



International
Labour
Organization

ILO Curriculum on Building Modern and Effective Labour Inspection Systems

Module

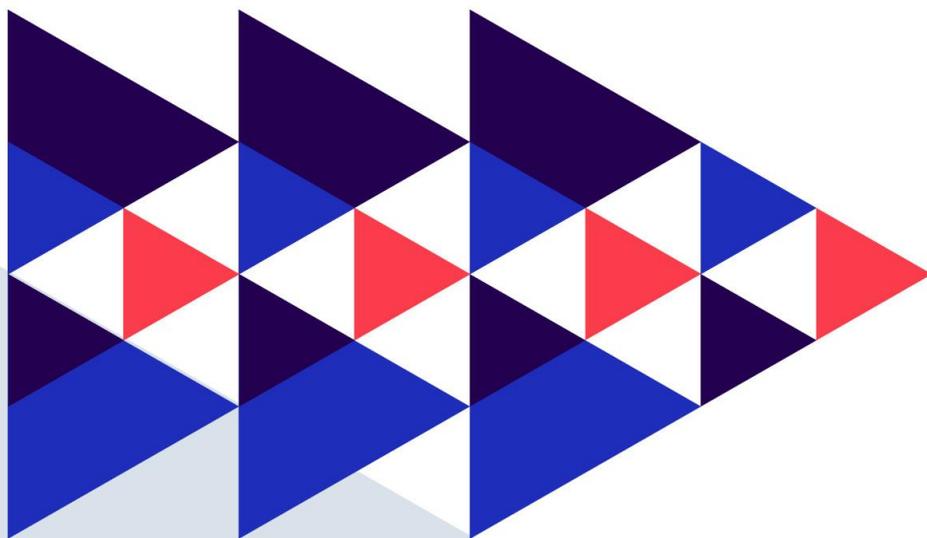
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▶ The inspection visit

ILO Curriculum on Building Modern and
Effective Labour Inspection Systems

► Module **10**

The inspection visit





► What this module is about

This module provides guidance on the main issues that inspectors should address during an inspection visit. It has been especially planned for the training of newly appointed inspectors in general guidelines and in the planning, conduct and follow-up of inspection visits. The competence of inspectors in these matters should improve the quality and effectiveness of inspection work, and also enhance the labour inspectorate's reputation for professionalism and impartiality.



► Objectives

The aim of this module is to provide an overview of the main principles to bear in mind when planning, conducting and following up inspection visits, and some guidance as to how these principles might work out in practice.

At the end of this module, participants will be able to:

- describe the main principles underlying the carrying out of inspection visits;
 - identify, in a methodological and sequential way, the key factors to take into consideration in the preparation, conduct and follow-up of an inspection visit;
 - differentiate between the aims of different kinds of inspection visit;
 - give some examples of how to prepare, conduct and follow up inspection visits.
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▶ 1. Some basic principles

An inspection action occurs every time one or more inspectors carry out a singular and distinct action to determine compliance with labour legislation. Inspection actions include inspection visits, preventive or advisory services, document checks, checks on procedures and so on. An inspection visit is a process that requires careful preparation and implementation if it is to be successful.

A properly conducted inspection action, in particular an inspection visit, can have an impact beyond the immediate concern of law enforcement and compliance. Inspectors play a front-line role in the work of ministries of labour. Through general observation and questioning, they can identify problem areas that might lead to industrial conflicts and disputes, as well as potential risks that might cause workplace accidents. Thus, **well-executed inspection visits can play an important preventive role** in the wider area of labour relations governance.

Before considering the detail of inspection visits, it is important to recall some broad overarching principles that determine the legal and ethical framework within which inspectors work.

These principles are based on international labour standards, notably the [Labour Inspection Convention, 1947 \(No. 81\)](#) and the [Labour Inspection \(Agriculture\) Convention, 1969 \(No. 129\)](#), as well as other internationally recognized standards of good practice. They therefore need to be established within national legislation and national inspection policy, so as to ensure that the inspection visits themselves are as effective as possible.

Independence and impartiality: Front-line inspectors, and indeed the inspectorate as a whole, should be able to undertake their work independently of improper external influence, whether political or financial (Convention No. 81, Article 6). For example, national employers' and workers' organizations should not try to exert influence on the decisions of inspectors and their managers when it comes to taking legal action against duty-holders. Nor should inspectors be asked to inspect enterprises in which they might have a direct personal interest, for example enterprises owned by family members. Some inspectors claim they have to rely on employers for transport to their workplaces, but this is ill-advised since this practice undermines the independence of inspectors.

Integrity: Inspectors are accountable for their performance and should adopt the highest standards of professional integrity when conducting inspection visits. Some inspectorates have adopted codes of conduct or sets of values — enjoining honesty, courtesy, respect, fairness and so on — which they have promoted and enforced among all their staff. The International Association of Labour Inspection has published [A Global Code of Integrity for Labour Inspection](#). This Code represents a commitment to ensure that people who work in labour inspectorates will at all times act with professionalism, respect, neutrality and integrity when performing their duties. Inspectors should therefore distance themselves from any corrupt or unethical practices during their visits, such as accepting gifts of factory products or taking bribes instead of enforcing the law.

Confidentiality: It is very important that inspectors respect any information given to them in confidence. Convention No. 81 (Article 15) makes it clear that inspectors must treat any trade or commercial secrets, or working processes coming to their knowledge, in strict confidence. The same article also requires inspectors not to reveal the sources of any complaints made to them or that inspection visits have arisen out of any complaints being made.

The availability of sufficient statutory powers: Although this is principally a matter for legislators and policymakers, it becomes vitally important for inspectors when conducting visits. Such powers provide a solid legal platform on which inspectors can conduct visits; without them, they have to rely on the goodwill of stakeholders, which is not always forthcoming. Thus, inspectors should have statutory powers to enter workplaces liable to inspection at any time of the day or night; to interview workers; to examine equipment and take samples; as well as powers to inspect records and remedy defects (Convention No. 81, Articles 12 and 13). It is vital that inspectors be fully conversant with these powers and how inspectorates use them.

Courtesy and respect: Labour inspectors have to be aware and understand their position of authority and power, but at the same time they need to be especially careful to behave in the best possible way, avoiding abuses of power, malice, prejudice or personal bias. They should initiate relationships and contacts with courtesy, and respect people regardless of their roles and status. During inspection visits, inspectors should put aside personal likes and dislikes and keep in mind that it is the enterprise and its working environment that is being inspected, not an individual employer or manager. Conduct which shows the inspector's superiority and power or which intimidates employers is not acceptable.

Clarity of inspection and enforcement policy: There need to be clear guidelines in the form of policy statements, instructions and written procedures as to how inspectors should go about their visits, with whom they need to collaborate and when (such as the Fire Authority in certain circumstances), and at what point they should consider taking formal enforcement action. The need for clarity is increasingly important in an age of open government, when inspectorates (like other public services) have to give account of their actions and justify their decisions. An open enforcement policy, agreed at national level with social partners, gives inspectors the assurance that they have the support of their organization at the highest level for the actions that they decide to take.

