

Athens Journal of Tourism

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The *Athens Journal of Tourism* (AJT) is an Open Access quarterly double-blind peer reviewed journal and considers papers from all areas of tourism and related disciplines such as culture, leisure, recreation, geography, urban planning, heritage, sports, historical cities, landscape, architecture etc. The AJT considers theoretical and empirical papers as well as case studies and policy papers. The journal's aim is to be useful to both academics of tourism research and the practitioners of the tourism industry. Many of the papers published in this journal have been presented at the various conferences sponsored by [the Tourism, Leisure & Recreation Unit](#) of the Athens Institute. All papers are subject to Athens Institute's Publication Ethical Policy and Statement. A journal publication might take from a minimum of six months up to one year to appear. All papers are subject to Athens Institute's [Publication Ethical Policy and Statement](#).

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Athens Journal of Tourism

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The current issue is the second of the thirteenth volume of the *Athens Journal of Tourism (AJT)*, published by the [Tourism, Leisure & Recreation Unit](#) of Athens Institute.

Gregory T. Papanikos
President
Athens Institute



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- Submission of Paper: **22 February 2027**

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- **Dr. Peter Jones**, Co-Editor, [Athens Journal of Tourism](#) & Professor of Management, University of Gloucestershire, UK.

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- Delphi Visit
- Ancient Corinth and Cape Sounion

More information can be found here: <https://www.atiner.gr/social-program>

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A Critical Reflection on Brazil's Tourism Security Macro-Policy

By Marcelo da Silva Taveira, Êndel Raul Pachêco da Costa[±]
& Salete Gonçalves[°]*

This study aims to discuss and critically reflect upon the content of Brazil's Tourism Security Macro-Policy, considering the premises of the Safe Tourism Program (PTS) and the projects “Brasil, essa é nossa praia!” and “Brasil, Turismo Responsável”. The research is characterized as an exploratory-descriptive study adopting a qualitative approach based on document analysis, a review of the specialized literature related to the central theme of the investigation, and an examination of the technical materials produced by the Federal University of Rio Grande do Norte (UFRN) and the Brazilian Ministry of Tourism. Additionally, consultations were conducted using digital platforms and data provided by international organizations concerned with Tourism Security. The research methodology considered the theoretical-conceptual framework, the Brazilian legal-institutional foundation, and the scientific and technical production surveyed in order to analyze the critical, reflective, and interpretive nature of the ongoing investigation. Particular emphasis was placed on the content of the aforementioned institutional projects and on the Ministry of Tourism's online platform (Digital Hub), which contains the principal policies, strategies, and actions related to tourism development in Brazil and their connections with Tourism Security. The findings demonstrate that, despite the efforts undertaken by the Federal Government and Brazil's Federative Units to promote safe tourism throughout the country, particularly in the most visited destinations, the emerging Tourism Security Macro-Policy remains at an early stage of development. As a result, it has not yet fully or effectively achieved the objectives and targets established by the Safe Tourism Program, nor has it adequately incorporated the contributions of scientific research conducted by UFRN and other teaching and research institutions through the strategies, initiatives, and actions proposed.

Keywords: *Brazil; Macro-Policy; Tourism Security; Responsible Tourism.*

Introduction

Tourism is both an economic activity and a social practice that emerged and gained prominence in modernity. It materializes within geographic space through territories shaped by the historical and cultural dimensions of human relations and by the (re)production of everyday life among residents, tourism service providers, and the experiences generated through encounters between hosts and visitors.

One of the fundamental elements underpinning travel for tourism purposes is the issue of safety, or safe tourism, at destinations. This factor constitutes one of the key

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determinants that may influence decision-making regarding destination choice (where to go), the timing and duration of the trip (when to travel), the need or motivation for travel (why to travel), the level of investment involved (financial resources), and the logistical aspects of the journey (its material and operational organization). Consequently, the selection of a tourist destination is a complex process involving a combination of rational and emotional considerations, with safety encompassing dimensions that are taken into account before, during, and after the travel experience.

In this regard, a safe destination constitutes a necessary condition for tourism to develop in accordance with the principles of sustainability, inclusion, accessibility, mobility, and connectivity, as well as responsible production and consumption relations throughout the tourist's stay at the destination (Chivandi et al. 2023).

Tourism security, understood in this discussion as a motivational and decision-making factor in the selection of a travel destination, should be ensured not only for visitors but also for host communities and tourism service providers or tourism workers. In other words, it should encompass all social actors and economic agents involved in the tourism dynamics of a destination.

According to the Global Peace Index (GPI), Brazil ranked 131st out of 163 countries included in the international ranking in 2024, obtaining an overall score of 2.59. This ranking is based on a composite index that measures the level of peacefulness of countries, with lower scores indicating higher levels of peace. The GPI comprises 23 indicators related to the absence of violence or the fear of violence. These indicators were originally selected with the assistance of an expert panel in 2007 and have been reviewed annually since then. Scores for each indicator are normalized on a scale from 1 to 5, with qualitative indicators grouped into five categories and quantitative indicators scored from 1 to 5 to three decimal places (Global Peace Index 2024).

Produced by the Institute for Economics and Peace (IEP), the Global Peace Index (GPI) is the world's leading measure of global peacefulness. Its 2024 report provides a comprehensive data-driven analysis of trends in peace, its economic value, and pathways for developing more peaceful societies. Within the South American context, Brazil ranked ahead of only Venezuela (2.82) and Colombia (2.88) in terms of overall score, occupying the 131st position among 163 countries assessed. Venezuela and Colombia ranked 142nd and 146th, respectively. By contrast, countries such as Argentina (1.85), Uruguay (1.89), and Chile (1.97) ranked 47th, 52nd, and 64th, respectively, while the regional average for South America stood at 2.28.

The GPI covers 99.7% of the world's population and is calculated using 23 qualitative and quantitative indicators, including perceived criminality in society, security and police personnel, homicide rates, prison population, access to weapons, internal organized conflict, violent demonstrations, violent crime, political instability, political terror, arms imports, terrorist activity, deaths from internal conflict, military expenditure, armed forces personnel, contributions to United Nations peacekeeping operations, nuclear and heavy weapons capabilities, arms exports, displaced persons, relations with neighboring countries, deaths from external conflict, involvement in external conflicts, involvement in internal conflicts, and indicators associated with domestic and international conflict, security, and militarization. These indicators are derived from highly respected sources and are used to measure peacefulness across

three principal domains: (i) the level of societal safety and security; (ii) the extent of ongoing domestic and international conflict; and (iii) the degree of militarization.

According to the 2025 Brazilian Yearbook of Public Security, which presents consolidated data for 2024, a total of 44,127 intentional violent deaths were recorded, despite a 5.4% reduction compared to the previous year. In the same year, 917,748 incidents involving the theft or robbery of mobile phones were reported. Additionally, 87,545 children and adolescents were victims of rape or statutory rape, representing the highest number ever recorded in the country's history. Brazil's prison system held 909,594 incarcerated individuals, including 218,225 pretrial detainees. The Yearbook further notes that public security policies were supported by investments totaling BRL 153 billion in 2024, representing an increase of approximately 6.1% in comparison with the 2023 budget.

Crimes against women classified as femicide increased by 0.7%, resulting in a total of 1,492 victims in 2024. During the same period, Brazilian courts issued 551,001 emergency protective measures. According to Bloom (2019), Brazil is the second most dangerous country in the world for women traveling alone, ranking behind only South Africa. Cerqueira et al. (2019, p. 35) emphasize that the 2017 edition of the Atlas of Violence recorded a total of 13 femicides per day: "A total of 4,936 women were killed, the highest number recorded since 2007." Simultaneously, there was an increase in hate crimes involving racism (26.3%) and racism motivated by homophobia or transphobia (51.2%), while homicides against LGBTQIAPN+ individuals decreased by 26.3% between 2023 and 2024, according to the 2025 Brazilian Yearbook of Public Security.

Taken together, these indicators reveal a scenario of persistent insecurity in Brazil. Despite public investments and reductions in certain categories of crime, the country continues to rank among the least secure nations in the world, according to reports and statistical data produced by leading international organizations in this field. This assessment is corroborated by a document prepared by the Federation of Industries of the State of Rio de Janeiro (Firjan) during the G20 process and presented in January 2023 through the technical report entitled Overview of the Competitiveness of G20 Countries: Brazil 2024, which highlights the following:

Two dimensions are considered in this analysis: the percentage of the population that feels safe walking alone at night in the area where they live and the number of homicides per 100,000 inhabitants. Although Brazil has demonstrated continuous improvement in these indicators since 2018, enhancing public safety conditions remains one of the country's principal challenges. In 2022, Brazil outperformed only Mexico and South Africa. The country achieved 34% progress toward the security-related targets established under SDG 16—Peace, Justice and Strong Institutions. The index methodology considers the United Nations' long-term targets, which for Brazil correspond to 90% of the population feeling safe and a homicide rate of 0.3 cases per 100,000 inhabitants. Therefore, it is essential that government actions prioritize the integration of police forces, the strengthening of public policies aimed at combating crime, and the exchange of experiences with other nations so that the country may advance toward levels comparable to those of other G20 members, which currently achieve an average of 79% of the targets established for the group (Federação das Indústrias do Estado do Rio de Janeiro 2023).

With regard to Tourism Security, public security constitutes one of the principal dimensions highlighted in both policy analysis and implementation. It is crucial for the sustainable and responsible development, organization, management, and governance of tourism destinations. Nevertheless, other domains—including social, environmental, technical-scientific, educational, cultural, and legal-institutional dimensions—are equally essential for understanding Tourism Security and its practical implications within destinations. From this perspective, and considering the particularities of the Brazilian context, this article emphasizes the national Tourism Security policy through an examination of governmental documents, legal instruments, and practical initiatives currently implemented in the country within the field of safe tourism.

In Brazil, significant governmental, legal, and institutional efforts have been directed toward fostering multi-sectoral and intersectoral public policies focused on Tourism Security in national destinations, particularly those characterized by high visitor flows and international relevance, such as metropolitan regions, state capitals, and destinations where sun-and-beach tourism predominates.

For the purposes of theoretical and methodological analysis, this article focuses on the Safe Tourism Program (PTS) and the projects “Brasil, essa é a nossa praia!” and “Brasil, Turismo Responsável,” all of which are Federal Government initiatives developed through institutional partnerships coordinated by the Brazilian Ministry of Tourism. Accordingly, the study examines the motivations, implementation processes, challenges, and effects of Brazil's emerging national Tourism Security policy and its implications for the country's tourism sector.

It should be noted that this article approaches Tourism Security from the perspective of a macro-policy, insofar as actions and initiatives are developed through coordinated efforts involving multiple public institutions, private-sector representatives, and third-sector organizations. In this context, the macro-policy analyzed herein refers to the set of legal-institutional, financial, technical, and scientific efforts resulting from sectoral, intersectoral, and multisectoral actions implemented by agencies of the Federal Government's Direct Administration, including the Ministries of Tourism, Justice and Public Security, Education, Cities, Human Rights, Culture, Environment, Health, Transport, Defense, Ports and Airports, Indigenous Peoples, Integration and Regional Development, and Social Development and Assistance, as well as the public institutions affiliated with these ministries.

The Ministry of Tourism plays a particularly important role as a coordinating, catalytic, and policy-promoting body in matters related to Tourism Security. Through technical guidance and institutional articulation, the Ministry is responsible for encouraging the effective integration of actions, strategies, and initiatives capable of mitigating or reducing the harmful effects of insecurity throughout the country, particularly in tourism destinations.

The central objective of this article is to discuss the core elements of Brazil's Tourism Security Macro-Policy based on the principles established by the Safe Tourism Program and the projects “Brasil, essa é a nossa praia!” and “Brasil, Turismo Responsável.”

From this problem emerges the following research question: How has the recently established Tourism Security Macro-Policy, conceived and led by the

Brazilian Ministry of Tourism, contributed to the structuring and organization of safe destinations through sustainable and responsible strategies, actions, and initiatives?

Considering the selected theoretical and institutional framework and based on the methodological procedures and techniques applied to the object of investigation, this article seeks to examine how Brazil's Tourism Security Macro-Policy has encouraged the implementation of safety-oriented practices in nationally and internationally significant destinations throughout the Brazilian territory.

Theoretical-Conceptual Framework of Tourism Security

In this discussion, the concept of Tourism Security developed by researchers at the Federal University of Rio Grande do Norte (UFRN) responsible for the projects "Brasil, essa é nossa praia!" and "Brasil, Turismo Responsável" is adopted. These projects are the result of a partnership between the aforementioned Higher Education Institution and the Ministry of Tourism, established in 2019 through Decentralized Execution Agreement (TED) No. 02/2019. Since then, the technical team composed of faculty members and graduate students from the Graduate Program in Tourism (PPGTUR) has worked on developing a theoretical-conceptual foundation for Responsible Tourism, encompassing, at least initially, the dimensions of Sustainability, Community-Based Tourism, and Tourism Security in Brazil. Accordingly, Tourism Security, within the context of Responsible Tourism, is

understood in a broad and pluralistic manner, encompassing the safety of tourists, service providers, tourism professionals, and host communities. Multiple dimensions may affect tourism activity in a destination, including health surveillance, the prevention of the sexual exploitation of children and adolescents in tourism, public security, consumer relations in tourism, civil defense, tourist transportation, and the effective communication of information to all stakeholders involved in tourism-related activities (Brasil 2023a).

Within the framework of Responsible Tourism, Tourism Security is regarded as one of the priority areas for the development of Brazil's tourism sector. It is considered a shared responsibility among the Federative Units and should be planned and managed through integrated, coordinated, decentralized, and collaborative efforts involving multiple sectors of society, state institutions, and private organizations (Brasil 2023a).

Peter Tarlow (2011 & 2014) identifies the following dimensions of protection when discussing safety in tourism activities: (a) protecting tourists; (b) protecting the tourism industry; (c) protecting attractions and tourism spaces; (d) protecting the economy; (e) protecting the natural environment; and (f) protecting the destination's reputation and image. The Ministry of Tourism defines Tourism Security as

the compilation of measures, actions, and attitudes focused on the well-being and physical and emotional integrity of tourists throughout the travel experience, as well as of service providers, suppliers, and resident populations. This means that Tourism Security extends across the entire process, from destination selection to the period of stay, encompassing hospitality and visitor reception, production and consumption relations, and the sociocultural, political, economic, environmental, sanitary, and

geographical contexts of the places visited, in accordance with the principles of Responsible Tourism (Brasil 2023).

The full, sustainable, and responsible development of tourism cannot occur without the promotion of effective Tourism Security policies capable of enhancing the well-being, comfort, accessibility, and quality of life of the individuals directly involved in the travel experience. (Bauzá Martorell FJ 2018).

Structuring Brazilian tourism destinations through collaborative networks involving public authorities, host communities, business owners, social entrepreneurs, and state institutions constitutes a significant challenge, particularly if Tourism Security is conceived as a universal policy detached from local and regional realities. Consequently, a viable alternative is the development of solutions that incorporate intelligence-based strategies, specialized human capital, the integration and engagement of diverse societal actors, and advanced infrastructure and logistics for public security institutions. Such solutions should also address demands related to health, education, public security, infrastructure, environmental protection, sanitary and epidemiological surveillance, civil defense, mobility, accessibility, and connectivity, thereby strengthening the safety of tourism destinations throughout the national territory (Brazil 2023a).

From this perspective, any comprehensive and multifaceted concept of Tourism Security must take into account the diverse premises, nuances, and singularities of the domains and variables inherent to contemporary society and, more specifically, to the dynamics of tourism as both an economic activity and a social practice. In this regard, Tourism Security may also be understood as

the outcome of a set of measures, strategies, and actions coordinated by the public sector in alignment with the demands of the tourism industry and civil society, with the purpose of identifying and addressing the structural elements that generate insecurity. This can be achieved through scientifically validated methodologies aimed at: (a) promoting safety and well-being for individuals (tourists, suppliers, service providers, tourism professionals, and resident populations); (b) protecting public and private property; (c) preserving and safeguarding cultural and environmental attractions; (d) combating and/or preventing the abuse and sexual exploitation of children and adolescents; (e) ensuring environmental safety and civil defense; and (f) strengthening public security policies in national tourism destinations based on the legal principles established in the General Tourism Law (Law No. 11,771 of September 17, 2008), free enterprise, decentralization, regionalization, and a more equitable, inclusive, sustainable, and ethically responsible model of socio-economic development (Brasil 2023a).

According to the Ministry of Tourism, a tourism destination can only be considered safe if it is capable of protecting residents and visitors from both violent and non-violent crime; ensuring the quality of products and consumer services; preventing and responding to environmental disasters and environmental crimes; promoting compliance with sanitary surveillance protocols; regulating tourism- and leisure-related products and services; and ensuring transparent and reliable access to data (Brasil 2023a).

This article argues that Tourism Security constitutes a complex, humanistic, holistic, and interdisciplinary concept whose theoretical-methodological reflection and empirical implications across Brazil's diverse regions and tourism destinations are

imperative. This is particularly important given that the government's Tourism Security Macro-Policy remains incipient and requires more systematic data collection, improved evaluation, monitoring, and control mechanisms, the establishment of a robust system of specific indicators, and, above all, a meaningful reduction in the country's social inequalities.

Florestan Fernandes (2008) reflects on the complex issues that reinforce social inequalities in Brazil through entrenched power structures and the roots and manifestations of structural racism. This influential Brazilian sociologist argues that

the social order and the racial order of an inclusive society changed at markedly unequal rates [...]. As if the caste-based model of social organization still prevailed, the sector constituted by the "white" racial stock became integrated into the currents of historical transformations within the social order, while the "black" racial stock remained stagnant, and the interrelations between the two continued to be regulated by old patterns. Excluded from history and from participation in the social struggles that determined its course, the "person of color" remained confined to a stagnant and static zone of society. Therefore, in contrast to the turbulent transformation of the historical-social landscape, the racial order tended to remain in a stationary condition (Fernandes 2008).

Although a significant portion of the literature and conceptual discussions concerning Tourism Security as a global issue—particularly in peripheral or developing countries, where it constitutes a profound social challenge of the contemporary world—recognizes multiple dimensions of insecurity, it often fails to place social inequalities at the center of the debate. Yet inequality remains an aggressive, persistent, and decisive force in the formation of Brazilian society.

Accordingly, this article considers social inequalities and their multiple effects as fundamental elements in both the present discussion and the formulation of a critical-reflective concept of Tourism Security. From this perspective, Tourism Security may be understood as an effective response to complex socioeconomic, political, cultural, and environmental phenomena intensified by the adverse effects of social inequalities and by the inadequacy of public policies aimed at promoting well-being and quality of life for individuals who reside, work, or temporarily circulate through urban centers, localities, and territorial spaces, whether tourism-oriented or not. These spaces constitute the loci of the (re)production of human relations and of enduring or ephemeral social bonds. In this sense, Tourism Security seeks to safeguard the physical, material, and emotional integrity of both residents and visitors, thereby fostering experiences and encounters that are fundamentally safe, meaningful, and enriching within the host–guest relationship.

Based on the foregoing discussion, the social content embedded in the proposed conceptualization of Tourism Security becomes evident. Such a perspective is essential for understanding the phenomena that contribute to the increase or persistence of violence and insecurity in both urban and rural areas of Brazil. Consequently, socioeconomic factors—particularly social inequalities—cannot be disregarded in analyses of this phenomenon. Social inequality, as a legacy of colonialism, remains present in numerous countries around the world, including Brazil, as emphasized in the Oxfam report *“As custas de quem? A origem da riqueza e a construção da injustiça no colonialismo”*. It reads as follows:

- (i) Colonialism and imperialism not only drained the natural resources of the Global South and left environmental destruction in their wake, but also entrenched poverty, leaving many people vulnerable and unable to respond effectively to climate change and climate-related disasters (Oxfam 2024).
- (ii) Wealth and political power continued to be concentrated among the wealthiest individuals in many countries of the Global South after independence, with extreme poverty and immense wealth separated by electric fences, golf courses, and other barriers. The inequality experienced by these countries today is, to a large extent, of colonial origin (Oxfam 2024).

Thus, the conception of Tourism Security proposed in this article is intrinsically linked to the recognition, affirmation, and reinterpretation of the origins and persistence of social inequalities in Brazil. These inequalities affect all sectors and dimensions of society and, consequently, influence the effectiveness and success of the Tourism Security Macro-Policy throughout the national territory.

Conceptualizing Tourism Security constitutes an intellectual challenge for academics and technical specialists working in the field of security because it transcends the boundaries of any single area of knowledge, professional domain, or sector-specific public policy. In this regard, the Tourism Security Macro-Policy currently being developed in Brazil, although still at an embryonic stage of implementation and consolidation, represents an important starting point for refining the concept itself and for fostering theoretical and methodological connections among scientific, technical, legal, institutional, and empirical forms of knowledge. Furthermore, it provides a foundation for the adoption of effective strategies aimed at enhancing Tourism Security throughout the country, particularly in destinations characterized by high visitor flows and/or exposure to imminent environmental risks.

