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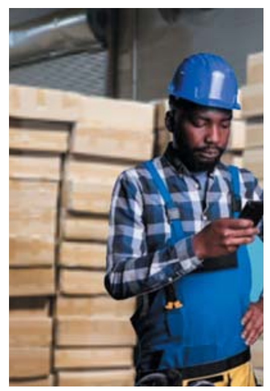
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Editor's Comment

CLAIMS FOR SLIPS AND FALLS

The duty of care by mall owners and their appointed contractors remains a recurring point of contention in South African courts, particularly when determining what constitutes reasonable measures to ensure shopper safety. In the article by Rethabile Shabalala and Maano Manavhela, the unsuccessful claim of Verna Mershall Manuel v Supercare Services Group (Pty) Ltd, (Zevenwacht Mall in Cape Town) is unpacked.

QCTO

Many occupational health and safety training practitioners regard the QCTO as confusing, intimidating, and full of unfamiliar language and acronyms. In his article, Ken Annandale explains the QCTO Skills programme journey in simple terms—from preparation to certification.

CAD SAVES LIVES

The article on advancing road safety in Limpopo tells us what happened when the Department of Transport and Community Safety (LDTCS) made road safety a top priority. Their collaboration with other entities and implementation of practical, data-driven tools shifted the province from reactive decision-making to a more proactive, intelligence-led approach about saving lives on the road.

COIDA AMENDMENTS

The COIDA, **Proclamation Notice 306 of 2026** published in January modernises the framework of the **Compensation for Occupational Injuries and Diseases Act 130 of 1993 (COIDA)**. These amendments reshape employer compliance obligations, introduce administrative penalties, expand enforcement powers and extend prescription periods. Mendel Sass and Amandlaka Thixo Magubane address the amendments.

WORKWEAR FIT AND COMFORT

Mustapha Adam delves into safety-critical environments where workwear can either support safe behaviour, or quietly work against it. He explains that workwear is not just PPE, but a daily behavioural cue, a productivity tool, and a visible symbol of whether safety is designed into the workplace. By matching fabrics and design to the environment, friction can be reduced, compliance improved and a culture of "safety first" reinforced. Adam will be presenting at the PPE Conference on 10th March 2026, discussing this issue in more detail.

CODE OF ETHICS FOR DEL INSPECTORS

Tibor Szana opines on the Code of Ethics for Inspectors (2019). He concludes that by adding enforcement mechanisms, standardising procedures, mandating proactive engagement, building specialised capacity, and integrating with national safety strategies, the Code can evolve into a powerful tool that not only guides inspector behaviour but also drives measurable improvements in workplace safety.

OSH IN THE NORTH WEST PROVINCE

Harry Fourie tells us about opening a branch of his business in the North West Province and surviving bureaucracy. He found that compliance means having a fire extinguisher. This is an amusing if not serious read about his experiences with DEL Inspectors.

Comfort drives compliance:

Why fit-for-purpose workwear improves safety and performance

Mustapha Adam – Managing Director of Premier Workwear. Mustapha is a practicing attorney with 8 years' of experience in garment manufacturing, PPE program development, and industrial supply chains, He works closely with safety professionals to design workwear solutions that improve compliance, reduce risk, and enhance operational efficiency.

Workwear is often treated as a uniform: something you issue, replace, and hope people keep wearing. However, in safety-critical environments, workwear acts as a visible safety control that either supports safe behaviour or quietly works against it.

When garments are hot, restrictive, heavy, or poorly fitted, workers adapt. Sleeves get rolled up, zips get left open, jackets get "forgotten" on warm days, and people swap items to something that feels easier.

Comfort, therefore, is not simply a luxury it is a primary driver of PPE compliance.

THE PSYCHOLOGY: CLOTHING SETS THE TONE

What people wear influences how they feel and how they act. Research on "enclothed cognition" (Adam et al, 2012) describes how clothing can affect psychological processes through two forces: the symbolic meaning of the garment (what it represents) and the physical experience of wearing it (how it feels on the body). That matters in safety clothing because your workwear constantly communicates a message: "this job is serious, hazards are real, and you are prepared".

Team spirit and a "safety-first mindset" are two of the biggest psychological benefits of consistent workwear, but there are others that are just as important, including:

- Identity and belonging: a shared look builds pride and helps people feel part of a professional team which supports and protects one another;
- Social norms: when everyone is wearing the right kit, safe behaviour becomes the default and non-compliance stands out;
- Role clarity and accountability: uniforms can reinforce "who I am at work" and the standard expected in that role;
- Trust and credibility: consistent workwear often signals competence and preparedness to colleagues, contractors, and customers; and
- Respect and inclusion: garments that fit different body types send a powerful message - "you belong here, and safety is designed for you."

The psychology of workwear cuts both ways. If workwear is uncomfortable, visibly ill-fitting, or unsuitable for the job, it can create frustration and reduce worker pride. Over time, that breeds workarounds and disengagement which is exactly what a safety programme cannot afford.

FIT-FOR-ENVIRONMENT: THERE IS NO "ONE PERFECT GARMENT"

A central truth in safety clothing is that no single fabric or design is perfect for every environment. The right choice depends on hazards, climate, activity level, and the other PPE the worker must wear.

A garment that performs well in an air-conditioned facility can feel unbearable in direct sun. A fabric built for rugged abrasion can be too heavy for high-mobility work. A water-resistant finish may be essential in one job and a heat-stress risk in another. When the fabric is wrong for the environment, the outcome is predictable: people dislike it, use it incorrectly, or avoid it. The organisation ends up paying twice through reduced compliance and repeated buying.

This is why "comfort drives compliance" is also a procurement principle. You don't buy comfort as a perk; comfort is a key determinant of whether protective clothing is used as expected.

COSTS ARE RISING! WHY INVEST IN BETTER FABRICS AND DESIGN?

Many organisations are feeling pressure on the rising cost of workwear stemming from increased costs in inputs, transport, compliance testing, and energy-intensive manufacturing and laundering. At the same time, the textile industry is navigating major transitions in chemistry and sustainability. For example, the move to reduce or phase out certain water and stain repellent finishes (such as PFAS – the dreaded "forever chemicals") that have historically delivered strong performance but now carry increasing regulatory and reputational risks.

When budgets tighten, the temptation is to buy "cheaper." Buyers often ignore that workwear has a total cost of ownership, not just a purchase price. Using improperly designed garments that tear early, trap heat, restrict movement, or loses shape will quietly increase costs through:

- higher replacement rates and emergency "top-ups";
- reduced productivity (more time adjusting, less range of motion, more fatigue);
- higher non-compliance risk, especially in hot or physically demanding work; and
- lower worker morale and retention.

In the author's considered opinion, rising fabric costs are not an argument against better workwear. They are an argument for specifying smarter so that you pay for performance that reduces risk and actually lasts.

A PRACTICAL CHECKLIST FOR BETTER WORKWEAR DECISIONS

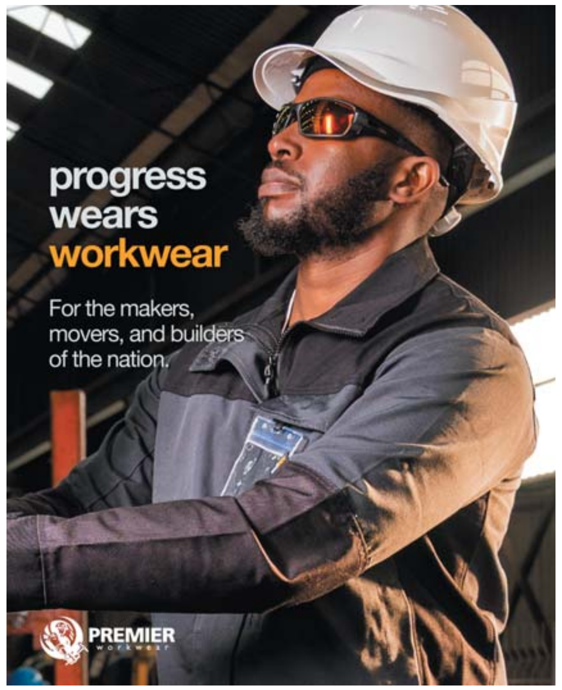
Before your next workwear tender, trial, or refresh, ask:

1. What are the real conditions (heat, weather, contamination risk, abrasions, visibility needs, mobility demands)?
2. What does "safe" mean for this task and which hazards must the garment help protect against?
3. Who is your workforce, really (sizes, body shapes, layering needs), and do you offer options that fit everyone?
4. What are the comfort non-negotiables (weight, stretch, ventilation, seam placement, pressure points under belts or harnesses)?
5. How will you care for it (laundering, repairs, inspection), and when will you retire it?
6. Have you piloted with end users and supervisors, and measured both safety outcomes and productivity friction?

THE BOTTOM LINE

Workwear is not just PPE. It's a daily behavioural cue, a productivity tool, and a visible symbol of whether safety is designed into the work and not just procedures.

When you match fabrics and design to the environment and the job, you reduce friction, improve compliance, and reinforce a culture where "safety first" is practical, not aspirational.



Claims for slips-and-falls in public spaces: *Who is responsible?*

Rethabile Shabalala, Senior Associate
Webber Wentzel

Maano Manavhela, Associate Webber Wentzel

South African courts continue to grapple with the issue of legal responsibility when it comes to preventing injuries caused by slip-and-fall incidents in public spaces. The duty of care owed by mall owners and their appointed contractors remains a recurring point of contention, particularly in determining what constitutes reasonable measures to ensure shopper safety.

This issue was recently brought into focus in the matter of Verna Mershall Manuel v Supercare Services Group (Pty) Ltd, which arose from an incident that occurred on 9 November 2016 at Zevenwacht Mall in Cape Town. The claimant slipped on a chip in a walkway and fractured her wrist. At the time, the mall was owned by Investec Properties (Pty) Ltd, managed by Broll Property Group (Pty) Ltd (property manager), and cleaned by Supercare Services Group (Pty) Ltd (cleaning contractor) under a service agreement.