Discretion: Although written instructions and procedures are very important, there will always be circumstances that cannot be foreseen. At such times, inspectors will have to exercise their discretion and make a balanced judgment as to what action to take and any timescales for improvements. For example, inspectors usually have discretion as to how much time they give for employers to rectify less serious contraventions of the law. Much will depend on the cost of remedying the problem and the financial situation of the enterprise, and an SME¹ with limited financial resources may well be given more time to rectify a problem than a larger one with more financial backing. Inspectors' training and professional competence will be crucial in helping them to make such judgments, and they should know that, if they have acted with due diligence, they will be supported by their own management in the decisions they make.

¹ Small and medium-sized enterprise.

Social dialogue: Finally, but certainly not least in importance, a fundamental tenet for effective labour inspection is that the social partners need to be engaged at all levels. Centrally, inspectorates and national employers' and workers' organizations need to collaborate in formulating policy and programmes, while at the enterprise level inspectors must make sure they speak to both employer and worker representatives. In particular, this means seeking out worker representatives and discussing working conditions and any necessary improvements with them. This is less easy if there is no formally recognized trade union in an enterprise, as is often the case with SMEs. However, this is an important aspect of an inspection visit and without such contact the impact of the visit will be significantly weakened.

▶ 2. Preparing for the inspection visit

Good preparation and planning of visits is essential for a professional approach to inspection. As well as a national inspection policy framework that reflects the principles mentioned in Chapter 1, *national priorities* for inspection also need to be set, as there will always be many more workplaces to inspect than there is time available for inspection. Such priorities will reflect issues of national importance, having been agreed in cooperation with the social partners, and may take the form of national campaigns or programmes. These may focus on any of the topics within the inspectorate's mandate, but will often relate to such matters as illegal employment, working time, child labour, HIV/AIDS, or specific safety and health issues.² Such programmes will help to determine priorities for workplace visits and also form part of the wider framework within which inspectors operate.

2.1 Collecting background information

Once inspection priorities have been established at central and regional levels and detailed work programmes agreed, inspectors will wish to check the records for the individual enterprises selected for inspection.

The content of such records will vary markedly from one inspectorate to another and will depend very much on its overall legal mandate. For example, records kept by an inspectorate that deals only with occupational safety and health (OSH) or working conditions will vary markedly, as will those of a general labour inspectorate covering both OSH and working conditions wages, labour relations, employment contracts and so on.

Records for individual enterprises may include such matters as:

- ▶ the location of the enterprise and the name of the contact person;
- ▶ identification of contractors, subcontractors, etc.;
- ▶ the total number of workers, number of women workers, young workers, apprentices, and foreign workers (if figures are available), skill levels, etc.;
- ▶ the nature of the work processes and their final products or services;
- ▶ the raw materials and equipment used, and any hazardous processes involved;
- ▶ previous inspection reports;
- ▶ previous violations of the law and the action taken;
- ▶ the employer's general attitude to the inspectorate (cooperative, hostile, indifferent) and general commitment to meeting legal requirements;

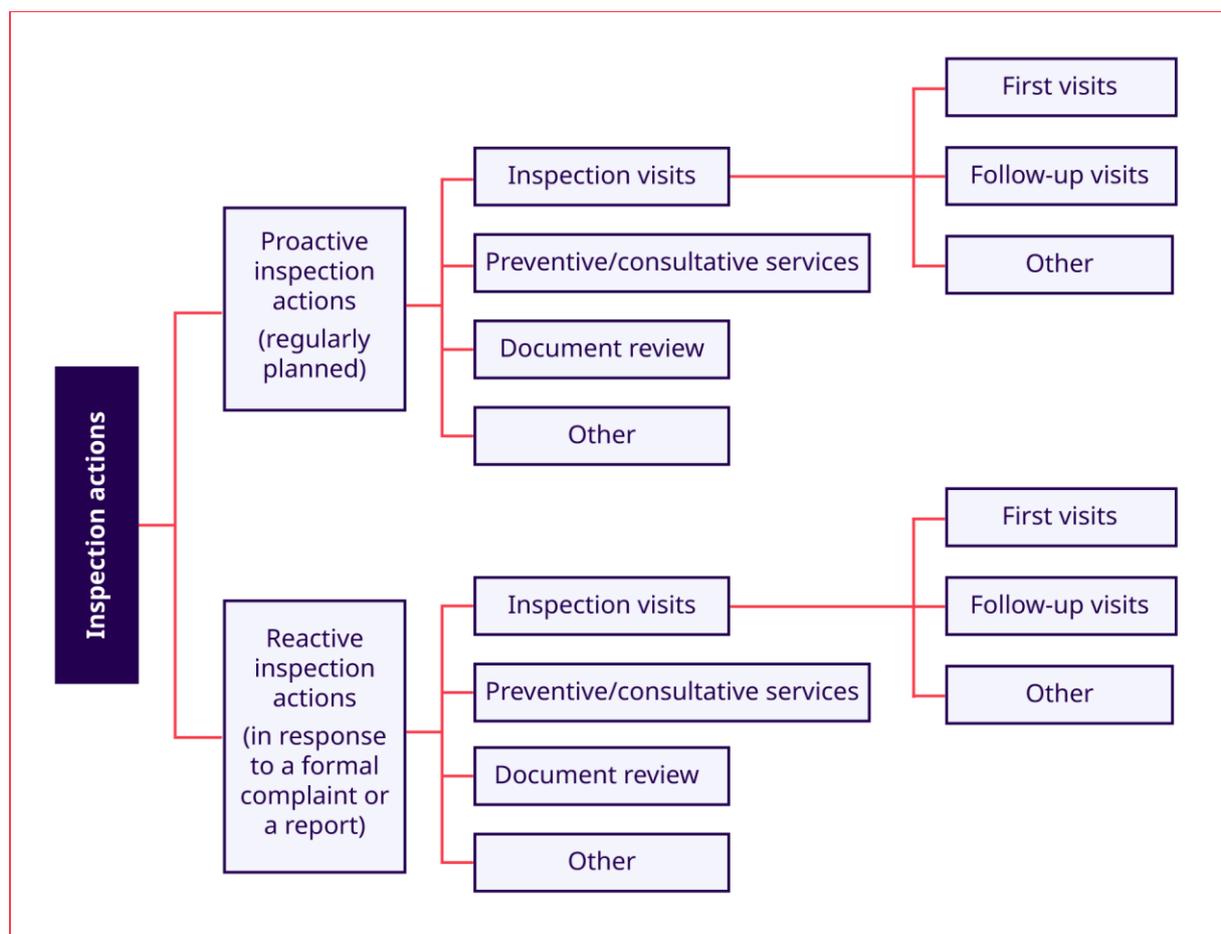
² For example, many countries now undertake national safety and health programmes, as envisaged in the Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187).

- ▶ occupational accidents and diseases in recent years, in particular any fatalities, investigation reports and remedial action taken;
- ▶ complaints from workers and action taken to address complaints;
- ▶ the existence of a trade union in the enterprise, and whether there is a collective agreement between the union and management;
- ▶ information from other units of the labour administration.

