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WORKPLACE SAFETY GUIDE

GUIDE 6

Hazard Identification and Risk Assessment (HIRA)

"The Safe Way Forward"

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Hazard Identification and Risk Assessment (HIRA)

The Foundation of Every Safe Workplace — and the First Thing a DoL Inspector Will Ask For

1. Why This Matters

A workplace that has never conducted a formal HIRA is a workplace that has never systematically asked the question that underpins every other safety decision: what could go wrong here, and what are we doing about it?

Every year, South African workers are injured, permanently disabled, or killed by hazards that existed in their workplaces long before the incident occurred — hazards that were visible, known, and in many cases reported by workers who were either ignored or told to get on with the job. A machine without a guard. A chemical stored in an unlabelled container. A floor that floods when it rains. An overhead load pathway that crosses a pedestrian route. These are not unforeseeable events. They are the predictable outcomes of workplaces that have never been required to look systematically at their own risks.

HIRA is that system. It is the structured, documented process by which an employer identifies every hazard present in their workplace, evaluates the likelihood and severity of harm, and puts in place controls to reduce that risk to an acceptable level. It is not a once-off exercise, a form to be filed, or a consultant's report to be shelved. It is a living document that must be reviewed whenever conditions change — and it is the legal and practical foundation on which every other element of your safety management system rests.

Without a HIRA, every other safety intervention in your organisation is guesswork.

2. What the Law Requires

The legal obligation to identify hazards and assess risks is not a suggestion buried in a guideline — it is a direct, enforceable requirement of South African occupational health and safety law:

- Section 8 of the OHS Act (General Duty of Care) requires every employer to provide and maintain, as far as is reasonably practicable, a working environment that is safe and without risks to health. This duty cannot be discharged without first knowing what the risks are — which is precisely what a HIRA is designed to determine.
- Section 8(2)(d) specifically requires employers to establish what hazards are attached to any work that employees are required to perform, and then to implement whatever control measures are necessary to protect those employees.
- Regulation 2 of the General Safety Regulations requires that before work commences, a risk assessment is conducted and the necessary precautionary measures are implemented. This applies to new work activities, changes to existing activities, and on an ongoing review basis.

- The Construction Regulations, 2014 (Regulation 9) require the principal contractor to ensure that a risk assessment is conducted by a competent person before work on a construction site begins, that it is reduced to writing, and that it informs the site's health and safety plan.
- The Hazardous Chemical Substances (HCS) Regulations require a risk assessment to be conducted for every workplace where hazardous chemical substances are present — with specific requirements for documentation, employee information, and control measures.
- ISO 45001:2018, to which RK SAFETY is certified, requires organisations to establish, implement, and maintain a process to identify hazards on an ongoing basis. This is not just a legal obligation — it is a foundational requirement of any internationally recognised safety management system.

A DoL inspector attending your workplace following a serious incident will ask one question above all others: show me your risk assessment. If you cannot produce a current, documented HIRA that covers the activity in which the incident occurred, you are already in a very difficult legal position.

3. Who Needs This in Your Organisation

HIRA training is relevant across virtually every role in an organisation that carries any safety responsibility. The following positions have the greatest need:

- HSE officers and safety managers — responsible for leading and documenting the HIRA process
- Supervisors and foremen — who must apply risk assessment thinking to day-to-day work planning and task assignment
- HSE representatives — who have a legal right and obligation to participate in hazard identification and risk assessment processes
- Operations managers and site managers — accountable for ensuring that risk assessments are in place before work begins and are reviewed when conditions change
- Maintenance and engineering managers — responsible for assessing the risks of planned and breakdown maintenance activities
- HR managers — responsible for ensuring that HIRA documentation is part of the legal compliance record and that new employees are inducted against the relevant risk assessments
- Health and Safety Committee members — who must review and approve HIRA outcomes as part of the committee's oversight function

Industries where HIRA is most urgently required: construction, manufacturing, chemical processing, logistics and warehousing, agriculture, mining services, food and beverage production, and any environment where machinery, vehicles, chemicals, or work at height is involved. In practice, this covers every significant industrial employer in South Africa.

4. What You Should Know — 8 Practical Facts

- **Know the difference:** A hazard and a risk are not the same thing — and the distinction matters.

