

Tourism Impact Assessment South Africa

Activities, Key Findings and Impactful Measures



Acknowledgements

- The Roundtable (RT) team expresses its gratitude to everyone in South Africa who contributed to the successful implementation of the process of this assessment. Without their invaluable inputs, openness and experience, this assessment would not have been possible.
- We would like to thank [Fair Trade Tourism \(FTT\)](#), especially Lisa Scriven and Rachel Nxele, as the locally-based facilitator and active support for the assessment.
- The core project group consisted of RT members [Bread for the World/ Tourism Watch](#), [DERTOUR Group](#), [Kneissl Touristik](#) and [Studiosus Reisen](#). Their financial support, active contributions to local partners and professional perspective made this project possible. Their dedicated local partners in South Africa deserve a special thank you.
- We would like to thank AER Kooperation for the financial and organisational support of the travel planning. Various further tourism businesses and stakeholders have supported the project with in-kind and financial contributions, and partner networks, and made a multi-stakeholder setting possible.



Executive Summary

This report summarises the key findings of the value-chain-focused tourism impact assessment conducted in South Africa from a European tour operator's (TO) perspective in January 2025.

The focus of this assessment is on a **typical tour operator's value chain for a group tour in South Africa** and does not constitute a sector-wide impact assessment. It constitutes a **snapshot of the current situation at the time of the on-site assessment (19-29 January 2025)** with a limited scope.

Besides the information gathered through existing documentation and the desk review, the findings are mainly based on the evidence and perspectives gathered through eight pre-consultations and during the 31 on-site consultations with more than 80 stakeholders. The assessment is based on qualitative research and anonymity was granted to the stakeholders consulted.

Roundtable Human Rights in Tourism (RT) is solely responsible for the content of this publication, published in June 2025.



Project Overview

The project

1. Focused on a tourism supply chain of **mid-range group tourism** products in the crucial **South African tourism hubs of Cape Town, Johannesburg, and the Greater Kruger areas**.
2. Applied a **multi-stakeholder approach** and follows an **internationally acknowledged methodology**.
3. Considered risk topics named in the German Supply Chain Act (LkSG).
4. Built on the Roundtable's [detailed blueprint tool](#) for conducting impact assessments in line with the UN Guiding Principles on Business and Human Rights (UNGPs).

The project supports tour operators to

- facilitate access to sector-specific information on human rights issues for tour operators on classical tourism routes in South Africa;
- identify and prioritize risk areas within their own business;
- take concrete measures to address human rights risks and implement due diligence strategies in a targeted and pragmatic manner;
- define appropriate mitigating actions (also with regard to LkSG)
- foster partnership with key local stakeholders, including employees, suppliers, NGOs and other businesses and organisations.



The Assessment - Consultations

The assessment included:

- **8 online pre-consultations** with various experts, institutions and organisations
- **2 focus group discussions** (Cape Town and Johannesburg)
- **31 consultations on-site with >80 stakeholders**
 - Destination Management Companies (DMCs)
 - Accommodations
 - Activity Providers
 - Transport Providers
 - Associations
- Visits to and exchange with tourism related **projects, good practice examples and organisations**



Key Findings / Key Issues

Based on the consultations, previous desk research and business risk analysis data, the following key issue areas were identified in the context of the assessment of TO's value chains in South Africa:

1. **Job Creation/ Upskilling (in-house training, engaging local communities)**
2. **Workers' Rights/ Risk of Exploitation (especially drivers, rangers and guides)**
3. **Child Rights:**
 - **Prohibition of Child Labour (esp. Youth Choirs)**
 - **Protection from Sexual Exploitation**
4. **Fair Pricing and Contracting in the Supply Chain**
5. **Further Topics:**
 - **Community Impact**
 - **Environmental Issues**
 - **Workplace Discrimination and Gender Roles**

For each of these topics possible effective risk mitigation measures were discussed and elaborated. These measures target different levels, from individual actions at TO level to joint projects, exchange formats with local partners and institutions to activities of local stakeholders.

The selection of measures takes into account the severity of the risk (scale and scope of risk for rightsholders) and ability to influence (leverage) tour operators and tourism businesses.



High Impact Measures for Tour Operators

This summary outlines key, practical measures identified through the Tourism Impact Assessment South Africa, developed in close consultation with local stakeholders. It focuses on high-impact actions for tour operators in areas such as upskilling local youth, certification, child rights, and workers' rights—aligned with local laws, challenges, and opportunities. It is most effective when read alongside the full report.

THE SOUTH AFRICAN CONTEXT



Cultural and Historical Background

South Africa is a diverse nation with a rich blend of cultures and traditions, and this diversity is reflected in its business and stakeholder engagement practices. Successful consultations depend on cultural sensitivity, open communication, and mutual respect.

- **Cultural Diversity:**
South Africa has a vast variety of cultures, languages, and ethnic groups with distinct customs, communication styles, and decision-making approaches.
- **Respect for Authorities:**
There are traditional structures and a cultural 'default' of respect for elders and authority figures in South Africa. In many workplaces this may manifest as a reluctance to speak up and a specific structure of leadership roles. Senior figures in an organisation or community may wield significant influence.
- **Relational Approach:**
Building trust and personal relationships are a crucial part of South African business culture. Stakeholders may prefer to establish rapport before addressing the more formal details of a discussion. Taking the time to listen and connect on a human level will facilitate more productive consultations. This also means to always start a conversation with what is considered "small talk" like "How are you" and ongoing questions.
- **Environment of Equality:**
South Africa's history of Apartheid has left lasting sensitivities and dynamics around issues of race, inequality, and representation.



