WORKING MATERIAL 1.3 · CHAPTER 1 — THE VISION OF OWNERSHIP (SECTION A) · SETTING: HOI AN, VIETNAM

The Register Nobody Reads: Legal Compliance Beyond Permits

Source: Francesco Dore, The Helm and the Lens, Volume 7a — GSTC Hotel Standard v4.0, subchapter 1.3 (book page 37)

GUIDING QUESTION

Most hotels can produce their licences in minutes, each with a stamp and an expiry date. Criterion A2 asks for something wider: a register of every law that applies to the hotel, including those for which no permit is ever issued. What does a hotel miss when its legal register lists only what it holds, and not what it owes?

1 · Verification Pact: market claims against the standard

Copied from the book. The last column is for your property: what holds here, and how you know it.

What is claimed	Binding?	What actually holds	In our property
A complete set of valid permits demonstrates legal compliance	No	A2 covers all relevant laws, including those that produce no permit, and A2.2 requires policies and procedures	
Child protection and trafficking are matters for the police, not the hotel	No	The A2 criterion names them, and B6 and B7 require a code, a policy, procedures and training	
The register needs only local and national laws	Only partially true	A2.1 names local and national laws; B9.1 adds ILO conventions where applicable, and the guidelines to B6 and B7 cite international frameworks	
GSTC certification confirms compliance with health and safety law	No	The preamble excludes any approval role in health, safety and security; authorities' certificates remain the evidence	
Where the law is silent, nothing is expected	No	The guideline to A2.2 sets fire equipment and evacuation-plan expectations where specific regulations are not in place	
A register is compiled once	No	A2.1 requires it to be up to date, and the guideline asks for periodic review	

2 · Common mistakes — a self-check

Tick each mistake you recognise in your own property, and note where it shows.

☐ Treating a complete set of valid permits as proof of legal compliance.

☐ Leaving out child protection, trafficking, modern slavery and animal welfare because no permit is issued for them.

☐ Compiling the register from memory or from another country's template instead of local legal expertise.

☐ Listing laws without the policies, procedures and training that apply them.

☐ Forgetting contractors, agency workers and the activities sold at the tour desk.

☐ Presenting a GSTC certificate as if it confirmed compliance with health and safety law.

☐ Updating the register only when an inspection is announced.

☐ Hiding rows where compliance is not yet evidenced instead of working on them.

3 · A Checklist for Reading the Legal Register

The book's checklist, with a column for your own answer.

Question	Why it matters	Our answer
Does our register list obligations by area, or only documents we hold?	A2.1 asks for applicable laws, not only permits	
Does it cover child protection, trafficking and modern slavery, labour rights and animal welfare?	The A2 criterion names these areas explicitly	
Who identified the applicable laws, and with what local expertise?	The standard does not state any country's law; applicability must be established locally	
Does each obligation have a policy or procedure, training and a compliance check?	A2.2 and its guideline require policies supported by training, checks and corrective action	
Are contractors and the activities we sell inside the register?	Obligations reach work and services the hotel does not perform directly	
When was the register last reviewed, and by whom?	A2.1 requires it to be up to date, and the guideline asks for periodic review	

4 · What would show this is working

Questions drawn from the subchapter's reading of the standard and its practical application. Indicator references point to the GSTC Hotel Standard v4.0; where the evidence lives is this book's practice, not a requirement of the standard.

Question	Where the evidence lives	Seen?
Does the register list applicable laws by area, as in the guideline to A2.1, not only the permits we hold?	Legal register (A2.1), organised by area	☐
Were the applicable laws identified with competent local expertise?	Advice letters or notes from a lawyer, association or authority	☐
Does each obligation have a policy or procedure, training and a compliance check (A2.2)?	Procedures, training records, compliance-check records	☐
Are contractors and the activities we sell checked against the register?	Contractor confirmations, contract clauses, activity reviews	☐
Is the register kept digitally where possible, with a named owner and a review date?	Register file history and review log	☐

> *What this sheet is not: the GSTC Hotel Standard does not prescribe this form. It is a working aid drawn from the book; the standard's criteria, indicators and guidelines govern the real case. Independent material; not affiliated with or endorsed by the GSTC. The standard's own text at www.gstc.org prevails.*