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Bullying in the Workplace Versus the Health of Employees: A Thundering Storm in the Professionals' Career Path

Nombulelo Queen Mabeka[1]

[1]Associate Professor and Attorney of the High Court, Department of Jurisprudence, University of South Africa (UNISA)

Correspondence: E-mail: mabeknq@unisa.ac.za

ORCID: https://orcid.org/0000-0003-3627-0523.

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Abstract

The recent jurisprudence on bullying calls for a review of the legislation that regulates it in the workplace. Bullying is currently governed by the provisions of Protection from Harassment Act. Section 23 of the Constitution of the Republic of South Africa, 1996 prevents unfair labour practice in the workplace. This is endorsed in section 186(2) of the Labour Relations Act 55 of 1995. The stipulations of Occupational Health and Safety Act 83 of 1993 places an obligation on employers to create a conductive workplace. These statues however do not expressly refer to bullying. The meaning of bullying is construed in the context of harassment. Item 19.2.2 of the Code of Good Practice on the Integration of Employment Equity into Human Resources Policies and Practices, General Notice 1358 of 4 August 2005 narrows down the meaning of harassment. There is case law that shows the narrow interpretation of harassment in the context of bullying in cases such as Centre for Autism Research and Education CC v Commission for Conciliation, Mediation and Arbitration and Others (2020) 12 BLLR 1260 (LC). There are authors that agree that the continuation of bullying in the workplace is an outcry that the legislature ought to pay attention to. This article analyses the statutes that govern bullying, and approach followed by courts and it provides a way forward that the legislature and courts should consider going-forward. In addition, the author looks at the position of bullying in the United States of America and does a comparative study between South Africa and the United States of America.

Keywords: Bullying amongst the professionals, continues, harassment, insults, humiliation, cyberbullying, The code of good practice, unfair labour practice

1. Introduction

The workplace is an important environment for professional employees and employers. It is therefore significant that the work environment be viewed as a healthy, conducive and free from any form of bullying. The legislature attempted to protect employees who are professionals from being bullied yet the bullying continues. Some employees who are professionals who are regarded as asserts to many companies resign because of bullying. It has been noticed that it is not only those who are in position of power who bully employees who are professionals, other professionals who are colleagues also bully other professionals in the workplace. It is observed that some of these professionals are known bullies and they "get away with murder" (Morrison 2017). Those who report bullies are nowadays worked out (*Mkhize and Dube Transport (2019) 40 ILJ 929 (CCMA)*. The question is, why are employees still bullied when there are sufficient laws that regulate bullying? What are employers doing wrong? Can employees be bullied to do things they are not comfortable with? This article explores these questions and attempts to provide a solution that will completely eradicate bullying amongst the professionals.

2. The Meaning of Bullying

Bullying is defined within the context of harassment (Lass and Boezaart, 2014). Section 1 of the Protection from Harassment Act 17 of 2011 (PHA) defines bullying within the context of harassment. Section 1 of the PHA states:

> …" harassment" means directly or indirectly engaging in conduct that the respondent knows or ought to know-

> (a) causes harm or inspires the reasonable belief that harm may be caused to the
>
> complainant or a related person by unreasonably…

It appears that the nub of the definition of harassment in section 1 of the PHA is that it causes harm to the victim, and this may be done in a tacit or in an express manner. The same provision of the PHA defines harm as "any mental, psychological, physical or economic harm". The construction of harassment and bullying denotes that these words are akin. This implies without doubt that the victims of bullying who are bullied in the workplace by other professionals may invoke the provisions of the PHA as a remedy.

Item 19.2.2 of the Code of Good Practice on the Integration of Employment Equity into Human Resources Policies and Practices, General Notice 1358 of 4 August 2005 narrows down the meaning of harassment.

Item 19.2.2 states:

> …Harassment is unwanted or unsolicited attention based on one or more of the prohibited grounds. It involves conduct that is unwanted by the person to whom it is directed and who experiences the negative consequences of that conduct. The conduct can be physical, verbal or non-verbal. It affects the dignity of the affected person or creates a hostile working environment. It often contains an element of coercion or abuse of power by the harasser….

