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ACCREDITATION, ACCREDITATION, ACCREDITATION

ITBs, SAQA, SETA, NQF and QCTO
What is going on here?

Have SAQA abolished the system aimed at equipping employees in basic workplace Health and Safety knowledge and skills?

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THE SOLUTION --Provide Non-Credit Bearing Legal Compliance Training

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BRIEF HISTORY OF OHS LEGISLATION

The Factories Act (Act No. 28 of 1918) was superseded by the Factories, Machinery and Building Work Act (Act No. 22 of 1941), the Machinery and Occupational Safety Act (Act No. 6 of 1983), and the Occupational Health and Safety Act (Act No. 85 of 1993). A draft amendment bill has been in circulation since 2014 and rears its head from time to time, with mention of “imminent” promulgation.

Throughout this extended period, legislation has indicated that employers are responsible for training their employees to prevent injuries and diseases in and from their work. Section 8 and 13 of the OHS Act mentions the employer’s duty to “Inform, Instruct and Train” their employees, as do some of the more recent Regulations.

BRIEF HISTORY OF SKILLS DEVELOPMENT

To manage legislated training, a system of “approval” via the Chief Inspector of the Dept. of Manpower, then the Dept. of Labour and now the Dept. of Employment and Labour was established.

This system comprised of Regulations such as:

- **General Safety Regulation** which includes First Aid training, refer to *Reg 3.4 (d) First aid, emergency equipment and procedures - Trained “by a person or organisation approved by the chief inspector for this purpose,”*
- **Diving Regulations** which embrace Commercial Diver training schools, refer to *Reg 3 (2) “may apply in writing to the chief inspector for approval as a diving school to train learner divers and the chief inspector may approve such application subject to such conditions as he or she may impose.”*
- **Driven Machinery Regulations** for training of Operators of Forklifts, Earth Moving and Lifting Equipment, Cranes and so forth; refer to *Reg 20. (1) Approval and registration of training providers. “The chief inspector may approve and register any training provider that has been accredited by the Transport Education and Training Authority as an approved training provider.*

In addition:

- Asbestos Abatement Regs
- Hazardous Biological Agents Regs
- Fall Protection-Construction Regs
- Ergonomics Risk Assessors-Ergo Regs
- Lifting Machines-Driven Machinery Regs

Other non-specific risk-based training was expected; however, training requirements were devoid of detailed quality standards, assessment methodologies, evidence of certification, etc.



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NQF “Certificates of Competency” were unheard of, while generic “Certificates of Attendance” proliferated the market.

Logically employers applied the principle of “Caveat Emptor” and selected the most appropriate training, from independent commercial options.

As one of the first safety training companies in South Africa, **INTRA**’s mantra was “Legal Compliance”, and “Accident and Incident” Prevention.

We coined the phrase “If you don't train them, you can't blame them”.

Without excessive bureaucracy, hundreds of thousands of employees were trained by entrepreneurial subject matter generalists / specialists, enabling these service providers to render relevant training at a reasonable price.

Training providers such as **INTRA**[™] would research and structure training with a specific view to ensuring functional understanding and application of the subject. Working closely with an employer, we would assist them to determine their Unique Risk Profile, conduct a corresponding training “Needs Analysis”, and deliver training in accordance with applicable law.

In 1998, Parliament promulgated the Skills Development Act, the creation of SAQA and the SETA system of accreditation. www.saqa.org.za

Prior to 2000, the short-lived ITB [Industry Training Boards] made their appearance as part of the educational spectrum. This was the precursor to SETA and the QCTO and comprised of 33 Boards covering various industry sectors and trades. They focused on apprenticeships, but not apparently on micro or short-course Health and Safety training. www.qcto.org.za

SETA was to focus on micro and short courses, while QCTO on careers, colleges, and universities.

INTRA[™] initially obtained accreditation from the Aviation ITB, but this proved to be a fruitless, expensive, excessive exercise.

The South African Qualifications Authority [Act 58 of 1995] was enacted, and subsequently replaced by the National Qualifications Framework [Act 67 of 2008].

So, with these disparities, what were training providers and employers to do?



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THE SOLUTION

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LEGAL COMPLIANCE / MANDATORY / REGULATORY TRAINING – EMPLOYER’S RESPONSIBILITY

Considering the precept of “Diligence Pater Familias” or “The Reasonable Man”, 100% responsibility lay with employers to determine who and what training would be provided to their employees and when learners were regarded “Competent”.

Employers were expected to declare their employees “competent” prior to either appointing or promoting them, and not rely on third-party providers who knew neither their employees, the nature of their work, the circumstances or dangers, hazards and risks they faced.