A hazard is anything with the potential to cause harm — a wet floor, a rotating shaft, a pressurised vessel, a forklift. A risk is the likelihood that the hazard will result in harm, combined with the severity of that harm if it does. Understanding this distinction is not pedantic — it determines how you prioritise your controls and where you allocate your resources.

- **Hierarchy of controls:** The hierarchy of controls is the law's preferred framework — and 'PPE first' is the wrong approach.

The OHS Act and ISO 45001 both require that control measures follow a specific hierarchy: elimination of the hazard first; then substitution; then engineering controls; then administrative controls (procedures, signage, training); and PPE only as a last resort when all other controls have been applied. A HIRA that recommends 'wear gloves' as the primary control for a chemical exposure risk has not been properly conducted.

- **Scope matters:** The HIRA must cover every task, not just the obvious ones.

A common error is to conduct a HIRA for the main production process and ignore routine maintenance, cleaning, material handling, and contractor activities. Statistically, a significant proportion of serious workplace injuries occur during non-routine tasks — maintenance shutdowns, cleaning operations, and ad hoc work that falls outside normal procedures. These must be assessed too.

- **Participation is not optional:** Workers who do the job must be involved in the HIRA.

The people who perform a task every day know its hazards better than any manager, consultant, or assessor who observes it from the outside. A HIRA conducted without the input of the workers performing the assessed tasks will miss hazards. Section 19 of the OHS Act recognises this by giving HSE representatives the right to participate in hazard identification. Use them.

- **Review triggers:** A HIRA is a living document — not a once-off audit.

Your HIRA must be reviewed whenever: a new task or process is introduced; existing equipment or materials change; an incident or near-miss occurs; there is a change in legislation; or the annual review date is reached. A HIRA that was completed three years ago and has never been updated is not a compliant risk assessment — it is a historical document.

- **Use a risk matrix:** Risk rating without a matrix is meaningless.

Every HIRA must use a documented risk matrix to assign a numerical or categorical rating to each identified hazard based on the likelihood of occurrence and the severity of potential harm. Without a matrix, risk ratings are subjective and inconsistent between assessors. The matrix also allows you to prioritise corrective actions — high-rated risks require immediate action; lower-rated risks can be scheduled.

- **Residual risk:** Residual risk must be rated after controls are applied — not before.

One of the most common errors in HIRA documentation is failing to re-rate the risk after control measures have been identified. The initial risk rating establishes the inherent risk level. The residual risk rating — after all controls are applied — tells you whether your controls are adequate. If the residual risk remains high after all controls are in place, additional controls are required.

- **Documentation:** Your HIRA register is a legal document — treat it like one.

A HIRA register must record: the task or activity assessed; the hazard identified; the potential consequence; the existing controls; the initial risk rating; the additional controls recommended; the responsible person and due date for implementation; and the residual risk rating after controls. It must be signed by the assessor, reviewed and approved by a competent person, and retained as part of your safety management system records.

5. What You Need to Be Trained In

HIRA is a structured, methodological discipline. The ability to conduct a legally compliant, practically useful risk assessment cannot be developed through experience alone — it requires formal, accredited training in the following:

- The legal framework governing hazard identification and risk assessment in South Africa — including the OHS Act, the General Safety Regulations, the Construction Regulations, and the HCS Regulations.
- The formal definitions of hazard, risk, incident, near-miss, and dangerous occurrence — and why precision in the use of these terms matters in legal proceedings.
- Hazard identification techniques — including physical workplace inspections, task-based hazard analysis, job safety analysis (JSA), and incident trend analysis.
- Risk matrix design and application — how to construct a likelihood/severity matrix appropriate to your workplace, and how to apply it consistently across all assessed tasks.
- The hierarchy of controls — how to apply the five-level hierarchy to each identified risk and document the rationale for the selected control measures.
- HIRA documentation and record-keeping — completing a legally compliant HIRA register, assigning corrective action owners and deadlines, and maintaining the review cycle.
- HIRA for specific environments — construction sites, chemical workplaces, machinery-intensive environments, and logistics and warehousing operations each present specific hazard categories that require sector-specific knowledge.
- Integrating HIRA into the broader safety management system — linking the HIRA register to incident investigation findings, HSE committee reviews, and legal compliance audits.

An accredited HIRA certificate from RK SAFETY demonstrates to the DoL, your insurer, and your clients that the person responsible for your risk assessments has been formally trained and assessed to a recognised standard.