The above definition is supported by authors such as Rycroft (2009). This author describes bullying in a nutshell as a work environment that is regarded as unwanted, continuous, undesirable and insulting behaviour that affects the dignity of a person (Rycroft 2009). Rycroft further links the definition of bullying with harassment. Potgieter however argues that there is a distinction between bullying and harassment. Potgieter asserts that "bullying affects the morale and ultimately, self-confidence of the employee. Bullying is essentially a power game by people with poorly developed emotional quotient (EQ) and leadership skills, often not relating to any personal attribute of the person bullied." It appears that Potgieter's definition to some extent appears to be akin with Rycroft's description of bullying.

3. Different Forms of Bullying

Various authors assert that bullying is often portrayed through insults, intimidation and belittling. Authors such as Potgieter further aver that cyber bullying is the most common methods that is used nowadays (Potgieter, 2014, p.89-90). Thus, some employees send insulting, provocative or harassing emails. Some bully other employees through social media (Potgieter, 2014, p.89). Phillips (2024) asserts that bullying can also be direct through humiliation and indirect, this is done through gossiping. Further, Phillips (2024) indicates that cyberbullying takes place through electronic communications.

4. The Law that Regulates Bullying

The provisions of section 23 of the Constitution of the Republic of South Africa, 1996 is the first point of departure because the legislature here indicates that no one should not be subjected to unfair labour practice. Section 23(1) states "everyone has a right to fair labour practices". This provision is endorsed in 186(2) of the Labour Relations Act 66 of 1995 (LRA) (Rycroft, 2009, p.1447). The stipulations of the Occupational Health and Safety Act 85 of 1993 (OHSA) places an obligation on employers to create a healthy and conducive work environment. The contextual interpretation of OHSA denotes that the legislature intended to prevent bullying and unhealthy workplace. Section 2 of the PHA enables the victims of harassment to apply to the court for a protection order. Section 10 confers powers on the courts to grant an order against the defendant. Section 11 allows the courts to issue a warrant of arrest. It is however observed that the provisions of the PHA do not specifically refer to bullying. However, the meaning of bullying is inferred in section 1 of the PHA under the definition of harassment.

The International Labour Organization's Violence and Harassment Convention of 2019 (No. 190) (ILO Convention) endorses the intention of the legislature that is incorporated into the provisions of the OHSA. Article 1 of this ILO Convention defines bullying within the context of harassment. Article 1 of the ILO Convention states:

> "…Violence and harassment" in the world of work refers to a range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment…"

Article 4 of the ILO Convention places an obligation on members to create a workplace that prevents harassment. South Africa ratified the ILO Convention on 29 November 2021. It is interesting to observe that the ILO Convention is an instrument that began the enforcement of a healthy work environment. There is no doubt in my mind that the tacit intention of the legislature shows that it does not appreciate bullying of any form in the workplace. This is shown by the promulgation of the above provisions. Authors such as Calitz (2022) argue that bullying creates an unhealthy work

environment, and this is contrary to the intention of the legislature. The author argues that employers must put strict measures in the workplace to prevent bullying. It is observed that the current statutes or legislation do not expressly refer to bullying and this is the gap that the legislature must close by amending the legislation and include specific provisions that regulate bullying in an express manner.

5. What is the Approach Followed by Courts?

The approach followed by the courts and the Commission for Conciliation Mediation and Arbitration (CCMA) is well articulated in the case of *FA / University of Witwatersrand*[2022] 9 BALR 879 (CCMA). In this case briefly, a senior manager who headed a school at the University of Witwatersrand bullied employees and students. There were complaints made about his bullying behaviour, and this resulted in a disciplinary action taken against him. There were witnesses who testified about the bullying and the incidents of bullying thereof. The senior manager was subsequently dismissed, and he was unhappy about the dismissal. He referred the dispute to the CCMA. The arbitrator gave a narrative award that highlighted the evidence of bullying. One of the witnesses who testified asserted that "She went on to state that his body language was tense and that she could see fire spitting from his eyes when having the interactions with him. He asked them in a derogatory way not to interfere, by asking, what do you know about this, and where is your evidence? Her perception from the interaction with him was that he was trying to block the conversation with some kind of resentment and animosity towards them" (at para 91).