WRONG PARTY = UNSUCCESSFUL CLAIM

The claimant alleged that both the property manager and the cleaning contractor owed her a legal duty to ensure the mall's surfaces were kept free of hazards and that their failure to detect and remove the chip constituted negligence. She initially sued both parties but later withdrew her claim against the property manager, leaving the cleaning contractor as the sole defendant. This strategic decision proved fatal to the plaintiff's case, as it eliminated the party with primary responsibility for hazard detection.

The cleaning contractor argued that its responsibility for the detection and continuous monitoring of the premises for spillages was expressly excluded under the Master Service Agreement (MSA) it concluded with the property manager, which required it to clean spillages only when notified. CCTV footage showed that the chip fell just 15 seconds before the incident, and cleaners responded promptly thereafter.

The Western Cape Division of the High Court dismissed the claimant's claim, finding that the MSA was binding and excluded any duty on the cleaning contractor to monitor or detect spillages.

The court held that the cleaning contractor could not be liable for failing to perform a duty it was not contractually obligated to undertake. It further noted that, given the short timeframe between the chip falling and the accident, no reasonable cleaning system could have prevented the incident. The court emphasised that the primary duty to ensure safety rested with the property manager and with the mall owner.

The appeal court examined whether the court a quo had erred in its interpretation of the contractual obligations and the existence of a legal duty.

The appeal court confirmed that the deeming provisions in the MSA were effective and that the cleaning contractor's role was limited to cleaning upon notification, not continuous monitoring. The court stressed that liability for negligent omissions depends on the existence of a legal duty, which in this case was absent. It reiterated that public policy does not support imposing liability on a contractor for duties expressly excluded by contract, particularly where the managing agent retained responsibility for hazard detection.

LEGAL DUTY OF CARE

The court reaffirmed that mall owners and managing agents bear the ultimate responsibility for maintaining safe premises. While they may delegate cleaning functions to contractors, such delegation must be reasonable and supported by clear contractual terms. The court clarified that the duty to provide a safe environment cannot be shifted entirely in circumstances where public policy dictates otherwise. In this case, the appointment of the cleaning contractor was reasonable, and its exclusion from monitoring duties was contractually clear, making it inappropriate to hold the contractor liable.

This three-tier structure, owner, managing agent, and service contractor, is typical in commercial property operations and creates complex liability chains that insurers must navigate when assessing coverage and exposure.

DEFINE RESPONSIBILITIES TO REDUCE RISKS

Mall owners and managing agents should ensure that agreements explicitly define responsibilities as any ambiguity in this regard creates exposure for all parties.

Where hazard detection duties are excluded from contractor agreements, owners and managing agents must implement independent monitoring systems to mitigate the risks. This might include dedicated personnel, enhanced CCTV monitoring with active observation, or regular inspection protocols.

Underwriters should request copies of all agreements concluded between property owners and their service providers to properly assess the extent of risk, particularly where cleaning contractors have contractually limited their liability or exposure.

Even with delegation, owners and managing agents should maintain oversight mechanisms to ensure contractors perform their allocated responsibilities in a competent and diligent manner.

The Hong Kong apartment fire: *Could it have been avoided?*

Dr Bill Pomfret has over 50 years of experience as a safety consultant working for leading companies around the world.
Dr Bill is a passionate advocate for safety training.

On 26th November 2025, a large fire broke out at the Wang Fuk Court apartment complex in Tai Po District, New Territories. Of the eight apartment blocks, seven were destroyed by the fire. For close on 45 hours the fire burned. The death toll was staggering -168 people lost their lives.

I lived in Hong Kong for five years while working for China Light & Power (CLP). While there, I undertook a fire safety audit of several high-rise buildings.

The report was published in the Hong Kong Fire & Safety magazine.

The conditions that concerned me included:

a. The bamboo scaffolding was far too close to neighbouring towers, especially during construction and maintenance.
b. Many of the floors had prams, bicycles and similar obstructions on stairwells.
c. There was no system for testing fire alarms in the homes or even the apartment building. Normally, I would advise that testing be done every 6 months.
d. No fire evacuation drills where conducted. Normally, I would advise that fire drills be practiced every 6 months.
e. Considerable waste lay outside the waste skips.
f. No permit to work system, was in use for repairs and installations.

THE INITIAL REPORTS

At 14:51 local time on Wednesday, a fire broke out at the Wang Fuk Court apartment complex in Tai Po, home to around 4,600 residents.

The fire ripped through the estate for over a day - before finally being put out on at around 10:18 local time (02:18 GMT) the following morning.

- The fire service reported that fire alarms in all eight blocks were found to be not working effectively.
- Experts reported that bamboo scaffolding, along with other construction materials found at the buildings - which were undergoing renovation - might have contributed to the rapid spread of the fire.
- Several residents had previously reported that their fire alarms did not sound when the blaze broke out.

EARLY REPORT?

Initially 128 people were identified as having died in the fire, but they knew dozens were still missing.

INVESTIGATIONS

Investigations immediately began and while underway, financial assistance was arranged for those who had lost their homes.

Three men from a construction firm were arrested on suspicion of manslaughter. A separate corruption investigation was opened.

FINDINGS

Hong Kong's labour and welfare secretary, Chris Sun, told reporters that his department had made sixteen health and safety checks on the works taking place at Wang Fuk Court since July 2024.

He says the checks were focused on health and safety, after receiving some complaints.

Sun said the last check had been on 20 November, when a written reminder about fire safety was given to management following complaints that workers were smoking at the site.

WHY THE FIRE SPREAD SO QUICKLY

Authorities started to paint a picture of what could have contributed to its rapid spread.

Wang Fuk Court consisted of eight tower blocks, each thirty one storeys high. Seven were affected by the fire. According to a 2021 government census, the complex provided 1,984 apartments for some 4,600 residents.

Flames were first spotted at 14:51 local time on Wednesday (06:51 GMT). According to a post on social media, six minutes later the fire had spread to other floors.

An hour and a half after it began, the fire had spread to at least two other towers.

Renovations were ongoing and police say they found materials on the outside of the buildings that aren't believed to be fireproof - including plastic sheets.

In a press conference, an official suggested the rapid spread of the fire could have been due to styrofoam placed outside the windows of the apartment blocks.

The tower blocks were covered in bamboo scaffolding, which is commonly used in Hong Kong - another contributing factor. There has been an official push to move away from this traditional material over safety concerns. However, online comments show Hong Kongers defending its use.

Meanwhile some residents reported that their fire alarms didn't sound, and authorities later said that alarms in all eight blocks were not working effectively.

Three people in charge of renovation works in the complex were arrested on suspicion of manslaughter, with a police spokesperson saying there was "reason to believe that those in charge at the company were grossly negligent".

CONCLUSION

Had I lived in one of those buildings and watched them enclose it in Styrofoam, then wrap it dark in green cloth after putting a (bamboo!!!!) cage on it, I would have never entered my apartment again.

Those poor people were roasted like a ham in a Reynolds browning bag.

Here in Canada, we lament both the EPA and OSHA, but we can be sure that hiring inexperienced and untrained people to make repairs to skyscrapers would never fly here.

The COIDA: *Key amendments come into effect*

Mendel Sass, Partner, Bowmans

Amandlaka Thixo Magubane, Senior Associate, Bowmans

On 23 January 2026, President Cyril Ramaphosa published **Proclamation Notice 306 of 2026**, bringing into operation several critical provisions of the **Compensation for Occupational Injuries and Diseases Amendment Act 10 of 2022 (COID Amendment Act)** which modernises the framework of the **Compensation for Occupational Injuries and Diseases Act 130 of 1993 (COIDA)**.

These amendments introduce substantial reforms to employer compliance obligations, enforcement mechanisms, penalties, and worker protections. The Proclamation sets out staggered commencement dates for various provisions of the COID Amendment Act. Some of the more significant amendments for employers to note are addressed below.

PROVISIONS EFFECTIVE 23 JANUARY 2026

- Definitions contained in section 1 of the COIDA updated and expanded: These include 'accident', 'actuary', 'assessment', 'compensation', 'dependent', 'employer', 'employer individually liable' and 'occupational disease'. Post-traumatic stress disorder has now explicitly been recognised. Notably, the amendments to the definition of 'earnings' (which now references the **Fourth Schedule to the Income Tax Act 58 of 1962**) and part of the definition of 'employee' (relating to members of the South African Defence Force and South African Police Service) are not yet in effect. Additional new terms now in force include 'licensee', 'monthly pension', and 'rehabilitation'.
- Claims and accident reporting procedural reforms: The Commissioner (rather than the Director General) will now receive accident and occupational disease notifications, compensation claims, and related reports and is also empowered to prescribe rules and forms for reporting, as well as conduct accident inquiries following a report. The prescription period for claims has also been extended from 12 months to three years.
- What is deemed to have taken place 'in the course of employment' has been expanded: It also now covers accidents that occur while attending work related training and extends the circumstances in which employees travelling to and from work in employer provided transport will be covered. Compensation is also now payable without qualification even where an accident is attributable to an employee's serious and wilful misconduct.
- Rehabilitation and reintegration framework created: This new statutory framework will require employers to support the rehabilitation and reintegration of employees who suffer occupational injuries or diseases. This formalises return to work obligations and rehabilitation responsibilities for employees suffering from occupational injuries or diseases.
- New inspection, compliance and enforcement provisions: Inspectors appointed by the Commissioner are allowed, among other things, to conduct inspections to ensure compliance with the COIDA and have the authority to issue compliance orders which can be made orders of the Labour Court if an employer does not comply.

PROVISIONS EFFECTIVE 1 FEBRUARY 2026

These are governance-related amendments related to the restructuring of the Compensation Board, including revisions to Board members' terms of office, as well as an update on the rules regarding disqualifications and removal from office of the Board members.

PROVISIONS EFFECTIVE 1 APRIL 2026

The April 2026 tranche of amendments introduces an administrative penalty system to replace criminal offences. Penalties may be imposed where employers:

i. fail to report accidents correctly or within prescribed timeframes and/ or furnish any further particulars required;

ii. fail to pay the first three months of temporary disability compensation;

iii. deduct or recover unlawful amounts from employees; or

iv. fail to maintain proper earnings and employment records (manual or electronic) for five years. Employers who actively participate in the rehabilitation of temporarily disabled employees may now qualify for an assessment rebate.