In 2017, in a somewhat surreptitious move, the Department of Employment and Labour [DEL], threw the proverbial “cat among the pigeons”, with the Minister and Chief Inspector’s drive to amend the requirements of the aging General Safety Regulation 3.4 relating to First Aid trainers.

At that time, Government Gazette R.1463 of 2017 G.G. 41350 of 2022/12/2017, and successive proclamations declared that the former Level 1, 2 and 3 First Aid course requirements were to be replaced by SAQA Unit Standards: Refer www.saioh.co.za/news/news.asp?id=382189

- 119567 [BASIC] 5 credits = 50 notional hours
- 120496 [PRIMARY] 5 credits = 50 notional hours
- 8 credits = 80 notional hours

In addition to the Chief Inspector’s GSR 3.4 approval, SETA accreditation would be required by training providers intending to present these courses.

This move reverberated throughout the Occupational Health and Safety training arena. It appears that this initiative was designed to move oversight of Legal Compliance / Mandatory / Regulatory training from DEL www.labour.gov.za to the Department of Higher Education [DHE] www.dhet.gov.za via SAQA and subsequently to the 21 SETAs.

At the initial 2017 proclamation, inquiring providers were pushed from pillar to post, with DEL declaring that the primary SETA would be the HWSETA [Health and Welfare SETA]. Information and guidance were scant and often contradictory.

After significant pushback, this was expanded to some of the other 21 SETAs.



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A point of contention and further confusion was that not all the SETAs had the three Unit Standards as part of their portfolio. An example was the FP&M SETA which only offered two of the Unit Standards, that being 119567 and 120496.

Should an accredited training provider wish to present the former Level 3 First Aid course, now 376480, they would have to obtain an Extension of Scope with a suitable SETA offering that Unit Standard, at further expense and effort or miss the business opportunity.

It also meant that new and existing training providers would in future, not only be required to apply for GSR 3 “approval” from DEL, but also SETA “accreditation” at significant cost and effort.

THE MESSAGING

Regrettably, the once noble emphasis of people-centric “Legal Compliance” and “Accident Prevention” training, has conspicuously shifted to the pursuit of NQF Credits, Skills Levy Rebates, Grants and B-BBEE points.

The requirements for accreditation, approval, registration, and certification, etc., all brought about a significant financial burden on training providers, who were often underfunded, unsupported, and struggling to stay afloat. In a quest to appease demanding employers and advisors, many training providers bit the bullet and applied for credit, to obtain accreditation.

In response, Saioosh [South African Institute of Occupational Safety & Health] www.saioosh.co.za formed SHASTAC [Saioosh Health & Safety Training Advisory Committee], who then engaged various stakeholders.

As a SHASTAC member, **INTRA**[™] follows the discussions and debate closely, with the objective of finding solutions for our Licensees, clients and OHS training providers.

In response to the need in the marketplace, **INTRA**[™], engaged the services of a professional SETA accreditation specialist, hosted countless Zoom webinars, and driven by market demand, subsequently assisted over 100 **INTRA**[™] Licensees in obtaining their SETA accreditation.

As a result, **INTRA**[™] rewrote all 17 of their popular high-quality training materials, including the former Level 1, 2 and 3 First Aid courses, and had them professionally SAQA Unit Standard aligned. The new training material was diligently peer-reviewed and made available to **INTRA**[™] Licensees to enable them to apply for SETA accreditation.

But then, ...

Confusion arose when it was publicized that accreditation would no longer be provided by the SETAs, and that this function had been redirected by the DHE and or SAQA to the QCTO [Quality Council for Trades and Occupations].

Over the past three years, talk escalated from a murmur to a cacophony of misinformation and speculation, as training providers attempted to clarify the direction they should take, so as not to disrupt their business practices.



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The messaging seems to have taken an inordinate length of time to reach employers, training providers and learners. Ostensibly, little to no communication regarding this switch was forthcoming from DEL.

Alarming in 2023, these three First Aid Unit Standards are now being replaced by QCTO First Aid Qualifications, Part Qualifications and or Skills Programmes. We anxiously anticipate the publication of the course curriculum and have adopted a “wait and see” approach to this supposed legislative supported change. Other regulated training seemingly affected include Working at Heights training as required by the Construction Regulations, with more to come.

In addition, little or no information exists on the development and publication of QCTO “Part Qualifications” and or “Skills Programmes”, to address the needs of part-time or volunteer Health and Safety Incident Investigators, Fire Fighters and Marshals, Representatives, Committee Members, Supervisors, etc., who require short training interventions, to perform their transitory functions efficiently. The OHSA specifically alludes to Health and Safety Representatives having functions as opposed to duties, and not being a career post.