Tourism Security Macro-Policy: The Case of Brazil

The 1988 Federal Constitution established the Federative Republic of Brazil as a Democratic State governed by the rule of law, intended to ensure the exercise of social and individual rights, liberty, security, well-being, development, equality, and justice as the supreme values of a fraternal, pluralistic, and prejudice-free society, founded on social harmony and committed, both domestically and internationally, to the peaceful resolution of disputes [...].

Within this context, Brazil is among the countries with the greatest and most diverse tourism potential in the world. At the same time, however, it faces significant structural and conjunctural challenges regarding the development of responsible tourism, including issues related to the safety of domestic tourism destinations (Brazil 2023a, 2023b, 2023c, 2023d).

In 2022, the Ministry of Tourism (MTur), through a series of thematic workshops involving representatives of the tourism industry and organizations from various fields of expertise, proposed the formulation of a Tourism Security public policy based on seven strategic areas of action: prevention of the sexual exploitation of children and

adolescents in tourism; tourism consumer relations; public security; tourist transportation; civil defense; health surveillance; and positive communication. This institutional effort was complemented by the demands and contributions of the Tourism Security Forum (SEGTur), established by the Ministry of Tourism in 2021.

This collective and representative effort resulted in the production of an institutional document entitled the Safe Tourism Program (PTS), a technical publication issued by the Ministry of Tourism that has since guided the development and implementation of Tourism Security initiatives organized around these seven strategic areas.

The Safe Tourism Program presents a legal and institutional framework that underpins the seven areas of action constituting Tourism Security. It identifies legislative and regulatory instruments that provide legitimacy to this technical document as the principal governmental guideline with the potential to formalize a Tourism Security Macro-Policy aimed at fostering effective actions and initiatives to promote safe tourism throughout the country. A key passage of the document refers directly to the core purpose of the Program, which is “to enhance the perception of safety in tourism activities in order to strengthen tourism in Brazil in a competitive and sustainable manner, thereby contributing to economic and social development” (Brazil 2022).

The document further states:

Among the lessons that the Covid-19 pandemic left for tourists and the tourism sector, the need for safety is perhaps one of the most significant. The global concern generated by the Covid-19 pandemic highlighted the importance of health protection. Nevertheless, it should not be overlooked that Tourism Security is a broader concept encompassing issues related to mobility, public security, consumer protection, the safeguarding of children and adolescents, human rights, gender equality, accessible information, the physical integrity of various stakeholders, food quality, among many others (Brazil 2022).

The Safe Tourism Program represents a watershed in the field of public policy and in the conceptualization of Tourism Security in Brazil. It advances the understanding of the dimensions that constitute safe tourism within the country's destinations by moving beyond the traditional focus on public security and incorporating new areas of governmental intervention and oversight. In doing so, it seeks to plan, organize, and foster managerial, technical, and operational strategies capable of enhancing the perception of safety in destinations located across Brazil's five macro-regions.

Within this context, further refinement of both the conceptual foundation and the Tourism Security Macro-Policy itself became necessary. In particular, it was essential to bring existing technical knowledge into dialogue with emerging theoretical contributions developed by higher education and research institutions in order to support the continued improvement of the policy framework.

Accordingly, the studies conducted by UFRN in partnership with the Ministry of Tourism through the projects "Brasil, essa é nossa praia!" and "Brasil, Turismo Responsável" resulted in an in-depth reflection on the concept of Tourism Security. Their objective was to qualify and expand the technical understanding of the concept officially adopted in Federal Government institutional documents by considering the following thematic dimensions: public security; prevention of the abuse and sexual exploitation of children and adolescents; business environment; urban and tourism

infrastructure; environment; sanitary and epidemiological safety; and reliable data systems (Brasil 2023a).

Consequently, UFRN researchers proposed a set of technical dimensions for Tourism Security, representing an important step toward refining both the understanding of the policy and its complexity within the Brazilian context. While these dimensions were informed by the content of the Safe Tourism Program (PTS), they were developed from a broader perspective in which Tourism Security is conceived as a cross-cutting, holistic, and multidimensional field. The conceptual synthesis of this framework is presented in Figure 1.

Figure 1. *Theoretical-Conceptual Basis of Tourism Security*



Source: Brasil (2023).

Technical and scientific knowledge production in the field of Tourism Security continues to evolve in Brazil and internationally through the efforts of public institutions, specialized practitioners, and academic researchers. This ongoing process of conceptual and methodological refinement reflects the growing recognition of Tourism Security as an urgent social, political, environmental, economic, and technological imperative for ensuring the sustainable, responsible, and secure development of tourism destinations.

Methodological Procedures

This study adopts an exploratory-descriptive research design with a qualitative approach, based on documentary and bibliographic analyses of the central theme under investigation. The results are presented and discussed using secondary data collected throughout the research process from institutional documents and information available in digital environments, considering the critical-reflective nature of the scientific inquiry.

The study drew upon technical documents produced by the Brazilian Ministry of Tourism, scientific literature on Responsible Tourism and Tourism Security available in academic repositories and digital platforms, as well as bibliographic references from the field of Applied Social Sciences that were theoretically and methodologically relevant to the investigation.

Empirical information was also collected from the Responsible Tourism Map, which compiles initiatives and best practices related to Tourism Security, Community-Based Tourism, and Sustainability across Brazil's five macro-regions. The platform is available at: <https://paineis.turismo.gov.br/sense/app/b3cabded-fdf5-4f0a-822a378c65934901/sheet/5589e238-576d-417c-a1a4-be6ec0087667/state/analysis>.

The Responsible Tourism Map is part of the Ministry of Tourism's Digital Hub platform (Figure 2), which hosts a wide range of services, information resources, and technical products derived from national tourism policies developed by the Federal Government.

Figure 2. *Digital Hub – Tourism Dashboards*



Source: <https://paineis.turismo.gov.br>.

In light of the foregoing, this study presents and discusses the findings concerning Brazil's emerging macro-policy for Tourism Security. Although still at an incipient stage of development, it already constitutes a significant and relevant initiative undertaken by the Federal Government and several bodies of the direct public administration, particularly the Ministries of Tourism and of Justice and Public Security. These institutions have implemented, either jointly or independently, policies aimed at mitigating the adverse effects of insecurity across the country's five macro-regions, especially in tourist destinations with the highest visitor flows, with a

view to strengthening perceptions of well-being and safety among individuals in both urban and rural public and private spaces.

Results Analysis and Discussion

The Safe Tourism Program constitutes an institutional milestone materialized through a technical document that compiles legal and regulatory information, as well as the objectives and guiding principles underpinning the development of actions and strategies aimed at promoting Tourism Security across Brazilian territory. From this perspective, a set of actions has been implemented nationwide under the inspiration of the PTS, representing an outgrowth of the fragmented sectoral policies in place until 2022. With the structuring and public release of the PTS, it is possible to argue that Brazil currently has a prototype of a Tourism Security macro-policy undergoing tactical and strategic experimentation, resulting from the PTS itself and from the actions and initiatives fostered by public and/or private institutions, as well as by representative entities of organized civil society, across the country's 26 states and the Federal District. Thus, the PTS emerges from the genuine need to conceive a Tourism Security macro-policy capable of producing nationwide effects, particularly in tourist destinations with the highest visitor flows, although the document itself essentially retains the features of a tactical-strategic program. Nevertheless, the document (illustrated in Figure 3) provides the foundational content for the establishment of such a macro-policy, given its complexity, scope, and the seven axes of action initially identified as necessary for enabling effective measures.

Figure 3. *Technical Document: Safe Tourism Program*



Source: Brasil (2022).

Concurrently with the development and launch of the Safe Tourism Program (PTS), the Ministry of Tourism has coordinated the projects "Brasil, essa é nossa praia!" and "Brasil, Turismo Responsável" at the national level in partnership with UFRN. These initiatives constitute a Federal Government action aligned with the National Tourism Plan and aimed at promoting Responsible Tourism through two principal lines

of action: one focused on the responsible management of tourism waterfronts and coastal areas, and another dedicated to Responsible Tourism more broadly.

Initially, the activities planned in 2019 focused on the production of scientific knowledge, the development of the Brazilian Responsible Tourism Map in a virtual environment, the preparation of educational and technical materials, and the organization and delivery of professional qualification extension courses through Distance Education (EaD) in strategic project areas, including Tourism Security, Sustainability, and Community-Based Tourism. These courses were designed for a diverse audience composed of tourism stakeholders and social actors involved in Brazil's tourism sector.

In addition, a Graduate Specialization Program in Responsible Tourism (*lato sensu*) was offered through the Distance Education modality. The program commenced on February 19, 2024, with an expected duration of 18 months and was specifically designed for state-level public tourism managers from across Brazil. In 2025, the e-book *Turismo Responsável: saberes, práticas e experiências* was published, bringing together extended abstracts derived from the final projects developed by students and faculty members participating in the specialization program.

In the field of Tourism Security, the partnership between the Ministry of Tourism and UFRN resulted in the production of a substantial body of technical and educational materials, which were made available through extension courses and digital platforms for individuals and institutions interested in the subject. Figure 4 presents the four principal technical products developed within this framework, encompassing the legal foundations, theoretical-conceptual discussions, principles and guidelines, institutional actions and strategies, as well as best practices and initiatives related to safe tourism implemented throughout Brazil.

This body of technical and educational material holds significant scientific and institutional relevance within the field of Tourism Security and public policy for the tourism sector. Prior to its development, the available knowledge on the subject was dispersed across academic and scientific publications, often remaining at an embryonic stage and lacking effective applicability to Brazil's diverse realities, particularly those of the country's most visited tourism destinations and destinations with the greatest international visibility.

In this context, one of the most relevant national publications, entitled *Public Security Planning and Management in Tourism: Theoretical Reflections and Case Studies* (electronic resource), published in 2021 and edited by Jean Henrique Costa, Marcello Tomé, Mozart Fazito, Wilker Nóbrega, and Ivenio Hermes, played a pioneering role in advancing discussions on the implications of public security for tourism and vice versa. The volume constitutes a unique and essential contribution to the emerging body of specialized literature on the subject in Brazil. Structured around cross-cutting themes from a holistic, complex, dynamic, and heterogeneous perspective, the book presents both theoretical reflections and national and international case studies addressing the tourism–public security nexus.

However, due to the period in which it was produced and published, the aforementioned work did not address the topic from the perspective of the technical-institutional conception of Tourism Security currently in force in Brazil, which has emerged from public policies developed by the Ministry of Tourism and its institutional

partners. Nevertheless, the publication remains fundamental for understanding the theoretical implications of safety and insecurity in tourism destinations and, consequently, for supporting the development and consolidation of a Tourism Security Macro-Policy consistent with the country's socioeconomic, cultural, and environmental complexity, as well as with the specific characteristics of Brazilian tourism destinations and territories.

Figure 4. *Technical Material on Responsible Tourism and Tourism Security*



Source: Brasil; UFRN (2023).

Following the country's new political context, and more specifically with the establishment of the Federal Government in 2023, the partnership between UFRN and the Ministry of Tourism was renewed in order to continue the activities originally developed under the project *"Brasil, essa é nossa praia!"*. From this renewed collaboration emerged the brand and project *"Brasil, Turismo Responsável"* (see official logo in Figure 5), whose priority objectives include: conducting a nationwide mapping of Indigenous communities; fostering planning and organizational strategies for the development of ethnotourism in Brazil; and producing technical materials related to Responsible Tourism and its implications within the Brazilian context.

Figure 5. *Official Logo of the Project "Brasil, Turismo Responsável"*



Source: Brazil (2023).

In 2024, the technical team of the project *"Brasil, Turismo Responsável"* carried out a broad range of activities involving planning, event organization and implementation, and scientific production. In addition, field visits were conducted to collect empirical data and gain firsthand knowledge of Indigenous territories located across Brazil's macro-regions. These initiatives generated substantial and significant outcomes within the field of Responsible Tourism.

Table 1 below presents the methodological framework used to identify the policies and strategic actions that have had the greatest impact on the structuring of Brazil's Tourism Security Macro-Policy. The table highlights the most significant results achieved through the projects and governmental initiatives promoted by the Ministry of Tourism.

Table 1. Actions That Impact Tourism Security in Brazil

Action/Initiative	Technical/Institutional Product	Result/Impact
Cadastur – Registry of Tourism Service Providers.	Online system and guidance documents established under Brazilian tourism legislation in 2008.	A registration system for individuals and legal entities operating in the tourism sector. Cadastur offers various benefits and opportunities to those registered and also serves as an important source of information for tourists. Its purpose is to promote the organization, formalization, and legalization of tourism service providers in Brazil through the registration of companies and sector professionals. Registration became mandatory in 2008 with the enactment of the General Tourism Law (GTL), Law No. 11,771/08, of September 17, 2008.
“Viage Legal”	Website created by the Ministry of Tourism in 2009.	“Viage Legal” is an initiative of the Ministry of Tourism designed to help tourists plan and carry out their trips by providing a wide range of information on transportation, travel documents, necessary precautions, tips, care measures, accident prevention, and general guidance on the precautions tourists should take before, during, and after travel.
Responsible, Clean, and Safe Tourism Seal Program.	Seal created in 2020.	The seal encourages consumers to feel safe when traveling and visiting places that comply with specific COVID-19 prevention protocols, positioning Brazil as a protected and responsible destination. To obtain the seal, companies and tour guides must be duly registered in Cadastur (Registry of Tourism Service Providers). This was the first stage of the Brazilian Tourism Recovery Plan, coordinated by the Ministry of Tourism, with the aim of reducing the impacts of the pandemic and preparing the sector for a gradual return to activities.
Tourist Consumer Publications.	Available in MTur's Content Centers from 2021 onward: - Air travel – before the trip; - Air travel – during the trip; - Air travel – arriving at the destination; - Traveling by car; - Safe tourism in natural environments.	Technical documents intended to guide consumers/ tourists through tips, informational materials, and an overview of consumer rights in order to provide access to useful and reliable information for tourists when purchasing services and planning travel in general.
Creation of the Code of Conduct aimed at preventing and combating the sexual exploitation of children and adolescents in tourism.	Ordinance establishing the Code of Conduct published in 2019.	Intended for the prevention of and response to the sexual exploitation of children and adolescents, to be adopted nationwide by companies and tourism service providers in accordance with the objectives of the National Tourism Policy, as established by Law No. 11,771 of September 17, 2008, and by the National Plan to Combat Sexual Violence Against Children and Adolescents 2013–2020, approved by Resolution No. 162 of January 28, 2014, of the National Council for the Rights of Children and Adolescents.
Creation of the Tourism Security Forum – SEGTur.	Ordinance published in 2021.	Established by MTur Ordinance No. 33 of October 20, 2021, it aims to increase the sense of safety in tourism through the integration of actors with relevant competencies at different levels of action. The Forum is composed of members of the Ministry of Tourism and includes the participation of specialists qualified to act in support of tourism security. The founding regulation provides for two annual meetings of the SEGTur Forum to address security needs in any of the areas of action of the Safe Tourism Program.
Holding of the 1st Tourism Security Forum meeting.	Meeting held in Brasília (DF) on February 1, 2022.	The meeting addressed the Public Security axis and focused on “the importance of public security data for the benefit of tourism security.” During the meeting, the first referrals for the development of actions in the segment

		were also discussed.
Safe Tourism Program.	Official launch document released on February 1, 2022.	Publication of an unprecedented technical document in Brazil, encompassing 59 actions divided into seven areas of action involving public security, the prevention of the sexual exploitation of children and adolescents in tourism, consumer relations in tourism, tourist transportation, civil defense, health surveillance, and positive communication.
Online platform of the Brazil Code of Conduct.	Facilitator's Manual – Project for the Prevention of the Sexual Exploitation of Children and Adolescents in Tourism, published in 2023.	A voluntary commitment instrument whose purpose is to guide and establish standards of ethical conduct for companies and tourism service providers, their employees and collaborators, who work directly or indirectly in the context of tourism so that, in the performance of their activities, they adopt measures to prevent and combat the sexual exploitation of children and adolescents.
National Responsible Tourism Meeting.	Event held on October 23 and 24, 2023, in Natal/RN. On that occasion, the official delivery of technical publications from the project “Brasil, essa é nossa praia!” took place.	A set of technical productions on Responsible Tourism in Brazil, with an emphasis on Tourism Security, the mapping of best practices in Tourism Security across the five macro-regions, and the publication of the results in institutional documents and digital environments.
Accessible Tourism Program.	Launched in 2012 by the Ministry of Tourism, it brings together a set of technical materials on Accessible Tourism, namely: <ul style="list-style-type: none"> • Profile of Tourists with Disabilities. • Mapping of Accessible Attractions, Enterprises, Products, and Services in Brazil. • Mapping of Best Practices in Accessible Tourism. • Tips for Providing Good Service to Tourists with Disabilities. 	The Accessible Tourism Program consists of a set of actions to promote social inclusion and access to tourism activities for people with disabilities or reduced mobility, enabling the use of tourism services, buildings, and facilities with safety and autonomy. By fostering the inclusion of people with disabilities or reduced mobility, the Program aligns with federal government actions and initiatives aimed at defending and ensuring dignified living conditions, full participation and inclusion in society, and equal opportunities for all people with disabilities, including in tourism activities. In this sense, the Program is directed at public and private managers, frontline tourism professionals, tourism enterprises, tourist destinations, and people with disabilities or reduced mobility (tourists and non-tourists).
Navseg App – Safe Navigation.	Free app launched on September 13, 2023.	Created through a partnership between MTur and the Brazilian Navy, the application uses the mobile phone network signal to track in real time the position of vessels using the platform, allowing all data to be monitored by the nearest Harbor Master's Office throughout the navigation period. In the event of a need for assistance or rescue, the functionality makes it easier to identify and locate the vessel in danger and dispatch aid.

Source: authors of Brasil and UFRN (2023).

The table illustrates several recent initiatives promoted by the Ministry of Tourism and its institutional partners to enhance and democratize access to information related to Tourism Security in Brazil. These initiatives are aligned with the seven strategic areas of the Safe Tourism Program (PTS), although some predate the creation of the Program itself.

Particular attention should be given to the development of the Brazilian Responsible Tourism Map, which compiles best practices in Tourism Security implemented across diverse regions and territorial contexts of the country. The platform includes initiatives associated with the strategic areas of the PTS, as well as actions related to Sustainability and Community-Based Tourism. Examples of these initiatives are presented in Figures 6 and 7 below.

Intersectoral and/or multisectoral public policies are implemented at different territorial scales through the actions of state and municipal governments, with particular emphasis on the establishment of tourism policing units in regions and destinations that receive high visitor flows. Specialized police stations, technical and technological resources, trained human capital, public security intelligence systems,

and specific legislation constitute the most common elements currently associated with Tourism Security. However, these measures do not fully meet the guidelines of the Safe Tourism Program (PTS) or the technical recommendations developed by researchers involved in the projects "Brasil, essa é nossa praia!" and "Brasil, Turismo Responsável".

Within this institutional, tactical, and strategic context, the development of a comprehensive Tourism Security Macro-Policy capable of addressing the full range of social, economic, political, scientific, and environmental demands requires a collective effort by public institutions operating across different levels of governance within the three branches of government (Executive, Legislative, and Judicial). Such an approach must take into account the needs of tourists, tourism service providers, and resident populations alike.

Figure 6. Online content of the Brazilian Responsible Tourism Map



Source: Ministério do Turismo, disponível em: <https://painéis.turismo.gov.br/sense/app/6c7ee682-c424-4b78-b98a-5bf04e66309f/sheet/5589e238-576d-417c-a1a4-be6ec0087667/state/analysis>

Figure 7. Good Practices for Tourism Security in Brazil



Source: Ministério do Turismo, disponível em: <https://painéis.turismo.gov.br/sense/app/b3cabded-fdf5-4f0a-822a-378c65934901/sheet/344fb0ee-776d-44f6-94e5-405c3c625638/state/analysis>

The Tourism Security Macro-Policy represents a powerful complementary framework that operates alongside existing policies in the areas of public security;

prevention of the abuse and sexual exploitation of children and adolescents; consumer relations; urban and tourism infrastructure; sanitary and epidemiological safety; environmental protection and climate emergency response; and reliable data systems (Mchunu NT 2025).

At the same time, this macro-policy must acknowledge the effects of social inequalities and the pervasive criminal activity that continues to affect the country and that manifests itself across both tourism and non-tourism territories. In this regard, effective action by the Brazilian State, in coordination with the national tourism industry and civil society, through the adoption of appropriate legal mechanisms, adequate physical and technological infrastructure, specialized human capital, and an integrated intelligence network, may gradually contribute to improving and democratizing perceptions of safety among those who live, work, and travel throughout the country, including visitors, tourism service providers, and residents.