Legislative Frameworks

South Africa has a very strong legal framework regarding human rights topics. It is important to acknowledge that since the end of Apartheid, South Africa has made substantial progress in promoting human rights and social justice, guided by one of the most progressive Constitutions in the world.

Strong institutions and a comprehensive legislative framework—including the Basic Conditions of Employment Act (BCEA), Labour Relations Act (LRA), and Employment Equity Act (EEA) —provide the legal backbone for fair labour practices and inclusive economic participation.

Institutions like the Commission for Conciliation, Mediation and Arbitration (CCMA) and the South African Human Rights Commission (SAHRC) play a key role in protecting and advancing these rights.

The government's robust legislation ensures compliance, particularly in workplace safety and environmental protection. However, enforcement of fair wages and systemic challenges needs greater alignment with workers' realities:

- Despite all progress, development systemic challenges such as wage gaps, gender pay disparity, and employment inequality remain critical issues. High unemployment, particularly among youth, continues to limit access to economic opportunities. Skills development has been prioritised through national programmes and Sector Education and Training Authorities (SETAs), but disparities in capacity building and access to opportunities persist.
- Worker exploitation—especially of casual, contract, and seasonal staff—occurs despite legal protections, and enforcement remains an ongoing challenge particularly in more rural contexts. Meanwhile, child labour and sexual exploitation, although not systemic, still occur in vulnerable communities. Government efforts, often in collaboration with civil society, focus on prevention, legal enforcement, and victim support.

South Africa's institutional and legal framework equips it to confront these challenges, but continued investment in implementation and accountability is key to realising the full promise of its Constitutional vision.

The report highlights relevant legal frameworks regarding the identified key issue areas under each section.



Tourism Development

Tourism is a vital economic driver in South Africa. In 2022, it contributed 3.5% directly to GDP, with indirect and induced contributions raising the total impact to 8.8% - an increase from 8.3% the previous year (Minister De Lille, Aug 2024). The most recent statistics in terms of economic and social impact are from 2022 when the sector directly employed 386,978 people—around 3% of total employment in South Africa— with indirect employment, e.g., through supply chains and complementary sectors, taking this to approximately 1.5 million (Statistics South Africa, Tourism 2024 report).

Amid high national unemployment rates, these figures highlight tourism's critical role in job creation. Many tourism-related jobs are semi- or low-skilled, providing relatively low barrier to entry employment opportunities for youth and women. Given its capacity to absorb large numbers of workers, particularly in key service areas like accommodation, food services, and transport, tourism offers a strategic pathway to address structural unemployment in both urban and rural areas, and it continues to be one of the few sectors with potential to drive inclusive and spatially dispersed economic development.

In 2024, South Africa received over 8.9 million international arrivals. Of these, 24% were from overseas long-haul markets with European nations consistently ranking amongst the top contributors. Key EU source markets included Germany (11.9%), the Netherlands (6.2%) and France (5.9%), while the UK contributed 16.4%. These markets play a significant role in sustaining employment and investment across tourism value chains. Their continued engagement is essential for achieving national tourism growth targets and for ensuring the positive socio-economic impacts of the sector are maximised and equitably distributed.

KEY ISSUES AND POTENTIAL MEASURES

For each of the defined key issue areas the core group, consulted stakeholders and local facilitation partner discussed and elaborated effective risk mitigation measures.

These measures target different levels, from individual actions at tour operator level to joint projects, exchange formats with local partners and institutions to activities of local stakeholders. The selection of measures takes into account the severity of the risk (scale and scope of risk for rightsholders) and ability to influence (leverage) of tour operators and tourism businesses.

Job Creation and Upskilling - Especially of Youth

Overview and Risk Factors in South Africa

According to the South African Government, the official unemployment rate was 32,1 % in the third quarter of 2024. Youth (15 to 34 years) remain vulnerable within the labour market with an unemployment rate of 45,5%.

The nation's awareness and response to this challenge is high, with job creation and youth unemployment featuring as top priorities, e.g., in the annual State of the Nation Address and related budgets. There are myriad national and provincial initiatives active in this space, including

- the National Youth Policy 2020 – 2030,
- an Employment Tax Incentive to encourage employers to hire youth,
- the National Rural Youth Service Corps,
- the Youth Employment Service Programme, and
- the Presidential Youth Employment Intervention (with over 4.5 million youth registered, over 1.5 million annual job placements, and 70% women participants).

Connected Legal Regulations

While local employment and creating opportunities are often found as strategic focus areas in many business' operating environments, there is no legislation prescribing the employment of youth, nor of people from the area surrounding the business, per se.

Other industry tools and incentives to promote this do, however, exist. For example, Fair Trade Tourism's (FTT) Standard requires that local employment be prioritised, and it also rewards businesses that create opportunities for youth.

Where state bodies are involved in contractual agreements, the topic of employment has also been included as a performance requirement. For example, concession agreements awarded within Kruger National Park include contractual binding agreements regarding local job creation.