Inspectorates are increasingly moving towards the use of modern IT and, consequently, electronic record-keeping. Much of this information may (eventually) be stored electronically and should therefore be more easily accessible. Some information can also be processed in paper-based registers.

2.2 Types of inspection visit

The background information to be collected for each inspection action will depend on the type of visit. Again, the classification of visit types will vary from one country to another, but they may be represented as follows:



1. Proactive/routine visits (or planned, regular, standard, preventive visits)
2. Reactive visits, (e.g. to investigate an accident or a complaint)
3. Follow-up visits
4. Special Visits
5. “Blitz” or “raid” visits (e.g. as part of a local campaign)

1) Proactive/routine visits

Visits of this kind are usually part of a programme of visits planned for the year, rather than being prompted by a complaint or accident. They are concerned with checking compliance with the law and advising enterprises on how to comply with legal provisions, and may or may not cover the full range of matters covered by the mandate of the inspectorate. For example, if specific priorities have been set by the government (such as specific safety risks), inspectors may focus on these exclusively, unless worker representatives bring to their notice other issues of concern, or if inspectors themselves notice matters that need their attention.

Routine visits may not need to be followed up by a return visit. But some will, particularly when the inspector has given a deadline for rectifying more serious problems or shortcomings, and has issued a warning letter, improvement notice, prohibition notice or similar “stop activity” order.

2) Reactive visits

These are paid to investigate a complaint, an accident or a disease. They are obviously unscheduled and need some preparation.

Complaints may be about any kind of workplace issue, but are often about wages, overtime, safety and health or some other basic right. Complaints must be taken seriously, though the motives for complaints may be mixed. Some may be made out of resentment and a desire to cause embarrassment, while others arise from more altruistic motives. Either way, most complaints are investigated as a matter of policy, either through a formal visit or by some other means, so as to satisfy the just concerns of the complainants.

Accidents at work happen all too frequently, in spite of measures taken to prevent them. The purpose of accident investigations is to ensure that similar accidents are not repeated. The role of inspectors is to **determine causes** and **establish preventive measures**.³ A visit may also serve to draw attention to accident prevention in general or to a particular risk and, in some cases, to determine the facts concerning legal liability or workers’ compensation.

It is impossible for inspectors to investigate all accidents (or diseases) reported to them, so some form of selection process is needed, based on appropriate parameters. With appropriate selection criteria to hand, inspector managers will decide which accidents to select for investigation and which to leave, possibly for discussion at the next routine inspection. Each national labour

³ See [Investigation of occupational accidents and diseases - A practical guide for labour inspectors](#) for further information.

inspectorate will have its own accident selection criteria, which may change from one year to the next, depending on national and local priorities, inspector resources available and so on. Possible selection criteria are shown in the box below.



▶ Possible selection criteria for accident investigation (simplified)

- ▶ All fatal accidents should be investigated.
- ▶ All major injury accidents (as legally defined) should be investigated, unless there are strong reasons not to do so.
- ▶ If minor accidents occur repeatedly in the same enterprise, they should be investigated as a group.
- ▶ Accidents that meet specific national criteria should be investigated, for example if they involve an industrial process of particular interest.
- ▶ Accidents affecting several workers should be investigated, even if no individual worker suffered serious consequences, e.g. a leak of dangerous chemicals.
- ▶ Accidents of wider public interest should be investigated, even if no one is injured, e.g. a scaffolding collapse.

3) Follow-up visits

Visits of this kind are undertaken to determine the extent to which the enterprise has responded to the outcome of an earlier action. They serve to ensure that enterprises/individuals have carried out any actions required from previous visits to correct/eliminate the problem/violation detected.

4) Special Visits

Such visits are made in response to a national or local programme on a particular issue, such as combating forced labour or child labour, or in response to requests from other authorities (e.g. health authorities, the police, a prosecutor). They may also concern more general employment issues of national importance, such as illegal employment or the presence of asbestos.

5) Blitz visits

These are a form of planned visit but are paid in quick succession to a large number of enterprises within a given geographical area or economic sector (e.g. agriculture, fishing) in seasonal periods. They are intended to have an impact on the whole community and may be paid over a period of one to two days or perhaps longer. They may focus exclusively on SMEs, cover enterprises of all sizes and sectors, or cover specific topics. Such visits are kept short, so that as many as possible can be carried out within the tight timeframe. They are often organized jointly with other

authorities, such as municipal departments, and involve the local media, so as to maximize the impact of the inspection through broadcasting on radio and television.⁴

2.3 Supporting documentation and materials

The inspector should put together the materials and items required for conducting the inspection efficiently, including some if not all of the following, as appropriate:

- ▶ an official identification card or warrant verifying his or her credentials;
- ▶ copies of relevant legislation, with any recent amendments;
- ▶ a copy of any collective agreement (sector or enterprise) between management and the relevant trade unions;
- ▶ any prescribed inspection forms, together with any instructions;
- ▶ checklists to assist in dealing with issues such as basic OSH, and for collecting information;
- ▶ the inspection service instructions or any circular or order of the central authorities on how to undertake the inspection visit or interpret a regulation;
- ▶ if available, a plan of the premises to be inspected;⁵
- ▶ any necessary equipment for carrying out examinations or collecting information (measuring equipment, camera, recorder, etc.);
- ▶ any available promotional material for awareness-raising and educational purposes;
- ▶ previous advice/instructions given to the enterprise as a result of earlier inspection actions;
- ▶ personal protective equipment.

Information is an important resource. Without a proper management system with full sets of records, inspectors will be wasting valuable time in collecting information from various sources, and in processing it.

2.4 Announced and unannounced visits

It is necessary to decide whether visits will be announced (by appointment) or unannounced (by surprise). Both have their advantages and disadvantages, and it will be for each inspectorate to decide its general policy and approach. Importantly, inspectors should have some discretion on this matter. As a general rule, **inspection visits should be unannounced**. Legal requirements for

⁴ For example, see the results of a province-wide, cross-sector enforcement blitz that focused on falls hazards from 2 October to 30 November 2017 in Ontario, Canada.

⁵ A floor plan/map will assist the inspector in accessing areas where machines are located, identifying storage areas (particularly for chemicals), and examining internal traffic flows and the general flow of raw materials and products. This is particularly valuable for visits to large establishments. It may well be possible to obtain this from the enterprise management, if needed.

prior notification of employers or requiring consent for inspections from other governmental agencies should be removed. As noted earlier, Convention No. 81 states that labour inspectors should be able to "...enter freely and **without previous notice** at any hour of the day or night any workplace liable to inspection". The decision should be based on assessment of the type of intervention most likely to improve workplace compliance.

Announced visits: The main **advantages** of an announced visit are that:

- ▶ it gives the enterprise time to gather relevant information and to arrange meetings to facilitate the inspector's visit;
- ▶ it also gives greater assurance that senior managers who might otherwise be unavailable will be present, since in the final analysis they are responsible for compliance.