KEY TAKEAWAYS FOR EMPLOYERS

The COID Amendment Act introduces a more robust compliance and enforcement environment, reinforced by enhanced administrative penalties, along with an extension of the COIDA's scope of coverage. This may require employers to review and update accident reporting protocols, reassess workplace transport and training related risks, strengthen record keeping and claims management systems, and prepare for new rehabilitation and reintegration obligations.

Employers who adopt a proactive approach will be best positioned to remain compliant and mitigate liability under the modernised COIDA framework.

Distractions: *Main cause of accidents on-the-job*

Factory environments are classified as high-risk workplaces. A moment of distraction can permanently change someone's life. Maintaining focus is not just about productivity, it's about safety, teamwork, and going home uninjured at the end of the shift.

Distractions are a leading cause of workplace accidents, accounting for up to 20% of injuries. Most accidents are preventable with proper training, protocols, and focus.

COMMON SOURCES OF DISTRACTION IN FACTORIES

- Cell phone use
- Loud conversations
- Horseplay
- Fatigue or lack of sleep
- Personal stress
- Excessive noise
- Multitasking beyond safe limits

SOME COMMON DANGERS INCLUDE

- Machinery accidents:

Not paying attention can lead to getting caught in machines or operating equipment incorrectly.

- Slip, trip, and fall hazards:

Missing warning signs or not watching your step can lead to falls.

- Chemical exposure:

Not following safety protocols or ignoring warnings can lead to chemical spills or exposure

- Collisions:

Distractions can cause collisions with vehicles, equipment, or other workers.

- Errors and mistakes:

Lack of focus can lead to mistakes, affecting product quality and safety.

THE MAIN DANGERS

- Increased risk of accidents

When attention shifts away from the task:

- Hands can slip into dangerous areas of machinery
- Safety steps may be skipped
- Warning signals may be missed This can lead to cuts, crush injuries, burns, amputations, or even fatalities.

- Machinery-related injuries

Factories often use:

- Forklifts
- Conveyor systems
- Press machines
- Welding equipment.

Even a brief distraction while operating or standing near equipment can result in serious injury due to the speed and force of industrial machines.

Slips, trips, and falls

Not paying attention to:

- Wet floors
- Loose cables
- Tools left out
- Uneven surfaces can result in falls, which are among the most common workplace injuries.

Reduced situational awareness

Distractions reduce awareness, increasing the chance of collisions or delayed emergency response.

In a factory, workers must constantly be aware of:

- Moving vehicles
- Co-workers nearby
- Alarm signals
- Emergency situations

Poor quality and production errors

This affects productivity, safety, and company costs.

Distraction can lead to:

- Incorrect measurements
- Faulty assembly
- Product defects
- Equipment damage

Increased stress and fatigue

Fatigue combined with distraction significantly increases accident risk.

Constant interruptions or divided attention:

- Slow reaction times
- Increase mental strain
- Raise the likelihood of mistakes

Communication breakdowns

Factories rely on clear communication for:

- Lockout/tagout procedures
- Equipment startup/shutdown
- Shift handovers.

New tools and strategies emerge to foster psychologically safer workplaces

Han Wenqi is an experienced workplace safety and health professional from Singapore, and an advocator with 15 years of industrial safety experience. He is a lecturer for the Bachelor of Science in SHEM and MSc in OHSW. He is currently a guest speaker / associate lecturer with the Leeds Beckett University, Cardiff Metropolitan University. His experience is highly sought after in Singapore mega projects.

Massive discussions, researches and promotions on the efficacy and importance of Diversity, Equity and Inclusion (DEI) in the workplace have reached a fever stage. While the conversations on DEI partially focus on politics, there is a fair amount of reflections by companies about how critical such policies and their impact can be. However, from the safety standpoint perspective, my view on DEI is the foundation of robust, sustainable and evolving psychological safety.

What is necessary is for companies to clearly understand the correlation between psychological safety and a safer workplace as the desired outcome. There are many ways to correlate psychological safety to physical safety. One being the terms of engagement.

Often, workers feel that they can trust health, safety and environmental (HSE) professionals to offer a listening ear, offer moral support and advocate for them. With this evolving trust, we can create teams that work collaboratively to not only improve physical safety but also psychologic safety.

In order to provide a safe and healthy workplace environment, our goal is to create safe and welcoming environments where differences related to factors such as race, ethnicity, class, religion, age, sex, sexual orientation, gender identity, nationality, ability and education are not only accepted but celebrated.

We want all stakeholders to be treated with respect and to know their voices are heard, particularly those who are often marginalised or silenced in other areas of their lives.

ISO 45003 - PSYCHOLOGICAL HEALTH & SAFETY

ISO has created a standard for psychological health and safety at work: ISO 45003. The guidelines for managing psychosocial risks emphasise the critical importance for companies to eliminate hazards and minimise EHS risks by taking preventive and protective measures, including psychosocial risks.

The guideline states: "Psychosocial hazards relate to how work is organised, social factors at work and aspects of the work environment, equipment and hazardous tasks. Psychosocial hazards can be present in all organisations and sectors, and from all kinds of work tasks, equipment and employment arrangements."

The guidelines note that negative outcomes for workers can include "poor health and associated conditions (e.g., cardiovascular disease, musculoskeletal disorders, diabetes, anxiety, depression, sleep disorders) and associated poor health behaviours (e.g., misuse of substance, unhealthy eating), as well as reduced job satisfaction, commitment and productivity. Managing psychosocial risks can result in positive outcomes, including improved job satisfaction and increased productivity.

THE PRICE OF NEGLECT

The consequence impact to companies of failing to manage psychosocial risks includes "increased costs due to absence from work, turnover, reduced product or service quality, repetitive recruitment and training, workplace incident investigations and litigation, as well as damage to the organisation's reputation."

To build inclusion, ISO 45003 details that psychosocial hazards can take a variety of forms. We need to better understand how incivility, workplace bullying, and a lack of psychological safety can negatively impact workplace safety.

Another avenue to ensure psychological safety is to understand the concept of unconscious bias. When an employee does not have the burden of bias, and feels psychologically safe, they are able to contribute at an optimal level. Dealing with the root cause of bias begins with understanding that bias is a two-way communication channel. An employee can have as much bias toward a manager as the manager has toward the employee. The two types of bias are directional and reverse. Directional is what you feel is aimed at your race, religion, gender, etc. Reverse is your bias in how you interpret what is happening. Whatever form this bias takes, it must be called out and corrected.

By looking across all forms of communication, such as training documents as well as job descriptions, we can identify words that unconsciously make employees feel uncomfortable.

There might be unconscious gender, ethnic, or cultural biases in particular word choices. By focusing on [inclusion] first, we work to bring people together, then create brave learning spaces.

We also need to address behaviours that harm and introduce bystander intervention and psychological safety. The process of understating psychological safety and implementing programmes which will create a safe work environment is a continual process.

DEI initiatives are not a one-time fix. As safety professionals, we should do something each day to move the benchmarking indicator on DEI to improve our companies.

Working together, we will not only create a safer, stronger future, we will also nurture a culture in which we all embrace opportunities to learn and grow so everyone can excel.

Illicit alcohol:

a brewing threat to health and workplace safety

Rhys Evans, Managing Director of ALCO-Safe

South Africa has one of the highest levels of alcohol consumption per capita in the world, with our government long using sin tax as a way to try and tackle the problem. By steadily raising the price of alcohol, the aim is twofold: discourage excessive drinking and generate revenue for public health. But while the intention is clear, the reality is more complicated.

As prices climb, demand for cheaper alternatives has surged. This has created fertile ground for the illicit alcohol trade, a shadow market that brings its own dangers, not just for public health but also for workplace safety in high-risk industries such as mining, construction, and transport.

WHEN ALCOHOL GOES UNDERGROUND

Raising alcohol taxes is not a new idea. However, history shows that restricting access to alcohol rarely eliminates demand - it simply pushes it elsewhere. South Africa is no exception.

As mainstream alcohol brands become more expensive, counterfeiters and homebrewers move in to fill the gap.

Illicit alcohol takes several forms. Some products are smuggled into the country without paying import duties, while others are counterfeit versions of well-known brands. The most dangerous are backyard brews with no oversight or quality control.

What they all have in common is a much lower price tag, making them more accessible to workers earning modest wages.

THE HIDDEN HEALTH RISKS

The problem with the trade of unregulated alcohol is not just the loss of tax revenue, it is the complete lack of safety standards.

Legitimate producers are required to follow strict processes to ensure that alcohol is safe for consumption. Bootleg producers are not safe.

This is where the danger of methanol comes in. When alcohol is improperly distilled, methanol can be produced instead of ethanol. Both can intoxicate, but methanol is highly toxic, damaging the liver, impairing the memory and even causing blindness.

For workers consuming these products, the risks extend far beyond a hangover. They face long-term health consequences that can undermine both their wellbeing and their ability to work.

WHY WORKPLACES ARE ESPECIALLY VULNERABLE

Large, shift-based workforces with lower pay and limited healthcare access are more likely to turn to cheaper alcohol. Unfortunately, these are also the industries where safety risks are greatest.

A miner or construction worker under the influence endangers colleagues, while an impaired truck driver threatens other road users. And because illicit alcohol is stronger and cheaper, workers may drink more often and in higher volumes than they would with regulated products.

Workplace breathalysers are a crucial safeguard. Whether the alcohol is legal or illicit, the technology detects intoxication before a worker enters a hazardous environment. Since both ethanol and methanol register in breath analysis, no form of consumption escapes detection.

BUILDING THE FOUNDATION FOR A CULTURE OF SUPPORT

Consistent, daily testing does more than just catch workers who arrive intoxicated. It changes behaviour. Employees who know they will be tested every morning are less likely to drink heavily the night before.

Over time, this can reduce overall alcohol consumption, cut down absenteeism, and even free up household income that would otherwise be spent on alcohol.