In addition, another witness testified that she had to seek psychiatric treatment because of the senior manager's conduct (at para 183). The arbitrator concluded that the senior manager's dismissal was substantively and procedurally fair. Thus, the employer was correct in dismissing him (at paras 244,246 and 268). It is interesting to observe that this case occurred in an academic institution that is managed by professionals who are expected to conduct themselves in a professional manner. In addition, the senior manager here was obliged to comply with the law. The case shows compelling evidence of bullying amongst the professionals. Phillips argues that bullying is common in the academic institutions in South Africa and the common type of bullying is conducted by belittling other employees (Phillip, 2024, p.44-47). What has gone wrong with the professionals in the workplace?

The case of *Centre for Autism Research and Education CC v Commission for Conciliation, Mediation and Arbitration and Others* (2020) 12 BLLR 1260 (LC) is an illustration of the consequences of persevering bullying in the workplace. The employee in this case resigned after the bullying because the workplace became intolerable. The labour court held that the employee had indeed been constructively dismissed. There was sufficient evidence to confirm the constructive dismissal and the reason for the resignation.

The labour court held that "it is also correct that intolerability extends beyond a 'difficult', unpleasant or stressful working environment or employment conditions…" (at para 4). This averment affirms that bullying creates intolerable work environment that results in resignations. The question is, should the bullies be allowed to continue creating an intolerable workplace? The answer is in the negative, bullies must not be allowed to continue with their unhealthy and unprofessional behaviour or conduct. It is time that employers be vigilant and put strict measures that will completely eradicate bullying in the workplace through their policies, disciplinary codes and contracts of employments.

In 2025, a young and aspiring medical intern, Dr Alulutho Mazwi passed away, he was bullied to come to work after he reported sick by a senior manager (Intern doctor's death sparks outcry over public health work conditions, 2025). The senior manager forced him to work knowingly that he was not feeling well. This is evidence that confirms that bullying continues amongst the professionals. The death of the intern further shows dire ramifications of bullying in the workplace. There is no doubt that the senior manager here contravened the provisions of the OHCA and PHA, LRA, Basic Conditions of Employment Act of 1998 (BCEA) because he was entitled to his sick leave in terms of section 23 of BCEA. This senior manager's bullying is a kind of conduct that courts and CCMA and employers should squash and make sure it never happens to any other professional employee in the future.

6. The impact of Bullying on Employees' Health

The effects of the bullying on the health of the employee are demonstrated in the case of *Jansen v Legal Aid South Africa* where a very good employee suffered from depression due to an unhealthy work environment (*Jansen v Legal Aid South Africa (2019) JOL 42192 LC* case number: C678/14 at paras 16 and 17). The employee was ignored by the employer (at para 46). The court held that the employer's behaviour affected the employee's dignity (at para 46). This averment confirms Rycroft's description of bullying that it affects the dignity of the victim, and it may cause psychological disorders (Rycroft, 2009, p.1439-1440). Smit supports the averments made in the Jansen case that bullying results in depression (Smith, 2021, p.24-63) Donald and Rivalani argue that bullying impacts employees "emotional wellbeing" and "mental health" (Donald and Rivalani, 2024, p1-14) Isaak *et al* confirm that bullying result in mental health problems (Isaak *et al,* 2025, p.20-25). Death is also a consequent of bullying as seen in the case of the young intern, Dr Alulutho Mazwi. Calitz asserts that "effects of bullying include depression, insomnia, ill-health,

posttraumatic stress disorder (PTSD), burnout, anxiety and nervous breakdowns" (Calitz, 2022, p.1-36).

Duvenhage and Squelch state that bullying result in psychiatric problems and employers may have to compensate the victims (J Duvenhage and J Squelch "Compensation of workplace bullying: Lessons from Leggett v Hawkesburry Race Club Ltd (No 3)" (2025) 29 *Tort Rev* 342-361). There is no doubt that courts and authors are singing the same song, bullying affects physical and mental wellbeing of employees and something must be done to prevent it from continuing.