The main **disadvantages** of an announced visit are that:

- ▶ it gives the enterprise the opportunity for window-dressing (e.g. replacing missing guards or borrowing safety equipment from other enterprises);
- ▶ senior management might be deliberately absent;
- ▶ relevant documents might have "gone missing";
- ▶ it may also give workers the impression that labour inspectors are "in the pockets of management" and lead to some frustration that they do not see conditions as they truly are.

Unannounced or surprise visits: An unannounced or surprise visit enables the inspector to observe the systems of work normally in use in the enterprise. Unannounced visits should be made if the inspector has reason to believe that an announced visit would allow time for concealing irregularities. An inspection visit resulting from a formal complaint should also normally be unannounced, to prevent documents and evidence from being concealed and to protect complainants from harassment and discriminatory behaviour before the inspection.

Some inspectorates provide information to employers as to what to expect when an inspector calls.

2.5 Transport facilities

A major issue in some countries is the availability of transport. Before undertaking a visit, inspectors need to make sure that they have adequate means of transport, whether public or private.⁶ Sometimes inspectors ask enterprises to provide transport from their office to the workplace, but this is ill-advised as it undermines inspectors' independence, as noted earlier. The inspectorate should have sufficient resources either to pay for official vehicles that inspectors can share, or to reimburse inspectors for the use of their own vehicles (cars or motorcycles) or the costs of public transport.

⁶ As set forth in Article 11 of Convention No. 81.

Walking, cycling and the use of public transport are generally only appropriate for inspections in urban areas, but they do provide a useful alternative to private vehicles. In rural areas, inspectorate/private vehicles are almost always needed, and inspectors should not have to reply on farmers (or others) for access to farms.

2.6 Physical safety of inspectors

It is reported that inspectors, in common with other representatives of enforcement authorities, are facing an increasing amount of physical violence and obstruction during inspection visits (see box below).

This is why Article 18 of Convention No. 81 states that: “Adequate penalties for violations of the legal provisions enforceable by labour inspectors and for obstructing labour inspectors in the performance of their duties shall be provided for by national laws or regulations and effectively enforced.”

It is therefore important that inspectorates address this issue seriously and that there be a clear national policy as to how inspectors can protect themselves in situations where there might be some risk of physical aggression, as well as a policy on what actions inspectorates will take against those obstructing inspectors.



► Inspectors and increasing personal violence

A General Survey of Labour Inspection Conventions noted that problems of physical safety can seriously affect labour inspectors' work. As with other authorities, aggression towards labour inspectors seems to be increasing worldwide, as instanced by the killing of three labour inspectors in Brazil and two in France during their inspection visits in 2004. In other countries, inspectors rarely, if ever, visit rural enterprises because their safety cannot be guaranteed.

Many labour inspectorates are now taking a much stronger stance to counter verbal and physical violence against staff members, warning that any such incidents will be taken very seriously and that legal proceedings against the perpetrators will follow.

In practice, if an employer is known to be hostile towards inspectors, it is advisable that a visit be undertaken by two inspectors, one of whom is more senior or more experienced. Mobile phones, if available, are certainly helpful for inspectors working alone in cases such those as described above. It is also useful if a lone-working operating procedure is adopted, for instance with the inspector reporting in to the office before beginning the visit and then upon completion, to advise the office that all is well. It may also be advisable to consider asking a police officer to accompany the inspector if hostilities are known to be serious (some but not all inspectorates are given this option). It will also be necessary to consider carefully whether an inspection should be by appointment or unannounced.

▶ 3. Conducting the inspection visit

In conducting the inspection, the inspector should be aware of the following important issues:

- ▶ The real purpose of inspection is not to punish or initiate legal proceedings, but to secure the enforcement of legal provisions and to promote compliance with the law and ensure decent work. Depending on the purpose and type of inspection visit, an inspection must be conducted systematically and follow a routine procedure as far as possible.
- ▶ The employer or employer's representative, as well as worker representatives, should be involved during an inspection, most importantly at the closing meeting.
- ▶ The inspection concerns the enterprise and its working environment, not an individual employer or manager. The inspector must put aside any subjective considerations and carry out the task of inspection as objectively as possible.
- ▶ The inspector, not the employer (or manager), is in charge of the inspection. The inspector has the backing of the law and the inspectorate as a whole in conducting the visit. This should be pointed out firmly to any uncooperative employer or employer's representative. Typically, the inspection visit will involve three main phases:
 - preliminary contacts and formalities;
 - the inspection itself;
 - a closing meeting with management and worker representatives.

3.1 Preliminary contacts and formalities

For larger enterprises, preliminaries begin at the factory gate, farm, mine/quarry, office, etc. Even when inspection is by appointment, security officers and/or receptionists can initially make the inspector's task difficult. Unannounced visits can be more complicated, particularly where enterprises follow a policy of "all visits by appointment" or "no strangers on the premises".

It is therefore essential for inspectors to carry official identification at all times, and to assert their legal authority to undertake inspections and ensure cooperation.

Management: Once the inspector has gained access to the enterprise, it is normal to inform senior management of his or her presence. Official identification may again be called for, though if the inspector is well known to management, this formality may be waived. Following a preliminary meeting to outline the visit's purpose (routine, to investigate an accident, for some special purpose, etc.), the inspector should ask for general information about the enterprise before proposing a format for the visit. The format will depend on the reason for the visit, but will always include discussions with managers and workers and their representatives, such as shop stewards or safety representatives. Meetings with the workers' committee, safety and health committee, works council or other similar body, if such exist, may also be appropriate.

In some cases, the inspector may simply inform management (or the receptionist or secretary) of his or her presence in the enterprise, and proceed immediately to that part of the enterprise where attention will be focused. In an accident investigation, for example, it may be essential to go as quickly as possible to the accident site.

If the inspector is visiting an enterprise for the first time, it is advisable to ask management to provide a plan of the premises (if it is a large enterprise) to facilitate inspection and highlight potential problem areas.

Dealing with uncooperative managers: Some managers may refuse to cooperate with the inspector, or provide as little assistance as possible, or be openly hostile and, in some cases, aggressive. In such circumstances, the inspector should explain the obligations of management as duty-holders under the law (providing the leaflet referred to previously may be helpful), and also some of the benefits to be derived from the visit. For example, the inspector should outline, persuasively and convincingly, how his or her work can contribute to:

- ▶ improving safety and health, thus increasing worker motivation;
- ▶ creating better work practices, resulting in better quality output and higher productivity;
- ▶ improving labour relations and solving problems before they escalate into major disputes.

The message itself is important, but so is the way in which it is presented. It is very important to remember that inspectors/inspections should be **non-confrontational as far as possible**.

If the inspector still fails to obtain the management's cooperation, he or she should remind the management of his/her legal authority to inspect the premises. This requires that the inspector be fully conversant with his or her powers as conferred by national legislation. If the management still refuses to give the inspector access to the premises, the inspector may indicate that he/she will initiate legal proceedings against the employer for obstruction.