Final Considerations

The analysis of Brazil's Tourism Security Macro-Policy demonstrates that, despite the existence of an institutional effort involving a substantial number of public organizations—particularly the Ministry of Tourism and its partner institutions—actions continue to be developed in a diffuse and insufficiently integrated manner. Consequently, responsibility for implementing strategies and initiatives remains largely concentrated at the level of the Federative Units and their respective municipalities, with a predominant focus on public security.

The strategic areas proposed by the Safe Tourism Program constitute the starting point for structuring a macro-policy capable of integrating different federal and state government institutions, based on the country's existing legal framework and the good practices already identified across Brazil's five macro-regions.

A considerable body of robust and officially endorsed documents is available to guide the development of a Tourism Security Macro-Policy, taking into account both the strategic areas of the Safe Tourism Program and the technical materials produced within the scope of the projects "Brasil, essa é nossa praia!" and "Brasil, Turismo Responsável", as well as the dimensions and variables identified in the scientific literature.

Initiatives such as the systematization and dissemination of Tourism Security data through the Brazilian Responsible Tourism Map are legitimate and highly relevant. Nevertheless, they are insufficient on their own to mitigate the adverse effects of insecurity throughout the country, particularly in destinations with high visitor flows and in Brazil's major urban centers.

Public security infrastructure and specialized tourism policing constitute strategic and essential measures for enhancing perceptions of safety in tourism destinations, as evidenced by the Brazilian Responsible Tourism Map. However, such measures alone are insufficient to address the multiple and complex demands associated with tourism, including transportation and mobility, environmental sustainability, consumer relations, and civil defense, among others.

Consequently, the formulation of a macro-policy characterized by broad, democratic, and representative participation, involving governmental and non-governmental governance bodies as well as the agents, operators, and stakeholders engaged in Brazil's tourism sector, emerges as an imperative condition. Such an approach must recognize regions, cities, and territories as spaces of residence, work, lived experiences, social interaction, and exchange that coexist with the dynamics of both domestic and international tourism.

Therefore, this article constitutes a starting point for future discussions and for the further development of the conceptual foundations and technical-operational dimensions of Tourism Security. It also seeks to contribute to theoretical-methodological propositions and to the production of knowledge capable of improving quality of life and collective well-being through the implementation of actions aligned with the Tourism Security Macro-Policy proposed in this reflection.

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Beyond Sustainability: Regenerative Pathways in Hospitality and Tourism Development in Small-Scale Destinations

By Ivanka Lulcheva & Krasimir Aleksandrov[‡]*

This paper examines the transition from sustainable to regenerative tourism development with a focus on hospitality and tourism in small-scale destinations. The study investigates the theoretical foundations of regenerative tourism and evaluates its practical application through the case study of Mineralni Bani, Bulgaria. The research applies a mixed-methods approach combining literature analysis, field observations, surveys among tourists and local residents, and assessment of tourism infrastructure and environmental conditions. The findings demonstrate that regenerative tourism can contribute to ecosystem restoration, community engagement, economic resilience, and enhanced visitor experiences. The study identifies both opportunities and challenges associated with the implementation of regenerative tourism practices in spa and wellness destinations. Particular attention is paid to the role of local communities, environmental management, tourism diversification, and regenerative hospitality practices. The paper concludes that regenerative tourism represents a transformative pathway for future hospitality and tourism development beyond traditional sustainability models and provides practical recommendations for the strategic development of small-scale destinations.

Keywords: *regenerative tourism, hospitality development, spa tourism, wellness tourism, small-scale destinations*

Introduction

Tourism has established itself as one of the most dynamic sectors of the global economy, generating economic growth, employment, and regional development opportunities. However, contemporary tourism is increasingly challenged by climate change, biodiversity loss, excessive resource consumption, and growing social inequalities. Traditional tourism models focused primarily on economic growth are no longer sufficient to address these complex challenges. Although sustainable tourism has contributed significantly to reducing negative environmental impacts, the current global context requires a more transformative approach.

While sustainable tourism seeks to minimize harm, regenerative tourism aims to restore, revitalize, and enhance ecosystems, local communities, and cultural heritage through tourism activities. Regenerative approaches focus on creating net positive impacts by integrating environmental restoration, community participation, local economic resilience, and visitor engagement.

Small-scale destinations are particularly suitable for the implementation of regenerative tourism due to their flexibility, authenticity, lower levels of

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overdevelopment, and stronger interconnections between local communities and natural resources. Such destinations can more easily integrate regenerative practices into tourism planning and management while preserving local identity and ecosystem balance.

This study examines the transition from sustainability toward regenerative development in hospitality and tourism with a specific focus on small-scale destinations. The research explores how regenerative principles can be applied to improve environmental, socio-cultural, and economic outcomes in tourism. The spa destination of Mineralni Bani in Southern Bulgaria is used as an illustrative case study within a broader international context.

The research evaluates the destination's natural resources, tourism infrastructure, environmental impacts, and the attitudes of local residents and visitors toward tourism development. In addition, the study examines the theoretical foundations of regenerative tourism and identifies practical opportunities and limitations for implementing regenerative models in hospitality and tourism.

The objective of this study is to examine the potential for regenerative tourism development in a small-scale spa destination and to evaluate how regenerative principles may contribute to environmental stewardship, community well-being, cultural preservation, and economic resilience. Using Mineralni Bani (Bulgaria) as a case study, the paper explores both opportunities and barriers associated with the implementation of regenerative tourism and hospitality practices.

Literature Review

The concept of regenerative tourism has attracted increasing academic attention during the last decade. Scholars argue that conventional tourism development models are unable to adequately respond to contemporary environmental and social crises. As a result, tourism researchers increasingly explore alternative approaches that move beyond traditional sustainability frameworks. Tourism is increasingly seen as a positive force for the conservation of cultural heritage, which can be used to create tourist resources, educate the population and influence policies aimed at preserving it (Brandão et al. 2024).

The origins of regenerative thinking can be traced to ecological sciences and regenerative agriculture, where regeneration refers to the capacity of living systems to renew and restore themselves after disturbance. Regenerative principles were later adopted in fields such as architecture, urban planning, economics, and organizational management. In tourism, regenerative thinking emphasises the creation of tourism systems that contribute positively to ecosystems and communities.

(Bellato et al. 2022) define regenerative tourism as a transformative process that integrates environmental restoration, community participation, and systemic thinking. According to the authors, regenerative tourism should not be understood as a specific tourism product but rather as a holistic framework for destination development. Bellato and Pollock (2023) further emphasize that regenerative tourism requires a fundamental change in the relationship between tourism, society, and nature.

Dredge (2022) argues that regenerative tourism involves a shift in values and mindsets. The author highlights that regeneration cannot be achieved solely through

technical environmental solutions. Instead, regeneration requires collaborative governance, ethical responsibility, and long-term commitment to community well-being and ecological resilience.

Cave et al. (2022) focus on the economic dimensions of regenerative tourism. Their work emphasizes the importance of diverse local economic practices and the reduction of dependency on extractive tourism models. Regenerative tourism therefore supports circular economies, local entrepreneurship, and socially inclusive development.

The COVID-19 pandemic additionally intensified debates regarding tourism transformation. Papanikos (2022) discusses how tourism-dependent economies experienced significant disruptions during the pandemic period. The crisis revealed the vulnerability of destinations dependent on mass tourism and strengthened arguments for more resilient and diversified tourism systems.

Regenerative tourism is closely connected with the concept of nature-positive tourism. Jones (2024a) explains that tourism should contribute actively to ecosystem restoration rather than simply reducing environmental damage. Nature-positive tourism emphasizes biodiversity conservation, habitat restoration, sustainable land use, and community engagement in environmental management.

Jones (2024b) further explores regenerative tourism practices in the United Kingdom and demonstrates how local communities and tourism enterprises can collaborate to improve destination resilience and sustainability. The author highlights that regenerative tourism often emerges more successfully in smaller destinations where local stakeholders maintain stronger relationships with natural and cultural resources.

Researchers also examine the role of hospitality enterprises in regenerative transformation. Sharma and Tham (2023) identify both opportunities and challenges related to regenerative hospitality. The authors argue that tourism businesses should move beyond green marketing and adopt comprehensive operational changes, including renewable energy systems, waste reduction, local sourcing, and employee engagement.

Fusté-Forné and Hussain (2022) emphasize the importance of community participation and cultural identity in regenerative tourism development. Their case study from New Zealand demonstrates that regeneration depends on local knowledge, indigenous perspectives, and place-based tourism experiences.

In addition to environmental restoration, regenerative tourism increasingly focuses on social and psychological dimensions of tourism experiences. Wellness tourism, spa tourism, nature-based therapies, and slow tourism have become increasingly popular among tourists seeking authentic and meaningful travel experiences. Such trends create favourable opportunities for small-scale destinations with rich natural and cultural resources. Considering this, according to Buhalis and Investini (2025) the approach to tourism should be tailored to the social-ecological systems essential qualities and complexity level.

The relationship between regenerative tourism and the circular economy has also become an important area of academic discussion. Circular economy principles support resource efficiency, waste reduction, recycling, and local production systems. In tourism, circular approaches can contribute to reducing environmental impacts while strengthening local economies. Another important issue concerns the measurement of regenerative tourism outcomes. Falatoni, Schaffer, and Dzakpasu (2016) emphasize the importance of tourism indicators and integrated assessment

frameworks. Measuring regenerative impacts remains challenging because regeneration involves complex interactions between environmental, social, and economic systems. The literature therefore demonstrates that regenerative tourism represents an interdisciplinary and evolving field. Although the concept continues to develop theoretically, practical implementation remains limited in many destinations. This creates the need for empirical studies examining regenerative opportunities in specific local contexts.

The present study contributes to this emerging literature by examining regenerative tourism potential in Mineralni Bani, Bulgaria. The research additionally contributes to the limited body of academic studies focusing on regenerative tourism development in Eastern Europe and Balkan spa destinations. By integrating theoretical perspectives with empirical evidence from a small-scale destination, the paper expands current discussions regarding regenerative tourism implementation, hospitality transformation, and destination resilience. The research combines theoretical perspectives with empirical analysis of tourism development, visitor attitudes, local perceptions, and environmental opportunities in a small-scale spa destination.

Despite increasing academic interest in regenerative tourism, empirical studies remain concentrated in destinations located in New Zealand, Australia, Western Europe, and North America. Research examining regenerative tourism in Eastern European spa destinations is still limited. Furthermore, while hospitality enterprises are increasingly recognized as important actors in regenerative transformation, relatively few studies investigate the relationship between regenerative tourism and hospitality development in small-scale wellness destinations. Existing literature remains largely conceptual, while destination-level empirical assessments continue to be scarce. This study addresses these gaps by examining the regenerative tourism potential of Mineralni Bani, Bulgaria, and contributes evidence from an underrepresented geographical context.

From Sustainable to Regenerative Tourism: the growing environmental and social pressures associated with tourism development have stimulated the evolution of tourism theories and management models (Jones 2024a; Jones 2024b). Sustainable tourism emerged as a response to the need to balance economic development with environmental protection and social responsibility. However, sustainability often focuses on reducing negative impacts without necessarily improving the conditions of ecosystems and communities.

Regenerative tourism represents an evolutionary step beyond sustainability (Bellato et al. 2022, Bellato and Pollock 2023). It seeks not only to preserve but also to restore natural systems, strengthen local communities, and generate long-term positive impacts. The regenerative approach recognizes the interdependence between ecological, social, cultural, and economic systems. Bellato, Frantzeskaki, and Nygaard (2022) define regenerative tourism as an approach that actively contributes to ecosystem restoration and community well-being. Similarly, Bellato and Pollock (2023) emphasize that regenerative tourism requires systemic transformation and collaboration among stakeholders.

Regeneration originates from biological systems and refers to the capacity to restore and renew living systems. In tourism, regeneration involves restoring degraded ecosystems, revitalizing local culture and traditions, and creating resilient local economies. The distinction between traditional, sustainable, and regenerative tourism models can be summarized as follows:

Table 1. Comparison between Traditional and sustainable Tourism Models

Aspect	Traditional Tourism	Sustainable Tourism	Regenerative Tourism
Main goal	Economic growth	Reducing negative impacts	Creating net positive impacts
Approach to nature	Resource exploitation	Resource protection	Ecosystem restoration
Economic model	Linear	More efficient linear model	Circular and restorative
Community role	Passive beneficiary	Stakeholder participation	Active co-creator
Visitor role	Consumer	Responsible tourist	Participant in regeneration

Source: Authors

Regenerative tourism therefore requires a holistic and integrated approach involving local communities, businesses, visitors, researchers, and public institutions (Dredge 2022, Cave et al. 2022). Hospitality enterprises play a critical role in the implementation of regenerative tourism principles (Sharma and Tham 2023). Hotels and tourism businesses are increasingly expected to move beyond resource efficiency toward active contributions to environmental restoration and community development. Regenerative hospitality extends beyond minimizing negative environmental impacts and seeks to create positive environmental, social, cultural, and economic outcomes for destinations and local communities. Key regenerative practices include the adoption of renewable energy systems, circular resource management, water and waste reduction and reuse, support for local food systems and supply chains, biodiversity restoration through green spaces and organic gardens, integration of local culture and traditions into tourism products, biophilic architecture and design, training and engagement of local employees, and the provision of educational activities for guests.

In addition to environmental and economic considerations, regenerative hospitality places strong emphasis on emotional and social well-being. Contemporary tourists increasingly seek authentic experiences, wellness-oriented travel, and meaningful connections with local communities and natural environments. As a result, hospitality enterprises are encouraged to create experiences that foster deeper relationships between visitors, destinations, and local cultures.

The growing influence of digital technologies, social media platforms, and changing consumer preferences has accelerated demand for wellness, spa, and nature-based tourism experiences. These trends create favorable conditions for the development of regenerative tourism, particularly in destinations characterized by rich natural resources, cultural heritage, and strong community identity.

Small-scale destinations possess several characteristics that support regenerative tourism development. These include preserved natural environments, strong local identity, close relationships between residents and tourism providers, opportunities for personalized tourism experiences, and relatively low levels of mass tourism and overtourism (Fusté-Forné and Hussain 2022). Such characteristics create conditions

that facilitate community participation, authentic visitor experiences, and stronger stewardship of local resources.

However, small-scale destinations also face a number of challenges that may hinder regenerative transformation. Common constraints include limited infrastructure, insufficient investment, weak destination management structures, and restricted international visibility. These limitations can reduce competitiveness and constrain the implementation of innovative tourism practices.

Consequently, the transition toward regenerative tourism requires a coordinated and long-term approach involving strategic planning, stakeholder collaboration, infrastructure development, institutional support, and capacity building among local actors. Successful regenerative transformation depends on the active participation of tourism businesses, local communities, public authorities, and other stakeholders working collectively toward shared environmental, social, cultural, and economic objectives.

Methodology

This study investigates the current state of tourism and hospitality development in the small-scale spa destination of Mineralni Bani, located in Southern Bulgaria. The research examines the interactions between tourism activities, local communities, hospitality enterprises, and the natural environment, with particular emphasis on the regenerative development potential of the destination and opportunities for implementing regenerative tourism practices.

A mixed-methods research design was employed, combining quantitative and qualitative approaches to provide a comprehensive assessment of regenerative tourism opportunities and challenges. The study adopts a regenerative tourism research framework integrating systems thinking, ecosystem assessment, participatory planning, and community-centered evaluation. Unlike conventional tourism studies that primarily assess tourism impacts, the regenerative approach focuses on how tourism can actively contribute to ecosystem restoration, community well-being, cultural revitalization, and economic resilience.

The research was conducted between 2022 and 2024 and follows a case study methodology, which is particularly suitable for examining complex interactions between tourism systems and destination-specific development processes.

Mineralni Bani Municipality was selected as the case study based on several criteria: the presence of unique mineral-water resources and long-established balneological traditions; preserved natural and cultural heritage assets; opportunities for spa, wellness, rural, cultural, and nature-based tourism development; favourable geographic location and accessibility; limited scientific research on regenerative tourism in the region; and significant potential for sustainable and regenerative transformation.

The destination represents a typical small-scale spa tourism area characterized by strong natural and cultural assets but facing challenges associated with infrastructure modernization, destination management, international visibility, and tourism product diversification. Data collection combined documentary analysis, field observations, surveys, semi-structured interviews, and stakeholder consultations. Primary empirical

data were collected from four stakeholder groups: accommodation providers, tourists and visitors, local residents, and representatives of local institutions and community organizations.

A structured questionnaire was administered to visitors staying in accommodation establishments and visiting major tourism attractions within the destination. Convenience sampling was employed due to the absence of a comprehensive visitor database and the exploratory nature of the study. A total of 131 valid tourist questionnaires were collected.

Local residents were selected through purposive sampling to ensure representation across different age groups, occupations, and residential areas within the municipality. A total of 111 valid resident questionnaires were obtained. Semi-structured interviews were conducted with accommodation providers, municipal representatives, tourism practitioners, and community stakeholders. These interviews explored perceptions of tourism development, regenerative opportunities, governance challenges, and future development priorities.

Field observations and destination assessments were undertaken to evaluate tourism infrastructure, environmental quality, public spaces, natural resource management practices, accessibility, visitor facilities, and opportunities for regenerative tourism implementation. The survey instruments were developed based on previous tourism sustainability and regenerative tourism studies and adapted to the specific characteristics of spa and wellness destinations.

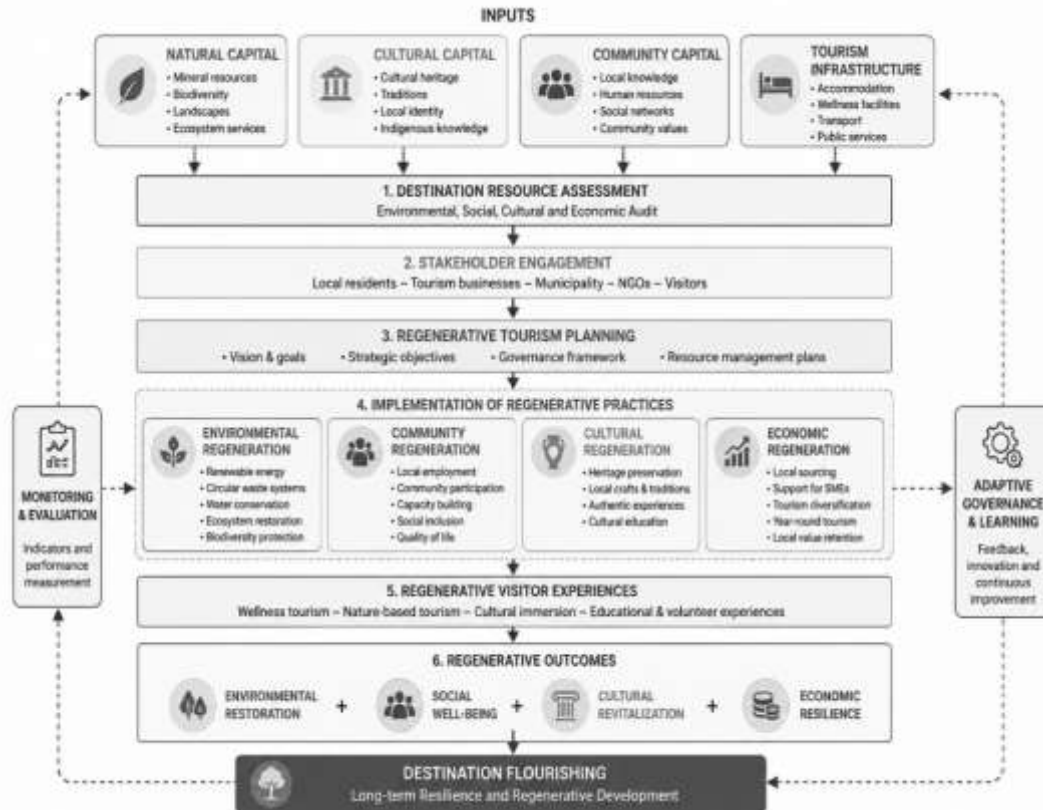
The questionnaires contained both closed-ended and open-ended questions and were organized into five sections: visitor profile and travel characteristics; tourism motivations and behavioural patterns; visitor satisfaction and destination image; environmental perceptions and sustainability attitudes; and regenerative tourism opportunities and future development priorities. Most attitudinal variables were measured using five-point Likert scales ranging from one (“strongly disagree”) to five (“strongly agree”). Prior to implementation, the questionnaires were reviewed by tourism researchers and destination-management experts to ensure content validity. A pilot test involving 20 respondents was conducted to assess question clarity, relevance, and reliability. The study utilized a regenerative tourism assessment framework adapted from contemporary regenerative tourism literature. The framework extends traditional sustainability assessment by evaluating the capacity of tourism to create net-positive environmental, social, cultural, and economic outcomes.