6. Is Your Workplace Compliant? — Self-Audit Checklist

Answer Yes or No to each of the following. Any No is a compliance gap that requires immediate attention.

- □ Has a formal, documented HIRA been conducted for every task and work activity performed in your workplace — including routine, non-routine, and maintenance activities?
- □ Was the HIRA conducted by a trained, competent person — and were the workers who perform each assessed task involved in the process?
- □ Does your HIRA register use a documented risk matrix to rate each hazard by likelihood and severity?
- □ Does the HIRA identify control measures according to the hierarchy of controls — not defaulting to PPE as the primary control?
- □ Is a residual risk rating recorded for each hazard after all control measures have been applied?
- □ Are corrective actions from the HIRA assigned to specific responsible persons with documented deadlines — and tracked to closure?
- □ Has the HIRA been reviewed within the last 12 months — or more recently if new tasks, equipment, or materials have been introduced?
- □ Is the HIRA reviewed and approved by a competent person, signed, dated, and retained as part of the safety management system?
- □ Are employees informed of the hazards and control measures that apply to their work — and is this induction documented?
- □ Does the HIRA register inform the Health and Safety Committee's agenda and corrective action tracking?

7. What Happens If You Get This Wrong

- Criminal prosecution under Section 8: An employer who fails to identify and control workplace hazards is in direct violation of the OHS Act's general duty of care. This is not a technicality — it is the foundational obligation of every employer. Section 38 penalties apply, including fines and imprisonment of responsible persons.
- Automatic DoL liability following any serious incident: When a worker is seriously injured or killed, the DoL investigation will immediately request the risk assessment for the activity involved. The absence of a current, documented HIRA for that activity is evidence of systemic failure — and transforms a tragic incident into a criminal matter.
- COIDA complications: A COIDA claim involving an injury in an area or activity that was never assessed under a formal HIRA strengthens the injured worker's position significantly. It demonstrates that the employer knew or should have known the risk existed and took no structured action to control it.
- Civil liability: South African courts have consistently held that an employer's failure to identify and control a known risk — a risk that a proper HIRA would have identified — constitutes negligence. Expert witnesses in civil proceedings will scrutinise your HIRA register, your review dates, and your corrective action closure records.
- Insurance exposure: Many commercial and industrial insurers are moving toward requiring evidence of documented risk assessments as a condition of cover, or as a basis for calculating premiums. An undocumented risk environment is an uninsurable one.
- Contractor and client disqualification: Major corporate clients, principal contractors, and government procurement processes increasingly require HIRA documentation as part of vendor pre-qualification. Without it, you cannot work on the site.
- The compounding effect: A workplace that has never conducted a proper HIRA has no baseline. It cannot identify trends. It cannot demonstrate improvement. It cannot defend itself. Every other safety intervention — training, PPE, procedures — operates in a vacuum without the risk assessment that tells you what risks you are actually trying to control.

8. The RK SAFETY Course

THE RK SAFETY COURSE

Course: Hazard Identification and Risk Assessment — HIRA (Accredited)
Duration: 1 day | Certificate validity: 2 years | Price: R1,127.00 incl. VAT

Who should attend: HSE officers and safety managers, supervisors and foremen, HSE representatives, operations directors, site managers, maintenance engineers, Health and Safety Committee members, and any person responsible for conducting or reviewing risk assessments in their workplace.

RK SAFETY's HIRA course is accredited and designed for the realities of South African industrial workplaces — not theoretical models. Delegates learn to identify hazards using proven techniques, apply a risk matrix correctly, work through the hierarchy of controls, and produce a HIRA register that will stand up to a DoL inspection. The course is facilitated by experienced safety professionals who understand what gaps look like in construction,

manufacturing, logistics, and industrial environments — because they have seen the consequences firsthand.

Contact us today — 031 837 3461

Book at rksafety.co.za/training | Call us: **031 837 3461**

THE SAFE WAY FORWARD

You cannot control what you have not identified. You cannot protect your people from hazards you have never formally acknowledged. HIRA is not paperwork — it is the structured, systematic commitment to looking at every part of your workplace and asking: what could hurt someone here, and what are we going to do about it? At RK SAFETY, we believe that commitment is the starting point of every safe workplace — and the foundation on which everything else in this guide series is built. That is the safe way forward.