Breathalysers are an important tool, but they are most effective when combined with broader safety measures. Companies can educate workers about the dangers of illicit alcohol, offer Employee Assistance Programmes (EAPs) that provide support for those struggling with dependency without fear of immediate punishment, and implement clear alcohol policies that encourage accountability while supporting recovery.

Together, these steps promote a culture where workplace safety goes beyond compliance and genuinely protects employees' wellbeing.

THE BOTTOM LINE

Sin tax serves an important purpose, but it comes with unintended side effects.

The rise of illicit alcohol is a pressing challenge, particularly for South African workplaces where safety is non-negotiable.

While employers cannot control the price of alcohol or the spread of illicit products, they can control how they respond.

By investing in breathalyser testing, awareness programmes, and support structures, enterprises can reduce the risks associated with illicit alcohol and protect both their employees and their operations.

In an environment where alcohol consumption is unlikely to disappear, proactive workplace measures are the best defence.

ALCO-Safe (Pty) Ltd

Advancing road safety through data intelligence in Limpopo

Limpopo sits at the heart of Southern Africa's regional road network, with the N1, R71, R37 and other major corridors carrying thousands of vehicles every day.

These routes connect communities, support cross-border trade and move essential goods across the province. But with this economic significance comes risk, making road safety a top priority for the Limpopo Department of Transport and Community Safety (LDTCS).

Effective enforcement, infrastructure planning and education all depend on one critical foundation: clear, accessible evidence about where and why incidents occur.

For many years, crash records in Limpopo were captured manually across districts and were not spatially mapped, making it difficult to identify hotspots or plan proactively.

Under the Limpopo Road Safety Programme (LRSP), funded by the Anglo American Foundation and implemented with support from The Impact Catalyst, Project 3 set out to strengthen this picture.

Working in partnership with LDTCS and the Office of the Premier (OTP), the team developed a GIS-enabled incident dashboard that brings provincial crash data into a single, map-based view.

"Having a shared picture of where our highest-risk corridors and communities are makes all the difference," notes Mr Stephen Matjena, LDTCS Head of Department, "because it allows us to direct limited enforcement and investment where they can have the greatest impact."

BUILDING A PRACTICAL TOOL THROUGH COLLABORATION

A proof-of-concept platform was built on ESRI technology with the CSIR and technical partners, testing real use cases such as pedestrian risk and ambulance response patterns.

As the project evolved, the focus shifted to data quality and usability: cleaning and structuring records, refining filters and categories, and adjusting terminology with direct input from provincial officials.

By 2025, the dashboard was "handover ready," offering users an accessible tool to visualise incidents by route, district, severity and time period.

Officials are already using it to support corridor planning discussions and to motivate targeted interventions in high-risk areas.

"The goal was never to build a shiny system in isolation," reflects Dr. Mari Romijn, Impact Catalyst Head of Department of Capable State. "It was to co-create something practical with provincial teams that can grow into a full road safety intelligence platform over time."

STRENGTHENING PARTNERSHIPS AND FUTURE OPPORTUNITIES

The impact is already visible. The dashboard has helped create a shared evidence base for LDTCS, the Office of the Premier, the Department of Health and Roads Agency Limpopo, strengthening collaboration on strategy, enforcement priorities and updates to the Limpopo Road Safety Strategy and Action Plan.

Meanwhile, the Limpopo Department of Health's new Computer-Aided Dispatch (CAD) system opens opportunities for future EMS data alignment, deepening insight into severity and response patterns and, ultimately, patient outcomes.

The incident dashboard demonstrates that even in resource-constrained settings, practical, data-driven tools can shift a province from reactive decision-making to a more proactive, intelligence-led approach to saving lives on the road, while steadily building internal capacity for long-term custodianship and innovation.

The ethical standards by which inspectors operate

Tibor Szana
Chief Inspector: Occupational Health and Safety (Retired.)

This article has been written as an opinion piece and not as a research paper.

In 2019, the Department of Employment and Labour developed a "Code of Ethics" for its inspectors. This was done for a variety of reasons: suffice it to say that such documents are developed to ensure an organisation provides the guidelines required to keep its employees on a particular path.

This document was made available to members of the public at the time, to inform the public of the expectation the organisation has of its employees, and to illicit the support of the public in general. Of course this has not changed.

Over the past 5 years or so, the Department of Employment and Labour employed an additional 500 inspectors in Occupational Health and Safety nationally and in the last two years or so it has indicated it would employ the services of 20,000 interns over a two year period starting last year. It was supposed to employ 10,000 interns in the first year and another 10,000 interns in the following year or so.

Government has just announced that it would employ an additional 10,000 full time employees this year. These are not interns. The 20,000 plus the 10,000 would be inspectors employed to administer the various labour law legislation nationally from the various labour centres.

Over the years, the work of the labour inspectors has evolved to the current area of specialisation in each field that prevails. So an inspector doing BCEA legislation, is only required to do BCEA legislation work. If he/she identifies work for any other specialised field such as UIA or COIDA or EEA or OHSA, they would notify their colleagues—the other specialist inspectors accordingly.

With the number of inspectors that were employed by the Department, essentially meant the Department would need to develop processes to manage staff and their conduct while out in the field, where they operate independently, and are essentially left to their own devices. How does one then manage under those circumstances? By introducing a "Code of Ethics" you essentially attempt to do so by trying to fill a vacuum.

With this in place, there will be more than 32,000 inspectors operating nationally over the next two years, more so than at any other time, and more than any other government agency, including State Owned Entities (SOEs). That is a lot of people operating out there on their own, so strong management and systems become imperative for the smooth interaction between the labour law enforcement side and the employers, including the public in general.

Naturally these numbers on the ground can only indicate one thing—greater compliance all-round by all. Therein lies the can or worms.

According to Merriam-Webster, a Code of Ethics is defined as:

"*a set of rules about good and bad behavior.*"

(https://www.merriam-webster.com/dictionary/code%20of%20ethics?utm_source=copilot.com)

"*Ethics, in its broadest sense, represents the moral principles governing a person's behavior or the conducting of an activity.*

Codes of ethics, on the other hand, are formalized, structured frameworks outlining acceptable and unacceptable behaviors within a specific professional domain or organization. They provide concrete guidelines derived from broader ethical principles."

What are Ethics and Codes of Ethics - California Learning Resource Network

In analysing the core principles of the Code, the document clearly establishes a framework for inspectors to conduct their duties with integrity, fairness, and professionalism where the key principles include:

- Integrity and Honesty: Inspectors must act truthfully and avoid conflicts of interest.
- Fairness and Impartiality: Equal treatment of all employers and employees, without bias.
- Confidentiality: Sensitive information gathered during inspections must be protected.
- Professional Competence: Inspectors are expected to maintain and improve their knowledge and skills.
- Accountability: Inspectors must be answerable for their actions and decisions, ensuring transparency.

You will also recall in like fashion the commitment all government departments and the public servants made in this regard with the declaration of the 8 Principles of Batho Pele (which is a discussion for another day).

So wherein lies the strength of the Code? Remember that the Code after all is a piece of paper and relies on each individual's commitment to behave "ethically", notwithstanding the important role the employer/user has in this regard. So what does the Code attempt to do, it provides:

- Clear ethical standards: The Code provides inspectors with a strong moral compass, reinforcing trust in the inspectorate.
- Alignment with international norms: It reflects values consistent with ILO conventions and global occupational health and safety practices. To which the Department of Employment and Labour is a signatory in relation to various key conventions.
- Focus on public confidence: By emphasising fairness, transparency, and professionalism, the Code aims to build credibility with stakeholders.
- Guidance for complex situations: The inclusion of principles like impartiality and confidentiality helps inspectors navigate sensitive workplace disputes.

Like any organisation, a closer look often reveals weaknesses and gaps that explain why traction has been lost or is slipping.

In the case of the Department of Employment and Labour's inspectors, the Code of Ethics document itself shows areas that warrant review—both in how it was originally conceived and in how its implementation was intended, namely:

- Operational consistency: Standards exist, but no mechanism ensures inspectors apply them uniformly across provinces and sectors.
- Proactive engagement: The Code stresses compliance, yet it underplays inspectors' role in education and prevention.
- Specialised capacity: Modern risks (psychosocial hazards, renewable energy, digital workplaces) are not addressed, leaving inspectors underprepared.
- Enforcement clarity: Ethical expectations are outlined, but consequences for breaches remain unspecified, weakening accountability.
- Integration with other bodies: Limited alignment in varying degrees with their strategies misses the chance for unified national safety governance.

Having adequately shown that there are great possibilities that exist in the current Code of Ethics the following recommendations to strengthen the Code of Ethics are proposed in the following areas:

1. ENFORCEMENT AND ACCOUNTABILITY

- Introduce clear sanctions: Specify consequences for breaches of the Code (e.g., disciplinary measures, retraining, suspension).
- Independent oversight: Establish an ethics review committee to monitor inspector conduct and handle complaints transparently.
- Annual Ethics audits: Require inspectorates to report on adherence to the Code, with findings published publicly.

2. CONSISTENCY ACROSS PROVINCES

- Standardised procedures: Develop uniform inspection protocols to reduce variability in enforcement.
- Cross-provincial peer reviews: Inspectors from different regions should periodically review each other's practices to ensure consistency.
- Centralised training modules: Deliver national training aligned with the Code to standardise interpretation and application.

3. PROACTIVE ENGAGEMENT

- Education mandate: Expand the Code to explicitly require inspectors to engage employers proactively through awareness campaigns and compliance workshops.
- Employer partnership programmes: Encourage inspectors to act as advisors, not just enforcers, helping employers understand obligations before violations occur. More formal approach required to specific groups of employers while the informal sector to be given greater attention through dedicated resources.
- Community outreach: Include provisions for inspectors to engage with trade unions, workers, and the public to build trust and awareness.

4. SPECIALISED CAPACITY BUILDING

- Emerging risk training: Add requirements for inspectors to develop expertise in psychosocial hazards, renewable energy sites, digital workplaces, and climate-related safety issues. Increase level of competence (reduce stress).
- Specialist units: Create dedicated inspector teams for high-risk sectors (construction, mining, healthcare) with advanced training.
- Continuous professional development: Mandate ongoing certification and refresher courses tied to the Code. Motivate professionalisation of inspectorate.