The assessment incorporated four dimensions. The ecological regeneration dimension included biodiversity conservation, ecosystem quality, water-resource management, renewable energy adoption, waste reduction practices, and ecosystem restoration opportunities. The community regeneration dimension examined community participation in tourism planning, local employment opportunities, stakeholder engagement, social cohesion, and community well-being. The cultural regeneration dimension focused on the preservation of cultural heritage, maintenance of local traditions, destination authenticity, and support for local crafts and cultural activities.

The economic regeneration dimension assessed local sourcing practices, support for local entrepreneurship, tourism diversification, year-round tourism development, and the retention of tourism revenues within the local economy. The indicators were assessed through survey responses, stakeholder interviews, field

observations, and documentary evidence. To support the assessment and interpretation of findings, a Regenerative Tourism Development Model for Small-Scale Destinations was developed (Figure 1).

Figure 1. *Regenerative Tourism Development Model for Small-Scale Destinations*



Source: Developed by the authors, based on regenerative tourism literature and empirical findings.

The model conceptualizes tourism as a catalyst for regeneration through interactions among natural and cultural capital, community stewardship, regenerative tourism experiences, and regenerative hospitality practices. These interactions generate environmental restoration, social well-being, cultural revitalization, and economic resilience, ultimately contributing to destination flourishing and long-term sustainability.

The model consists of six interconnected stages: Destination Resource Assessment, Stakeholder Engagement, Regenerative Tourism Planning, Implementation of Regenerative Practices, Regenerative Visitor Experiences, and Regenerative Outcomes and Destination Flourishing. Continuous monitoring, stakeholder collaboration, adaptive governance, and organizational learning function as feedback mechanisms supporting long-term regenerative transformation. Quantitative data were analyzed using descriptive statistical techniques, including frequency distributions, percentages, means, and cross-tabulations. Qualitative data obtained from interviews, field observations, and open-ended survey responses were analyzed using thematic content analysis. Themes were identified through iterative coding and categorized according to the four regenerative dimensions of the assessment framework.

The analysis focused on identifying the strengths and weaknesses of the destination, regenerative tourism potential, relationships between tourism and community well-being, environmental and socio-cultural impacts, and opportunities and barriers to regenerative transformation. The integration of quantitative and qualitative findings enabled triangulation of results and enhanced the reliability and validity of the study.

To improve the credibility of the findings, methodological triangulation was employed by combining surveys, interviews, field observations, and documentary analysis. The preliminary findings were presented to local stakeholders, including residents, tourism businesses, municipal representatives, and tourism experts. Feedback obtained during these consultations was incorporated into the final interpretation of results. This participatory validation process ensured that the findings accurately reflected local realities and strengthened the practical relevance of the recommendations for regenerative tourism development in Mineralni Bani. By adopting a regenerative research framework, the study moves beyond traditional assessments of tourism impacts and evaluates how tourism can actively contribute to ecosystem renewal, community development, cultural revitalization, economic resilience, and long-term destination well-being.

Results and Discussion

Mineralni Bani possesses valuable natural resources that create significant potential for regenerative tourism development. The destination is particularly known for its mineral springs, which have been used since Roman times for healing and therapeutic purposes. The mineral water is hyperthermal and characterized by a unique chemical composition with proven therapeutic properties, making the destination an important center for balneological treatment, rehabilitation, and wellness tourism.

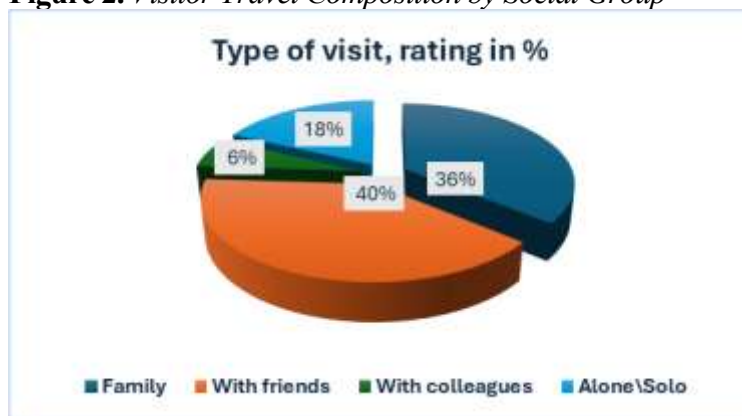
In addition to its mineral-water resources, the area benefits from preserved natural landscapes, favorable climatic conditions, rich biodiversity, forest ecosystems, archaeological sites, and cultural heritage attractions. The destination also offers opportunities for rural tourism and nature-based experiences, which further enhance its attractiveness and support the implementation of regenerative tourism principles.

These natural and cultural assets provide a strong foundation for developing tourism models that contribute not only to economic growth but also to environmental conservation, cultural preservation, and community well-being. However, the regenerative use of mineral resources requires careful planning and management to prevent overexploitation and environmental degradation. Consequently, sustainable water management, ecosystem protection, and biodiversity conservation must become central components of future tourism development strategies.

The destination also has considerable opportunities to diversify its tourism offer by combining spa and wellness tourism with cultural tourism, rural tourism, wine tourism, eco-tourism, and nature-based therapeutic experiences. Such diversification can enrich visitor experiences, reduce tourism seasonality, attract new market segments, and strengthen the resilience of the local economy. The current tourism development of Mineralni Bani is primarily based on its mineral-water resources and established spa tourism traditions. The destination has developed a tourism profile centered on health, wellness, and rehabilitation services, which continues to

attract visitors seeking therapeutic and recreational experiences. At the same time, the presence of natural and cultural attractions creates opportunities for expanding tourism activities beyond traditional spa tourism and supports the transition toward a more diversified and regenerative tourism model.

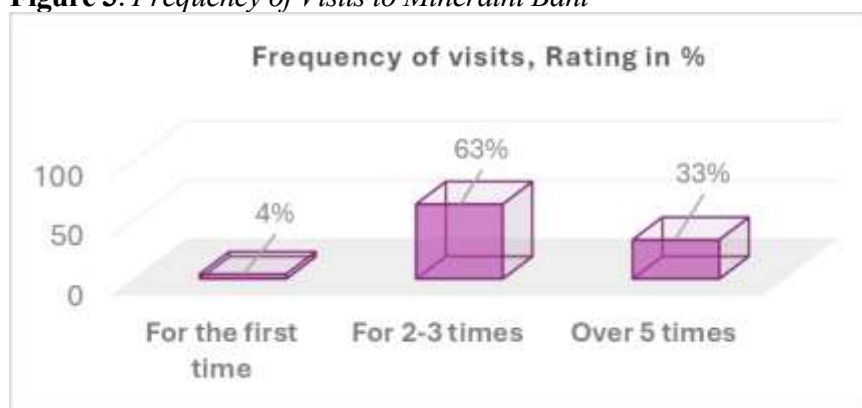
Figure 2. Visitor Travel Composition by Social Group



Source: Author's research (2022–2024).

64% of the respondents are over 30 years old, while people under 25 account for 8.34% of the total. The resort is visited least frequently by individuals over 70 years old and those under 24, likely due to preferences for other tourist destinations that offer specialized forms of tourism tailored to their age-specific needs. A total of 36% of the surveyed tourists visit the resort with their families, while the largest proportion visit the destination with friends (Figure 2). Additionally, 58% of visitors come for balneological treatment.

It can be concluded that the resort village is preferred primarily as a place for balneological treatment, after-treatment and rehabilitation. 4% of the visitors have as their purpose of visiting getting acquainted with the archaeological sites in the region. 2% are tourists who spend the night in hotels and go on a hike to the local natural landmark - Mount Aida. In recent years, the trend of weekend tourism has been confirmed, with visitors predominantly from the city of Haskovo, the city closest to the studied destination, which is also a regional center - 68% of the total number of weekend tourists. These are mainly families with small children, as well as groups of friends of 2-4 people. The results indicate that the destination is primarily preferred for social and family-oriented tourism experiences. The relatively high percentage of family visitors supports the development of wellness, recreation, and family-focused tourism products.

Figure 3. *Frequency of Visits to Mineralni Bani*

Source: Author's research data (2022–2024).

From the results of the survey conducted, we can summarize that the tourist flow is concentrated mainly on weekends, with the guests being mostly Bulgarian citizens over the age of 30, who arrive with their families from the nearby cities of Haskovo, Dimitrograd and Kardzhali. Half of them visit the spa centers of the hotel accommodation base in the Mineralni Bani destination accompanied by their children, which emphasizes the need to create family-oriented services and facilities, which is also consistent with the results of a survey conducted by the Mineralni Bani municipality itself. Providing an opportunity for the development of a higher quality and specialized tourist product is determined by the fact that among the tourists there is a significant share of individuals with their own business or in management positions, who have a higher standard of living and are inclined to spend more on quality services. The data in Figure 3 shows that 33% of the surveyed visitors stay in the resort from 5 to 8 times. These are mainly people from the age groups of 50-65 years. They are regular or “loyal” customers (visitors). 43% of them come to the resort with their family. People who visit the resort for the first time are 4% of the total number of visitors. The fact that over the past four years there have been 2-3% new visitors visiting the resort village for the first time annually testifies to the fact that the resort is popular and there is a constant interest in it.

In Bulgaria, there is a trend of shortening the average time spent on rest and vacations, while the number of trips and vacations per calendar year is increasing. Nearly half of the visitors to the resort village of Mineralni Bani stay there for seven days, which is the amount paid by the National Health Insurance Fund, which confirms the specialization of the resort village, namely: balneotherapy and SPA procedures. The high percentage of repeat visitors demonstrates strong customer loyalty and confirms the attractiveness of the destination for health and wellness tourism.

Table 2. Relationship between Length of Stay and purpose of Visit

Purpose of Visit	1 Day	2–3 Days	7 Days	10–15 Days	16–20 Days
Rest and recreation	–	2.0%	56.5%	35.1%	6.4%
Balneotherapy and SPA	–	–	49.5%	40.5%	10.0%
Weekend tourism	31.1%	68.9%	–	–	–
Sports activities	18.4%	75.1%	6.5%	–	–
Local culture visits	35.0%	62.5%	2.5%	–	–
Archaeological tourism	38.1%	58.5%	3.4%	–	–
Special events	43.5%	52.5%	4.0%	–	–

Source: Authors

From the data in Table 2, the main motive for visiting the Mineralni Bani resort is balneotherapy and SPA procedures. More than half of the visitors for SPA procedures and balneotherapy (56.5%) stay in the destination for seven days. They come with the medical direction, for health reasons. These are mainly people aged 35-50-65 years. For a one-day stay in the resort, visitors from the age group up to 24 years and from the age group 25-40 years predominate. They are mainly for weekend tourism and sports. Visits to specialized events within one or two-three days are mainly carried out by visitors from the younger age groups. The municipality organizes festivals and days of mineral water, vineyards and wine, sports events and thus attracts visitors to the resort village. Balneotherapy is the main motive and reason for choosing the resort village as a destination for rest, relaxation and medical procedures. All other visits to the resort village are for secondary reasons and reasons. 33% of respondents reported that they visit the resort regularly, annually, and do not need advertising or assistance from a travel agency.

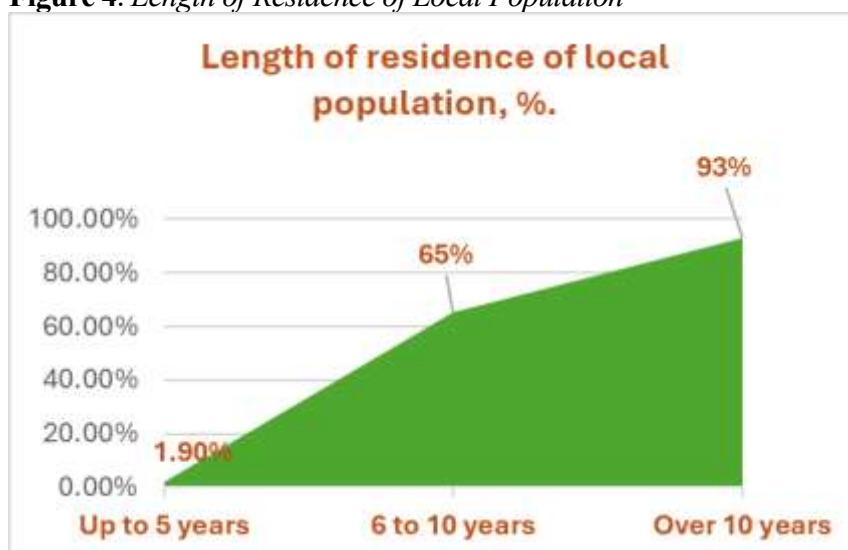
Despite these positive trends, the tourism sector in Mineralni Bani has not yet realized its full potential. There is a lack of a comprehensive development strategy that integrates all aspects of regenerative development – ecological, social and economic. Another direction that can contribute to the sustainable development of the hotel industry and tourism in the resort village is the mitigation of seasonal use of the resort and the services offered therein. This requires strengthening the advertising of the resort and, of course, increasing the quality of service to tourists. The infrastructure needs modernization and expansion, which will create conditions for balancing tourist flows throughout the year, and to avoid congestion during weekends and the summer season. Balneological and wellness tourism generates the longest stays in the destination, while cultural and event-related tourism are primarily associated with short-term visits. This demonstrates the importance of spa tourism as the core tourism product.

The destination has a well-established accommodation base that includes hotels, family-run hotels, guesthouses, and private accommodation facilities. Tourism demand is concentrated primarily on balneological treatment, spa and wellness services, weekend tourism, and family-oriented travel. The survey results indicate that most visitors are Bulgarian citizens, predominantly over the age of 30. Most

tourists travel with family members or friends, and a considerable proportion of visitors return to the destination regularly, demonstrating a high level of visitor loyalty. Balneological treatment and SPA procedures represent the main motivation for travel, with many visitors staying for approximately seven days as part of health treatment programs supported by the National Health Insurance Fund. The findings also reveal several positive trends, including the growth of weekend tourism, increasing family-oriented travel, rising demand for wellness experiences, and a strong pattern of repeat visitation. These trends indicate the continuing attractiveness of Mineralni Bani as a health and wellness destination.

Despite these positive developments, several limitations continue to affect the competitiveness of the destination. These include underdeveloped infrastructure, insufficient diversification of tourism products, limited integration of cultural attractions into tourism packages, weak destination management structures, inadequate international marketing efforts, and the absence of an integrated regenerative tourism strategy. Collectively, these challenges reduce visitor engagement, limit opportunities to extend the average length of stay, and constrain the overall economic potential of the destination. The analysis of visitor and resident attitudes reveals generally positive perceptions of tourism development in Mineralni Bani. Visitors value the destination's natural environment, mineral-water resources, peaceful atmosphere, and opportunities for health and wellness activities. At the same time, residents recognize tourism as an important source of employment, income generation, and community development. However, both groups acknowledge the need for improvements in infrastructure, destination management, and the diversification of tourism products to strengthen the long-term competitiveness and regenerative potential of the destination.

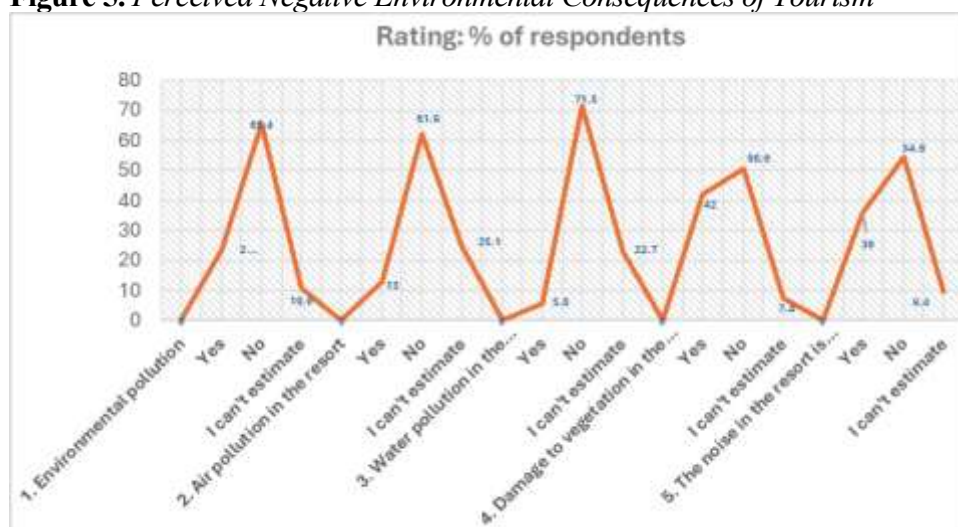
The majority of the respondents from the local population of the Mineralni Bani destination (92.6%) have lived there for more than ten years, and only a very small part has settled in the resort village for five years. More than half (65%) have lived in the surveyed destination for 6 to 10 years. The distribution of respondents by gender is as follows: men 56.4% and women 43.6%. According to the age of the respondents, due to the aging age structure of the population in the municipality, it is as follows: 52% are from the age group 45 – 65 years; 38.5% are from the age group 24 – 44 years; persons under 24 years old are 9.5%. Of the employees surveyed, about 40% work in the hospitality and tourism industry. Of these, 32.4% work in the hospitality and tourism industry as their main activity, 5.5% as an additional job, and 8.4% of those working in the hospitality and tourism industry as seasonal employment.

Figure 4. Length of Residence of Local Population

Source: Author's research based on the survey data

According to the surveyed residents, the development of the hotel industry and tourism in Mineralni Bani has, above all, a positive effect on the lives of people (local population) in the destination. Their incomes increase, which makes it possible to more easily overcome crises of a different nature, unemployment, the depopulation of the settlement is stopped, and for individuals - the standard of living increases. About 76% of the respondents believe that with the development of the hotel industry and tourism in the resort village, new jobs are created, and their regenerative development contributes to raising the cultural level of the local population. The historical and archaeological landmarks in the region are preserved, which is important for the future development of tourism and the resort village itself. Regeneration, however, is in fact an ancient way of understanding and living in the world, rooted in deep connections to place and underpinned by indigenous knowledge that has been preserved and fiercely protected by indigenous people despite the colonization and industrialization of their lands and peoples (Major and Clarke, 2021).

A weakness in the development of the destination is the attraction of foreign tourists. Therefore, it is necessary to expand advertising, modernize the infrastructure and improve the quality of service in hotels and tourist facilities. The hotel and tourist product offered in the resort is mainly aimed at consumers with an average level of solvency. Attracting more affluent tourists requires an increase in the quality of the hotel product, as well as the diversity of additional attractions. For example: due to the significant number of weekend tourists, it is necessary to increase the number of parking spaces, their organization and accurate marking. Most respondents have lived in the destination for more than ten years, indicating strong local attachment and community identity.

Figure 5. Perceived Negative Environmental Consequences of Tourism

Source: Author's research based on the survey data.

Mild climatic conditions with clean air and normal humidity, proximity to the large regional city and the availability of good transport connections are a solid prerequisite for the resort village of Mineralni Bani to be attractive for living and tourism.

Figure 5 shows the attitude of the local population regarding the negative impact of tourism on the environment in the study destination. The indicators studied were environmental pollution, air pollution, water pollution, damage to vegetation and increased noise in the destination. The majority of respondents gave a positive assessment - from 50.6% to 71.5% for the individual indicators. They believe that tourism has not had a major negative impact and the Mineralni Bani destination has a relatively clean, preserved and natural environment. The respondents point out as negative consequences of the development of tourism in the resort village, mainly the pollution of the streets, parks and public places. The condition of the common spaces in the resort also negatively affects its image. For it to have its future as a sustainable tourist destination, it is necessary to build regenerative vision and leadership that must be embedded in the destination's development and management strategy, with management adopting a long-term perspective and investing genuine commitment to regenerative values. Most respondents believe that tourism has not yet caused severe environmental degradation. However, concerns related to vegetation damage and noise indicate the need for better destination management and regenerative planning.

The findings of the study confirm that regenerative tourism represents an important opportunity for the future development of small-scale destinations. The case of Mineralni Bani demonstrates that destinations with valuable natural resources, cultural heritage, and established wellness traditions possess strong potential for regenerative transformation. One of the key observations concerns the relationship between tourism and local identity. The empirical findings indicate that residents generally perceive tourism positively and associate it with employment opportunities, regional development, and improved quality of life. Such attitudes are essential for regenerative tourism because community participation represents one of

the core principles of regenerative development. At the same time, the study identifies several structural limitations that constrain the destination's development potential. Infrastructure deficiencies, limited diversification of tourism products, and insufficient strategic coordination reduce the overall competitiveness of the destination. These findings correspond with broader international discussions emphasizing that regenerative tourism requires integrated governance and long-term planning.

