WORKING MATERIAL 3.10 · CHAPTER 3 — THE INTERNAL AUDITOR'S LENS · SETTING: NINH BINH, VIETNAM

Auditing the Sensitive Criteria: Safeguarding and Conduct

Source: Francesco Dore, The Helm and the Lens, Volume 7b — GSTC Hotel Standard v4.0, subchapter 3.10 (book page 123)

GUIDING QUESTION

A zero-tolerance policy can be flawless on paper and useless in the moment it is needed, if the person who notices something does not know whom to tell. How does an internal auditor test safeguarding and conduct without turning an audit into an investigation, and without mistaking a signed policy for a working system?

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 signed zero-tolerance policy satisfies B6 and B7	No	The indicators also require communication, training with records, confidential channels, monitoring and supplier requirements	
Safeguarding concerns only children staying as guests	No	B6.3 covers guest and community children, youth, students and interns; B7 protects all vulnerable groups	
Reporting to the general manager is a sufficient channel	Only partially true	The guideline to B7.1 requires clear, accessible and confidential channels; one route through the hierarchy can be a barrier	
The policy applies to employees only	No	B7.2 extends communication to guests and suppliers; B7.6 requires suppliers to comply	
Recording adults' identity at check-in is enough	No	The guideline to B6.3 refers to all guests, including children and accompanying adults	
The internal auditor should look into any concern raised in an interview	No	Concerns go to the designated person under the response procedure; the auditor tests the system, not the case	

2 · Common mistakes — a self-check

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

☐ Treating a signed zero-tolerance policy as evidence of a working safeguarding system.

☐ Attaching the designated role to a person rather than a position with a deputy.

☐ Offering only one reporting route, through the hierarchy.

☐ Leaving interns, contractors and excursion partners outside the code and the channel.

☐ Recording adults at check-in and leaving children's identification to individual habit.

☐ Auditing safeguarding by reading documents and never asking staff whom they would tell.

☐ Allowing an internal audit to drift into investigating a specific concern.

☐ Writing findings that identify or imply individuals instead of describing the system.

3 · A Checklist for Auditing Safeguarding and Conduct

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

Question	Why it matters	Our answer
Who is the designated person today, and who is the deputy?	A role attached to one individual fails when that individual leaves	
Is there a confidential channel that does not pass through the hierarchy, and was it tested recently?	The guideline to B7.1 requires clear, accessible and confidential channels	
Can staff, interns and partners name whom they would tell?	Knowledge of the channel is the test that the policy works	
Are interns, partners and suppliers covered by the code and by agreements?	B6.3 names students and interns; B7.6 requires suppliers to comply	
Does check-in record the identity of all guests, including children and accompanying adults?	The guideline to B6.3 requires it, within legal and privacy limits	
Do I know what I will do if a real concern is raised during an interview?	The auditor refers concerns; she does not investigate them	

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?
Is there a written code of conduct and a zero-tolerance policy (B6.1, B7.1)?	Code of conduct; policy document	☐
Is there a clear, accessible and confidential channel that works, with a designated person (B7.1 guideline)?	Contact cards; record of monthly channel tests	☐
Are all guests identified at check-in, including children and accompanying adults (B6.3 guideline)?	Check-in procedure; sample of registration records	☐
Do interns, partners and guests receive the code and policy, and do supplier agreements require compliance (B6.6, B7.2, B7.6)?	Induction records for interns; supplier agreements; guest information	☐
Are staff trained to recognise and report concerns, with records (B6.5, B7.4)?	Training attendance and scenario materials	☐
Can sampled staff name whom they would tell?	Interview records	☐

> *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.*