5. INTEGRATION WITH NATIONAL SAFETY STRATEGY

- Link with compensation fund & licensees: Align inspector ethics with incident reduction strategies of the Compensation Fund, FEMA, and RMA.
- Shared targets: Incorporate national reduction benchmarks (e.g., % decrease in incidents) into the Code as guiding objectives.
- Unified reporting: Require inspectors to feed inspection outcomes into a consolidated national incident report.

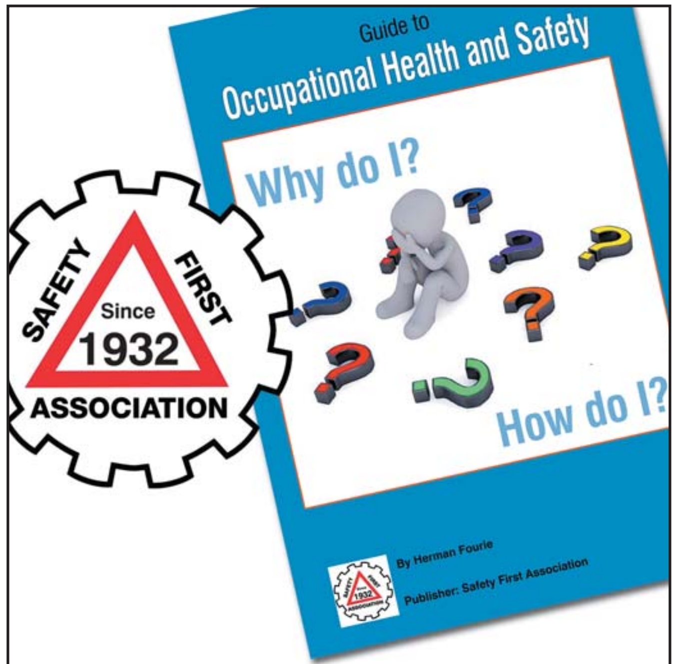
6. TRANSPARENCY AND PUBLIC CONFIDENCE

- Annual public report: Publish a national ethics compliance report alongside inspection statistics (long overdue by the current holders of information).
- Stakeholder feedback: Include mechanisms for employers, employees, and unions to provide feedback on inspector conduct.
- Open data: Make anonymised inspection outcomes available to the public to demonstrate fairness and accountability.

CONCLUSION

The Code of Ethics for Inspectors (2019) is a strong foundation, but it needs structural reinforcement to move from principle to practice.

By adding enforcement mechanisms, standardising procedures, mandating proactive engagement, building specialised capacity, and integrating with national safety strategies, the Code can evolve into a powerful tool that not only guides inspector behaviour but also drives measurable improvements in workplace safety.

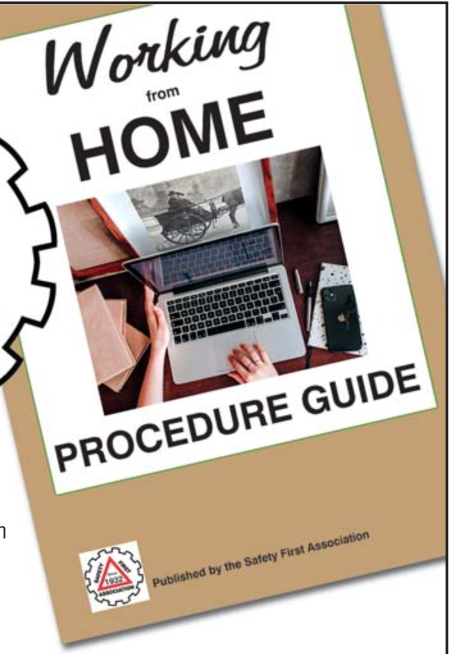


Occupational Health and Safety (OHS) is the practice of ensuring the safety and well-being of workers in their workplace.

Employers and employees need to understand the Dos and Don'ts of OHS to maintain a safe and healthy working environment.

This guide discusses some of the key Dos and Don'ts of OHS.

To order a copy email: debbie@safety1st.co.za

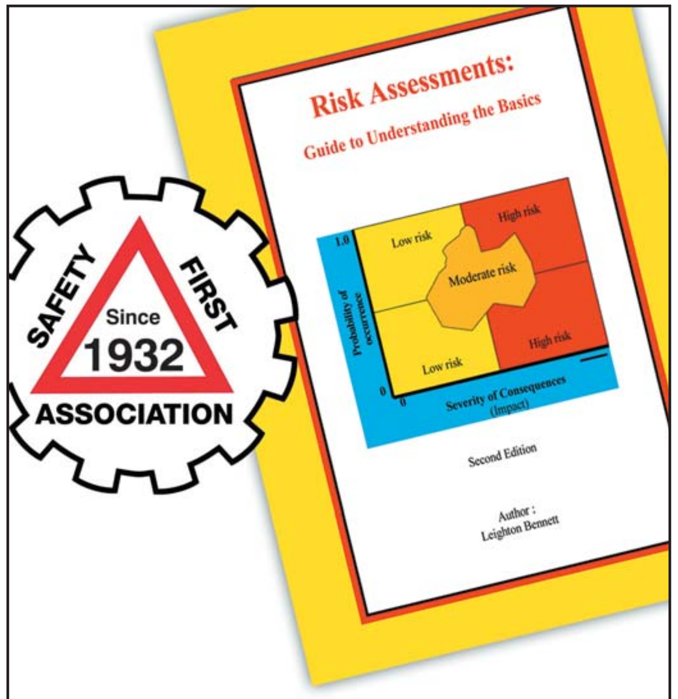


The "new workplace norm", a practice of working from home which started during the Covid-19 pandemic has continued.

The employer is required to provide, maintain and ensure a safe and healthy workplace for all his/her employees at the company premises and this extends to work at essentially a remote employee "workplace" venue where required.

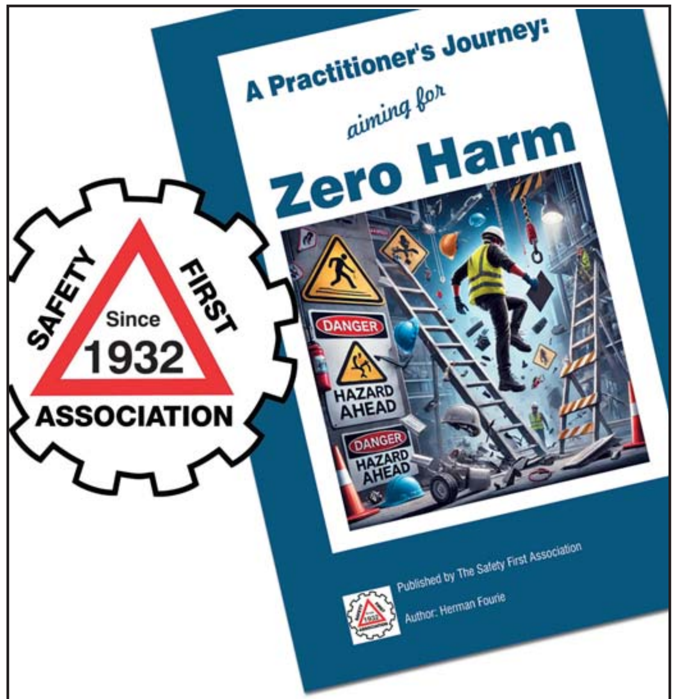
This guide details all health and safety requirements that need to be applied to both the company employee working from home and the responsibility of the employer.

To order a copy email: debbie@safety1st.co.za



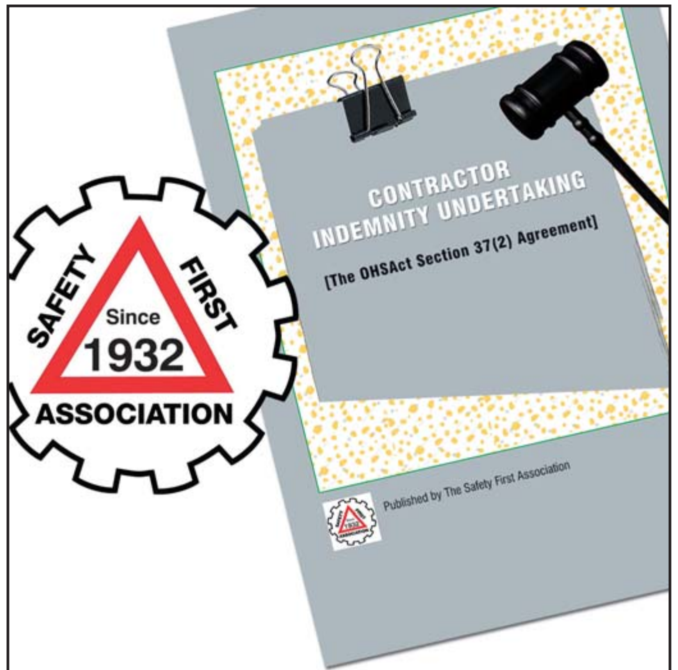
The aim of this booklet is to facilitate the development of an understanding of the Risk Assessment basics and the Risk Assessment Process, enabling a basic to baseline risk assessment to be performed with confidence.
This booklet is now in its second edition which provides updated risk assessment insights and concept thinking for use to support assessing business, project or workplace risk.

To order a copy email: debbie@safety1st.co.za



An excellent guide for creating an accident-free workplace:
What it means. What to do. How to achieve it!