The strong role of spa and wellness tourism in Mineralni Bani also creates important opportunities for regenerative hospitality development. Wellness-oriented tourism is increasingly associated with nature-based experiences, slow tourism, and holistic well-being. Visitors seeking health improvement and relaxation are generally more receptive to environmentally responsible and community-oriented tourism products. The research additionally demonstrates the importance of preserving ecosystem quality in spa destinations. Mineral resources constitute the core tourism asset of Mineralni Bani, and their long-term sustainability depends on responsible environmental management. Regenerative tourism therefore requires balancing tourism growth with ecosystem conservation and restoration. Another important issue concerns the diversification of tourism experiences. Although balneological tourism remains the dominant tourism product, the destination possesses additional opportunities related to rural tourism, gastronomy, wine tourism, eco-tourism, and cultural heritage experiences. Diversification can strengthen destination resilience by reducing dependence on a single tourism segment and extending visitor stays.

The study also highlights the growing significance of regenerative hospitality practices. Hotels and accommodation providers increasingly face expectations to implement environmentally responsible operations. Renewable energy systems, energy-efficient technologies, water-saving infrastructure, local food sourcing, and circular waste management are becoming central components of modern hospitality management.

Furthermore, regenerative hospitality extends beyond environmental performance and includes social dimensions such as employee well-being, local employment, cultural authenticity, and community engagement. Tourism enterprises that collaborate with local producers, artists, farmers, and cultural organizations can contribute significantly to local economic resilience.

The results also reveal the importance of educational and participatory tourism experiences. Visitors increasingly seek authentic interactions with local communities and natural environments. Regenerative tourism therefore benefits from tourism products that encourage learning, participation, and emotional connection with destinations.

The findings correspond with international regenerative tourism literature emphasizing the need for systemic transformation rather than isolated environmental initiatives. Regeneration requires cooperation between public institutions, tourism businesses, academic organizations, and local communities. An additional implication concerns destination branding and marketing. Small-scale destinations often struggle with limited international visibility. Regenerative tourism can provide a distinctive branding framework emphasizing authenticity, environmental responsibility, wellness, and community-centered experiences.

The study also contributes to discussions regarding post-pandemic tourism recovery. The COVID-19 crisis demonstrated the vulnerability of mass tourism systems and increased tourist demand for safer, healthier, and less crowded destinations. Small-scale destinations such as Mineralni Bani may therefore benefit from changing tourism preferences favoring wellness, nature, and sustainability.

Financial support mechanisms also play an important role in regenerative transformation. European Union programs related to renewable energy, sustainable regional development, innovation, and the circular economy can provide funding opportunities for tourism infrastructure modernization and ecosystem restoration projects. However, the transition toward regenerative tourism also involves several challenges. High investment costs, insufficient managerial expertise, and limited institutional capacity may slow implementation processes. Measuring regenerative outcomes additionally remains difficult because regeneration involves complex ecological and social processes that cannot easily be quantified. Despite these limitations, the research suggests that regenerative tourism offers significant long-term advantages for small-scale destinations. By integrating environmental restoration, local participation, cultural preservation, and economic resilience, regenerative tourism can support more balanced and adaptive forms of tourism development.

The case of Mineralni Bani illustrates that regenerative tourism should not be viewed merely as a theoretical concept but as a practical framework capable of guiding destination planning and hospitality management in the future. The study also highlights the importance of integrating regenerative principles into regional tourism policies and destination management strategies. Local governments and tourism organizations should encourage stronger cooperation between accommodation providers, cultural institutions, environmental organizations, and educational institutions. Such collaboration can support integrated tourism products and strengthen destination identity.

Future tourism strategies should additionally prioritize the development of smart and resilient tourism infrastructure. Investments in renewable energy systems, digital technologies, sustainable transportation, water management, and waste reduction can significantly improve destination competitiveness and environmental performance. Another important recommendation concerns the development of educational and interpretative tourism programs. Visitors increasingly seek authentic and meaningful experiences connected with local traditions, nature, gastronomy, and cultural heritage. Regenerative tourism therefore benefits from tourism products that combine recreation with learning and participation.

The findings further demonstrate that wellness and spa tourism can serve as strategic foundations for regenerative destination development. Mineralni Bani possesses favorable conditions for integrating health tourism, nature-based therapies, and wellness-oriented experiences into broader regenerative tourism strategies. Finally, the research confirms that regenerative tourism represents a long-term development process rather than a short-term marketing trend. Successful regenerative transformation requires strategic vision, institutional support, community participation, and continuous adaptation to environmental and social changes.

The figures and graphics included in this section are adapted from the original empirical report and reorganized in accordance with the revised conceptual framework focused on regenerative tourism development in small-scale destinations.

According to the conceptual model, the findings illustrate the interconnected relationship between natural resources, tourism activities, local participation, and regenerative outcomes. The results demonstrate that tourism development in Mineralni Bani is strongly influenced by the interaction between environmental assets, local stakeholders, and tourism businesses, creating favorable conditions for regenerative tourism implementation. The attitudes of local residents toward tourism development are generally positive. Most respondents believe that tourism contributes to employment creation, income generation, improved quality of life, preservation of local heritage, and the reduction of depopulation. These findings suggest that the local community perceives tourism as an important mechanism for socio-economic development and community resilience.

At the same time, local residents report several concerns associated with tourism growth, including pollution of public spaces, insufficient maintenance of common areas, increasing noise levels during peak periods, and infrastructure deficiencies. Despite these concerns, the majority of respondents consider the destination to maintain a relatively preserved and natural environment. The findings indicate that local communities recognize tourism as an important development opportunity but also expect better planning, infrastructure investment, and environmental management.

Visitors similarly value the natural environment, mineral resources, authenticity of the destination, peaceful atmosphere, and opportunities for health and wellness. These attributes represent the destination's principal tourism assets and contribute significantly to visitor satisfaction and loyalty. The study confirms that the close relationship between local communities, tourism providers, and natural resources creates favourable conditions for regenerative tourism implementation. The research demonstrates that Mineralni Bani has strong potential to adopt regenerative tourism models. Environmental opportunities include the implementation of renewable energy systems, energy-efficient tourism infrastructure, circular waste and water management practices, restoration of green areas and biodiversity, biophilic hotel design, and ecosystem conservation. These initiatives can contribute to environmental restoration while simultaneously improving the sustainability of tourism operations.

Socio-cultural opportunities include the preservation of local traditions and crafts, greater involvement of local producers and suppliers, educational and volunteer tourism activities, cultural interpretation and heritage tourism, and stronger community participation in destination management. Such measures can enhance cultural preservation and strengthen local identity while enriching visitors' experiences. Economic opportunities include diversification of tourism products, year-round tourism development, support for local entrepreneurship, development of local supply chains, and increased destination competitiveness. These actions can strengthen local economic resilience and reduce dependence on seasonal tourism demand.

The study also identifies opportunities for financial support through European funding programs related to renewable energy, circular economy initiatives, tourism innovation, energy efficiency, and sustainable regional development. Such programs can support the implementation of regenerative technologies and infrastructure improvements that contribute to long-term destination sustainability. Despite its considerable potential, the transition toward regenerative tourism involves several important challenges. These include high initial investment requirements, limited

managerial capacity, insufficient strategic coordination, a lack of specialized tourism organizations, weak stakeholder collaboration, the need for professional training, and difficulties in measuring regenerative impacts. These barriers may slow the implementation of regenerative initiatives and require coordinated efforts among stakeholders.

The findings indicate that regenerative tourism requires a long-term vision and an integrated management approach. Success depends on the active participation of local authorities, tourism businesses, residents, researchers, and visitors. Therefore, regeneration should not be viewed merely as an environmental initiative but as a systemic transformation of tourism development models capable of simultaneously supporting environmental restoration, community well-being, cultural preservation, and economic resilience (Dredge 2022, Bellato and Pollock 2023).

Conclusions

This study examined opportunities for regenerative tourism development in Mineralni Bani, Bulgaria, a small-scale spa destination characterized by valuable mineral-water resources, cultural heritage assets, and established wellness traditions. The findings suggest that the destination possesses favorable conditions for the implementation of regenerative tourism principles due to its strong natural-resource base, community attachment, and growing demand for wellness-oriented experiences.

The research identified several strengths, including high visitor loyalty, positive resident attitudes toward tourism, significant opportunities for tourism diversification, and the presence of resources that support nature-based and wellness tourism. At the same time, infrastructure deficiencies, limited international visibility, insufficient strategic coordination, and restricted tourism diversification continue to constrain destination competitiveness.

The study indicates that regenerative tourism may contribute to environmental stewardship, community well-being, cultural preservation, and economic resilience when supported by integrated planning and stakeholder collaboration. Hospitality enterprises have a particularly important role through the adoption of renewable energy systems, circular economy practices, local sourcing, and community-oriented tourism experiences.

From a theoretical perspective, the research contributes empirical evidence from an underrepresented Eastern European context and demonstrates how regenerative tourism principles may be applied in small-scale spa destinations. From a practical perspective, the findings highlight the need for a comprehensive regenerative tourism strategy, infrastructure modernization, destination branding, and stronger partnerships among public institutions, tourism businesses, local communities, and educational organizations.

Future research should focus on comparative studies of regenerative tourism implementation across spa destinations and on the development of measurable indicators capable of evaluating long-term regenerative outcomes. Overall, regenerative tourism should be viewed not merely as an environmental initiative but as a holistic framework for destination transformation that seeks to create positive outcomes for ecosystems, communities, visitors, and local economies.

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Corporate Responsibility in Cultural Heritage Tourism: A Legal Analysis of Tour Operators' Obligations in Vietnam

*By Quoc Hoang Nguyen**

Cultural heritage tourism has become an important component of tourism development in Vietnam, contributing to economic growth, destination branding and the promotion of national cultural identity. However, the commercial exploitation of cultural heritage by tour operators also raises legal and policy concerns regarding conservation, community participation and sustainable use of heritage resources. This article examines the corporate responsibility of tour operators in cultural heritage tourism from a legal perspective. Using doctrinal legal research, the study analyzes relevant Vietnamese legal provisions, including tourism law, cultural heritage law, environmental protection law and related regulations on business obligations. The findings show that although Vietnamese law recognizes the responsibilities of tourism enterprises in protecting cultural resources and promoting sustainable tourism, the legal framework remains fragmented. Specific obligations of tour operators in heritage conservation, benefit-sharing with local communities, visitor management and accountability for heritage damage are not yet clearly defined. The article argues that strengthening corporate responsibility in cultural heritage tourism requires clearer legal duties, stronger coordination between tourism and heritage authorities, and more effective enforcement mechanisms. The study contributes to the legal discussion on sustainable tourism governance and offers policy recommendations for improving the responsibility of tour operators in balancing heritage exploitation and conservation in Vietnam.

Keywords: *corporate responsibility; cultural heritage tourism; tour operators; legal obligations; heritage conservation; sustainable tourism; Vietnam.*

Introduction

Cultural heritage is increasingly recognized as an important resource for tourism development, economic growth, and the preservation of national identity. Cultural heritage tourism not only creates opportunities for destination promotion and local economic development but also contributes to the transmission of historical, cultural, and social values to future generations. UNESCO has emphasized that sustainable tourism can serve as an effective mechanism for protecting cultural and natural heritage when tourism development is integrated with conservation objectives and stakeholder participation.

In recent decades, cultural tourism has become one of the fastest-growing segments of the global tourism industry. The growing demand for authentic cultural experiences has encouraged tourism enterprises to develop products and services associated with historical sites, traditional communities, festivals, and other tangible and intangible heritage resources. However, the expansion of tourism

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activities has also generated concerns regarding over-commercialization, environmental degradation, loss of cultural authenticity, and increasing pressure on heritage sites. Scholars and international organizations have argued that sustainable tourism development requires a balance between economic benefits and heritage conservation objectives (Geçikli et al. 2024, UNESCO 2025).

Vietnam possesses a rich system of cultural heritage resources, including both tangible and intangible heritage recognized at national and international levels. These heritage assets play a significant role in attracting domestic and international tourists and contribute substantially to the development of the tourism industry. The rapid growth of cultural heritage tourism has increased the involvement of tour operators in organizing tourism activities, designing travel products, managing visitor flows, and promoting heritage destinations. As key actors in the tourism supply chain, tour operators directly influence the manner in which cultural heritage is utilized, interpreted, and presented to visitors.

Despite their important role, the responsibilities of tour operators in cultural heritage conservation remain a subject of legal and policy debate. While tourism enterprises benefit economically from the exploitation of heritage resources, questions arise regarding the extent of their obligations to contribute to heritage protection, support local communities, and prevent negative impacts resulting from tourism activities. International discussions on sustainable tourism governance increasingly emphasize stakeholder responsibility, corporate accountability, and collaborative management approaches involving governments, businesses, local communities, and heritage institutions (UNESCO 2025).

In Vietnam, the legal framework governing tourism and cultural heritage includes various provisions related to heritage protection, sustainable tourism development, environmental responsibility, and business obligations. Nevertheless, these regulations are dispersed across different legal instruments and do not provide a comprehensive framework specifically addressing the responsibilities of tour operators in cultural heritage conservation. The lack of clear legal obligations may limit the effectiveness of heritage protection efforts and create challenges for enforcement and accountability.

Against this background, this article examines the corporate responsibility of tour operators in cultural heritage tourism from a legal perspective. The study aims to analyze the existing legal framework governing tourism enterprises and heritage conservation in Vietnam, identify regulatory gaps and challenges, and propose legal and policy recommendations to strengthen the role of tour operators in balancing tourism development with cultural heritage preservation. By contributing to the growing literature on sustainable tourism governance and business responsibility, the article seeks to provide a legal foundation for enhancing the protection and sustainable use of cultural heritage resources in Vietnam.

Legal Framework of Corporate Responsibility in Cultural Heritage Tourism in Vietnam

Concept of Corporate Responsibility in Cultural Heritage Tourism

Corporate responsibility in cultural heritage tourism refers to the legal, economic, social, and ethical obligations of tourism enterprises to ensure that tourism activities contribute to the preservation and sustainable use of cultural heritage resources while generating economic benefits. Unlike conventional business responsibilities that primarily focus on profit generation and compliance with commercial regulations, corporate responsibility in heritage tourism requires enterprises to consider the long-term impacts of their operations on heritage values, local communities, and future generations.

The concept is closely associated with sustainable tourism development, which emphasizes the balanced integration of economic growth, social well-being, and environmental and cultural conservation. According to the World Tourism Organization (UNWTO), tourism stakeholders should contribute to preserving cultural heritage and maintaining the authenticity of host communities while ensuring that tourism benefits are shared equitably among stakeholders (UNWTO 2022). Consequently, tour operators are increasingly expected not only to comply with legal requirements but also to actively participate in heritage conservation efforts.

From a legal perspective, corporate responsibility in cultural heritage tourism may include obligations related to compliance with heritage protection regulations, prevention of damage to heritage sites, dissemination of cultural values to tourists, support for local communities, and cooperation with heritage management authorities. These responsibilities reflect the broader principle that businesses benefiting from cultural resources should contribute to their protection and sustainable development.

International Legal and Policy Framework

The international legal framework concerning cultural heritage conservation and tourism development has evolved significantly over the past decades. Although most international instruments impose obligations primarily on states rather than private enterprises, they establish important principles that influence national legislation and corporate conduct.

One of the most influential instruments is the Convention Concerning the Protection of the World Cultural and Natural Heritage 1972 adopted by UNESCO. The Convention requires State Parties to identify, protect, conserve, present, and transmit cultural and natural heritage to future generations (UNESCO 1972). While the Convention does not directly regulate tourism enterprises, it provides a normative foundation for integrating heritage conservation into tourism governance.

The International Cultural Tourism Charter developed by the International Council on Monuments and Sites (ICOMOS) further emphasizes the need to balance tourism development with heritage conservation. The Charter highlights that tourism activities should respect the authenticity and integrity of heritage

resources and should contribute to their protection rather than undermine them (ICOMOS 1999).

Similarly, the UNESCO World Heritage and Sustainable Tourism Programme promotes a collaborative governance approach involving governments, businesses, local communities, and tourists. The programme recognizes tourism enterprises as important stakeholders whose activities can significantly affect heritage conservation outcomes and encourages responsible business practices within heritage destinations (UNESCO, 2025).

These international instruments collectively establish several principles relevant to tour operators, including:

- Sustainable use of cultural heritage resources;
- Respect for cultural authenticity and integrity;
- Stakeholder participation and community engagement;
- Equitable distribution of tourism benefits;
- Prevention and mitigation of adverse impacts on heritage sites.

Although these principles are often non-binding for private businesses, they have increasingly influenced national legal systems and tourism governance policies worldwide.

Vietnamese Legal Framework Governing Tour Operators and Cultural Heritage Protection

Law on Tourism

The primary legal instrument regulating tourism activities in Vietnam is the Law on Tourism 2017. The Law recognizes sustainable tourism development as a fundamental principle and emphasizes the responsibility of tourism stakeholders in preserving tourism resources and protecting cultural values.

Article 5 of the Law establishes sustainable tourism development as one of the guiding principles of tourism governance. Tourism development must be associated with the preservation and promotion of national cultural identity, environmental protection, and community participation (National Assembly of Vietnam 2017).

The Law also imposes obligations on tourism enterprises, including compliance with legal regulations, protection of tourism resources, provision of accurate information to tourists, and contribution to the development of sustainable tourism products. However, the provisions concerning heritage conservation remain general and do not specifically define the responsibilities of tour operators in cultural heritage destinations.

Law on Cultural Heritage

The Law on Cultural Heritage 2001, as amended in 2009, provides the principal legal framework for protecting and managing cultural heritage in Vietnam. The Law establishes responsibilities for organizations and individuals involved in activities that may affect cultural heritage resources.

Under the Law, cultural heritage must be protected from acts that cause destruction, degradation, encroachment, or misappropriation. Organizations and individuals exploiting heritage values for economic purposes are required to comply with conservation requirements and relevant regulations established by competent authorities (National Assembly of Vietnam 2001/2009).

Although tourism enterprises frequently use heritage resources as tourism products, the Law does not contain detailed provisions specifying the extent of their conservation obligations, financial contributions, or liability for tourism-related impacts. This regulatory gap has generated challenges in determining the accountability of tour operators when tourism activities contribute to heritage degradation.

Environmental Protection Legislation

The Law on Environmental Protection 2020 **indirectly** contributes to heritage conservation by requiring organizations and businesses to minimize environmental impacts arising from their activities. Since many heritage sites are closely connected with surrounding natural and cultural environments, environmental protection obligations may support broader heritage preservation objectives.

Tour operators organizing tourism activities in environmentally sensitive areas may therefore be subject to environmental responsibilities relating to waste management, pollution prevention, and sustainable resource use. These obligations complement heritage protection objectives but do not specifically address cultural heritage conservation.

Legal Gaps and Challenges

Despite the existence of multiple legal instruments governing tourism and heritage protection, the current Vietnamese legal framework exhibits several limitations.

First, the responsibilities of tour operators in cultural heritage conservation are fragmented across different legal documents. The absence of a unified regulatory framework makes it difficult to identify specific obligations and enforcement mechanisms.

Second, existing legislation focuses primarily on the responsibilities of state authorities and heritage management agencies, while the role of private tourism enterprises receives relatively limited attention. As a result, businesses may benefit economically from heritage tourism without being subject to clear conservation obligations.

Third, there is limited regulation concerning benefit-sharing mechanisms between tourism enterprises and local communities. International best practices increasingly recognize that local communities should receive a fair share of tourism benefits because they are often the custodians of cultural heritage.

Fourth, enforcement mechanisms remain relatively weak. In practice, determining the causal relationship between tourism activities and heritage degradation can be difficult, limiting the effectiveness of sanctions and accountability measures.

These challenges suggest the need for legal reforms that more clearly define the responsibilities of tour operators, strengthen stakeholder cooperation, and establish mechanisms for monitoring and enforcing corporate obligations in cultural heritage tourism.

Corporate Responsibility of Tour Operators in the Exploitation and Conservation of Cultural Heritage

The Role of Tour Operators in Cultural Heritage Tourism

Tour operators play a central role in the development of cultural heritage tourism because they serve as intermediaries connecting tourists, heritage destinations, local communities, and government authorities. Through the design, marketing, and operation of tourism products, tour operators influence tourist behavior, visitor flows, and the overall tourism experience at heritage sites.

Unlike individual tourists, tour operators possess significant organizational and economic power. Their decisions regarding tour routes, group sizes, interpretation methods, and destination promotion directly affect the sustainability of heritage resources. Consequently, the impact of tourism enterprises on cultural heritage can be both positive and negative.

On the positive side, tour operators contribute to heritage conservation by generating financial resources, increasing public awareness of cultural values, creating employment opportunities, and supporting local economic development. Tourism revenues often provide an important source of funding for heritage preservation and site management (Timothy & Nyaupane 2009).

However, poorly managed tourism activities may also lead to overcrowding, commercialization, physical deterioration of heritage sites, and the erosion of cultural authenticity. Excessive visitor numbers, inappropriate tourist behavior, and profit-oriented business practices may place significant pressure on cultural resources and local communities (Pedersen 2002).