If an inspector reaches such an impasse, it is better to break off the visit, return to the office and discuss immediately with line managers or directors (or, in their absence, with senior colleagues) what steps to take next. However, the case should not be dropped. An immediate, swift reaction to such illegal obstruction is imperative; if necessary, and as a last resort, assistance should be sought from the police.

Deciding on accompaniment: Before commencing the inspection visit, the inspector should decide whether he or she wishes to be accompanied by a representative of management and/or of the workers. This is to be encouraged for normal inspections, not only to promote cooperation between the parties (mainly management) and the inspectorate, but also to obtain access to information that might otherwise be difficult to obtain. By having informed persons present throughout the inspection, the inspector will have many of his or her questions answered on the spot.

In some cases, it may be preferable for the visit to proceed without a representative of management (and possibly even of the workers), for example if the inspector wishes to ask questions of workers who may be reluctant to respond when a manager or a worker representative is present. Inspectors should, where necessary, insist on their right to talk to workers alone, i.e. in the absence of any management staff.

3.2 The inspection visit: content and format

Once the inspector has completed the formalities with management, the actual inspection can commence. The most common ways in which labour inspectorates can obtain the information they require is by:

- ▶ gathering information prior to the visit;
- ▶ examining books and records;
- ▶ interviewing managers and workers;
- ▶ visually observing the facilities, taking pictures;
- ▶ measuring certain parameters (noise, lighting, vibrations, etc.).

There are no fixed rules as to the order to follow; it will depend on the nature of the inspection, its objectives, the information obtained during the preparatory phase and the preliminary discussions.

Before visiting the production area, the inspector may prefer to examine documents and records in the offices of the enterprise. Depending on the mandate of the inspectorate, these could relate to training, wage scales, overtime working, rest periods, leave arrangements or other matters relating to the terms and conditions of employment, or, for example, to chemical safety (data sheets) or accidents. It may be necessary to ask accountants or finance clerks to respond to specific queries, or ask safety engineers or similar personnel to provide additional information. Examining its records can provide useful insight into how well an enterprise conducts its affairs and manages safety and health and other functions. Poorly kept financial records, missing information and outstanding payments are sure signs that management is poorly organized, thus alerting the inspector to the possibility of deficiencies in other areas.



► The inspection visit – Workplace Relations Commission (Ireland)

The following are extracts from the Workplace Relations Commission leaflet – [An Employers Guide to WRC inspections \(Ireland\)](#), about inspection visits by its staff.⁷

Inspectors' Powers/Warrants

Prior to the commencement of an inspection, Inspectors are required to identify themselves and produce their Warrant of Appointment to the employer or their representative and explain the nature and purpose of the visit/inspection together with the legislative basis upon which they are acting.

Conducting the Inspection

At the outset, the Inspector will carry out an initial interview with the employer or his/her representative. The relevant records will then be requested for inspection. Having examined the records and carried out the necessary calculations, the Inspector will then interview a sample of employees. This is usually followed by a further meeting/interview with the employer or his/her representative to inform them of any preliminary findings.

If potential contraventions have been detected during the inspection, the Inspector may need to ask the employer further questions in relation to them. ...

Where Compliance is Evident

Where the necessary records are available and demonstrate compliance with employment law and this is subsequently verified through interviews with employees, the inspection can be carried out efficiently and with the minimum disruption to the employer's business. Following such inspections, the Inspector will issue a letter concluding the inspection.

Where minor Non-Compliance is Detected

In some cases, where Inspectors encounter minor or sometimes inadvertent contraventions, the Inspector will ask the employer to rectify them. In such cases, where the employer demonstrates to the Inspector's satisfaction that the matter has been rectified, the file is closed.

Non-Compliance Involving Underpayment of Wages

If there is reason to believe that employees have been paid less than the minimum amount provided for by law, the WRC seeks to recover unpaid wages for all employees (both current and former employees) in respect of whom underpayments have been identified.

...

In all cases, the WRC seeks to have unpaid wages paid as soon as possible. Neither the WRC nor its Inspectors, has the power or authority to agree a compromise sum in respect of unpaid wages due to employees, or to negotiate away any part of an employee's legal entitlements.

Serious Non-Compliance and/or Non-cooperation

There are times when it is necessary and appropriate for the WRC to invoke legal sanctions against non-compliant employers. This can involve the issue of Compliance Notices and Fixed Payment Notices and/or prosecution where employers refuse to comply with the law, fail to cooperate with the inspection process, and/or have been found repeatedly in breach of the law.

The inspector may first wish to see the work premises, be it a farm, a factory, a quarry or an offshore oil platform. For a first inspection, it is desirable for the inspector to have a comprehensive overview of the enterprise's work and learn about its raw materials, processes, machinery, storage facilities, power supply and general technology level, as well as its wages registry, contracts, salary receipts, collective agreements, time sheets and other legally required documentation. The inspection should be conducted systematically, preferably by following the production process, from the arrival and storage of raw material to the final-product stage.

The inspector may decide to go immediately and directly to a section of the enterprise if he/she has reason to believe that there is a particular issue there. For example, if illegal labour is thought to be prevalent in a factory, or an unsafe item constituting an immediate danger is being used, the inspector will adjust his or her programme accordingly.

The items to be covered in a regular inspection of the terms and conditions of employment, as well as the working environment, will depend on specific regulations and the requirements of current legislation on OSH and employment matters. It will also depend on the mandate of the inspection service, if it does not follow an integrated inspection model.

1) Inspection of working conditions, wages, employment, etc.

The legislation of most countries authorizes inspectors to require the production of any books, registers, documents or electronic information, the keeping of which is prescribed by national laws or regulations, to check that they are in conformity with the legal provisions and to copy or take extracts from them.

Inspection will involve examining books and records, as well as observing the physical conditions under which work takes place.

If such records have not been kept, the inspector will have to make specific checks, such as the actual time employees enter and leave the enterprise, and may question individuals as to the number of hours taken into account for calculating their most recent wages. He/she will also interview several workers to establish the facts — typically in the absence of management representatives and in such a manner as to avoid subsequent victimization. Unauthorized overtime could be checked by making an unannounced visit outside normal working hours.

In particular (with regard to labour legislation), checks should be carried out to ascertain whether:

- ▶ written contracts of employment have been issued;
- ▶ basic remuneration has been paid at the rates required by law;
- ▶ payments have been made at proper intervals;
- ▶ deductions have been correctly calculated;
- ▶ benefits in kind have been paid and accurately calculated;

⁷ http://www.employmentrightsadvice.ie/Documents/WRC_Guide_to_Inspections_.pdf

- ▶ all allowances have been paid in respect of transport, dependents, shift work, housing and clothing;
- ▶ hours of work, rest periods, and holidays required by law for particular occupations are being adhered to;
- ▶ overtime worked has not exceeded the legal time limits; and it has been properly authorized.

2) Inspection of occupational safety and health

Promoting acceptable standards of safety, health and welfare is one of the principal functions of labour inspectors.