Relevant policy instruments addressing unemployment include

- the **Broad-based Black Economic Empowerment (BBBEE) Act** and Codes of Good Practice
BBBEE addresses economic transformation and development; scorecard themes reflected therein include skills development, enterprise and supplier development, and socio-economic development (which includes employment). Performance in each of these is scored according to investment that benefits historically disadvantaged individuals, which includes black people, and there is an emphasis on black women, youth, and those with a disability. It is intended to advance economic transformation and enhance the economic participation of black people in the South African economy.
- the **Employment Equity Act**
The Employment Equity Act aims to promote fairness and equal opportunity in South African workplaces by eliminating unfair discrimination and encouraging the inclusion of historically disadvantaged groups, including Black people, women, and people with disabilities. While all employers are required to treat employees fairly and ensure equal pay for work of equal value, larger employers (based on employment and turnover thresholds) must take additional steps by developing and implementing employment equity plans to improve representation across all levels of their workforce. Referred to as “designated employers”, they are also required to report progress to the Department of Employment and Labour annually.

Practical Challenges in South African Tourism

The high unemployment rates significantly impact the tourism sector, highlighting the potential for tourism to drive economic growth and job creation. The tourism sector in SA provides a lot of jobs on different skill levels, also a lot for unskilled/ low skilled - and small local businesses/suppliers can be supported as they sell to accommodations etc. Decentralised job creation is very critical in South Africa, and tourism is important for it as it by default creates job opportunities outside of city hubs, often in more economically marginalised areas.

The given setting makes on-the-job training and upskilling for local people by tourism businesses an important issue. As there are limited opportunities for vocational training in tourism in South Africa, especially in rural areas, many businesses train their staff directly through different programs and incentives.

Within this context, there are specific safety and legal requirements that need to be borne in mind for guides, drivers, and rangers in tourism. None of these are legally allowed to provide service without the relevant certificates and qualifications. Supporting the acquisition of these qualifications is an impactful possibility to support local people. This is, however, coupled with the reality that tourism companies that invest in this kind of training, find that newly qualified employees then apply to work with other companies or find a job elsewhere. This situation can lead to frustration with engaged companies, resulting in a reluctance to invest in their team. It needs an exchange of views on what opportunities for cooperation or exchange exist so as not to deter companies from creating these opportunities. It may be possible to create joint formats and opportunities for trainees in which different companies can work together and save resources.



Possible Measures and Action Steps

Give opportunities to young, qualified but inexperienced local guides and drivers in tours, actively discuss topic with local partners to find solutions

⇒ ACTION STEPS FOR TOURISM BUSINESSES

- Elaborate on this topic with local partners/DMC and discuss the possibility of working on it on a project basis:
 - *How could booked experienced guides be accompanied by qualified but inexperienced ones during tours?*
 - *How could best practices, i.e., local examples of DMCs already doing this (there are many) be approached and collaborated with (through internships, job shadowing, career day experiences, etc.)?*
 - *How could it be contractually designed and is there room for adaptation to give more chances to young/ inexperienced guides/drivers?*
 - *How could such a project be managed/ implemented also regarding quality management?*
- Suggest that any initiatives draw on the pool of Travelife affiliated DMCs (which are also FTT-approved) as the criteria for DMCs include creating youth opportunities.

- Support the acquisition of qualifications for drivers and guides, also with regard to relevant language skills that are highly requested by international tours (e.g., German).

⇒ ACTION STEPS - MULTI-STAKEHOLDER APPROACH

- Exchange with local institutions and existing initiatives
 - how this topic could be brought forward,
 - on networking opportunities, e.g., government subsidised stipends for interns (CATHSETA)
 - how to receive relevant info about tour guides (experience, who wants to get more experience/ be part of such a project, language skills etc.) for Tour Operators that do not work with DMCS
 - if a project with local stakeholders and vocational training school was impactful

Conduct joint training interventions

⇒ ACTION STEPS - MULTI-STAKEHOLDER APPROACH

- Exchange with local organisations, associations, and institutions to plan activities (webinars, workshop on-site) on a low level, for different target groups, with local context to bring forward local (verified) good practice and solutions.
 - Exchange with local industry associations and institutions to conduct joint training interventions (e.g., Blended learning format for existing E-Learning “Human Rights in Tourism” but connected to real examples of local implementation and contextualisation what it means/ what is especially relevant in SA.)
- If needed, co-develop funding proposals.
- Follow-up with local organisations and institutions for broad distribution and pointing out relevance of training offers to various stakeholders in SA and Europe.

Create a central repository of existing, free, tourism & hospitality e-learning resources, knowledge-hubs, tools etc. including general training as well as sustainability-related themes (including human rights) with relation to existing local legislation.

⇒ ACTION STEPS - MULTI-STAKEHOLDER APPROACH

- Find local organisations to give tender for the creation of the repository.
- Broad distribution of resource to local stakeholders, business partners and own employees
- Broad distribution of resource to various stakeholders in SA and Europe through different channels (Tos, associations, local organisations/ partners)
- Design resource in a way that ensures that it won't be out-dated quickly and can be found sustainably.

Good Practice, Further Resources and Guidance

- **Government gazette on minimum wages** , which includes the recommended stipends for learners based on the National Qualifications Framework (NQF) levels
- **Goodworkfoundation** :
The Good Work Foundation (GWF) is a nonprofit organization that trains local youth in technology, conservation as well as Tourism and Hospitality. They provide opportunities in the tourism sector for youth in the villages bordering the Kruger National Park.
- **Kruger to Canyons Biosphere Region NPC (K2C)** :
K2C is currently implementing a range of conservation and sustainable development projects that are managed in an integrated way & address our vision and strategic objectives. Interventions are focused on the interface where vulnerable communities; water; biodiversity and ecosystem services exists which is pertinent in the face of climate change.