7. Comparative Studies Between South Africa and the United States of America (US)

It is crucial to first consider the statutes that regulate bullying in the US. It must first be pointed out that there is no specific statute that governs bullying *per se* in the US. Bullying is inferred in the statutes that controls basic rights (Calitz, 2022, p.10). These statutes include Title VII Civil Rights Act of 1964, 42 U.S.C. § 2000e–2000e-17 (Hereinafter referred to as Title VII Civil Rights Act), Labor-Management Reporting and Disclosure Act of 1959, as well as the Occupational Health and Safety Act of 1970, as amended.

The provisions of section 5 of the Occupational Health and Safety Act place an obligation on employers to create a healthy workplace just as it is the case in South Africa. Section 2000 of Title VII Civil Rights Act governs unlawful employment practices and includes the right not to be differentiated or discriminated against in the workplace. This was endorsed by the court of appeal in *Meritor Savings Bank, FSB v. Vinson*, 477 U. S. 57, 64 (1986). The court of appeal averred that insults and intimidation fall within the meaning of harassment and this may be considered by courts in terms of Title VII Civil Rights Act. This decision was endorsed in the case of *Oncale v Sundowner Offshore Services*, Inc 523 US 75 (1998) 80. The court in this case addressed discrimination within the ambit of the provisions of section 2000 of Title VII Civil Rights Act. The court of appeal averred that harassment affects the dignity of the victim.

The court in *Harris v Forklift Systems, Inc.,* 510 U.S. 17, 21 1993 confirmed the application of the provisions of Title VII Civil Rights Act in abusive workplace where employees are subjected to insults and intimidation. In *EEOC v. Epiq Food Hall Woodbridge, LLC, et al*, Case No.: 1:24-cv-1518, the court asserted that insults on race fall within the ambit of unfair discrimination in accordance with Title VII Civil Rights Act. In *Ames v Ohio Dept. of Youth Services*, 605 U.S (2025), affirmed that employers are compelled to prevent discrimination in the workplace in terms of Title VII Civil Rights Act.

Section 101(a)(1) of Labor-Management Reporting and Disclosure Act of 1959 regulates equal rights in the workplace. It appears that bullying falls within the ambit of equal rights. It is argued that the United States of America follows a similar approach to South African legislation in relation to the description of bullying. Thus, the US courts and authors affirm that insults, humiliation and intimidation fall within the meaning of harassment (Richardson and Richardson, 2022, p.2).

Notwithstanding all the above-mentioned statutes, authors such Richardsons and Richardson confirm that bullying continues (Richardson and Richardson, 2022, p. 1). These authors state "…Workplace bullying" goes beyond ordinary disagreements at work, even those that are heated exchanges with raised voices. Definitions of the term are varied but tend to point out such behavior involves repeated, intentional acts which are malicious, abusive, and harmful to the bullied employee…" (Richardson and Richardson, 2022, p.2). In addition, these authors argue that victims of bullying subsequently become ill due to bullying. This appears to be akin with the South African jurisprudence. Further, case law and the death of Dr Mazwi confirm that bullying amongst the professionals continues too in South Africa.

Calitz asserts that the United States of America follows the equal rights notion in addressing bullying cases (Calitz, 2022, p.11). Calitz is supported by Richardson and Richardson in this regard (Richardson and Richardson, 2022, p. 5). Both these authors state that bullying forms part of the right not to be differentiated against that is entrenched in Title V11 Civil Rights Act. Phillips argues that there is statistics that confirm that bullying does occur in the academic institutions in the US (Phillips, 2024, p.44). It is however observed that both jurisdictions, South Africa and the US do not have specific statutes that expressly refer to bullying. It appears that this is the gap that South Africa and the US must close by amending the current legislation to incorporate specific provisions in the PHA and Labour Relations in South Africa and Title VII Civil Rights Act in the US. This implies that the time has come to amend the current legislation to specifically include bullying.

8. What is The Way Forward?

The continuation of bullying in the workplace amongst the professionals shows that there is something that is not done right in the workplace. There is no doubt in the author's mind that there is a need to amend the current statutes and specifically draft a statute or an amendment in the PHA and section 186(2) of the LRA that specifically includes and regulates bullying. The same applies to the US, the fact that there is no reference to bullying in the above-mentioned statutes calls for an amendment in the provisions of VII Civil Rights Act and Labor-Management Reporting and Disclosure Act of 1959.