Rumours thrive, with hypothetical opinions and inferences doing the rounds. The SETAs, QCTO and DEL have consistently neglected to communicate these changes with their accredited and approved providers, often talking to non-accredited role players, who they supposedly assumed would pass the information on to those with or wanting accreditation. While live seminars were apparently hosted in some of the larger centres, those in outlying areas appear to have been completely ignored. In many instances the SETA’s and QCTO websites lack constructive information and guidance.

The adage “if you fail to plan, you plan to fail” was foremost in our minds, resulting in **INTRA™** hosting numerous free online panel discussions to better understand the impact on our present and future licensee’s and client’s respective businesses.

We were driven to clarify what would happen when the SETAs stopped accrediting new and existing training providers who wished to apply for accreditation or Extensions Of Scope, at the end of June 2023.

In addition, we intently sought clarity on what the plan of action would be for existing training providers who appear to be prohibited from operating under their former SETA accreditation after the end of June 2024; and what would subsequently happen to previously SAQA Unit Standard aligned training material.

It is reported that almost 11,400 SAQA Unit Standards expired at the end of June 2023.

This would impact on new training providers, who would not be able to acquire SETA accreditation, not be able to contribute to the dire need for training and not be entitled to claim the use of Unit Standards as part of their marketing strategy.

Confusingly, it was postulated that existing providers with unexpired accreditation could continue to use the expired Unit Standards until the end of 2024. Existing accredited training providers would lose the right to provide credit bearing training thereafter.

This may conflict with the Bill of Rights 22 which says *“Freedom of trade, occupation and profession. Every citizen has the right to choose their trade, occupation or profession freely. The practice of a trade,*



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occupation or profession may be regulated by law". It has been suggested that as these changes have not been promulgated in a Government Gazette, they were potentially in conflict with this hard won right.

In addition, it is vague as to what employers are to do with their Skills Levy Contributions, Rebate Claims and B-BBEE returns, if accredited training was not provided or attended.

Collectively, we were confused by the replacement of the SAQA Unit Standards with extended, multi-credit QCTO qualifications.

Of all the Full and Part Qualifications that have apparently been registered so far, only four relate to some form of "safety", but regrettably not Occupational Health and Safety. Refer to <https://www.qcto.org.za/full--part-registered-qualifications.html> . We await more , however currently they are:

1. 102158 : Railway Safety Inspector : NQF Level 6 : Credits 330 : Notional hours 3300
2. 101875 : Road Traffic Safety Officer : NQF Level 6 : Credits 390 : Notional hours 3900
3. 99712 : Safety Inspector (Forestry And Related Industries Safety Health And Environment Officer) : NQF Level 4 : Credits 278 : Notional hours 2780
4. 99714 : Safety, Health And Quality Practitioner (Occupational Health and Safety Practitioner) : NQF Level 5 : Credits 256 : Notional hours 2560

The former two-day Basic First Aid, 5 NQF credit bearing course, would supposedly become a 50 notional hour course, equivalent to 7 days theoretical and practical training once the qualification had been written and published.

In the meantime, no new training providers can be accredited or re-accredited or awarded Extensions of Scope, to present this critical regulatory training. To compound matters Certificates of Competency may be delayed yet further or cannot be issued invalidating the employer's attempts to comply with the OHSA.

None of these qualifications would address the needs of the Regulatory 1, 2 and 3 day micro/short courses.

It is speculated that the revised QCTO methodology would also negate the role of qualified, registered ETDP Moderators, who would no longer be required. This rumour needs to be refuted, but by whom?

Formerly the process of post-facilitation training verification was conducted by the relevant SETA.

However, the future of this vital activity needs to be fully explained, as it appears that accredited training providers will no longer have a SETA to whom they could submit the moderated documentation to receive the learner's SOR and valued "Certificate of Competency".

Subsequently, the learner's credits cannot be uploaded on the NLRD, [National Learners` Records Database] invalidating a major effect of the accreditation system. Refer to www.saga.org.za/services/registration-of-qualifications

This may expose the employer to a complaint / charge of non-compliance of the requirements of the OHSA and or Regulations, that could result in criminal prosecution.

It was intimated that all Regulatory, Mandatory and "Legal Compliance" micro and short course training would initially be quality controlled by the QCTO, but this now appears to be transferred to either the



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Professional Bodies such as Saioh, IWH, [Institute For Working at Heights] <https://ifwh.co.za/>, SAIOH [South African Institute of Occupational Health] www.saioh.co.za, etc. or DEL.