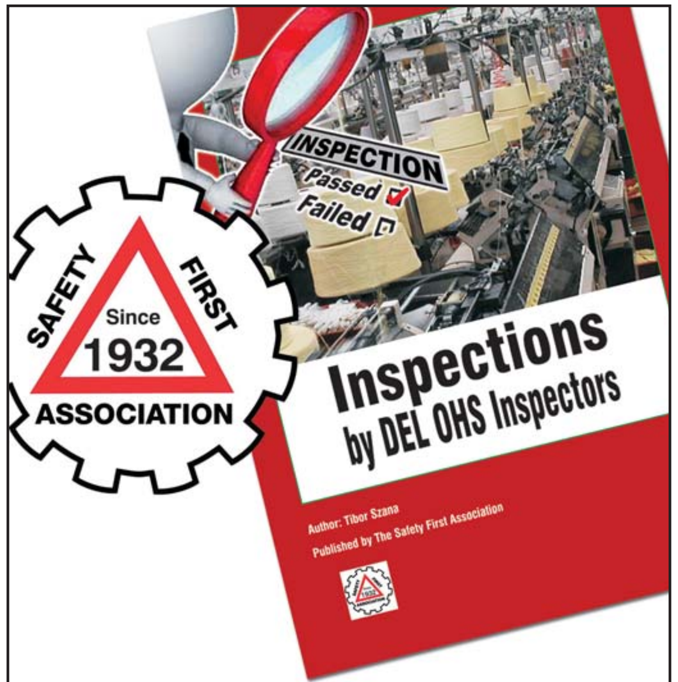
To order a copy email: debbie@safety1st.co.za



There is a great unawareness and misunderstanding of the actual transfer of liabilities and responsibilities from the employer (mandator) to the contractor (mandatory) in terms of the OHS Act AND the COID Act.

This issue is discussed in detail in this booklet using as a reference the applicable and relevant, but not all or complete sections of the OHS Act and the COID Act.

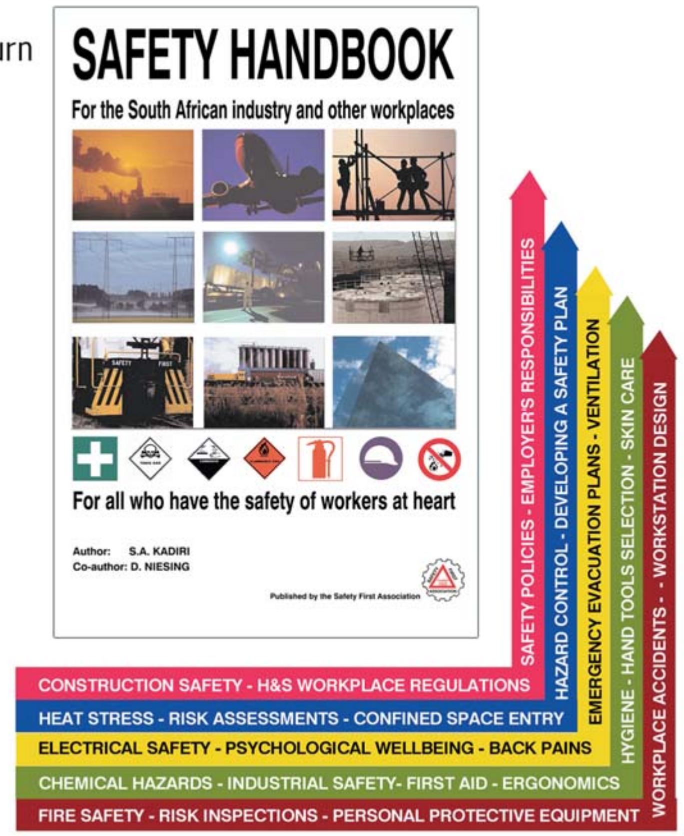
To order a copy email: debbie@safety1st.co.za



This guide provides insight into the way inspectors from the Department of Employment and Labour: Occupational Health and Safety do inspections.

The purpose is to provide some knowledge which will allow companies to engage with the inspectors at an appropriate level when inspections are conducted at your premises.

To order a copy email: debbie@safety1st.co.za



What businesses and SHE practitioners need to know (Without falling asleep or getting fined)

By someone who's still recovering from the Northwest Province experience

Herman (Harry) Fourie has a passion for occupational health and safety and has been working in the industry for many years. He is Vice-Chairman of the Safety First Association.

So, I opened a branch of my business in the North West Province. Sounds fancy, right? What followed was two years of wide-eyed disbelief, jaw-dropping confusion, and enough regulatory whiplash to qualify as an extreme sport.

Picture this: I walk into businesses, all smiles, ready to chat about Occupational Health and Safety (OHS). Instead, I get hit with the classic line: "We have fire extinguishers". Full stop. No follow-up. No mention of evacuation drills, risk assessments, or whether those extinguishers were last serviced during the Mandela administration. Just "We have fire extinguishers". As if that alone qualifies them for a safety Oscar.

But hey! I didn't just stand there nodding politely. I did something most people wouldn't dare: I befriended Department of Employment and Labour (DoEL) inspectors. Yes, really. And guess what? They're actually lovely humans—some strict, some chill, but all doing their job properly.

They'll grill you on your first aid kits, your Certificates of Compliance (COCs), and whether you've got your Section 16(1) and 16(2) appointments sorted under the **Occupational Health and Safety Act, 1993 (Act No. 85 of 1993)**.

Spoiler: if you don't, you're not compliant—you're just hopeful.

Then came the plot twist. *Enter*: the municipal health and environmental inspector. (Cue dramatic music of Star Wars).

One of my clients? Picture-perfect DoEL compliance. Spotless records, trained HSE reps, the works. But this inspector looked at them like they'd just tried to pay their rates bill in Monopoly money. Suddenly, we were violating environmental laws, business by-laws, and municipal ordinances faster than you can say "rat infestation".

Let's unpack the chaos:

1. The great rodent panic

There were no rats. Not one whisker. But the inspector insisted my client sign a contract with a pest control company—just in case.

We compromised: we bought traps (placed strategically near every corner, bin, and suspicious shadow) but refused the ongoing contract. Paying R1,500 a month to watch glue boards collect dust isn't compliance—it's performance art.

2. The sanitiser-in-first-aid-box saga

Our first aid box met every requirement under the **General Safety Regulations of the OHS Act**. Yet the inspector demanded hand sanitiser be inside the box. Technically? Not required by law. But arguing with a municipal official over where to stash Dettol is like debating pineapple on pizza at a family braai—nobody wins. So we added it. With a Post-it note that read: "*For drama purposes only*".

3. The scrap metal whisperer

My client had a solid arrangement with a local guy who removed scrap metal and used oil (less than 20 litres—barely enough to fill a teapot). He issued proper invoices and waste disposal certificates. In that town, he's the only game in town. The nearest licensed waste handler? 160 km away. At R8/km and half a day's travel, that's not sustainability—that's financial suicide. Still, the inspector wasn't satisfied. "Where's your municipal business licence?" he asked.

And that's when the hamster wheel in my brain started spinning so fast, I feared spontaneous combustion. Turns out, the town used to require business licences ... but the system quietly expired like a forgotten yoghurt in the back of the fridge. Nobody knew. Not the businesses. Not even the municipality's own front desk. So I dug. Deep. And here's what South African law actually says: ***The Legal Lowdown: You're registered ... But are you allowed to operate***? Just because you've registered your company with CIPC doesn't mean you're legally allowed to trade.

Think of CIPC as giving your business a birth certificate—not a driver's licence.

Here's what you actually need, depending on your hustle:

1. Municipal business licence

Under the Local Government: Municipal Systems Act, 2000 (Act No. 32 of 2000), Sections 81.85, every municipality can—and often does—require a business licence via its own by-laws. □

→ Yes, even if you□are CIPC-registered. □

→ Yes, even if you□are SAIOSH-certified. □

→ Yes, even if your dog has a LinkedIn profile.

2. Environmental permits

Running an abattoir, poultry farm, or handling waste oil? Say hello to the **National Environmental Management Act, 1998 (NEMA)**. You might need an Environmental Authorisation or Atmospheric Emission Licence. Ignorance won't save you—but it will cost you.

3. Food safety rules

If you're processing chicken (or anything edible), the **Foodstuffs, Cosmetics and Disinfectants Act, 1972 (Act No. 54 of 1972)** demands a Certificate of Acceptability from your local health department. No certificate = no customers. Simple.

4. OHS isn't optional

The **Occupational Health and Safety Act** require proper appointments (Section 16!), trained first aiders, and documented risk assessments.

Having fire extinguishers is step one—not the whole staircase.

5. Training providers, listen up!

Offering First Aid or SHE training? You need DoEL accreditation to issue valid certificates—with a DoEL number. Otherwise, your "certificates" are just fancy paper napkins.

6. Sector bodies ≠ Legal licences

Being SETA-accredited or MIBCO-registered is great—but it doesn't replace your municipal licence. Think of them as gold stars on your homework, not a hall pass.

THE BOTTOM LINE (BEFORE YOU GET A FINE)

☑ CIPC registration = your business exists. .

☑ Municipal business licence = you're allowed to operate here.

☑ Sector permits (health, environment, transport) = you're allowed to do this specific thing.

Miss one? You're not "technically compliant." You're technically in trouble.

So, to all my fellow SHE practitioners and small business owners: don't wait for an inspector to knock before you check your paperwork. And if someone tells you, "We have fire extinguishers," gently hand them this article ... and maybe a stress ball. Because in South Africa, compliance isn't just about rules—it's about surviving the bureaucracy with your sanity (and bank balance) intact.

Stay safe. Stay legal. And for goodness' sake—label your rat traps.

What the QCTO really expects:

A practical story for new facilitators, assessors, and moderators

Ken Annandale,
Intra-Safe (Pty) Ltd

For many people entering the world of occupational health and safety training, the QCTO system can feel confusing, intimidating, and full of unfamiliar language and acronyms.

New facilitators, assessors, and moderators often ask the same questions: *Where do I start? What is expected of me? And how do I know I am doing this correctly?*

This article tells the story of a typical QCTO Skills Programme journey, from preparation to certification, in simple and practical terms. It explains what the Quality Council for Trades and Occupations (QCTO) expects from each role, and what novice practitioners can realistically expect from the system in return.

A SHIFT FROM INFORMAL HEALTH AND SAFETY TRAINING TO FORMAL ACCOUNTABILITY

Under the old ways of doing things, OHS training was often informal. A facilitator arrived with slides, learners attended a session, and certificates were issued at the end of the day. While this approach felt simple, it did not always prove that learners were truly competent.