Given these dual impacts, the responsibilities of tour operators extend beyond commercial objectives and encompass broader obligations related to sustainable heritage management.

Legal Responsibilities of Tour Operators in Cultural Heritage Conservation

Compliance with Heritage Protection Regulations

The most fundamental responsibility of tour operators is compliance with applicable legal regulations governing tourism activities and cultural heritage protection.

Under Vietnamese law, tourism enterprises must ensure that their operations do not violate regulations concerning protected heritage sites, cultural properties, or conservation zones. Tour operators are expected to organize tourism activities in accordance with management plans established by competent authorities and to respect restrictions designed to protect heritage values.

Compliance also requires enterprises to cooperate with heritage management agencies and to ensure that tourists under their supervision adhere to site regulations. Failure to comply with legal requirements may result in administrative sanctions, suspension of business activities, or liability for damages where applicable.

From a governance perspective, legal compliance represents the minimum threshold of corporate responsibility and serves as the foundation for more proactive conservation efforts.

Responsibility to Prevent Damage to Cultural Heritage

Beyond mere legal compliance, tour operators should actively prevent tourism-related damage to cultural heritage resources.

Tourism activities may contribute to various forms of heritage degradation, including physical deterioration, vandalism, unauthorized access to protected areas, and inappropriate visitor behavior. Large tour groups may increase wear and tear on heritage structures and intensify pressure on fragile cultural environments.

Accordingly, responsible tour operators should adopt preventive measures such as:

- Limiting group sizes in sensitive heritage areas;
- Implementing visitor management practices;
- Providing heritage protection guidelines to tourists;
- Training tour guides on conservation principles;
- Coordinating with site managers regarding carrying capacity limits.

These measures are consistent with the preventive approach increasingly emphasized in international heritage management and sustainable tourism policies (UNESCO 2025).

Responsibility for Cultural Interpretation and Education

Tour operators also perform an important educational function in cultural heritage tourism.

Tour guides and tourism enterprises influence how visitors understand and appreciate cultural heritage. Accurate interpretation of historical, cultural, and social values contributes to public awareness and fosters respect for heritage resources.

Responsible tourism enterprises should therefore ensure that information provided to tourists is accurate, respectful, and culturally sensitive. Misrepresentation of heritage values for commercial purposes may distort cultural meanings and undermine heritage authenticity.

The educational responsibility of tour operators is particularly important in destinations associated with ethnic minorities, indigenous communities, religious traditions, and intangible cultural heritage. In such contexts, tourism enterprises should avoid stereotypes, cultural commodification, and inappropriate representations of local traditions.

Corporate Social Responsibility and Heritage Conservation

The concept of corporate social responsibility (CSR) has become increasingly relevant to cultural heritage tourism. CSR refers to the voluntary integration of social, environmental, and ethical considerations into business operations and stakeholder relationships (Carroll, 1991).

In the context of cultural heritage tourism, CSR extends beyond legal compliance and includes proactive contributions to heritage preservation and community development.

Examples of CSR initiatives undertaken by tourism enterprises may include:

- Sponsoring restoration and conservation projects;
- Supporting cultural festivals and traditional practices;

- Funding heritage education programs;
- Promoting responsible tourist behavior;
- Investing in community-based tourism initiatives.

Such activities demonstrate that tourism enterprises can function not only as economic actors but also as partners in heritage governance.

International experience suggests that CSR initiatives can enhance corporate reputation, strengthen stakeholder trust, and contribute to long-term business sustainability while simultaneously supporting heritage conservation objectives (Garrod & Fyall 2000).

Community Engagement and Benefit-Sharing Responsibilities

Contemporary approaches to heritage governance increasingly recognize local communities as key stakeholders in cultural heritage conservation.

Many heritage sites derive their significance from the cultural practices, knowledge systems, and traditions maintained by local residents. Consequently, tourism development should generate benefits not only for tourism enterprises but also for host communities.

Tour operators have an important responsibility to support community participation and equitable benefit-sharing. This responsibility may include:

- Employing local workers and guides;
- Purchasing locally produced goods and services;
- Supporting community cultural initiatives;
- Respecting traditional customs and practices;
- Consulting local stakeholders during tourism planning.

The principle of benefit-sharing has gained growing recognition in international tourism governance because it contributes to both social justice and heritage sustainability (UNESCO 2015).

When local communities perceive tourism as beneficial, they are more likely to support conservation efforts and participate actively in protecting heritage resources. Conversely, unequal distribution of tourism benefits may create social tensions and weaken local commitment to heritage preservation.

Emerging Challenges for Corporate Responsibility in Heritage Tourism

The expansion of digital tourism, social media marketing, and global travel presents new challenges for corporate responsibility in heritage tourism.

First, aggressive marketing campaigns may contribute to overtourism at popular heritage destinations. Social media exposure can rapidly increase visitor numbers beyond the carrying capacity of heritage sites.

Second, the growing commercialization of cultural experiences raises concerns regarding authenticity and cultural commodification. Enterprises may prioritize entertainment value and tourist demand over cultural integrity.

Third, climate change and environmental degradation create additional risks for many heritage sites, requiring tourism enterprises to adopt more sustainable business practices.

Finally, increasing international attention to environmental, social, and governance (ESG) standards suggests that corporate responsibility in heritage tourism is likely to become more important in the coming decades. Tourism enterprises may face growing expectations from governments, communities, investors, and tourists regarding their contributions to cultural heritage conservation.

These developments indicate that corporate responsibility should be viewed not merely as a legal obligation but as an essential component of sustainable tourism governance and long-term business success.

Recommendations for Strengthening Corporate Responsibility in Cultural Heritage Tourism in Vietnam*Improving the Legal Framework Governing Corporate Responsibility*

One of the most important requirements for strengthening corporate responsibility in cultural heritage tourism is the improvement of the legal framework regulating the activities of tour operators. Although Vietnam has established a relatively comprehensive system of laws relating to tourism, cultural heritage protection, environmental management, and business activities, the responsibilities of tourism enterprises in heritage conservation remain fragmented and insufficiently defined.

Current legislation primarily focuses on the responsibilities of state agencies and heritage management authorities while providing only general obligations for tourism enterprises. As a result, the legal basis for determining corporate accountability in cases of heritage degradation caused by tourism activities remains limited.

Vietnam should therefore consider introducing more specific legal provisions concerning the responsibilities of tour operators in cultural heritage destinations. Such provisions should clearly define obligations related to visitor management, heritage protection, environmental sustainability, community participation, and cooperation with heritage authorities.

In addition, legal reforms should establish clearer standards for sustainable tourism operations in heritage sites. These standards could serve as benchmarks

for evaluating the performance of tourism enterprises and ensuring consistency in regulatory enforcement.

A clearer legal framework would contribute to legal certainty, facilitate compliance by businesses, and strengthen the effectiveness of heritage conservation efforts.

Establishing Stronger Accountability and Enforcement Mechanisms

The effectiveness of legal regulations depends largely on the existence of appropriate accountability and enforcement mechanisms. In many cases, tourism enterprises may formally comply with regulatory requirements while failing to adequately address the negative impacts of their activities on heritage resources.

Vietnam should strengthen mechanisms for monitoring and evaluating the activities of tourism enterprises operating in heritage destinations. Regulatory authorities should develop indicators for assessing corporate performance in relation to heritage conservation and sustainable tourism objectives.

Administrative sanctions should also be reviewed to ensure that violations involving cultural heritage protection are subject to effective and proportionate penalties. Where tourism activities contribute directly to damage or degradation of heritage resources, enterprises should be required to participate in restoration efforts and bear corresponding responsibilities.

Furthermore, transparency and public reporting mechanisms should be encouraged. Tourism enterprises operating in major cultural heritage destinations could be required to disclose information regarding their conservation initiatives, community support activities, and sustainability performance. Such measures would strengthen accountability and encourage responsible business behavior.

Integrating Heritage Conservation into Corporate Social Responsibility Strategies

Corporate social responsibility (CSR) should become an integral component of business strategies adopted by tourism enterprises. Rather than viewing heritage conservation solely as a regulatory obligation, businesses should recognize heritage protection as a long-term investment that contributes to destination sustainability and business competitiveness.

Tour operators can integrate heritage conservation objectives into their CSR programs through various initiatives. These may include sponsoring restoration projects, supporting cultural festivals, financing heritage education activities, and collaborating with local communities in preserving traditional cultural practices.

Such initiatives generate benefits for both heritage conservation and business development. By demonstrating commitment to cultural preservation, tourism enterprises may enhance their reputation, strengthen stakeholder trust, and improve customer loyalty.

Moreover, integrating heritage conservation into CSR strategies aligns with global trends emphasizing environmental, social, and governance (ESG) principles. Increasingly, investors, consumers, and governments expect businesses to contribute positively to social and environmental objectives beyond profit generation (Porter & Kramer, 2011).

Consequently, strengthening CSR engagement in heritage conservation represents not only a social responsibility but also a strategic business opportunity for tourism enterprises operating in culturally significant destinations.

Enhancing Community Participation and Benefit-Sharing Mechanisms

Sustainable cultural heritage tourism cannot be achieved without meaningful participation by local communities. Communities often serve as custodians of cultural heritage and possess valuable knowledge, traditions, and practices that contribute to the significance of heritage sites.

Therefore, tourism enterprises should adopt more inclusive approaches that promote community engagement throughout tourism planning and implementation processes.

One important mechanism involves equitable benefit-sharing. Tourism revenues generated from cultural heritage should provide tangible economic and social benefits for local communities. Such benefits may include employment opportunities, support for local businesses, investments in community infrastructure, and funding for cultural activities.

Tour operators should prioritize partnerships with local service providers, artisans, cultural practitioners, and community organizations. Community-based tourism initiatives can create opportunities for local residents to participate directly in tourism development while preserving cultural authenticity.

In addition, consultation processes should be strengthened to ensure that local communities have opportunities to express their views regarding tourism projects affecting heritage resources. Participation not only improves decision-making quality but also strengthens local support for heritage conservation efforts.

International experience indicates that community engagement contributes significantly to both cultural heritage protection and sustainable tourism development (UNESCO 2015). Accordingly, enhancing community participation should be considered a central component of corporate responsibility in cultural heritage tourism.

Strengthening Heritage Education and Responsible Tourism Awareness

Education plays a critical role in promoting responsible tourism behavior and fostering appreciation for cultural heritage. Tourism enterprises are uniquely positioned to influence tourist attitudes and behaviors through interpretation, communication, and visitor management practices.

Tour operators should invest in training programs for tour guides to ensure that they possess adequate knowledge of heritage values, conservation principles, and cultural sensitivity. Well-trained guides can serve as effective mediators between tourists and heritage resources, encouraging respectful and responsible behavior.

Tourism enterprises should also develop educational materials that provide information about heritage significance, conservation requirements, and appropriate visitor conduct. Digital technologies, mobile applications, and interactive learning tools may be utilized to enhance visitor awareness and engagement.

Furthermore, responsible tourism campaigns should emphasize the importance of preserving cultural heritage for future generations. Such initiatives can help reduce harmful behaviors, including vandalism, littering, unauthorized access, and disrespectful conduct at heritage sites.

Educational efforts should target not only tourists but also tourism employees, local communities, and business managers. A shared understanding of heritage values is essential for achieving sustainable conservation outcomes.

Promoting Multi-Stakeholder Collaboration in Heritage Governance

The complexity of cultural heritage management requires collaboration among multiple stakeholders, including government agencies, tourism enterprises, local communities, non-governmental organizations, academic institutions, and international organizations.

Tourism enterprises should actively participate in collaborative governance mechanisms designed to support heritage conservation and sustainable tourism development. Such mechanisms may include heritage management committees, public-private partnerships, community advisory boards, and destination management organizations.

Collaboration can facilitate information sharing, resource mobilization, conflict resolution, and coordinated decision-making. It also enables stakeholders to develop shared objectives and jointly address challenges associated with tourism growth and heritage protection.

Universities and research institutions can contribute scientific expertise and evidence-based recommendations, while international organizations can provide technical assistance and access to global best practices.

By fostering stronger partnerships among stakeholders, Vietnam can develop more integrated and effective approaches to heritage governance that balance tourism development with conservation objectives.

Adopting Sustainable Tourism Standards and ESG Principles

Global tourism governance increasingly emphasizes sustainability standards and ESG principles. These frameworks provide useful guidance for tourism enterprises seeking to improve their environmental, social, and governance performance.

Vietnam should encourage tourism enterprises operating in cultural heritage destinations to adopt internationally recognized sustainability standards and certification systems. Such standards may include indicators relating to heritage protection, environmental management, community engagement, and responsible business conduct.

ESG reporting can also improve transparency and demonstrate corporate commitment to sustainable development. Incorporating heritage conservation into ESG strategies may help tourism enterprises align their operations with international expectations and attract socially responsible investors.

As sustainability considerations become increasingly important in global tourism markets, enterprises that embrace responsible business practices are likely to enjoy long-term competitive advantages.

Conclusion

Cultural heritage represents an invaluable resource for tourism development, economic growth, and the preservation of national identity. In Vietnam, the rapid expansion of cultural heritage tourism has generated significant opportunities for tourism enterprises, particularly tour operators that play a central role in connecting tourists with heritage destinations. At the same time, increasing tourism activities have created new challenges relating to heritage conservation, cultural authenticity, environmental sustainability, and community well-being.

This article examined the corporate responsibility of tour operators in the exploitation and conservation of cultural heritage from a legal perspective. The analysis demonstrated that while Vietnam has established a broad legal framework governing tourism and cultural heritage protection, the specific responsibilities of tourism enterprises remain fragmented and insufficiently defined. Existing legislation recognizes the importance of sustainable tourism and heritage conservation but provides limited guidance regarding the precise obligations of tour operators and the mechanisms for ensuring corporate accountability.

The study further highlighted the multifaceted nature of corporate responsibility in cultural heritage tourism. Beyond legal compliance, tour operators are expected to prevent tourism-related damage, promote responsible visitor behavior, support heritage interpretation and education, engage with local communities, and contribute to sustainable destination management. These responsibilities reflect broader international trends emphasizing stakeholder participation, sustainable development, and corporate accountability.

The findings suggest that strengthening corporate responsibility requires a combination of legal, institutional, and managerial measures. Legal reforms should provide clearer standards governing tourism activities in heritage destinations and establish stronger accountability mechanisms. At the same time, tourism enterprises should integrate heritage conservation into their corporate strategies, CSR programs, and ESG commitments. Community participation, benefit-sharing arrangements, heritage education initiatives, and multi-stakeholder collaboration should also be promoted to enhance the effectiveness of conservation efforts.

Ultimately, the long-term sustainability of cultural heritage tourism depends on achieving an appropriate balance between economic utilization and heritage preservation. Tour operators are not merely commercial actors benefiting from cultural resources; they are important stakeholders with responsibilities toward heritage conservation, local communities, and future generations. By strengthening corporate responsibility within both legal and business frameworks, Vietnam can enhance the protection of its rich cultural heritage while ensuring that tourism development contributes to sustainable and inclusive growth.

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How Do Flexible Norms Achieve Effectiveness for Sensitive Personal Information Governance in Tourism Big Data Commercialization?

*By Qi Xu**

This study investigates how flexible norms are institutionally designed to achieve intended de facto binding force in governing sensitive personal information within tourism big data commercialization, addressing the theoretical gap regarding their effectiveness mechanisms in the absence of state coercion. Employing W. Richard Scott's Three Pillars of Institutions (regulative, normative, and cultural-cognitive) as a theoretical framework, this research conducts a structured document analysis of 11 representative flexible norms (from 12 original documents, with two documents from the same corporation consolidated into one source), including national guidelines, industry standards, corporate policies, and self-regulatory covenants. Sample selection follows the logic of comparative case sampling. The analysis identifies three synergistic mechanisms through which flexible norms are designed to generate intended de facto binding force: (1) role-driven mechanisms that clarify governance subjects and accountability structures; (2) content-driven mechanisms that translate abstract principles into operational rules through detailed institutional design; and (3) enforcement-driven mechanisms that leverage public commitments, training systems, and reputational constraints to promote norm internalization. This study moves beyond static textual analysis to reveal the intended mechanisms through which flexible norms aim to achieve practical effectiveness, offering a systematic theoretical explanation grounded in organizational institutionalism and providing actionable pathways for sensitive information governance in data-driven tourism contexts. The findings are based on textual evidence and identify design features associated with intended effectiveness; empirical validation of actual behavioral effects remains a task for future research.

Keywords: *Tourism Big Data; Flexible Norms; Sensitive Personal Information; Structured Document Analysis; Intended Effectiveness*

Introduction

Research Background and Problem Statement

Driven by the wave of digital transformation, the tourism industry has emerged as a critical domain for the data-driven economy. The entire life-cycle of tourism activities—from pre-trip information search and itinerary planning, to booking tickets, accommodation, and dining, to transportation navigation during the trip, and finally to post-trip evaluations and sharing—continuously generates massive data footprints (Safaa et al. 2021, Benhaida et al. 2024). This data encompasses not only basic identity information but also highly sensitive data, such as location trajectories, biometric information, payment records, and personal preferences, collectively constituting what is termed "tourism big data" (Perkumienė 2025, Florido-Benítez 2024).

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The commercial utilization of tourism big data creates immense economic value. Through precise user profiling and personalized recommendations, entities such as online travel agencies (OTAs), hotel groups, and airlines can optimize services, enhance customer experiences, and implement targeted marketing (Buhalis et al. 2023). However, this value-creation process is accompanied by systemic privacy risks. Within the multi-actor, long-chain circulation network of tourism services, tourists' sensitive personal information frequently flows and is shared among consumers, platforms, suppliers, third-party service providers, and technology vendors, forming a complex data ecosystem (Yallop et al. 2023). Each instance of data transfer can potentially become a point of leakage. Whether due to cyberattacks, internal policy violations, or partners' security lapses, large-scale data breaches remain a persistent threat (Herke et al. 2025). This coexistence of "value creation" and "privacy risk" constitutes the fundamental paradox of tourism big data commercialization (O'Connor 2020).

In response to the systemic risks mentioned above, traditional governance paths have primarily relied on rigid norms backed by state coercive power, such as various countries' Personal Information Protection Laws and related data security regulations. These laws and regulations set baseline standards for data collection, processing, storage, and transmission. However, when confronted with rapidly evolving tourism technologies and dynamic, complex commercial scenarios, rigid regulation faces a significant "pacing problem" (Marchant 2011). The complexity and lengthy nature of legislative processes stand in stark contrast to the exponential iteration speed of tourism technology, leading to what is known as the "Collingridge Dilemma" (Collingridge 1980). In the early stages of technological development, regulatory intervention is difficult due to insufficient risk information. Conversely, when a technology's social impacts become clear and demand regulation, its developmental path and application models have often become highly solidified, making regulatory adjustment extremely costly. Within the domain of tourism big data governance, this dilemma manifests in two ways: laws related to tourism may be outdated regarding the technological landscape they address by the time they are enacted, or conversely, they may inadvertently spur the creation of new pathways for regulatory circumvention (Moses 2007, Zhang 2023). Furthermore, tourism services involve numerous heterogeneous actors—OTAs, hotels, airlines, local operators, payment processors, etc.—forming a loosely coupled complex network. Traditional "command-and-control" regulatory models struggle to penetrate these multi-layered outsourcing and partnership arrangements to effectively monitor and enforce data governance across the entire data life-cycle. This results in high compliance costs and significant enforcement difficulties (Kalesnykas 2025).

Consequently, a flexible governance path has gradually emerged and plays an increasingly important role in practice. This path is embodied in flexible norms such as industry guidelines, technical standards, corporate codes of conduct, privacy certifications, and self-regulatory conventions (Luo and Song 2009, Shen 2023). Flexible norms are a normative model rooted in the concepts of agile and flexible governance. Originating from the idea of flexible governance, it does not rely on top-down administrative compulsion but rather employs "non-mandatory methods to stimulate the inner potential, initiative, and creativity of governance partners and objects" to achieve good governance goals (Tan 2014). Compared to rigid norms, which directly

define the rights and obligations of regulated subjects and enforces provisions through coercive measures, flexible norms recognize informal relationships as an important feature of social relations. It transmits pressure through these informal relationships to mitigate conflicts and contradictions in a non-violent, low-coercion manner (Wu and Hu 2021). Participants in flexible governance manage internal affairs through non-mandatory means such as rational communication and collaborative cooperation, reaching consensus through equal dialogue. Unlike rigid norms, which are formulated by the state and enforced by coercive power, flexible norms are typically developed jointly by industry organizations, corporate alliances, or multi-stakeholder groups. The binding force does not stem from external sanctions but relies on the voluntary compliance of participants (Shelton 2000, Abbott and Snidal 2000). In tourism big data governance, elements such as big data guidelines from government-affiliated platforms, travel data standards from industry associations, privacy policies and developer agreements formulated by major OTAs, and various privacy protection certifications collectively constitute a flexible governance system.