There is no standard sequence for OSH inspection, which will differ from one country or administration to another, depending on priorities, procedures and other criteria. Many inspectors will decide to follow the production flow, checking machinery, equipment and processes as raw materials are progressively transformed into finished products. In this way, employment and OSH concerns can be very conveniently combined. While moving through the enterprise, inspectors should take note of:

- ▶ the condition of the building and general work areas;
- ▶ general housekeeping and sanitary conditions;
- ▶ the location of and access to (emergency) exits, which should be unobstructed;
- ▶ electrical wiring;
- ▶ water outlets;
- ▶ fire-detection and firefighting equipment;
- ▶ internal traffic movement, including warnings of dangerous sectors;
- ▶ the proper posting of signs;
- ▶ the provision of proper fencing between work areas and traffic-flow areas;
- ▶ the guarding of machinery and other risk-control measures, for instance local exhaust ventilation, work instructions, and the appropriateness and use of PPE.

Checklists may be useful for this purpose.

Certain complex OSH issues can be dealt with only by an inspector with specialist qualifications and skills. For example, a thorough inspection of electrical installations, lifts, pressure vessels, mines, quarries and high-risk chemical plant (such as oil refineries) obviously requires a higher degree of technical knowledge than for most workplaces. Such work may be undertaken by specialist inspectors or other technical experts attached to the labour inspectorate, or by persons from the private sector authorized by the inspectorate, such as boiler surveyors from insurance companies. If this is the case, inspectors will still need to verify that these inspections have been completed and any identified remedial measures carried out satisfactorily.

However, in the vast majority of cases, well-trained inspectors can achieve a great deal by simply checking whether an active OSH management system is in place and functioning effectively, whether well-managed risk-control measures are in place, or whether protective/preventive equipment has been damaged or has been removed or lost. This will include checking such matters as:

- ▶ guards for machinery: whether they are in place and properly used or have been damaged or are missing;
- ▶ local ventilation equipment for chemical fumes or dust: whether it is working properly or not, and how well it has been maintained;
- ▶ electrical protection: whether protective sheaths, etc., are in good condition or have been damaged;
- ▶ protective clothing and other equipment (ear protectors, safety helmets, goggles, gloves, etc.): whether such equipment is available and used, and what kind of condition it is in;
- ▶ safety rules on machine operation and maintenance: whether or not such rules are complied with;
- ▶ the risks of falls from heights: whether tools or other objects are being dropped from scaffolding and roofs, or there is a risk of workers falling from obviously defective scaffolding;
- ▶ speeding internal transport vehicles, such as fork lift trucks;
- ▶ other evidence of obviously or visibly unsafe working practices;
- ▶ whether workers have received sufficient information, instruction and training.

Common sense should be applied.

Where the working environment is concerned, inspectors can easily check such matters as temperature, noise, lighting and overcrowding. If technical measuring equipment is not available, the inspector can still rely on his/her physical senses and some basic guidance to make a preliminary assessment of problems and provide guidance on how to overcome them in compliance with national legislation.



▶ Third party inspection and examination

The use of third parties for the technical inspection and examination of certain types of plant is well-established in many countries. Enterprises with high-risk plant or equipment, such as chemical plant, lifting equipment and pressure vessels, have been required for many years to have such items of plant regularly inspected and examined by “competent persons”. These are often private organizations, such as insurance companies, accredited within their specialist field, and enterprises (the plant owners) will pay for these services.

After inspection and examination, the third parties will issue certificates or reports, which will be valid for a certain period of time and will be available for inspection by labour inspectors. In some cases, the private organizations concerned are required by law to inform inspectors immediately if there are serious deficiencies, so that rapid remedial action can be taken.

It is especially important that inspectors **meet safety and health representatives** and/or members of safety and health committees. Apart from giving them information and support, inspectors can learn much from them about working practices that may not be apparent from a visual inspection. For example, there might be many “hidden” cases of back injuries or unsafe working practices that are only carried out intermittently. Maintenance is often carried on outside normal working hours and can involve greater risks, and safety representatives may have concerns about unsafe maintenance procedures.

All inspectors should be knowledgeable about basic and recurrent safety and health matters, even if there are still a number of specialists in the service. These specialists should be responsible for providing the necessary ongoing basic training and information for generalist labour inspectors, for example in informal monthly briefings.

Many countries have adopted national regulations on safety and health requiring every enterprise to establish systems of internal control: systematic actions at the enterprise level to ensure and document the fact that OSH activities are performed in accordance with the requirements specified in the regulations. Some of the more common actions prescribed by many countries are risk assessments, training and information for workers, surveillance of workers’ health, environmental monitoring and planning for emergencies. These new regulations have affected the way in which inspectors perform their inspection visits. The task of inspectors is now to assess how well an enterprise undertakes these preventive and control-management actions, rather than undertaking exhaustive examinations of hazards and particular risk-control measures.

The ILO has also developed a guide⁸ to assist inspectors and employers in fulfilling their functions by providing information on the management of OSH issues common across many sectors of industry. Generic information is also provided, so as to empower and inform users of this guide

⁸ ILO. *Occupational Safety and Health - A Guide for Labour Inspectors and other stakeholders*

about occupational hazards and risks, and the actions that employers and workers should take to reduce them.

The guide also provides information for inspectors on how organizations can develop OSH management systems, and for employers on what steps they can take to actively manage OSH in their workplaces.

However, even in countries with these internal control schemes, some aspects of inspection visits will depend on the size and complexity of the enterprises concerned.



▶ OSH inspection goals in small and large enterprises

Inspection techniques in the workplace vary according to the size and complexity of the enterprise. In smaller companies, the inspection will be comprehensive and will assess all hazards and the extent to which the risks arising from the hazards have been minimized. The inspection will therefore ensure that the employer is fully aware of safety and health problems and is given practical guidance on how they may be addressed. But even in the smallest enterprise the inspectorate should not give the impression that fault-finding and the application of suitable remedies are the function of the inspectorate and not of the employer. Employers must be encouraged by inspection to control and effectively manage safety and health problems, and they must not abdicate their responsibilities by awaiting an inspection from the enforcement authorities before taking needed action.

In larger companies, the emphasis of inspection is rather different. These companies have the technical and financial resources to deal with safety and health problems. They should devise both effective management systems to resolve the problems, as well as management procedures to check that the systems are working. In these circumstances, the emphasis of the inspection should therefore be on checking and validating the management control systems found at the workplace. The inspection should therefore not be an exhaustive examination of all items of plant and equipment to determine their safety, but rather to use selected examples to test the effectiveness or otherwise of the management systems for ensuring safety and health at work.

3) Investigating complaints

Inspection visits are often undertaken in response to particular complaints.

The issue of confidentiality is particularly important when it comes to dealing with complaints. This issue is specifically mentioned in Convention No. 81, Article 15, and should therefore be reflected in relevant national policy.

The inspector must not disclose the reasons for his or her presence, or the name of the informant and, when interviewing workers for the purposes of this investigation, should talk to as many people as possible to avoid inadvertently disclosing the source of the complaint or information. To protect confidentiality, the inspector could act as though a routine inspection is being

undertaken, but ensure that the subject matter of the complaint is addressed in the course of the visit. Most complaints are investigated in one way or another, not always through a formal inspection visit.