The QCTO system was introduced to change this. Its purpose is to ensure that occupational health and safety training leads to real workplace competence, not just attendance. This means health and safety training must be planned properly, delivered consistently, assessed fairly, and recorded nationally.

For facilitators, assessors, and moderators, this shift means one thing above all else: your role is now part of a regulated national process, not a standalone activity.

BEFORE THE CLASSROOM: WHY PREPARATION COMES FIRST

In the QCTO system, health and safety training, often called SHE training, does not begin in the classroom. It begins with preparation.

Every skills programme starts with an approved curriculum. This curriculum explains what the learner must know, what they must be able to do, and how competence must be measured. It is not optional reading. It is the foundation of everything that follows.

From this curriculum, the Facilitator Guide (FG) is developed. For a novice facilitator, it is important to understand that the FG is not just a teaching aid. It is the master document that controls learning, assessment preparation, and compliance.

If the FG is poorly designed or misunderstood, the entire programme is at risk.

The Learner Guide (LG) is then derived from the FG. Learners see only what they need to learn and practise. They do not see assessment decisions or internal instructions. This separation protects the integrity of assessment and ensures fairness.

STEPPING INTO THE ROOM: THE FACILITATOR'S REAL ROLE

When health and safety training finally begins, the facilitator's job is often misunderstood. Under QCTO, a facilitator is not there to "get through slides" or rush learners toward assessment. The facilitator's responsibility is to guide learning in line with the curriculum.

This means explaining concepts clearly, allowing learners to ask questions, and supporting them as they practise new skills. Learning activities are not random; they are carefully placed to build knowledge and confidence.

Formative assessment happens naturally during this stage. The facilitator observes, corrects, and supports.

However, it is critical to understand that facilitators do not declare learners competent. That responsibility belongs solely to the assessor. For new facilitators, this boundary is essential. Staying within it protects both the learner and the provider.

WHEN LEARNING BECOMES ASSESSMENT: THE ASSESSOR'S RESPONSIBILITY

Assessment under QCTO is formal and structured. In skills programmes, this is known as Formative Internal Summative Assessment (FISA).

The assessor's role is to make a professional judgement, based on approved assessment instruments, about whether the learner meets the required standard. This judgement must be evidence-based, fair, and consistent.

A novice assessor quickly learns that assessment is not about opinion or experience alone. It is about matching learner evidence directly to the Internal Assessment Criteria in the curriculum. The outcome is simple: the learner is either competent or not yet competent.

This clarity protects everyone. Learners know where they stand, and providers can defend their decisions during audits or verification.

THE MODERATOR: GUARDIAN OF FAIRNESS AND CONSISTENCY

Moderation is often the least understood role, yet it is one of the most important. The moderator does not re-assess learners. Instead, they check that assessments were conducted correctly and consistently.

For moderators, the QCTO expects independence, attention to detail, and professional judgement. A moderator ensures that standards are applied equally, regardless of who facilitated or assessed the programme.

This process builds trust in the system. It reassures learners, employers, and regulators that results are reliable.

AFTER THE TRAINING: RESULTS, RECORDS, AND NATIONAL RECOGNITION

Once assessment and moderation are complete, learner results are compiled and submitted through the QCTO-approved process. At this stage, many providers ask about systems, spreadsheets, and uploads. What matters most is not the software used, but the accuracy and traceability of the data.

Verified learner achievements are ultimately recorded on the National Learners' Records Database (NLRD), which is the national record of learning under the authority of the South African Qualifications Authority (SAQA).

If results do not reach the NLRD, the learner has no nationally recognised credit. This is why record-keeping, submission timelines, and documentation are taken so seriously under QCTO.

WHAT QCTO IS REALLY LOOKING FOR

Many novice practitioners fear that QCTO is looking for perfection. In reality, QCTO looks for discipline, structure, and honesty.

They expect:

- Health and safety training to follow the approved curriculum.
- Roles to be respected and clearly separated.
- Assessment decisions to be evidence-based.
- Records to be accurate and available.

They do not expect complicated systems or unrealistic administration. They expect providers and practitioners to understand their responsibilities and to act professionally within them.

A SYSTEM DESIGNED TO PROTECT, NOT PUNISH

When viewed correctly, the QCTO system is not there to make life difficult. It is there to protect learners from poor training, employers from unsafe practices, and practitioners from legal and professional risk.

For facilitators, assessors, and moderators who are new to the system, the journey can feel demanding at first. But with the right guidance, clear documentation, and a structured approach, it becomes predictable and manageable.

THE BIGGER PICTURE FOR THE OHS INDUSTRY

South Africa's occupational health and safety sector plays a critical role in protecting lives. QCTO-aligned health and safety training strengthens this role by ensuring that competence is real, measurable, and trusted.

When practitioners understand what is expected of them, and when providers support them with compliant materials and clear processes, the entire system works better.

I believe that good compliance tells a good story - one where learners gain real skills, practitioners work with confidence, and the industry earns respect.

AUTHOR'S NOTE

This article is intended as guidance, not legal advice, and reflects current QCTO methodology as applied to occupational health and safety skills programmes in South Africa. It was co-developed by INTRAi.

Tackling mental health in the construction industry

Petra Devereux, Executive Director, Master Builders Association Western Cape (MBAWC)

Mental health pressures across South Africa continue to rise. For those working in construction this is exacerbated by long hours, high-risk environments, tight deadlines, job insecurity, and a culture of stoicism creating an environment of stress, anxiety and emotional fatigue.

These pressures affect not only safety and productivity but also the lives of workers, their families, and the wider community.

"International research echoes the severity of the problem," says Petra Devereux, Executive Director, Master Builders Association Western Cape (MBAWC). "We need to intensify our efforts, highlighting mental health as an essential and urgent industry priority."

SEVERITY IN THE INDUSTRY

A 2020 Chartered Institute of Building (CIOB) survey of 2,081 construction workers found that more than a quarter (26%) had experienced suicidal thoughts, while almost half reported poor mental health and only 56% said their workplace had a mental-health policy.

The updated 2025 report shows little improvement: workers remain reluctant to seek help, often suffering in silence until the strain becomes overwhelming. Of the 865 respondents in 2025, 24% reported stress, 20% fatigue, 18% anxiety, 7% depression and 2% suicidal thoughts.

Rising pressures such as limited-term contracts, long commutes, time away from family, and a 'macho' culture further exacerbate the problem.

These global concerns mirror South Africa's own construction landscape. Local research from the Construction Industry Development Board (CIDB) and the Department of Employment and Labour confirms that construction workers shoulder significantly higher mental-health risks than most other sectors. The reasons are systemic: unstable work opportunities, hazardous conditions, economic stress, lack of diversity, substance abuse as a coping mechanism, and the persistent stigma that discourages openness.

Further, the South African Forum of Civil Engineering Contractors' (SAFCEC) recent workplace trends also pointed to a rise in anxiety and burnout among supervisors and site managers due to increased administrative and compliance demands.

CAUSE AND EFFECT

"Mental health challenges have become impossible to ignore," says Devereux. "We're seeing increased pressure and mental fatigue across all levels from business owners to labourers who start their day with long, expensive commutes.

"With the surge in developments in the Western Cape and frequent project commencement delays, many contractors are being pushed into impossible timelines. By raising awareness, we want to shine a light on the often-overlooked mental well-being of our workforce. Mental health is a legitimate safety concern, not an optional extra."

The human impact is profound. Workers under strain are more vulnerable to accidents, near misses, reduced concentration and slower reaction times. Productivity suffers, team cohesion breaks down, and communication, essential on fast-moving sites, weakens. As Devereux notes, "A safe site is not only one free of physical hazards. It is one where mental wellness is protected."

Chandré Abrahams, Chairperson of the MBAWC Marketing Committee, agrees that cultural and systemic barriers compound the problem. "Construction has long been shaped by a 'work through it' mindset," he says. "Many workers fear judgement or even job loss if they speak up.

"Stigma remains one of the biggest obstacles, especially in male-dominated environments. But talking about stress should be as normal as talking about scaffolding safety. That's the shift we need."

LEADERSHIP MUST TAKE CONTROL

This cultural shift must begin with leadership. MBAWC emphasises that site managers and senior staff play a pivotal role in breaking down stigma and creating a climate where workers feel safe to voice concerns. "Leadership must show visible support," says Devereux. "If managers don't acknowledge mental health as a real issue, no policy or poster will make a difference."

Practical, accessible interventions are essential. MBAWC encourages companies to embed mental well-being into their health and safety systems, just as they do with Personal Protective Equipment (PPE) or fall protection.

Recommended steps include:

- Incorporating mental health into site-specific health and safety policies.
- Providing access to counselling or Employee Assistance Programme (EAP) services.
- Scheduling monthly mental-health toolbox talks.
- Training supervisors in mental-health literacy and supportive communication.
- Appointing mental-health champions or 'first aiders' on site.
- Offering anonymous reporting channels.
- Ensuring fair workloads and realistic deadlines.
- Encouraging peer-support groups and fostering work–life balance where possible.

Many South African firms are already adopting these measures, demonstrating that meaningful progress is possible even in high-pressure environments.

Abrahams stresses that small, consistent habits can transform site culture. "Real change doesn't only happen in workshops; it happens in daily check-ins, in supervisors asking, 'Are you okay?' and in teams knowing they won't be judged for speaking up."

STEPS TO FIGHTING THE PROBLEM

MBAWC's commitment includes providing members with guidance, awareness materials, toolbox talk templates, and links to established resources such as the South African Depression and Anxiety Group's (SADAG) counselling line, community mental-health organisations, and sector-specific guidance from the Construction Industry Development Board (CIDB) and MBAWC.

For employers and site managers, MBAWC's message is clear. "Mental health is not a personal issue. It's a safety issue, a productivity issue and a people issue," says Abrahams. "When workers feel supported, they work more safely, more efficiently, and with greater resilience. Healthy businesses are built on healthy people."