Working Conditions and Working Hours (esp. of Drivers, Rangers, and Guides)

Overview and Risk Factors in South Africa

Strong regulations exist in SA with regard to workers rights, social security and occupational health and safety (see legislative frameworks). Audits and controls happen but were perceived in consultations to be less in rural areas. At the same time, there is generally higher union representation in rural areas. If people are working self-employed as drivers, rangers, or guides in tourism, they have little access to the named medical and social security mechanisms.

- South Africa has a **legislated minimum wage in effect since 2019**. The topic was discussed in almost all consultations during the assessment, with various opinions on it. (see excursus "Minimum and living wage").
- **Tipping** plays a vital role for workers in hospitality and tourism. The 'standard' is 10 - 15%, but there is no industry norm and depends largely on the service being delivered and the standard. For example, 5* lodges would likely advise their clients to tip an amount that is far higher (per day, per guest) than a 3* lodge would advise. There is also a fine balance between tipping enough, and tipping too much; i.e., where the 'good intentions' of a disproportionately large tip results in workplace jealousy and similarly destructive dynamic. Excessive tips can have unexpectedly far-reaching consequences and can even throw the balance of the local economy, with the potential for rather negative results.
- South African workers have **constitutional rights to freedom of association**, and trade unions- as well as the CCMA- hold significant influence. Nonetheless, apprehension about asserting workplace rights persists, rooted in the country's Apartheid legacy, cultural norms, and traditional power structures. Although no direct causality exists, this complex context combined with high unemployment contributes to vulnerabilities among tourism workers who often feel powerless to advocate for improved conditions.
- **Migrant workers**, often from Malawi and Zimbabwe, play a significant role in the SA tourism sector but face precarious conditions, lack of skills recognition, and sometimes even hostility from local workers due to high unemployment and competition for jobs. Despite South Africa's very progressive legal frameworks, xenophobia in hiring practices can often still present a challenge.

Connected Legal Regulations

Workers' rights are well regulated in SA through several acts and laws.

LINKS TO THE MOST RELEVANT FRAMEWORKS ON WORKERS' RIGHTS

1. Basic Conditions of Employment Act (BCEA)

Governs working time (II), statutory leave (III), contracts and forced labour (IV), termination of employment (V), child labour & inspections (X) and amendments

Sectoral Determination 14 - Hospitality (SD14)

Provisions specific to hospitality, falls under BCEA. Specifics include things like the provision of accommodation and food, which are somewhat unique in remote context typical of the sector.

Ministerial Determination no 1: small business sector

Applies to businesses with fewer than 10 employees; falls under BCEA. Topics include the application of overtime limits, averaging working hours, and family responsibility leave (which are more flexible for a small business employer).

2. Occupational Health & Safety Act (OHSA)

Duties of employers, OHS Representatives and Committees, duty to report, and listed work

3. Labour Relations Act (LRA)

Freedom of association, collective bargaining, workplace forums, labour disputes, and CCMA (Commission for Conciliation, Mediation and Arbitration)

Codes of Good Practice re Employment and Pregnancy, and of Arranging Working Time

4. Social Security

Unemployment Insurance Fund (UIF)

Companies are obliged to pay into the Unemployment Insurance Fund (UIF) – the contributions are 1% of salary from employer and employee each. UIF is managed under SARS (revenue authority).

Compensation for Occupational Injuries and Diseases (COIDA)

Employers also pay an annual fee for the **Compensation for Occupational Injuries and Diseases (COIDA) fund**, from which medical expenses of the employees are paid in the event of an injury while on duty. There are standard trainings for every sector available with regard to health and safety. COIDA is managed by the Department of Employment and Labour's Compensation Fund.

5. Protection of Personal Information Act (POPIA)

Protection against unlawful collection, retention, dissemination and use of personal information

Practical Challenges in South African Tourism

How does a company ensure it respects relevant national laws relating to working time in an industry that operates 24 hours a day for 365 days of the year? Overtime issues with rangers, drivers and guides in tourism is not only a workers' right topic but also a major safety risk for travelers and due diligence topic for tour operators.

One response to the realities of the South Africa tourism sector falls under what is known as “**averaging hours agreements**”, which are provided under BCEA. In summary, working hours can be averaged over a specified period. At the end of this period, the ratio of days worked to off days would still need to work out to a 'normal' working week, e.g., 45 hours / week, on average. How this is commonly applied in practice is by working, e.g., 3 weeks on (consecutively) following by 1 week off, or 6 weeks on (consecutively) followed by 2 weeks off.

Under averaging hours agreements, weekly overtime limits are reduced from the normal maximum of 10 hours per week, down to 5 hours per week.

Averaging hours can be applied to a maximum period of four (4) months, allowing flexibility in contexts where workloads fluctuate dramatically. These working agreements are re-signed on an annual basis between employer and employee, and would involve Shop Stewards and their Trade Unions, where applicable.