However, flexible norms are not without their own dilemmas. On one hand, flexible norms shall maintain their flexibility and therefore cannot use mandatory clauses like rigid norms to directly constrain behavior. On the other hand, flexible norms' reliance on participants' voluntariness raises a critical question: in the absence of state coercive power, how can the effectiveness of flexible norms be ensured?

Current Research Status on Flexible Governance

Recognizing the limitations of rigid norms, academia has increasingly turned its attention to flexible governance models centered on flexible norms (Tan 2014). In international law, "soft law" was initially defined as normative instruments that are "not legally binding in principle, but may produce practical effects" (Shelton 2000, Abbott and Snidal 2000). Subsequently, this concept was introduced into domestic law, particularly in emerging fields like technology governance and environmental governance, referring to rules, principles, and codes of conduct formulated by non-state actors and implemented through non-coercive means (Shen 2023). Researchers generally agree that flexible norms offer advantages such as flexible formulation processes, rapid responsiveness, and the ability to incorporate diverse participants, enabling better adaptation to technological iteration and social change (Luo and Song 2009).

In the field of technology governance, significant research has accumulated on the analysis of flexible norms texts, such as AI ethics guidelines (Jobin et al. 2019) and data privacy protection frameworks (Zeng et al. 2024). Scholars have outlined the core principles of these texts and compared different global governance models (Gutierrez et al. 2020).

However, current research exhibits a significant theoretical gap: numerous studies remain at the static analysis of normative texts—describing and comparing "what flexible norms say"—while critically lacking dynamic mechanism inquiries into "how flexible norms produce actual effects" (Bietti 2020). Although some scholars suggest that flexible norms may exert influence through mechanisms like reputation, market pressure, or community identity, these assertions are mostly empirical observations

lacking a systematic theoretical framework to explain how this "de facto binding force" is generated, maintained, and operates. Regarding its effectiveness in the high-risk area of sensitive personal information governance, in-depth theoretical and empirical research is particularly scarce.

Research Purpose

To fill the aforementioned theoretical gap, this study proposes introducing the new institutionalism theory of organizational sociology. Based on W. Richard Scott's "Three Pillars of Institutions" framework (Scott 2014), this study aims to explain the sources of flexible norms' effectiveness and its driving mechanisms. Scott argues that institutions are social structures composed of three major elements—regulative, normative, and cultural-cognitive—which together provide stability and meaning to social life.

The regulative pillar emphasizes explicit rule-setting, monitoring, and sanctioning activities, with its core mechanism being coercion and fear of violating rules. This is the typical domain where rigid norms operate. (Scott 2014).

The normative pillar emphasizes obligations, expectations, and appropriateness in social life. (March and Olsen 1989) It guides actors to fulfill responsibilities commensurate with their social roles through value assessment and normative constraints. Flexible norms, such as industry self-regulatory conventions and professional certifications, primarily operates at this level.

The cultural-cognitive pillar focuses on the shared understandings, cognitive frameworks, and beliefs that actors hold regarding specific situations and modes of behavior (Suchman 1995). When a set of rules is internalized as the "taken-for-granted" way of doing things, its binding force is most profound. For example, viewing user privacy protection as a moral baseline that entity "shall" uphold, rather than merely a compliance requirement.

Specifically applied to tourism big data governance, an effective set of flexible norms need not only to establish a consensus at the normative level that "protecting user privacy is industry best practice," but also to provide actors with a predictable action framework through clear rules, role definitions, and implementation mechanisms. Ultimately, it needs to shape the relevant actors' value identification with data protection. The Three Pillars framework will help us deeply understand how flexible norms function, ultimately achieving the transformation from "what ought to be" rules to "what is" action. This study will select typical data governance flexible norms within the tourism industry as research objects, deeply analyzing their institutional designs across the regulative, normative, and cultural-cognitive dimensions, and examining how these designs collectively intend to produce "de facto binding force" on participating entities.

Methodology

Theoretical Framework: W. Richard Scott's Three Pillars of Institutions

Scott defines institutions as "composed of regulative, normative, and cultural-cognitive elements that, together with associated activities and resources, provide stability and meaning to social life" (Scott 2014). This framework moves beyond a

legal-centric perspective that emphasizes state coercive power, offering a systematic analytical tool for understanding how flexible norms generate de facto binding force.

The regulative pillar focuses on the coercive binding force of institutions. Its core mechanism is instrumental "expediency," achieving behavioral regulation through explicit rule-setting, monitoring, and sanctions (Scott 2014). The legitimacy basis of this constraint lies in "regulative legitimacy"—where actors comply with rules due to fear of sanctions (Suchman 1995). Although the flexible norms at the center of this study do not possess the coercive power of national laws, they still contain unique reward and punishment logics implemented internally by enforcement entities. For example, industry association standards may impose internal sanctions through means such as revoking certification qualifications or expelling members; corporate self-regulatory conventions may create constraints through intra-industry notifications or membership revocation. Therefore, proceeding from the regulative pillar, this study will focus on examining the internal reward and punishment mechanisms and role-driven implementation structures embodied in the texts.

The normative pillar concerns the obligatory and expectational dimensions of social life. It includes "the specification of goals or objectives" and "the appropriate ways to pursue them" (Scott 2014). Its legitimacy basis lies in "normative legitimacy"—where actors comply with rules due to recognition of social obligations (Suchman 1995). The core of the normative system is the "logic of appropriateness," where actors act based on their understanding of their roles and obligations (March and Olsen 1989). In the realm of flexible norms, this pillar manifests through the formulation of standards, certification implementation, guideline issuance, and other means that specify what constitutes normatively compliant behavior.

The cultural-cognitive pillar is the most sociologically oriented part of Scott's theory, emphasizing that institutions are "composed of shared conceptions that constitute the nature of social reality and the frames through which meaning is made" (Scott 2014). Its legitimacy basis lies in "cognitive legitimacy"—where actors comply with rules because they view them as "taken for granted" (Suchman 1995). The core mechanism of cultural-cognitive elements is "orthodoxy," where actors follow a certain behavioral pattern because it is considered the taken-for-granted way of doing things, as "the way we do things in these situations" (DiMaggio and Powell 1991). For flexible norms, their effectiveness ultimately depends on whether it can be internalized by relevant actors as a shared belief and behavioral logic, gradually making compliant behavior the "natural choice" for participants through public commitments, information disclosure, performance indicators, and other means.

In the subsequent analysis, this paper will categorize the governance designs distributed across the 12 samples into the "regulative," "normative," and "cultural-cognitive" domains. It will then examine which specific effectiveness-guaranteeing mechanisms emerge under each pillar, thereby systematically revealing the mechanisms through which flexible norms generate effectiveness under the Three Pillars of Institutions framework. This framework echoes the analysis of institutional change and organizational fields by Greenwood et al. (2008) and provides a foundation for subsequent theoretical construction.

It is important to clarify how flexible norms differ from rigid norms within this three-pillar framework. Rigid norms derive their binding force primarily from the regulative pillar—explicit rules backed by state-enforced penalties. Flexible norms, by contrast, cannot rely on such coercive mechanisms. Instead, they rebalance the three pillars: the regulative pillar is not absent but operates through internal organizational

sanctions rather than state coercion; the normative pillar becomes central, specifying appropriate behavior through standards and guidelines; and the cultural-cognitive pillar is activated through training, public commitment, and reputation. The three mechanisms identified in this study reflect this rebalancing: role-driven mechanisms embed accountability within organizations; content-driven mechanisms reduce ambiguity through detailed rules; enforcement-driven mechanisms leverage reputation and internalized norms. This configuration is not exclusive to flexible norms, but its relative weighting differs systematically from that of hard law.

Research Design: Structured Document Analysis with Comparative Sampling Logic

This study adopts structured document analysis (Bowen 2009) as its core research method, and sample selection follows the logic of comparative case sampling (Seawright and Gerring 2008), specifically maximum variation sampling. Structured document analysis is appropriate for research questions that ask “how are norms designed to achieve intended effectiveness?” rather than “do norms actually achieve effectiveness?” (Bowen 2009). The present study focuses on the former. Therefore, the analysis identifies mechanisms that are embedded in the texts as intended governance logic. Whether these mechanisms produce compliance, reduce privacy breaches, or change organizational behavior remains an empirical question requiring survey, interview, or observational data. This methodological boundary is explicitly acknowledged throughout the study.

Sample Selection and Consolidation

This study employs purposive sampling, selecting 11 independent normative sources (representing 12 original documents, with two documents from the same corporation consolidated as one source due to content overlap). The sample includes: national/ provincial guidelines (Samples 1–4), industry association standards (Samples 5–8), corporate policies (consolidated from F corporation’s two documents into Sample 9), and self-regulatory covenants (Sample 12). For transparency, the original 12 documents are listed in Table 1, with consolidation noted.

Rationale for consolidation: F corporation’s Rules on the Protection of Minors’ Personal Information (original Sample 9) and Privacy Policy (original Sample 10) are issued by the same entity, and the privacy policy already covers minors’ data protection. Treating them as independent samples would artificially inflate the prevalence of certain mechanisms (e.g., training systems, public commitments) due to content dependency. Therefore, they are treated as a single corporate policy source. The analysis refers to the more comprehensive document (Privacy Policy) while noting supplementary provisions from the minors-specific rules where distinct.

Specifically, sample selection considered three key dimensions:

1. Formulating body: Including national ministries, provincial standardization bodies, industry associations, and corporations;
2. Norm level: Including national/provincial guidelines, industry standards, corporate policies, and self-regulatory conventions;
3. Binding intensity: Forming a continuum from "certification standards" to "voluntary commitments." Through the cross-combination of these three dimensions, the 12 samples cover the main types of flexible norms currently existing in China. The specific composition of the samples is as follows: (see Table 1)

Table 1. Basic Information on the 12 Flexible Norm Samples

No.	Category	Sample Name	Issuing Body	Year	Description
1	National/Provincial Government Industry Guidelines or Standards	Tourism Big Data Security and Privacy Protection Requirements (Draft for Comments)	Ministry of Culture and Tourism	2026	An industry guidance document issued by a national ministry, reflecting top-level regulatory intent.
2		GB/T 35273-2020 Information Security Technology - Personal Information Security Specification	State Administration for Market Regulation	2020	A national recommended standard specifying the relevant behaviors of personal information controllers in various stages of information processing.
3		DB62/T 5083-2025 Tourism Big Data Security and Privacy Protection Standard	Gansu Provincial Market Supervision Administration	2025	A local standardization document, reflecting regional governance characteristics.
4		DB14/T 3539-2025 Guide to Privacy Protection in Tourist Hotel Guest Rooms	Shanxi Provincial Market Supervision Administration	2025	A privacy protection guide for a specific scenario, reflecting vertical domain
5	Industry Association Standards	T/CSAS 0016-2025 Requirements on personal information protection	Sichuan Cyberspace Security Association	2025	Security standards formulated by an industry association, emphasizing technical compliance.

No.	Category	Sample Name	Issuing Body	Year	Description
6		T/NBSIA 003-2024 Data privacy protection and security requirements for urban public transportation users	Ningbo Software Industry Association	2024	Focuses on public transportation data privacy, including technical requirements such as anonymization.
7		T/CCTAS 11-2020 Self-discipline specifications for app-based ride-hailing company safety and security operation	China Communications and Transportation Association	2020	An industry self-regulatory norm for ride-hailing, covering safe operation and data protection.
8		Compliance Management Guidelines for User Rights Protection in Mobile Internet Application Services (2025)	Internet Society of China	2025	Focuses on personal information protection in apps, with a broad scope of application.
9	Corporate Privacy Policies & Industry Self-Regulatory Covenants	F's Rules on the Protection of Minors' Personal Information	F corporation	2025	An online travel platform's special protection rules for minors' personal information.
10		F's Privacy Policy	F corporation	2025	The platform's overall privacy protection rules.
11		X's Personal Information Protection Policy for Driver/Guide End	X corporation	2025	The platform's personal information protection rules for the driver
12		Self-Regulatory Covenant for Promoting Interconnectivity and Interoperability	Internet Society of China	2026	A multi-party self-regulatory covenant aimed at promoting data interconnectivity and interoperability between platforms.

No.	Category	Sample Name	Issuing Body	Year	Description
		of Internet Platforms			

The samples include flexible norms that are widely cited or formally adopted by industry or government bodies, which serves as a proxy for perceived legitimacy rather than measured effectiveness. We do not claim that these norms have been empirically validated as effective; rather, they represent the population of norms that have achieved some degree of institutional recognition.

The above samples constitute a multi-level flexible norms sample library, encompassing public norms from central to local levels, technical standards formulated by industry associations, and corporate privacy policies directly targeting users. This layered design facilitates examining the performance differences of norms with different sources of authority and varying binding intensities under the Three Pillars framework.

Inclusion and Exclusion Criteria

Inclusion criteria were: (1) the document must be a written norm (excluding oral agreements or informal practices); (2) it must be formulated by a recognized entity (government, association, or corporation); (3) it must address personal information or data privacy; (4) it must be applicable to tourism-related data processing (directly or indirectly). Exclusion criteria were: (1) legally binding regulations (e.g., national laws); (2) purely technical specifications without normative requirements; (3) internal documents not publicly accessible.

The sample includes flexible norms that have been widely cited, formally adopted by industry or government bodies, or publicly endorsed by relevant stakeholders. This serves as a proxy for perceived legitimacy or institutional recognition, not as a claim of empirically verified effectiveness. We do not assert that these norms have been proven effective in reducing privacy breaches or changing behavior; rather, they represent the population of norms that have achieved some degree of de facto acceptance in governance practice. Consequently, the mechanisms identified are common features among recognized norms, not necessarily necessary or sufficient conditions for effectiveness. This caveat addresses the potential circularity of assuming that “representative” norms are effective by definition.

Justification of Sample Relevance to Tourism Big Data

Although not all 12 samples are exclusively tourism-specific, each document is relevant to tourism big data commercialization for the following reasons.

National and provincial standards (Samples 1–4): These documents either directly target tourism big data (Samples 1, 3, 4) or serve as the foundational information security standard widely referenced by tourism platforms (Sample 2, GB/T 35273). For example, online travel agencies (OTAs) such as F corporation explicitly state compliance with GB/T 35273 in their privacy policies.

Industry association standards (Samples 5–8): Sample 5 is a general personal information protection standard but is cited in tourism app compliance reports. Sample 6 addresses urban public transportation data privacy, which directly relates to tourist mobility in city tourism contexts. Sample 7 covers ride-hailing—a core component of

tourist ground transportation. Sample 8 targets mobile internet applications, including travel apps.

Corporate policies (Samples 9–11): F corporation is an anonymized online travel agency (OTA) with hotel and flight booking services. X corporation is an anonymized mobility platform offering ride-hailing and chauffeur services. Both process large volumes of tourist personal information. Their names are anonymized to comply with confidentiality requirements while preserving analytical utility.

Self-regulatory covenant (Sample 12): This document addresses platform interoperability, a key issue for tourism data sharing among OTAs, hotels, and airlines. As tourism big data commercialization increasingly involves cross-platform data sharing, interoperability standards have direct implications for data protection governance.

Analytical Strategy: Coding Procedure and Mechanism Identification

Coding Procedure

The analytical procedure consisted of four steps.

Step 1: Operationalization into sub-dimensions. Following Scott (2014), we first operationalized the three pillars into eight specific sub-dimensions, without reference to the eventual three mechanisms. This ensures that mechanism identification emerges from data aggregation, not a priori labeling. (see Table 2)

Table 2. Operationalization into Sub-dimensions

Pillar	Sub-dimension	Operational Definition
Regulative	(R1) Designated enforcement actors	Explicit naming of who implements/enforces
	(R2) Internal enforcement systems	Presence of risk assessment, audits, emergency plans
	(N1) Concept definitions	Clear definitions of key terms (e.g., sensitive information)
Normative	(N2) Systematic institutional design	Full life-cycle coverage (collection to deletion)
	(N3) Responsibility clauses	Division of obligations across actors
	(C1) Public commitment	Mandated privacy policies, disclosure channels
Cultural-Cognitive	(C2) Training systems	Regular employee training requirement
	(C3) Social reputation constraints	External certification, blacklists, public reporting

Each sub-dimension was coded as present (1), partially present (0.5—mentioned but without operational detail), or absent (0). A detailed coding manual with examples is available from the author.

Step 2: Coding execution. Each document was coded by the author using a standardized coding sheet recording the eight sub-dimensions (see Appendix A). Coding units were paragraphs or sections. To control interpretive bias, coding rules were documented in a codebook, and all coding was reviewed twice with a two-week interval.

Intra-coder reliability: Three randomly selected samples (Samples 2, 5, and the consolidated F corporate policy) were recoded after two weeks. The percentage agreement was 97% (67 out of 69 sub-dimension scores identical). Disagreements occurred on two items: (1) Sample 5's "social reputation" was initially coded as 0, revised to 0.5 after re-reading a clause on "external audit disclosure"; (2) Consolidated F policy's "internal enforcement systems" was initially 1, revised to 0.5 because the emergency response plan was mentioned but not detailed. All disagreements were resolved through text re-examination.

No second coder was involved; therefore, intercoder reliability is not reported. Transparency is ensured through the provision of the full coding matrix in Appendix A and detailed quotation references

Step 3: Mechanism identification (aggregation). The study identified recurring patterns across documents and grouped them into three mechanism categories based on their dominant pillar and functional logic. The identification was iterative, moving between data and theory. To avoid confirmatory bias, we first coded all documents without reference to the three-mechanism framework, then later mapped emergent categories to the theoretical constructs. We examined patterns of co-occurrence and grouped sub-dimensions into three higher-order mechanisms:

Role-driven mechanism = R1 + (part of) R2 (specifically, the parts about accountability structures)

Content-driven mechanism = N1 + N2 + N3

Enforcement-driven mechanism = C1 + C2 + C3 + (remaining parts of R2 related to monitoring)

This aggregation was guided by theoretical reasoning (Scott's pillars) but also allowed for emergent adjustments. For example, we initially considered separating "training systems" as its own mechanism, but theoretical coherence suggested it belongs to cultural-cognitive internalization.

Step 4: Cross-sample synthesis. The study summarizes the presence of each mechanism across the 12 samples to identify common patterns and variations (see Table 3; full coding in Appendix A).

Analytical Heuristic for Presentation

For analytical clarity, we present the three mechanisms in a sequential order (role → content → enforcement). This ordering is an analytical heuristic, not an empirical claim about temporal sequence or causal dependency. In practice, the mechanisms likely operate iteratively and reinforce each other. The purpose is to organize the presentation of evidence, not to assert strict causality.

Analysis: A Comparative Case Study Based on 12 Samples

Analytical Framework: Representative Design Elements of the Three Pillars of Institutions

(a) Regulative

The regulative dimension primarily examines whether a document can form effective constraints on the regulated objects through clear responsible subjects and institutional design. The executing subject is the starting point of regulation; only by clarifying "who is responsible" can the subsequent implementation and execution of the system be ensured. Internal execution systems are the carriers of regulation, including safety management, risk assessment, emergency response, compliance audits, and other institutional designs, reflecting the systematization and completeness of regulation.

(b) Normative

The normative dimension focuses on the degree of rigor and operability of the document itself. Clear concept definition is the foundation of normativity; only with clear terminology and defined boundaries can ambiguity in understanding and implementation be avoided. Detailed institutional design is the core of normativity. Documents need to systematically stipulate various requirements according to business logic or the data life-cycle, such as specific operational norms for collection, storage, use, sharing, deletion, and other stages. Additionally, a complete normative document should include specific responsibility clauses, covering the division of obligations for different subjects in different scenarios, responsibility constraints for third-party cooperation, and disposal measures after violations, ensuring that every requirement has a clear responsibility attribution and accountability basis. These three types of elements are selected because they reflect the degree of transformation of a document from "abstract principles" to "enforceable rules."

(c) Cultural-Cognitive

The cultural-cognitive dimension examines whether a document can promote the internalization of compliance awareness and the formation of organizational culture through external commitments and internal education. Public commitment is the external manifestation of the cultural-cognitive aspect, including publicizing complaint channels, disclosing algorithm principles, etc., reflecting the organization's respect for users' right to know and choose, and forming the basis for building trust. Training systems are the internal guarantee of the cultural-cognitive aspect, ensuring the formation of inherent compliance motivation by incorporating compliance requirements into new employee induction, management promotion, and annual training for all staff. Social reputation is the outcome feedback of the cultural-cognitive aspect, including methods like self-discipline compliance evaluation, signing industry conventions, and publicizing violative behaviors, forming external supervision and reputational constraint mechanisms. These three types of elements constitute a cultural-cognitive system of "building external trust + cultivating internal awareness + accepting social supervision."

