WORKSHEET 2.10

Evaluation of Compliance

Subchapter 2.10 · case in the book: Puebla

GUIDING QUESTION

Somebody asks whether your hotel is compliant today. Not last January, today. Who can answer, what would they look at, and how long would it take them?

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
Ask the guiding question inside your own hotel this week. Are we compliant today, who can say, and how long does it take them? The length of the pause is the finding.		
Connect the maintenance planner to the register. Everything with an expiry date is already being tracked by somebody, accurately, and has never been recognised as compliance information.		
Differentiate the frequency. Importance, operating conditions, changes in the requirement and past performance are the factors the guidance names, and they produce a regime in which some things are watched continuously and some are looked at once.		
Evaluate the promises you made. The tender response, the brand standard, the annexe, the sentence on the website. Nobody evaluates these, and they are the obligations most likely to be checked by somebody who is paying you.		
Route every gap through the corrective action process rather than through a task list. Cause, action, verification, and the question of whether the same gap exists elsewhere, which is what catches the one that appears in two consecutive reports.		
Where a gap cannot be closed, record the decision and the date. An open item with a reasoned plan is a managed risk; an open item with a blank beside it is a documented liability.		

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 evaluate compliance annually and hold the report."	The clause requires the organisation to maintain knowledge and understanding of its compliance status. An annual report is a result; the requirement describes a continuing state.	
"Compliance means legal compliance."	The phrase throughout is legal requirements and other requirements. Contracts, brand standards, employment terms and public commitments are inside it, and nobody evaluates a tender response.	

What the property took to be true	What actually holds	Our position
“The gaps were on the action list and most were closed.”	Evaluate and take action if needed, with a cross-reference to the corrective action clause. A gap handled as a task has no cause, no verification and no question about whether it exists elsewhere.	
“An annual frequency is reasonable for everything.”	Frequency and method are determinations, and the guidance names importance, operating conditions, changes in requirements and past performance as the factors. Not every obligation ages at the same rate.	
“Compliance is an administrative subject.”	A large part of it is a question of dates already held, accurately and continuously, in the maintenance planning system, which is the most complete compliance instrument most hotels possess and is never used as one.	
“The evaluation came back at ninety-four per cent, so we are in good shape.”	You can only evaluate against what you determined. An evaluation performed against a register last updated in 2019 returns an accurate result about a world that no longer exists.	

Common mistakes: a self-check

Mistake (from the book)	Present here?	Action / owner
Treating compliance as an annual event. The requirement is to maintain knowledge and understanding of status, which is a continuing state.		
Evaluating only the legal half. The clause says legal requirements and other requirements, and nobody evaluates the promises the property made itself.		
Handling a gap as a task. It is routed to the corrective action clause, which means cause, verification, and the question of whether it exists elsewhere.		
Applying one frequency to everything. The determination is supposed to turn on importance, conditions, changes and past performance.		
Ignoring the planner in engineering. It is the most complete and current compliance instrument in the building and nobody has ever called it that.		
Reporting a percentage. It adds things that cannot be added and it reassures nobody who is actually checking.		

Operative synthesis

- The clause asks for four things and one of them changes the subject: the organisation is to maintain knowledge and understanding of its compliance status. That is a continuing state rather than a periodic result, and it is what an annual report cannot supply in August. Frequency and method are determinations, and the guidance points them at the importance of the requirement, the operating conditions, changes in the requirements and past performance, which licenses a differentiated regime instead of one sweep a year.
- In a hotel a large part of the answer already exists in the maintenance planning system, where every certificate, inspection and periodic service is tracked with a date and an owner; the rest divides into practices, which are observed by the monitoring of 2.9, and promises, which nobody

evaluates at all although they are the obligations most likely to be checked by a paying client. And a gap is not a task: the clause sends it to the corrective action machinery. Evaluating without closing produces a dated internal record of known non-compliance, which is worse than not having looked: not an argument for looking less, but for funding both halves of the same sentence.

- **The report was serious, competent and accurate, and it said ninety-four per cent.** It was January. The auditor was asking in August, and the person who could have answered him that afternoon had never once been invited to the exercise.
- **Three gaps had been found and none of them had been treated as what the standard calls them.** What that machinery actually consists of (and why an organisation that fixes things without it will meet the same problem again wearing different clothes) is what comes next.

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 2.10. 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.