Working hours of drivers, guides and rangers

Despite averaging hours agreements as a workable solution there are still several operational challenges for the tourism industry to apply averaging hours in practice, especially for drivers, guides and rangers in FIT (Free Independent Traveler) arrangements:

1. Rangers, tour guides and drivers are assigned to guests on a dedicated basis, i.e. they are responsible for the same people for the duration of their stay. This is related to quality of the experience and safety, and changing this practice would, therefore, be difficult to motivate. This is important for any considerations around how the management of hours is approached.
2. When offering safari tours or tours to remote areas, **staff accommodation on site in protected areas is limited** – with a maximum number of beds stipulated by the conservation management authorities. The remote location of these operations makes it necessary for staff to stay on site so there is a limitation on how many people can be there at any given time. As such, a recommendation of simply 'hiring more people' is not feasible.
3. Related to the above, driving staff to / from work pre or post shift is logistically unpractical, not to mention unsafe and a security risk. Hitting an elephant in the road is a real risk to everyone, increased risk of roadkill, and making anti-poaching activities more challenging, etc. People simply can't drive on / off site early or late.
4. Overnight rest periods are also relevant here. Normally, a minimum of 12 hours is required but if the employee stays on site and gets a minimum 3-hour break in their split shift, the overnight rest period can be reduced to 10 hours. To respect this minimum 3-hour break, the option of guests doing a game walk after the morning game drive presents a challenge. Although game walks don't happen every day, you can see how a day's itinerary can get filled and exhausting (and increase health and safety risks).
5. Tips are also a huge incentive in the safari industry. Even if rangers are well salaried, they get big tips and this pushes them to want to work more, do more, please more. The only solution is that the choice regarding working hours compliance should not be theirs to make as they will always (or at least often) make the choice that brings in more money. Management should insist – with both staff and guests – on systems that ensure working hours agreements are respected.

Consider this example of a ranger's working day to see the operational realities in the face of guest demands and expectations:

- 4 hours work in the morning for a morning game drive (wake up calls, sort out vehicle and snacks, do game drive, clean vehicle),
- 4 hours work again in the afternoon for the afternoon game drive.

That's already an 8 hour day with 9 being the maximum.

So doing a game walk and sitting dinner with guests compromise a ranger's ability to stay within working hours (unless another activity is sacrificed, e.g. they can sit dinner if they don't have to do the game drive the next morning).



Possible Measures and Action Steps

Reasonably mitigate risk of non-compliance and support and respect local systems and regulations for workers' rights

⇒ ACTION STEPS FOR TOURISM BUSINESSES

- Engage with suppliers that employ rangers, guides and / or drivers to assemble best practice case studies regarding management of working hours (to comply with BCEA); these case studies can then be shared with other suppliers along with a request to communicate about how they ensure compliant managing of working hours for these positions.

Strengthen local structures and access to local project partners, stakeholders, and institutions = network in destination

⇒ ACTION STEPS FOR TOURISM BUSINESSES

- Work with locally owned small-scale properties (accommodation) rather than big chains/ properties – if possible, regarding group size.s
- Look deeper at the individual business structure of SA value chain with direct and indirect suppliers and sensitise on topics and benefits of local certification schemes.
- Think further of impactful measures that fit in the context without excluding trusted business partners.
- Spread compilation of resources and know-how with local context through local network and local facilitation partners.

Increase the share of certified local partners per 1-3

⇒ ACTION STEPS FOR TOURISM BUSINESSES

- Be pro-active about asking your local business partners for established independent certification – if possible with local representation and context sensitivity.

⇒ ACTION STEPS MULTI-STAKEHOLDER APPROACH

- Create and host joint webinars with buyers (TOs), their suppliers, and locally represented certification schemes to create a better understanding of how things work, and how businesses can benefit from a holistic and structured approach to their sustainability management.

Establishing responsible working conditions for drivers, rangers, and guides

⇒ ACTION STEPS FOR TOURISM BUSINESSES

- Tour Operators can request the tax clearance letter from the South African revenue authority SARS, that manages the obligatory contributions under the Unemployment Insurance Fund. They can also request the « Letter of Good Standing » from the Compensation for Occupational Injuries and Diseases (COIDA), managed by the Department of Employment and Labour's Compensation Fund. These documents are made annually available at a company level as part of legal requirements. They show the commitment of local companies regarding official workers registration, payment of taxes and social security. To ask for them places only a little extra reporting burden on suppliers but gives good insight into workers' rights compliance.
- Discuss with local partners and set up a system for submission and verification.
 - Up front communication with local stakeholders and partners on

- Worker welfare first: the TO's commitment to collaborating with suppliers who protect the welfare of their staff as a principle that buyers should prioritise --> give them the mandate to decide not only on customers' demands but on workers' welfare with same priority
- Up front communication to customers and in-house staff on
 - Shifting client expectations and options reg. working hours and communicating clear policies to clients and employees: e.g., no guarantee of success for Big 5, no entitlement to dinner/ evening support from drivers/guides, communicating safety as an important aspect
- Adapting purchasing and itinerary planning on site with local partners in the supply chain - clear policies on workers' welfare
 - Sensitisation of purchasing and planning on site with local partners in supply chain - clear policies on workers' welfare.
 - Structure itineraries in a way that drivers, rangers, and guides can handle it with enough breaks/ without overtime: "Itinerary reflects due diligence"
 - Include proper/ decent accommodation and meal allowance for drivers near the group.
 - Offer possibilities for drivers to take part in activities of travelers (e.g., project interested.)
 - Actively promote workers' welfare for rangers

⇒ ACTION STEPS MULTI-STAKEHOLDER APPROACH

- Exchange with local organisations about formats
 - to conduct participative workshops on site with drivers, guides, and rangers to develop solutions/ approaches from within the circle / contribute jointly to improvement, empowerment of those affected.'
 - to provide backing for drivers, guides, rangers to represent their rights to customers,
 - to actively include the local context and the individual wishes of local stakeholders

Sensitisation on tipping

⇒ ACTION STEPS FOR TOURISM BUSINESSES

- Sensitise clients on importance and role of tips in South African Tourism, and explain tipping culture in SA/ how tips are shared.
- Discuss tipping policies with suppliers/ share perspectives.