When the complaint comes from the workplace safety and health committee or from authorized staff members, or when the problem or complaint is common knowledge, there is clearly not the same need for confidentiality.

4) Investigating accidents or diseases

Article 14 of Convention No. 81 states that: “the labour inspectorate shall be notified of industrial accidents and cases of occupational disease (...)”.

The means of notifying accidents may differ depending on the seriousness of the accident: by telephone, use of the internet or, in some cases, by sending a completed form to the inspectorate.

Inspectors investigate both accidents and (much more rarely) cases of occupational disease to determine the causes and ensure that appropriate measures are taken to avoid repetitions. They may also take legal action, such as a prosecution, when the accident or disease is particularly serious, e.g. in the case of a fatality. Investigations may also be undertaken to determine the facts concerning legal liability for worker compensation.

The investigation of accidents and diseases can be a lengthy and complex process, as they may have several direct and indirect causes, and many people may need to be interviewed. Labour inspectors should therefore be thoroughly trained in the techniques of investigation and such training will be enhanced as they gain more experience.⁹

5) Follow-up visits

Follow-up visits are typically undertaken to check compliance with an order (such as a prohibition or improvement notice) issued at an earlier visit, or to check that remedial action has been taken following advice given on some important issue. Such visits are required by law in many countries.

Follow-up visits should be undertaken in timely fashion and not postponed or delayed; they are usually unannounced. If the order has not been respected or if other remedial action has not been taken, inspectors will need to consult the standard operating procedures when considering whether legal action is required to bring about the required changes.

3.3 The closing meeting

After the inspector has visited the premises, spoken with managers and workers and examined necessary documentation, a closing meeting should be held with management representatives and, where possible, workers’ representatives or trade union officials. This meeting provides the

⁹ For further detailed information on this subject, see the ILO’s [Investigation of occupational accidents and diseases - A practical guide for labour inspectors](#).

opportunity for an open discussion of the issues found during the inspection and on the best way of complying with legal requirements. It is vital and it should not be rushed.

The closing meeting should not be used as an opportunity to intimidate the employer and should not become a confrontation. The inspector has to balance the dual functions of enforcing the law and providing advice and information. He or she should clearly and objectively state what needs to be done and the likely repercussions of failure to comply with legal provisions within a clear time frame. However, if the situation warrants it, the deadline for implementing measures required or proposed by the inspector may be discussed or “negotiated” in return for the employer’s firm commitment to comply. Such “negotiated compliance” has to be based on prevailing legal requirements and increases the level of acceptance of measures imposed by the labour inspectorate.

Inspectors must show good judgment and communication skills both during and at the end of the inspection visit, and their ability to summarize the main findings of the inspection visit is paramount. If well done, this will both convey the importance of any remedial action required and win the employer’s and the workers’ commitment to taking such action. An inspector should also indicate whether issues are serious enough to warrant further action, particularly if legal proceedings are contemplated.



▶ The aim of the closing meeting: an example

The aim of the closing meeting is for inspectors to:

- ▶ summarize the general standard of working conditions in the enterprise, including the state of housekeeping, emphasizing what is satisfactory, but clearly pointing out what needs improvement to ensure compliance with the law;
- ▶ discuss any unfair, unsafe, unhealthy or otherwise unlawful conditions observed, outlining all apparent violations and possible legal consequences;
- ▶ propose priorities for improving working conditions and the working environment by identifying three or four important issues;
- ▶ state those measures that have to be implemented without delay;
- ▶ inform the employer of the period allowed for implementing time-consuming measures;
- ▶ inform those present of the role and purpose of labour inspection, indicating the services it can provide to both employer and workers;
- ▶ present all findings in a balanced, impartial manner, highlighting areas of non-compliance, as well as areas of compliance.

▶ 4. Follow-up and reporting

4.1 Communications with the enterprise

After an inspector has left an enterprise and is preparing to write his/her report, certain steps may be necessary. For example, inspectors may wish to consult technical experts and check relevant legal texts, guidelines and publications to ensure that the recommendations made or instructions given were correct. They may also wish to re-examine the issues identified and confirm that they are, in fact, priority ones.

Inspectors then decide what action to take on each issue. This will depend on an assessment of the seriousness of the issues found, the inspector's powers under the law and, most importantly, what is likely to improve the situation in the workplace in a sustainable manner.

An inspector could decide to confine action to advising on how best to comply with the law or, if the issue is not — or not entirely — covered by legal provisions, advising on how to rectify the situation. Where the inspector decides to give **advice**, an attempt should be made to provide the employer with alternatives on how best to comply within the framework of legal and other requirements. This should normally be done in writing.

Where a problem relates to certain sections of the law or regulations, the relevant sections should be referred to in any notification to the enterprise. Where advice or a recommendation is based on a standard or technical norm not specified by law, the distinction should be made clear.

When there is a clear breach of the law and mere advice will not have the desired result, the inspector may decide to issue a **warning letter** — the first step in the legal process to deal with non-compliance. Failure on the part of the employer to respond to the warning (including a second warning, if required by law) will eventually lead to prosecution.

In many countries, inspectors have powers to issue orders to close an item of plant, a process or the enterprise itself where there is an imminent, serious threat to workers' safety or health (**prohibition notice** or "stop" order). Before doing so the inspector may wish to consult superiors, providing evidence of the non-compliance and discussing the adequacy and appropriateness of the proposed action. This should be done immediately after the inspection visit to reduce the period during which workers remain exposed to the danger.

When the inspector is prepared to allow a certain period of time to rectify non-compliance, this should be communicated in writing to the employer and workers. It should be consistent with what was said during the closing meeting. This is usually done in the form of an **improvement notice**, clearly identifying the violations committed, indicating what is required to rectify them, and setting a clear, reasonable (that is, achievable) time frame for compliance. This time frame or deadline may differ for different forms of non-compliance.

Another option for serious violations is to directly impose administrative **sanctions** or initiate legal proceedings when serving a prohibition order or improvement notice.

The time limit for compliance will ideally be determined by the inspectorate's national enforcement policy, which should have been agreed by national employers' and workers' organizations to ensure national consistency and fairness. For example, where OSH is concerned:

- ▶ if a risk is judged high or unacceptable, protection measures must be implemented immediately; work must be stopped until the action is completed;
- ▶ if the situation is judged to be of medium risk, but still unacceptable overall, low-cost measures may be imposed for implementation within a period of weeks or even months;
- ▶ if the situation is judged to be of low risk, and considered overall acceptable, a longer period may be set for any action still required.

The time limit for improvements should not be so short as to make it impossible for the employer to comply, nor so long that exposure to risk continues for an unreasonable period.

4.2 The inspection report

An inspection report is an internal document. Its purpose is twofold: to convey information as a basis for ongoing improvement on the part of the enterprise, and to provide further information to enable the inspectorate to improve its own data collection, and ultimately its effectiveness and impact. The information contained in an inspection report is of course used to assist in determining actions required by the inspected enterprise, and the inspected enterprise will need to be informed of these required actions, usually by some other means (letter, legal notice, etc.). The format of an inspection report will vary widely from country to country. It may follow:

- ▶ a standard format, whereby the inspector provides information in response to a series of questions on a prescribed form;
- ▶ a narrative format, whereby the inspector presents information in full sentences and paragraphs under a series of broad headings;
- ▶ a combination of the standard and narrative formats;
- ▶ another format.