Summary of Mechanism Presence

Summary of Mechanisms Presence Across 11 Independent Normative Sources (see Table 3)

Table 3. *Summary of Mechanism*

Mechanisms	Core Function	Number of Sources (out of 11)	Representative Source(s)
Role-driven	Designates enforcement actors and accountability	11	Samples 2, 5, 8, 10
Content-driven	Operationalizes abstract principles into verifiable rules	11	Samples 2, 5, 6
Enforcement-driven	Transmits pressure via training, reputation, complaints	9	Samples 2, 4, 5, 8, 10

Note: “Presence” indicates at least one key sub-dimension of the mechanism is coded as 1 or 0.5. Detailed sub-dimension scores are in Appendix A. (The original detailed coding table for 12 documents is now replaced by a compact representation in Appendix A, which includes both the eight sub-dimensions and the aggregated mechanisms.)

Analysis of the Internal Mechanisms of Flexible Norms

The findings indicate that flexible governance norms can effectively constrain participants through sophisticated mechanisms, even without the coercive force of rigid rules. This is particularly evident in the commercialization of tourism big data. Through a systematic analysis of flexible norms formulated by different entities, we find that the regulative pillar reveals the configuration of subjects regarding “who enforces,” the normative pillar clarifies the rule framework concerning “what is enforced,” and the cultural-cognitive pillar points to the value identification of “how to internalize.” This set of norms constitutes a distinctive implementation safeguard system, namely the role-driven mechanism, the content-driven mechanism, and the enforcement-driven mechanism.

Before presenting the empirical evidence for each mechanism, we provide precise definitions and specify how they relate to—but differ from—Scott’s three pillars.

Role-driven mechanism refers to the institutional design that assigns explicit governance functions (initiator, enforcer, supervisor) to specific actors. It primarily activates the regulative pillar by answering “who acts” but goes beyond Scott’s framework by specifying the organizational embedding of enforcement (e.g., dedicated data protection officers, compliance committees, and external supervisory bodies).

Content-driven mechanism refers to the translation of abstract principles into operational rules (e.g., data classification, scenario-based indicators, verifiable requirements, and responsibility clauses). It primarily activates the normative pillar by specifying “what is appropriate action” but adds an incentive-compatibility layer that

Scott’s framework treats less explicitly (e.g., linking compliance to market advantages or cost savings).

Enforcement-driven mechanism refers to the transmission of internal and external pressure through public commitments, training systems, and reputation constraints. It primarily activates the cultural-cognitive pillar by shaping “what is taken for granted” but introduces explicit pressure channels (e.g., complaint mechanisms, supplier audits, industry blacklists) that Scott describes more diffusely.

Causal sequence (analytical, not strictly linear): The three mechanisms operate in a sequential logic for analytical clarity: role-driven mechanisms establish organizational carriers (→ who enforces); content-driven mechanisms make compliance instrumentally rational (→ why comply); enforcement-driven mechanisms internalize norms into habits and reputation (→ how compliance is sustained). While presented sequentially, in practice these mechanisms are iterative and mutually reinforcing. This sequence moves from structural design → rational choice → cultural embedding (See Table 4).

Table 4. *Mechanisms*

Mechanisms In/Ex	Internal Mechanisms	External Mechanisms
Role-Driven Mechanisms	Initiators and Implementers	Public Actors
Content-Driven Mechanisms	Internal Benefit-Cost Alignment Rule Design, etc.	Standardization & Certification
Enforcement-Driven Mechanisms	Public Commitments and Target Guarantee Measures	Pressure Transmission Measures

Unlike rigid norms, which rely primarily on the regulative pillar (coercive sanctions), flexible norms activate all three pillars but shift the center of gravity toward the normative and cultural-cognitive pillars. The three mechanisms identified in this study reflect this shift: role-driven mechanisms compensate for the absence of state enforcement by embedding accountability within organizations; content-driven mechanisms transform abstract principles into actionable rules, reducing ambiguity that would otherwise require judicial interpretation; enforcement-driven mechanisms leverage reputation and internalized norms rather than external sanctions. This configuration is not exclusive to flexible norms, but its relative weighting differs systematically from that of hard law.

Role-Driven Mechanism: Clarifying the Functional Configuration of Governance Subjects

The role-driven mechanism corresponds to the Implementing Entities and part of the Internal Systems within the regulative pillar. Its core lies in transforming flexible norms into an operable governance structure by defining the functions and responsibilities of different participants.

First is the functional configuration of initiators and enforcers. National Standard GB/T 35273 (Sample 2) requires large-scale processors to establish a dedicated personal information protection officer. Sample 5 further stipulates that the legal representative bears overall responsibility, while the Compliance Management Guidelines for User Rights Protection in Mobile Internet Application Services (2025) (Sample 8) specifies the three-level responsibilities of the board of directors, compliance management officers, and business departments. This internal role division ensures that flexible norms have clear “owners” and “promoters” within the organization. For example, the “dedicated personal information protection department” and “personal information protection officer” established in F’s privacy policy (Sample 9, consolidated), as well as the “specialized responsible team” mentioned in X’s guide (Sample 10), provide organizational support for the implementation of flexible norms.

Second is the external constraint imposed by supervisory committees. The Self-Regulatory Covenant (Sample 12) designates the Internet Society of China as the convention enforcement body responsible for supervision and dispute mediation. GB/T 35273 (Sample 2) and T/CSAS 0016-2025 (Sample 5) introduce third-party certification and compliance audit mechanisms. These external supervisory bodies conduct independent assessments and public disclosures of participants’ compliance performance through methods such as issuing reports, organizing evaluations, and accepting complaints, thereby forming an effective check on internal enforcers.

Content-Driven Mechanism: Integrating Rule Design and External Endorsement

The content-driven mechanism integrates the Concept Definitions, System Design, and Responsibility Clauses from the normative pillar, as well as the Public Commitments from the cultural-cognitive pillar. Its core lies in making compliance with flexible norms a rational choice for participants through well-structured rule design.

On one hand, it involves the design of internal interest-cost trade-off rules. T/CSAS 0016-2025 (Sample 5) introduces international standard certifications and advanced technologies, enabling compliant entities to gain technological leadership and market competitive advantages. T/CCTAS 11-2020 (Sample 7) incorporates security performance into assessments and links it to rewards and penalties. DB14/T 3539-2025 (Sample 4) establishes an employee privacy protection evaluation mechanism. X’s guideline (Sample 10) requires background checks and confidentiality agreement constraints for employees who may access sensitive information. These designs internalize compliance costs, make violation costs explicit, and guide participants to proactively choose compliance based on interest trade-offs.

On the other hand, it involves external endorsement through standardization and certification. GB/T 35273-2020 (Sample 2), as a national standard, serves as the basis for national-level “personal information protection certification” and certification for cross-border personal information transfers. Sample 7 requires third-party network and

information security assessments and the implementation of security operation compliance evaluations. T/CSAS 0016-2025 (Sample 5) sets mandatory compliance audit cycles (2/3/4 years) based on processing scale. These external certification mechanisms provide objective and verifiable proof of compliance with flexible norms, reducing information asymmetry among transaction parties and enhancing stakeholder trust.

Enforcement-Driven Mechanism: Ensuring the Implementation of Governance Requirements

The enforcement-driven mechanism corresponds to the Public Commitments, Training Systems, and Social Reputation in the cultural-cognitive pillar, as well as the Internal Systems in the regulative pillar. Its core lies in translating flexible norms from written requirements into actual practices through the transmission of internal and external pressure.

First, public commitments and target assurance mechanisms establish a reputation-based constraint mechanism. GB/T 35273-2020 (Sample 2) mandates the formulation and public release of personal information protection policies. T/CSAS 0016-2025 (Sample 5) requires apps to display privacy policies via pop-up notifications when first launched. Corporate policies (Samples 9 and 10) explicitly display contact information for the personal information protection officer in prominent locations. Such public commitments place an organization's compliance performance under public scrutiny, where violations may lead to reputational damage and user attrition. The Self-Regulatory Covenant (Sample 12) goes further by requiring the enforcement body to periodically publish lists of entities joining or withdrawing from the convention, thereby reinforcing reputational constraints within industry self-regulation.

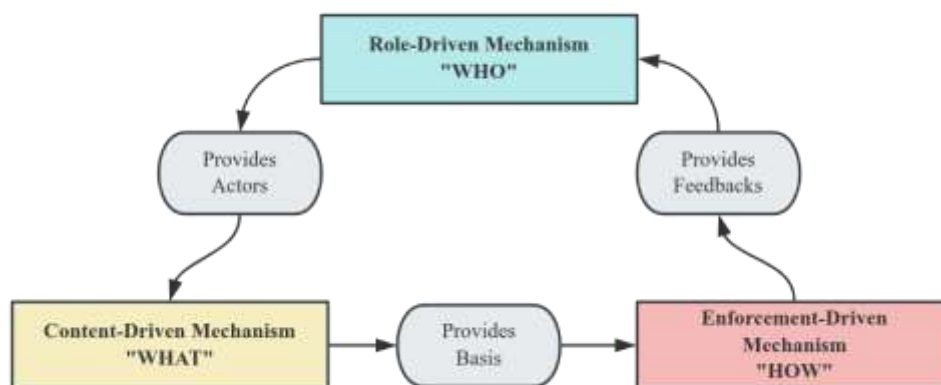
Second, training systems enable the internalization and perpetuation of norms. GB/T 35273-2020 (Sample 2) requires at least one specialized training session and assessment annually. T/CSAS 0016-2025 (Sample 5) stipulates that new employees complete training within one month of hire and retain assessment records. The Mobile Internet Application Guidelines (Sample 8) requires the establishment of training mechanisms integrated into promotion assessments. Corporate guidelines (Samples 9 and 10) explicitly mention regular security and privacy protection training programs. This systematic training transforms flexible norms from external constraints into employees' internal awareness and behavioral habits, ensuring the intergenerational transmission and sustained implementation of governance requirements.

Third, pressure transmission channels are established to transform external regulatory pressure into internal governance impetus. GB/T 35273-2020 (Sample 2) requires the establishment of complaint management mechanisms with responses within 15 days. The Mobile Internet Application Guidelines (Sample 8) mandates convenient complaint reporting channels and customer service hotlines with clearly defined response timelines, as do Consolidated F's policies (Sample 9). These channels facilitate the exercise of oversight by external individuals, aggregating dispersed individual concerns into sustained organizational pressure. DB14/T 3539-2025 (Sample 4) and T/CCTAS 11-2020 (Sample 7) extend this pressure transmission to the supply chain by requiring privacy protection clauses in supplier contracts, regular audits, and termination of partnerships in cases of non-compliance, thereby extending the effectiveness of flexible norms along the industrial chain.

In summary, the role-driven mechanism addresses the organizational carrier issue of flexible norms by clarifying "who executes," the content-driven mechanism

resolves the incentive compatibility issue by appropriately designing “what to execute,” and the enforcement-driven mechanism tackles the practical transformation issue by transmitting pressure on “how to execute.” These three mechanisms are mutually reinforcing and progressive, collectively forming the institutional foundation for the intended effective operation of flexible governance norms. This finding reveals that flexible norms are designed to achieve effective governance outcomes even in the absence of coercive force through sophisticated mechanism design, providing a practical operational path for the protection of sensitive personal information in the commercial application of tourism big data. (See Figures 1)

Figure 1. *The Interaction of Three Mechanisms*



Summary

This finding reveals that flexible norms are associated with a governance design that aims for effective governance outcomes even in the absence of coercive force through sophisticated mechanism design, providing an actionable operational path for the protection of sensitive personal information in the commercial application of tourism big data.

Conclusion

Main Findings

This study focuses on the intended effectiveness of flexible norms as reflected in their institutional design for governing sensitive personal information within the commercialization of tourism big data. It aims to answer the question: In the absence of state coercive enforcement, how are flexible norms designed to generate de facto binding force on participants? By introducing W. Richard Scott’s three pillars of institutions, the research constructs an analytical framework that transcends legal centralism. Employing a structured document analysis with comparative sampling logic, it systematically examines 12 representative flexible norms texts, including national/ provincial guidelines, industry standards, corporate policies, and self-regulatory covenants.

The study finds that the design effectiveness of flexible norms rests not on any single mechanism but on the interplay of three synergistic drivers. The role-driven mechanism provides organizational carriers through clear accountability assignment. The content-driven mechanism translates abstract principles into actionable rules—such as data classification, graded safeguards, and verifiable indicators—making compliance a rational choice. The enforcement-driven mechanism leverages public

commitments, training, and reputational constraints to embed written requirements into organizational routines and shared industry beliefs. These mechanisms are nested and mutually reinforcing, enabling flexible norms, even without coercive backing, to achieve intended effectiveness through organizational embeddedness, incentive alignment, and social reputation. The findings are based on textual evidence; empirical validation of behavioral effects remains for future research.

Existing research on soft law has identified broad influence mechanisms such as reputation, market pressure, and community identity (Abbott & Snidal, 2000; Shelton, 2000). However, these studies remain at a high level of abstraction, treating soft law as a monolithic category. This study advances the literature by specifying the institutional micro-foundations through which these broad mechanisms are operationalized in written norms. Specifically, we show how reputation constraints are translated into concrete design elements; how market pressure is channeled through certification and compliance audits; and how community identity is cultivated through training systems and shared responsibility clauses. By bridging the gap between abstract soft law theory and concrete norm design, this study provides a more actionable framework for governance practitioners and a more precise vocabulary for future empirical testing.

Critical Discussion: Limits and Alternative Explanations

While this study identifies design mechanisms that may support effectiveness, several limitations inherent to flexible governance must be acknowledged.

First, symbolic compliance and privacy washing. Flexible norms rely on self-reporting and public commitments, creating risks of “ethics washing” (Bietti 2020) where organizations adopt the language of compliance without substantive implementation. Only a few samples (e.g., Samples 2 and 5) mention independent audits, but none specify sanctions for non-compliance. This leaves room for performative compliance.

Second, uneven bargaining power. Flexible norms presume voluntary participation, but tourism platforms often impose terms unilaterally on users, drivers, and small hotels. The “consent” obtained may reflect power asymmetry rather than genuine agreement. None of the 12 samples address this power imbalance.

Third, weak independent oversight. Although three samples (Samples 2, 5, 12) mention third-party certification or external enforcement bodies, none provide detailed sanction mechanisms for false reporting. This raises questions about accountability.

Fourth, commercialization-privacy tension. Flexible norms cannot resolve the fundamental conflict between data monetization and privacy protection. None of the samples restrict profit-driven data use beyond legal minima. Thus, flexible norms may coexist with persistent privacy risks.

These limitations do not invalidate the study’s findings but suggest that flexible norms are most effective when embedded in a broader governance ecosystem that includes independent oversight, user redress mechanisms, and alignment with hard law standards. Future research should examine not only design mechanisms but also enforcement realities, including audit practices, complaint outcomes, and platform responses to user dissent.

Fifth, sample composition and case selection. This study includes several documents that are not exclusively tourism-specific (e.g., general personal information standards, public transportation data standards, platform interoperability covenants). While we justified their relevance in the previous Section (*Justification of Sample Relevance to Tourism Big Data*), the inclusion of non-tourism-specific norms may dilute the contextual specificity of findings. Readers should exercise caution when generalizing

conclusions to the tourism sector exclusively. Moreover, this study adopted maximum variation sampling without including negative cases (i.e., flexible norms that have demonstrably failed to achieve effectiveness). Consequently, the mechanisms identified are common features across the selected samples, but we cannot claim they are sufficient or necessary conditions for effectiveness. Future research should include comparative cases of ineffective norms to strengthen causal inference.

Limitations and Future Research

Although this study reveals the internal logic of how flexible norms are designed to achieve intended effectiveness through structured document analysis, several limitations exist.

First, static text focus. The analysis is primarily based on a static interpretation of texts, lacking direct empirical observation of dynamic implementation processes, the actual degree of participant compliance, and long-term effects. For instance, whether corporations truly implement training systems or whether user complaints receive effective responses requires empirical testing.

Second, sample scope and generalizability. While the sample strives for diverse types, it predominantly consists of Chinese domestic regulations and does not exhaust all emerging governance forms. Moreover, as noted in the *Section: Critical Discussion: Limits and Alternative Explanations*, this study includes several non-tourism-specific documents and lacks negative cases. The generalizability of the conclusions needs verification in broader cultural, institutional, and sectoral contexts.

Third, mechanism interaction vs. isolation. The study treats the three mechanisms as complementary and presents them in an analytical heuristic sequence. It does not examine conditions under which one mechanism dominates or backfires, nor does it empirically test interaction effects.

Fourth, relationship with hard law and technical standards. The study focuses on the mechanism design of flexible norms themselves, with limited discussion on their interactive relationships with other governance tools like rigid norms and technical standards—a critical issue unavoidable in a complex governance ecosystem.

In the future, the research directions will focus on: (a) conducting in-depth field investigations or questionnaire surveys to track the adoption, implementation, and effects of flexible norms within specific organizations, thereby validating and refining the mechanism model proposed in this study. (b) Employing qualitative comparative analysis (QCA) or fine-grained comparative case analysis to systematically compare flexible norms across types (e.g., national standards vs. corporate policies) and include negative cases to identify necessary and sufficient conditions for effectiveness. (c) Undertaking cross-national comparative research to test whether the mechanisms identified in China's context operate similarly in other legal and cultural settings. (d) Examining the interplay between flexible norms, hard law, and technical standards to understand how hybrid governance systems can be optimized for sensitive personal information protection.

Further, to validate the intended effectiveness claims, future research could adopt the following empirical strategies: (1) a survey measuring organizational compliance behaviors across firms that have adopted flexible norms with different mechanism configurations; (2) a difference-in-differences design comparing data breach incidents before and after the adoption of a specific flexible norm; (3) a qualitative comparative analysis (QCA) with conditions such as presence/absence of role-driven mechanism,

content-driven mechanism, and enforcement-driven mechanism, and outcome = demonstrable compliance.

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Appendix A. Two-Level Coding Matrix

The table below presents the coding at two levels: first the eight sub-dimensions (R1, R2, N1, N2, N3, C1, C2, C3) as per operationalization, then the aggregated mechanisms (Role, Content, Enforcement). Scores: 1 = present, 0.5 = partially present, 0 = absent.

Source	R1	R2	N1	N2	N3	C1	C2	C3	Role (R1+R2)*	Content (N1+N2+N3)*	Enforcement (C1+C2+C3+R2 monitoring)*
Sample 1	1	1	1	1	1	0.5	0.5	0	1	1	0.5
Sample 2	1	1	1	1	1	1	1	0.5	1	1	1
Sample 3	1	1	1	1	1	0.5	0.5	0	1	1	0.5
Sample 4	0.5	1	0.5	0.5	0	0.5	1	0	0.5	0.5	1
Sample 5	1	1	1	1	1	1	1	0.5	1	1	1
Sample 6	0.5	0.5	1	1	0	0.5	0	0	0.5	1	0
Sample 7	1	1	1	1	1	0.5	0.5	0	1	1	0.5
Sample 8	1	1	1	1	1	1	1	0.5	1	1	1
Sample 9 (Consolidated F)	1	0.5	1	1	1	1	0.5	0	1	1	0.5

Source	R1	R2	N1	N2	N3	C1	C2	C3	Role (R1+R2)*	Content (N1+N2+N3)*	Enforcement (C1+C2+C3+R2 monitoring)*
Sample 10 (X)	1	1	1	1	1	1	0.5	0	1	1	0.5
Sample 12	1	1	0.5	0.5	0.5	0.5	0	1	1	0.5	1

Note on aggregation:

The aggregation rules are based on theoretical reasoning: reputational constraints (C3) are considered sufficient for enforcement-driven mechanism even without training or public commitment because social sanctions can operate independently; conversely, public commitment (C1) alone is deemed insufficient without monitoring or reputation effects.

Role-driven mechanism = 1 if $R1 \geq 0.5$ AND at least one accountability-related element in R2 (e.g., designated compliance officer, internal audit requirement) ≥ 0.5 . Rationale: A role mechanism requires both a designated actor (R1) and an operational accountability structure (R2).

Content-driven mechanism = 1 if the average of (N1, N2, N3) ≥ 0.5 . Rationale: Content operates as a package; a norm lacking concept definitions (N1) or responsibility clauses (N3) but with strong system design (N2) still has partial content strength. Equal weighting is adopted for simplicity; future research could refine weights based on expert elicitation.

Enforcement-driven mechanism = 1 if (average of C1, C2, C3 ≥ 0.5) OR (C3 = 1). Rationale for C3 weighting: Reputational constraints (C3), such as public blacklists or mandatory disclosure of violations, can operate independently without training (C2) or public commitment (C1) because social sanctions (e.g., consumer boycotts, partner distrust) are directly triggered by public naming. Conversely, public commitment alone (C1=1, C2=0, C3=0) is deemed insufficient without monitoring or reputation effects. This weighting is theoretically justified (Shelton, 2000) and should be empirically tested in future research.