⇒ ACTION STEPS MULTI-STAKEHOLDER APPROACH

- Develop short, concrete customer info on tipping „Do's and Dont's for travelers..." for the industry.

Good Practice, Further Resources and Guidance



Child Rights

Overview and Risk Factors in South Africa

The term 'child' in South Africa refers to any human being under the age of 18 years (StatsSA, [2017](#)). BCEA (section 43) gives very specific labour guidance about Child Labour in South Africa: No one under 15 may be employed; but there are certain conditions under which children between 15 and 18 may be employed.

According to a representative from the International Labour Organisation in South Africa, child labour is not perceived as a structural issue in tourism in South Africa, but may occur in family-owned or migrant-owned businesses. No substantial data exists on this topic with regard to tourism.

Despite the implementation of various legislative reforms, there are cultural, social and traditional beliefs in South African communities that make it challenging to differentiate between culturally acceptable practices of children supporting family members and exploitation.

Institutional improvements have been made to protect children. These include the creation of specialised family violence, child protection and sexual offences units together with the training and increase in labour inspectors. (Abdulkareem et al., [2021](#)). Local communities play a crucial role in child safeguarding and protection.

Connected Legal Regulations

There is quite strong legal basis on the ground regarding child protection in South Africa. The current laws prohibit the employment of children until the last school day of the year when they turn 15 years old and restrict the employment of children aged 15–17 years to non-harmful activities, with all laws on health and safety applying to child workers.

The Basic Conditions of Employment Act (BCEA) includes the prohibition of forced labour (VI). In its Determination 10 (SD 10), it covers specific rules about the participation of children under the age of 15 in the performance of advertising, artistic and cultural activities. It includes particulars regarding 'contracts', remuneration, hours of work, and protections.

Relevant policy instruments addressing children's rights include

- **BCEA (prohibition of Child Labour)**
Governs participation of children under the age of 15 in advertising, artistic and cultural activities. Includes particulars regarding 'contracts', remuneration, hours of work, and protections
- **+ Sectoral Determination 10 (SD 10): Children in performance of advertising, artistic and cultural activities**
Includes particulars regarding 'contracts', remuneration, hours of work, and protections
- **Prevention and Combating of Trafficking in Persons Act 7 of 2013**

Practical Challenges in South African Tourism

In general, activities like school visits or project visits involving children involve many challenges and risks for children and should be regarded critically. Schools are supposed to be a safe place for children to learn. Many tour operators no longer offer visits to schools and other projects and locations for children. At the same time, several businesses and organisations still do so in South Africa to support local communities.

Child welfare and safeguarding are crucial and need a special focus, also in tourism. Staff awareness in lodges and tourism businesses, especially in remote areas about these topics is needed.

Local communities play a significant role in child safeguarding and protection. If there is awareness about these topics it is a strong security aspect. The local context always needs to be considered next to the legal basis, for any activity and measure planning for tour operators.

- Child Labour

There is a fine line between cultural preservation through performances of dances and choir activities that are a possibility for communities to participate in a touristic product, and this participation can empower them, but also bear risks for children. Normally, children do not participate in choreographies or activities at the expense of going to school. The comprehensive legislation in South Africa regarding the involvement of children in performances is a good starting point for any tourism business and can serve as a legal basis on the ground. The official permit regarding child inclusion in tourism activities and performances can serve as a clear orientation and supportive measure to implement with local partners. At the same time, the available permit is mostly focused on formal activities and larger activity providers. There are clear boundaries/ limitations for smaller tour operators and informal or small activity providers to use the official permit procedure.

- Child (Sexual) Exploitation

Activities with children involved as part of tourism products expose children to various challenges and risks such as trafficking, sexual exploitation and inappropriate engagement with unregistered projects and organisations, or unregulated childcare centers.

Sexual exploitation of children is often closely connected to human trafficking topics. It happens that families with economic restraints fall into trafficking without knowing anything about it – they do not know what sexual exploitation or trafficking means and that it is happening to them, they do not know what their rights are and what can protect them or what they can do to protect themselves or their children.

Especially remote lodges or anonymous big accommodations are at risk of being used for human trafficking purposes and sexual exploitation of children. During the assessment, it was reported that sexual exploitation is also happening by tourists. Staff awareness is crucial to fight this topic, as well as sensitisation of the local population.



CHILD (SEXUAL) EXPLOITATION

Training, awareness raising, sensitisation of local partners and local accommodation staff on the risk of child (sexual) exploitation in tourism

⇒ ACTION STEPS FOR TOURISM BUSINESSES

- Discuss with local staff and local partners on suitable, culturally sensitive possibilities to sensitise accommodation staff on the risk of trafficking and sexual exploitation of women and children, especially in rural areas. Discuss about realistic formats and ideas for implementation.
- Be aware of the local context and include insights from local experts; e.g., get in touch or plan a staff webinar/ workshop with a local child rights the (contacts see below)
- Check the possibility of supporting local organisations. Discuss internally and get in contact.