To add to the confusion, the objectives of the QCTO Qualifications, Part Qualifications and Skills Programmes, were specifically designed to equip learners with career or occupation enhancing Certificates, Diplomas and Degrees.

The reimagined QCTO appears to fail abysmally in addressing the extensive demands of one day to one week Regulatory, Mandatory or “Legal Compliance” OHS short courses as required by the OHSA.

To explain. part-time or volunteer Health and Safety Incident Investigators, Fire Fighters and Marshals, Representatives, First Aiders, Supervisors, etc., require short training interventions, to perform their temporary functions efficiently. The OHSA specifically alludes to Health and Safety Representatives having functions as opposed to duties, and not being a career post.

That clearly excludes these activities from being regarded as an occupation as envisaged by the QCTO. These employees were probably nominated by their peers or assigned and appointed by their employers, in addition to their paid roles and responsibilities.

QCTO indicated they are not predominantly concerned about quality control of short course regulatory training, where fewer than 8 credits [80 notional hours] were guaranteed, and that in future, all such training would be relegated back to the relevant government department, in our case the DEL, or a Professional Body. It is doubtful whether these organizations would be able to cope with the administrative burden of approving, accrediting, verifying, or certifying training providers, trainers, training material and methodology, considering their workload.

It was cited in a letter from the CEO of the QCTO, that it was not necessary for training providers falling in this category to apply for accreditation.



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To quote Mr. Naidu:

“The skills programmes or Unit Standards that are required by the DoEL, do not have to be accredited by the QCTO or a quality assurance body that has been delegated the quality assurance responsibility by the quality council for trades and occupations QCTO due to the following:

- a. they are regulated skills programmes and require unit standards. regulated skills programmes or regulated Unit Standards are conducted in order to award a License to practice a certain skill for a certain. [usually 12 months], whereas the QCTO issues a lifetime certificate and*
- b. Regulated skills programmes or regulated Unit Standards have small credits whereby its training is one or two days, whereas the QCTO and its Quality Partners focuses on training and learning of at least 8 credits which is equivalent to two weeks or more*

Given the above, regulated skills programmes and regulated Unit Standards offered by SDP's or any provider do not need to be accredited nor registered by a Quality Council or DHET.

DoEL that certifies or approves providers that offer regulated skills programmes and regulated Unit Standards should take the responsibility of developing these training, monitoring and inspecting them

For any further information needed contact

latat@qcto.org.za or mbuwe.e@qcto.org.za

Regards

Mr. V Naidu CEO Dated 29/07/2022

So, what is the solution to this quandary?

Would it be sensible to recommend that employers and training providers diligently focus their attention on Regulatory, Legal Compliance and Mandatory training, rather than on non-statutory / non-obligatory NQF credit bearing training?



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THE SOLUTION

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As in the past, and prior to the ITBs, SAQA, SETAs, NQF and QCTO, we are constructively re-engaging in the process of encouraging Health and Safety trainers to FOCUS ON LEGAL COMPLIANCE training, ensuring their clients are:

- First and foremost, legally compliant, and defensible,
- Secondly the recipients of high-quality Health and Safety training in keeping with the Consumer Protection Act [No. 68 of 2008] and their contractual obligations to their customers.
- Procuring “risk specific” training course content, which specifically aligns with the OHSA and its Regulations and the employee’s risk profile.
- Able to release their employees for training in a productive, effective, and efficient manner.

Provide Non-Credit Bearing “Legal Compliance” Training

There are some 250 potential Health and Safety related subjects / topics which an employer may, on analysis, be required to train their employees in. Refer to the article “OHS Training Needs Risk Analysis Guide” <https://safetytraininglicense.com/wp-content/uploads/2023/06/09-OHS-Training-Needs-Risk-Analysis-Guide-.pdf>

WHAT ABOUT QCTO?

Should you have determined in your business plan that your goal was to become a College, Academy, or establishment of higher learning, to educate professional Health and Safety Practitioners, Officers, Managers, Trainers, Environmental Managers, Ergonomists, Full-Time First Aiders, Investigators, Occupational Hygienists, Risk Managers, Working at Heights specialists, etc., then QCTO may be the way to go. You may want to start the QCTO accreditation process at your earliest convenience, knowing full well it will take time for the QCTO to publish the relevant career orientated qualifications.

INTRA™ have acquired various QCTO qualifications for this purpose and will when other qualifications become available, source, and distribute them to our Licensees as part of our License agreement. Presently they are:

226302001 Occupational Health & Safety Practitioner : Level 256 : Credits 256 : Notional Hours 2560

99712 Occupational Certificate: Safety Inspector Level 4: Credits 278: Notional Hours 2780

121905000 Introductory Studies for Project Managers Credits:40 : Notional Hours 400



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THE SOLUTION – PLAN OF ACTION

Provide Non-Credit Bearing “Legal Compliance” Training

SO WHERE TO FROM HERE?