Devereux echoes this, "Employers must prioritise mental wellness with urgency. Our industry is built on human effort, and those individuals deserve care, support and understanding. Strong foundations aren't only made of concrete. They are built on the wellbeing of the people who bring our projects to life."

Non-compliant electrical products:

Putting consumers at risk

Safehouse's Technical Lead and Chairperson, Connie Jonker

South Africa has no reliable national statistics on electrical product compliance, with independent industry testing consistently showing high failure rates, says voluntary electrical safety association, Safehouse.

Most South Africans trust that if a product is being sold in a store, it must be safe because it is assumed that the retailer has vetted the product. Unfortunately, that isn't always true.

LACK OF OVERSIGHT

Many products available on our shelves fail to meet basic safety requirements. And while non-compliant electrical products are not always immediately dangerous or seen upfront to be dangerous, they can pose significant risks.

More concerning is the systemic threat of South Africa's illicit electrical goods trade and the far-reaching consequences it has on consumer safety, economic stability and industrial sustainability.

Safehouse was founded in 2014 in response to ineffective regulation and the lack of robust market oversight under the National Regulator for Compulsory Specifications (NRCS), which relies primarily on administrative approvals and single type-test reports.

Without ongoing quality control, the risk of undetected non-compliance increases significantly, creating a system that can be exploited by certain

importers and unscrupulous local manufacturers to sell a wide range of products under a single approval certificate. Compounding the problem is the NRCS's refusal to publicly disclose non-compliant products, a practice that leaves all consumers exposed to unnecessary risk.

ILLICIT TRADE COMPOUNDS THE PROBLEM

The South Africa Illicit Economy 2.0 Report, launched by the Transnational Alliance to Combat Illicit Trade (TRACIT) in conjunction with Business Unity South Africa (Busa) earlier this year, states that South Africa's illicit trade is estimated at R100 billion, or about 1.5% of our GDP.

This figure barely captures the wider damage it inflicts on lawful manufacturers, retailers, employees, and tax revenue.

And while the NRCS is making some effort to control non-compliant and illicit products across sectors including building materials, automotive components, chemicals and electrical products, its overall enforcement reaches less than 0.5% of South Africa's illicit trade.

EFFORTS TAKEN TO ENSURE THE SALE OF SAFE PRODUCTS

"Robust processes are being put in place thanks to our members' continued commitment to product safety and regulatory compliance.

Consumers can now make more informed and

reliable choices by selecting products bearing the Safehouse mark and checking the Safehouse website to verify suppliers and businesses that are accredited members," says Safehouse's Technical Lead and Chairperson, Connie Jonker.

According to South African civil society organisation—Tax Justice South Africa—the influx of cheap, non-compliant electrical products into South Africa poses serious risks to consumer safety and local industry.

Many such products enter through porous borders or online channels. Surveys show that nearly 80% of electro-technical companies are highly concerned about this growing problem.

NON-COMPLIANCE - A DISASTER WAITING TO HAPPEN

Jonker says that no one can determine compliance through visual inspection alone. He says that tests, which can cost several thousand rand each, involve the assessment of dimensions, flammability of materials, insulation, and tripping currents of circuit breakers. These can only be conducted in proper laboratories. "Even experienced people cannot reliably identify a compliant product on a shelf."

Connie Jonker, part of Safehouse's management team who brings over 50 years' electrical industry experience to the organisation, says that the compliance situation in South Africa is a disaster. "A lot of non-compliant products are entering the country without proper control. We can only advise, we cannot force products off shelves.

"We send test results to companies and urge them to fix issues, and if not, we report to the NRCS. But not much happens after that. It is also virtually impossible to track what action, if any, the NRCS takes on any compliance issues raised," he explains.

"Different products carry different risks. If a circuit breaker doesn't trip when needed, you could have a fire or an electrical shock. Other issues, such as incorrect marking, may not be immediately dangerous but can lead to products being used incorrectly," says Jonker. "Buying very cheap products increases the risk of serious non-compliance", and the consumer must be aware that buying cheap poses its own risks even when done by a third party and signed off via CoC.

The accountability for the safety of electrical products being sold in South Africa also lies with the retailers. Safehouse emphasises that retailers have a fundamental responsibility to protect consumers by carefully verifying test reports and Letters of Authority (LOAs) before listing products.

"Retailers need to understand exactly what they are selling, and act as the first line of defence against unsafe or non-compliant goods," says O'Leary. "Too often, retailers rely blindly on documentation that should be rigorously scrutinised, particularly when prices seem too good to be true."

As a result, Safehouse is urging both consumers and retailers to learn more about their mission to remove nefarious suppliers of unsafe electrical products and services and to eradicate dangerous products from the market. They also want to make electrical safety information understandable and accessible.

While many compliant products are still updating their packaging, consumers can start identifying trusted items by the Safehouse mark on electrical appliances and other products.

Consumers can also visit the Safehouse website to see which companies have committed to producing compliant products and protecting lives and livelihoods across South Africa.

Safehouse, which operates on a peer-review model with members funding laboratory testing and committing to a strict code of conduct, has become the go-to platform to support ethical compliance, conduct credible independent testing, and encourage higher standards across the sector.

The association wants to partner with authorities, not replace them, by providing technical insight and evidence-based recommendations.

"You can't see electrical safety with the naked eye. Two products may look identical on a shelf, yet one can meet every requirement while the other fails critical safety tests. That's why ongoing compliance testing matters, and why consumers and retailers need a way to know who is doing things properly," says Jonker.

"This is a sector where safety should never be optional. A more informed marketplace, from sales floors to boardrooms, will drive demand for compliant products and improve national safety standards," he says.

Sappi Forests: *Commitment to safer forestry operations*

Forestry remains one of South Africa's most demanding and high-risk sectors, shaped by challenging terrains, unpredictable weather and intensive manual labour.

For the thousands of employees and contractors working in the South African Forestry industry, safety is not simply a protocol, it is a discipline that underpins every decision, every shift and every task in the field.

The sector's risk profile is well recognised internationally. According to the International Labour Organization (ILO), forestry harvesting activities account for between 38% and 90% of all accidents reported in global forestry operations.

In South Africa, the national forestry and logging workforce increased from 36,767 employees in 2019 to 39,087 in 2023, according to Statistics South Africa's Quarterly Employment Statistics (QES). These figures illustrate the urgent need for proactive safety cultures that evolve in line with industry pressures, rural contexts and environmental volatility.

SAPPI'S POSITIVE PROGRESS

Against this backdrop, Sappi Forests has recorded a year of encouraging progress across its operations.

Regional teams in KwaZulu-Natal and Mpumalanga collectively reached several record-setting lost-time injury (LTI) free milestones, reflecting a deepened culture of care, where open communication, leadership engagement and continuous improvement builds commitment.

In regions such as the Zululand Coastal, KZN South, KZN Midlands, Highveld, Barberton and Ngodwana areas, teams have achieved multi-million-hour periods without LTIs, demonstrating what is possible when safety becomes embedded in day-to-day behaviour rather than limited to compliance checklists.

"These milestones are a reflection of what happens when safety becomes part of the culture, not merely a requirement," says Duane Roothman, Vice President of Sappi Forests. "It is about leadership, accountability and the confidence to speak up before something goes wrong and preferably before it goes wrong."

Sappi Forests attributes much of its progress to an evolving approach that combines targeted behaviour-change programmes with strong on-the-ground leadership.

One of the most influential of these is the STBA (Stop and Think Before You Act) programme, a behavioural-safety initiative designed specifically for rural, multilingual teams. Using relatable storytelling and clear reflection prompts, the programme encourages workers to pause and assess risks before acting, helping bridge language and barriers that often affect frontline safety communication.

By combining expert technical insight with on-the-ground engagement across our forestry operations, Sappi was able to co-create a practical behaviour-change solution.

Through active listening and incorporating feedback from the workforce throughout the process, the initiative fostered early ownership and embedded the principles of accountability and care from the outset.

SAFETY WALK SAFETY TALK

Daily engagement practices have also strengthened safety ownership. The "Safety Walk, Safety Talk" method has been rolled out across operations to ensure that safety conversations become part of routine interaction between supervisors, employees and contractors.

These engagements are designed not only to identify risks in real time, but also to foster shared responsibility in both workplace and home environments.

LIFE SAVING RULES

Leadership development continues to form another cornerstone of Sappi's safety efforts.

Through values-based interventions and reflective leadership sessions, operational leaders are supported in creating environments where safety conversations are encouraged, lessons are openly shared and vigilance is promoted at every level of the organisation.

This culture is further reinforced by Sappi's eight *Life-Saving Rules*, clear and non-negotiable standards developed through years of incident analysis, aimed at ensuring that both routine and high-risk activities are carried out safely and consistently.

"Safety is not a static concept, it evolves with our people, our environment and our industry," says Roothman. "We are committed to ensuring that every one of our teams feels supported, equipped and empowered to work safely.

Recognising lead indicators remain paramount in driving continuous improvement and guides proactive interventions, as much as positive reinforcement of the correct behaviour builds confidence and accelerates culture change. The success of behaviour based safety culture, is very visible when the same culture starts gaining traction at home and in communities.

AFFECTS OF CLIMATE CHANGES ON FORESTRY

As global forestry shifts toward increased mechanisation, climate resilience and integrated safety systems, South Africa's sector is under renewed pressure to adopt future-focused approaches.

Recent findings from the FAO, ILO and UNECE report, *Occupational Safety and Health in the Future of Forestry Work*, call for the industry to strengthen behavioural safety, embed continuous learning and invest in technologies that reduce manual risk exposure.

For Sappi Forests, the progress of the past year reflects meaningful steps forward, but not a finish line.

At the core of a dedicated safety philosophy is a simple principle that everyone can relate to: every employee should return home safely at the end of each day.

Sappi is firm in its view that zero accidents is a very attainable goal, achieved through shared responsibility, consistent awareness and unwavering personal commitment.

"At Sappi Forests, we have learned that safety is never a destination," Roothman concludes. "It is a daily commitment shaped by accountability, reflection and shared responsibility. While we are proud of what our teams have achieved, we remain focused on doing more, because when safety becomes a shared value across the industry, everyone benefits."