⇒ ACTION STEPS MULTI-STAKEHOLDER APPROACH

- Initiate or support multi-stakeholder settings to discuss this topic/ create awareness on this topic (e.g., connect with ECPAT Germany on collaboration, or other tour operators for concrete measures like child safeguarding workshops in SA (already initiated through a tour operator)

Child rights sensitisation to travelers and staff of (European) tour operators

⇒ ACTION STEPS FOR TOURISM BUSINESSES

- Provide travelers with information material before or during the trip, or in preparation of specific activities that involve contact to children, e.g., "Do's and Don'ts when dealing with children in travel and tourism"
- Use the online trainings of "The Code" to sensitise staff

⇒ ACTION STEPS MULTI-STAKEHOLDER APPROACH

- Plan webinar in collaboration with a local child rights organisation for tourism businesses

CHILD LABOUR/ CHILDREN IN TOURISM-RELATED ACTIVITIES

Support creation of Child Rights Policies and Supplier Code of Conducts on Child Protection for and with tour operators, DMCs, local tourism businesses and stakeholders

⇒ ACTION STEPS FOR TOURISM BUSINESSES

- Use available permits to be signed by local partners for activities that involve children to ensure compliance with SA law
- Develop a child rights policy in collaboration with local partners to include local context, sensitivity and perspectives.

⇒ ACTION STEPS MULTI-STAKEHOLDER APPROACH

- Create a guidance document template for the industry regarding activities / performances including children in SA (with local context integrated)
- Support hotels and other tourism businesses to create/ implement standardised due diligence processes regarding the prevention of (sexual) exploitation of children and involvement of children in tourism activities by initiating collaboration/ exchange
 - with (local) NGOs working on these topics, initiate multi-stakeholder exchange
 - between activity providers/ organisations offering child choir activities to share best practices and foster knowledge exchange
 - with local partners and stakeholders to raise awareness of western perspective on child labour concepts and perception, colonial pictures etc.

Support local organisations, community-led registered projects and locally developed tools and systems working on child rights

⇒ ACTION STEPS MULTI-STAKEHOLDER APPROACH

- Share contacts of local organisations for various relevant topics, and experiences from impact assessment consultations to industry. Include list of organisations in report.

Good Practice, Further Resources and Guidance

Good Practice

- **Childline** is an effective non-profit organisation that works collectively to protect children from all forms of violence and to create a culture of children's rights in South Africa.
The 116 Childline, widely recognised across South Africa and the SADC region, is a critical resource for children facing exploitation and other vulnerabilities. However, more public awareness is needed to maximise its effectiveness, particularly in addressing tourism-related child rights risks.

Further Resources and Guidance

- **Atingi course "Child Protection in Tourism"**
by the GIZ Sector Project Cooperation with the Private Sector - Component Sustainable Development through Tourism. In this self-paced course, tourism professionals in management positions will learn to develop a child-friendly tourism business. The course is intended for tourism professionals in management positions, and anyone interested in the topic.
- **ECPAT International**
ECPAT International has evolved into the world's largest influencing network fully dedicated to ending the sexual exploitation of children, with a membership of 135 civil society organisations in 111 countries.
- **Hlokomela**
Hlokomela was established in 2005 in response to research that highlighted a critical need for health care among farm workers and other vulnerable populations in the greater Hoedspruit area. Since then, Hlokomela has been a prominent and respected role player in the health and well-being of the local community, serving about 60 000 people annually (direct and indirect beneficiaries).
- **Jelly Beanz**
Jelly Beanz is a South African non-profit organisation dedicated to transforming the lives of children who have experienced trauma, abuse, and neglect. Established in 2009 and based in Table View, Cape Town, the organisation provides direct therapeutic services, develops resources to support and interventions, offers training and mentorship to professionals working with children, and advocates for service delivery to children who have suffered trauma and abuse.



Fair Pricing and Contracting in the Supply Chain

Overview and Risk Factors in South Africa

Businesses need to know the legal, cultural specifics and human rights risks in their SA value chain to embed these insights directly into their procurement practices.

Procurement practices, including supplier selection, contract drafting, pricing negotiations and payment terms, have a significant impact on human rights due diligence in the supply chain. Short deadlines, extended payment terms and inadequate pricing can negatively impact working conditions among suppliers. These conditions may lead to excessive overtime, low wages, or delayed salary payments. By implementing reasonable timelines, fair pricing and prompt payments, negative impacts can be reduced while supplier relationships are strengthened.

With regulations on European level, even closer collaboration, exchange between business partners and equal partnership is needed to comply.

The German supply chain law and the discussed directive on the European level both follow a risk-based due diligence approach. This means that businesses that fall under the law are not allowed to shift responsibilities and demands to suppliers without a previous risk analysis. Not all suppliers present the same level of risks – a risk-based approach is needed to focus your resources on the greatest potential negative impact and concentrate your efforts where needed most.

Connected Legal Regulations

See working conditions

Practical Challenges in South African Tourism

During the assessment, the bargaining and contracting topics were very relevant topics for the tourism stakeholders consulted. The European tour operators recognise the challenge and are open to follow-up but see the complexity and that it would need a sector approach for impact.

TOs have an influence on contracts with direct suppliers/partners but have no influence on what local business partners then do. They have no influence or leverage to make sure that their money is being passed on fairly in the supply chain, or how they could increase their influence on this aspect.

Wages are mainly bargained through so-called bargaining councils in South Africa. The role of trade unions and bargaining councils is interesting here and can provide insight into local issues and negotiations.



Possible Measures and Action Steps

Discuss and show willingness to discuss the issue of shared responsibility with direct local partners.

⇒ ACTION STEPS FOR TOURISM BUSINESSES

- Actively communicate openness for mutual responsibility/ responsible contracting = not negotiating every price to the bone
- Sensitise DMCs/ direct local partners on their rights and responsibilities.
- Share E-Learning Human Rights in Tourism with local partners and promote the training.
- Encourage internal training/ discussion on this with staff/ relevant departments of EU tour operators (CSR, contracting/ purchasing etc.)

