disappear because a contract describes the relationship differently.		

Mistake (from the book)	Present here?	Action / owner
Discovering the number during an emergency. The assembly point is a bad place to learn how many people are in your building, and the emergency consequences of that are treated in 2.8.		

Operative synthesis

- **The standard's operative term is worker, and it turns on control of the work rather than on the employment contract.** A hotel that builds its system from the payroll has built a coherent, auditable system around a fraction of the people at risk, and the missing fraction is not random, because the work that gets outsourced is the same work in which people get hurt.
- **Three relations have to be told apart.** People doing your work under your direction are your workers whatever their contract, and they belong in consultation, competence, communication and incident data. People doing their own work in your workplace require coordination rather than direction, and the interface is the object. People who are not working for anyone (guests, visitors, passers-by) are not workers but sit squarely inside hazard identification. Ignoring all three is the common error; absorbing all three is the sophisticated one. The instrument is a single page listing every group with who inducts, who consults and who notifies, and the number that opens the conversation is how many people performed work here yesterday.
- The three people in the building with a complete safety induction were the students, because their college demanded proof of it. Everyone else who was not on the payroll had a signature at a gate.
- **Knowing who they are is the beginning.** What the standard then asks the property to do with them is harder than anything in this chapter so far, because it cannot be satisfied by a document or a briefing, and it is the requirement that separates this standard from the other two in the series.

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 1.3. 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.