Inspectors are increasingly using modern IT facilities for reporting and maintaining records on enterprises and their visits.

As an internal document, the report is principally for the inspectorate's use, though other parties may wish to see a copy of it, for example a lawyer acting on behalf of a client suing for compensation after a workplace accident (that has been investigated by an inspector). The normal practice is for the inspection report to be kept at the inspectorate, with the enterprise and other concerned parties being notified of relevant matters by letter. This ensures that the confidentiality of the information collected from enterprises is maintained. When completing the report, it may be necessary to gather additional information by observation, interview, measurement and/or reading.

The inspector should always distinguish between **fact and opinion**. Information presented as fact should be verified for accuracy; subjective opinion should not be presented in final, definitive

statements, but should nevertheless reflect sound judgment based on competence and experience. If necessary, senior colleagues or specialists should be consulted. For example, if an inspector measures the temperature and records it, then it is a fact that the temperature was 28 degrees centigrade; if no measurements were taken, the inspector's opinion may be that the premises were overheated, but this is opinion — not fact — and should be recorded accordingly.

The report should be **completed as soon as possible after the inspection**, preferably on the same day. There should be binding deadlines throughout the inspectorate, with clear, achievable performance standards. For example, it would be reasonable to require that a routine inspection report be submitted to the supervisor no later than one week after the visit, or that the enterprise be informed of required actions within 10 days. Adherence to deadlines, taking timely action and providing feedback should be closely monitored by supervisors at district level. Inspection managers should likewise ensure that all inspectors report in the correct format and on time, and that reports are well-written.

Content of the report

The content of the report will vary from one inspectorate to another, depending on its mandate, the purpose of the inspection visit and other factors. An example of a possible contents list is given below. The report should indicate the inspector's name and all the parties to whom it is addressed, and should be dated and signed.



▶ Contents of an inspection visit report: an example

General information on the enterprise

- ▶ Name, legal status (company, partnership) and relation to other entities and companies (e.g. subsidiaries)
- ▶ Location and address
- ▶ Nature and description of business
- ▶ Contact person, and telephone and fax numbers
- ▶ Number of employees (disaggregated by sex, age, occupational categories)
- ▶ Special processes (e.g. use of chemicals) or “special conditions” (high risk/hazardous)
- ▶ Applicable collective agreement

Working conditions

- ▶ Hours of work and overtime worked (if any)
- ▶ Minimum wages and allowances paid
- ▶ Weekly rest periods and holidays
- ▶ Other legal conditions or employment requirements
- ▶ Safety and health conditions
- ▶ Medical and welfare services
- ▶ General state of “housekeeping”
- ▶ Rating of enterprise in terms of work hazards
- ▶ Rating of enterprise management’s ability and willingness to at least maintain, and if possible improve, existing standards

Industrial relations

- ▶ Existence of a trade union
- ▶ Collective agreement applicable or not
- ▶ Number and function of workers’ representatives
- ▶ Existence of a functioning consultative committee, such as works council, workers' committee, OSH committee

Inspection details

- ▶ Nature of inspection (routine, special, follow-up, investigation)
- ▶ Nature of all contraventions and inspectorate action
- ▶ Priority areas for attention
- ▶ Action to be taken by enterprise on each priority area
- ▶ Any other information or data considered useful.

Reports of any subsequent visits should update the information on general matters, working conditions, industrial relations and safety and health, and concentrate on the nature of the contraventions found, the action proposed to remedy them, and whether the employer has complied or not.

Different reporting arrangements apply to special investigations. Such reports should indicate:

- ▶ the reasons for inspection (e.g. a complaint);
- ▶ the inspector's findings;
- ▶ the action being taken by the inspectorate and that required of the enterprise;
- ▶ the deadlines imposed;
- ▶ whether it is likely that further checks will be necessary.

The report must in all cases lead to consequences, i.e. to improved conditions and, ultimately, to full and sustainable compliance with the law.

The inspection report must be added to the file on the enterprise. It is also desirable to file the inspector's working notes and comments for future reference. Information on each visit becomes part of the inspectorate's statistical database and the outcomes become part of the inspectorate's "institutional memory".

When writing reports, remember:



▶ **Guidelines for effective written communication**

- ▶ **Know your reader.** Who will be reading the report? What do they know about the problem?
- ▶ **What do they need to know?** How can the information best be provided so that they can make an informed decision?
- ▶ **Keep to simple language.** Using fancy words or technical jargon will only blur your message.
- ▶ **Keep the report short, while still providing the necessary information.** The value of the report does not depend on its length. The more wordy the report, the more likely the message will not be received, or will be clouded.
- ▶ **Do not use long rambling sentences.** If a sentence has more than 17 words, see if you can express it in a different way.
- ▶ **Present only the facts.** Do not use emotive language. State the source of your facts.
- ▶ **Make sure your recommendations and the actions required of the reader are clearly stated.** Do not leave the reader guessing as to what you want them to do.

► Summary

One of the great advantages that labour inspectors enjoy is that they can gain direct access to workplaces during inspection visits and see working conditions as they truly are. As representatives of their governments, they therefore have a key role to play on behalf of their ministries in promoting compliance with relevant labour legislation, and advising on and enforcing the law where necessary. Without efficient inspection visits, the law would remain a dead letter and the protection afforded to workers would be an illusion. The efficiency and quality of inspection visits depends on a number of factors; visits should therefore be carefully planned and standardized, and inspectors should be adequately trained.

It is also important to bear in mind that inspection visits provide the main point of contact between the labour inspectorate, employers and workers on a day-to-day basis. While there should be cooperation between the inspectorate and its social partners at national level, such cooperation must also exist at the enterprise level, where the relationship that employers and workers have with the inspectorate is “played out” in practice.

Well-executed inspection visits require careful preparation. They should be conducted following a standard operating procedure based on a national inspection policy. Visits will be enhanced by proficient inspectors with good soft skills in areas such as communication, questioning and observation. During visits, inspectors will need to exercise judgment in assessing how well the law is being complied with and how capable the enterprise is of meeting its obligations. Subsequent reporting and follow-up visits are also important for building on the benefits gained from earlier inspections. Set guidelines are useful, and inspectors need to be competent in decision-making and reporting.

It is crucial that inspectors be well trained to carry out inspection visits, to ensure that they have the necessary legal and technical knowledge, and communication skills, so that their visits have maximum impact. Although detailed inspection procedures will vary from one country to another, there are broad principles and common approaches that apply to all inspection visits. It is these principles and approaches that are set forth in this module, with relevant practical examples.

The module can also serve as a reference for developing a standardized manual of procedures for inspection visits, adapted to the specific conditions and policy of different countries. It will be helpful in training inspectors in all aspects of the inspection process, and in training the managers who supervise and support them.