Sensitising European tourism businesses and staff on the topic

⇒ ACTION STEPS MULTI-STAKEHOLDER APPROACH

- Plan joint webinar/ format: What is just transition? (contextualise risks with countries, look at cultural differences) - in collaboration with local

Get more information on local negotiation patterns and processes

⇒ ACTION STEPS MULTI-STAKEHOLDER APPROACH

- Try to get info from unions/ bargaining councils and think of options for suitable/ impactful measures. Share info with tour operators/ industry.

Good Practice, Further Resources and Guidance

Further Resources and Guidance

- German Federal Office for Economic Affairs and Export Control ([BAFA](#)) [Guideline "Collaboration in the supply chain between obliged enterprises and their suppliers"](#)
This paper shows possibilities and boundaries the Act sets to demands. Moreover, it contains recommendations for constructive collaboration. The BAFA additionally published a catalogue with the most important questions and answers for small and medium-sized enterprises (SMEs) and - together with the Helpdesk on Business & Human Rights.
- [Responsible Contracting Project](#)
Founded in 2022, the Responsible Contracting Project (RCP) is a non-profit initiative housed within Rutgers Law School. RCP's mission is to drive better outcomes for people and the planet through better, more Responsible Contracts. We develop practical contractual tools that promote shared responsibility for human rights and the environment in global supply chains.
- [UN Global Compact "Responsible Contracting in Sustainable Procurement"](#)
As part of the Decent Work Toolkit for Sustainable Procurement. The purpose of this toolkit is to enable procurement staff and their suppliers to take action to improve labour conditions for supply chain workers.



Further Topics: Environmental Issues, Community Impact and Gender Roles

Environmental Issues

South Africa is grappling with significant water and energy scarcity, affecting daily life, economic stability, and also the tourism sector. Being one of the driest countries in the world, its limited rainfall, combined with factors like climate change, population growth, and inadequate infrastructure investment, exacerbates water scarcity. The country also faces an ongoing energy crisis, primarily due to aging coal-fired power plants, mismanagement, and corruption within the state-owned utility, Eskom. Frequent power outages, known as load shedding, have become routine, with some areas experiencing blackouts lasting up to 12 hours.

Other environmental issues are e.g., biodiversity loss and threat of the country's megadiverse status, deforestation, and land degradation.

Environmental law is anchored in the constitution. Nature capital is also one of the most key factors for tourism in the country. There is also a lot of excellent info developed at local level (by suppliers and DMCs) on environmental issues in SA, especially water and energy scarcity, but these partners do not have contact with the traveller prior to arrival. Better B2B communication could unlock opportunities here, i.e., invite this information from those on the ground who understand the context, and commit to providing it. It may seem basic, but there is real barrier / gatekeeping kind of dynamic that - prevents this from happening.

⇒ ACTION STEPS FOR TOURISM BUSINESSES

- Actively communicate locally relevant info to guests – before arrival and during the stay

Community Impact

Tourism in South Africa supports local economic development and social empowerment of communities and local populations in many areas. It contributes to poverty reduction, inclusion, and cultural resilience—but it requires thoughtful planning, long-term support and active involvement of local communities to reach its full impact. During the consultations, several challenges were mentioned, such as the integration of local community members in tourism, narratives in tourism products or use of big vehicles.

There are market statistics on SA tourism ([SATSA - State of Tourism in South Africa: Inbound Recovery and Geographical Spread](#)) that show an alarming state of tourist concentration in Cape Town and Kruger, and extremely low levels in the rest of the country. This concentration is not sustainable, will lead to overtourism (already happening and detracting from the quality of the experience), and will exacerbate challenges for tourism businesses and communities throughout the rest of the country.

Support local organisations working sustainably with/in the communities

⇒ ACTION STEPS FOR TOURISM BUSINESSES

- Discuss with local partners how to collaborate with local organisations/ integrate them in itineraries/ support them.

Actively involve/ give more power to local guides and local communities - let them tell their story.

⇒ ACTION STEPS FOR TOURISM BUSINESSES

- In SA, it is a legal requirement that local guides accompany tours – let them tell their own story. Do not promote poverty as business (power dynamics).
- Try to create greater involvement of local communities / participation etc. in activities in general. For example, drivers are allowed to take part in activities, the choir sings not only for tourists, but also for local staff, community etc., cooperation with local organisations etc.
- Support local organisations working sustainably with/in the communities.

Reduce the use of big coaches and use smaller vehicles for tours, also e.g. winelands, and communicate challenges / problems transparently to customers.

Develop tours to less developed areas/ diverse destinations in SA

⇒ ACTION STEPS FOR TOURISM BUSINESSES

- Work with local DMCs that focus on the hidden gems, in particular.
- Forge new B2B partnerships so that these opportunities can be unlocked. Start looking at the ones that have a sustainability certification.

Workplace Discrimination and Gender Roles

The topic of workplace discrimination and women's rights are very regulated and there is a lot of information/ projects/ practice available. When working on the topics, tour operators, tourism businesses and multi-stakeholder initiatives should make sure to not tackle the topic too generically but stick closely to working reality in SA.

Sensitisation and exchange with local partners

⇒ ACTION STEPS FOR TOURISM BUSINESSES

- Discuss with staff in own business and with local partners about women empowerment in tourism: Which groups have access to work in tourism and how could local businesses push it? How to create diversification of job roles/ possibilities for women in SA tourism....?

APPENDIX