We have substituted the PRIME License with the legal compliance BASIC License. So can you.

GET A QUOTE: <https://safetytraininglicense.com/requestquote/>

INTRA™ have embarked on a productivity drive, to strip all the SAQA requirements out of our high-quality customizable training material to equip our Licensees with refreshed material and contemporary course content and orientation.

We urge **INTRA™** Licensees and Health and Safety trainers to include this revitalized motivation in your sales and marketing plan. This suite of training material will be rebranded as TRAX vs TRAC:

1. ACTRAC[X] Legal Liability Knowledge & Application of Occupational Health & Safety Act
2. CLAIMTRAC[X] Injury on Duty Claims Management in Terms of COID Act
3. CONREGS Construction Regulations
4. COVID Awareness Training in Prevention, Protection, & Preparedness
5. ELECTRAC[X] Introduction to Electrical Safety
6. ENVIROTRAC[X] Practice Environmental Awareness
7. ERGOTRAC[X] Demonstrate Fundamental Knowledge of Ergonomics Regs
8. FALLTRAC[X] Explain & Perform Fall Arrest Techniques When Working at Height
9. FIRETRAC[X] Perform Basic Firefighting
10. FIRSTRAC[X] 01 Perform BASIC Life Support & First Aid Procedures
11. FIRSTRAC[X] 03 Provide First Aid as An ADVANCED First Responder
12. FIRSTRAC[X] 02 Provide Risk-Based PRIMARY Emergency Care/First Aid in The Workplace
13. FOODTRAC[X] 01 Implement Personal Hygiene for Perishable Food Stores
14. FOODTRAC[X] 01 Maintain Hygiene in Food Preparation, Cooking & Storage
15. HASREP Describe Functions of Workplace Health & Safety Representative
16. HAZCHEM Receive, Handle & Store Hazardous Chemicals Safely
17. HIRA Conduct a Baseline Risk Assessment & Take Appropriate Action
18. INDUCTOR Explain Basic Health & Safety Principles In & Around the Workplace
19. INVESTRAC[X] Investigate Workplace Safety, Health & Environmental Incidents
20. ISO 01 Awareness [Material Delivery Post Completion of Primelink Training].
21. NOISETRAC[X] Sources & Control of Workplace Noise
22. SUPERTRAC[X] Supervise Health & Safety



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1. PROVIDE NON-CREDIT BEARING “LEGAL COMPLIANCE” TRAINING

Exercise your constitutional rights and equip your team to present training, despite not having accreditation. Refer to article “Am I Allowed to Provide Health and Safety Training before being Accredited or DEL Approved?” <https://safetytraininglicense.com/wp-content/uploads/2023/07/05-Am-I-Allowed-to-Provide-Health-and-Safety-Training-before-being-Accredited-or-DEL-Approved-1.pdf>

2. APPLY FOR Saioosh CPD CORPORATE MEMBERSHIP & COURSE VERIFICATION

- REGISTER as a CORPORATE Member of Saioosh on www.saioosh.co.za
- RECEIVE your Saioosh CORPORATE Member registration certificate.
- SUBMIT your application to Saioosh for CPD verification of the relevant course /s you wish to receive verification for, to admin@saioosh.co.za. Saioosh levies a fee for this service.
- Where successful, you will receive your CPD Verification Certificate / s from Saioosh.
- DELIVER Saioosh CDP verified training to both Saioosh and non Saioosh members.
- On satisfactory completion of the course, provide customised course certificate/s [displaying your Saioosh Corporate Member number, contact details and unique QR code] to the client / successful learner.

3. DILIGENTLY PLAN FOR QCTO ACCREDITATION.

At this stage, and until such time as Working At Heights, First Aid and other Health and Safety Qualifications are published, the extremely limited number of QCTO Qualifications, Part Qualifications or Skills Programmes available for training “non-career learners” in the variety of Occupational Health and Safety knowledge and skills, may require that you preliminarily assess your thinking and investment in QCTO accreditation.

CONCLUSION

While clarity has been difficult to gain and the confusion has been disconcerting, it is abundantly clear that the demand for Health and Safety training will not abate, and if anything, will increase with impending legislation.

It is our sincere desire to provide uncluttered information to enable you to adapt your business model and offering. We are keen to hear from you, as we forge a future in this dynamic environment.

Additional information will be forthcoming and we welcome any contributions to this discussion.

Kindest regards

Ken & Penny

Co-founders **INTRA™**

www.safetytraininglicense.com