Some employees have policies on bullying in place, yet it continues. The courts and the authors agree that bullying is a serious misconduct in the workplace, yet it continues. The death of the employee caused by bullying amongst the professionals is a major concern. It is thus prudent to consider putting stringent measures in place to completely stop bullying from continuing especially amongst the professionals. It is disturbing to see that professionals bully other professionals and, in the process, bring the name of the professions they are associated with into disrepute. This is utterly unacceptable and calls for an urgent intervention.

It is submitted that those bullies who belong to professional bodies should be referred to such bodies for further discipline. For example, should legal practitioners who are found guilty of bullying colleagues in the workplace and subsequently dismissed be referred to Legal Professional Practice for further discipline for bringing the reputation into disrepute? The answer is in the positive because for example item 3.15 of the Code of Conduct for all Legal Practitioners, Candidate Legal Practitioners and Juristic Entities (The Code) prevent practitioners from bringing the name of the "legal profession into disrepute".

Item 6.3.2 of the Code prohibits bullying and harassment. Consequently, the continuation of bullying calls for a review of the policies and employment contracts to include a referral to a professional body for further discipline after employers' discipline bullies who belong to professional bodies.

Another example relates to a senior engineer who bully junior engineers in the workplace, such manager should be referred to the Engineering Council of South Africa for further discipline. The same applies for those who are bullies within the medical profession. They should also be referred to the Health and Professional Council for their further deliberations. The question is, can the referral to a professional body by employers be viewed as double jeopardy? Some may argue that the referral may be regarded as double jeopardy, and section 35 of the Constitution of the Republic of South Africa, 1996 does not allow it.

It is imperative to acknowledge the fact that there are differences that exist in the way double jeopardy is interpreted. For example, double jeopardy in the United States would not apply to a situation being examined in the courts and by a professional organization. Mensah (2024) asserts that double jeopardy in the United States protects people from an abuse of power and it enhances fairness.

Classen (2026) argues that there are some cases where the courts had to deal with the defence of double jeopardy as seen from the case law. The author argues that there is a way to circumvent this. Thus, employers'policies and disciplinary codes should include a clause that allows employers to refer the bullies who belong to a professional body to such bodies, namely, legal professional council. This will prevent bullies from raising double jeopardy when they are also disciplined by professional bodies. The employment contracts should also incorporate a strong clause that prevent professionals from bullying other employees in the workplace and by signing the contract, such professionals waive their right to raise double jeopardy as the defence. In worst cases of bullying that result in death for example, such bullies should also face criminal charges for facilitating and causing the death of the employee who dies because of bullying. In addition, it is submitted that managers who turn a blind eye on bullying should also be disciplined and be referred to the professional bodies they belong to. The time has come for employers to stand up and protect the legacy of the professions that is tainted by bullies who work people out from the workplace by bullying other professionals. Lastly, employers must protect the integrity of the professions by preventing bullying from continuing amongst the professional.

9. Conclusion

There is no doubt in my mind that professionalism in the workplace is crucial and bullying amongst the professionals is unwanting, undesirable and utterly unacceptable. It is evident that South Africa infers the regulation on bullying within the context or meaning of harassment in terms of the PHA. The Code of Good Practice on the Integration of Employment Equity into Human Resource Policies and Practices endorses the definition of harassment that provided in the PHA.

In addition, the South African courts tend to decide in favour of the victims when there is compelling evidence against the bullies. It is however submitted that the lack of reference to bullying in the current statutes in South Africa, calls for an amendment in the provisions of section1 of the PHA and section 186(2) of the LRA. These statutes must include bullying to show the bullies that the legislature regards bullies amongst the professionals as a very serious misconduct and a concern that should be eradicated in the workplace.

Further, just as it is the case in South Africa, the US should also amend the legislation and consider incorporating express provisions that define bullying and eradicate it to uphold the integrity of the professions the bullies belong to or registered with. The US court of appeal appears to be strict towards the harassers as seen in cases such as *Meritor Savings Bank, FSB v. Vinson; as well as Oncale v Sundowner Offshore Services* respectively. Lastly, the time has come

for the courts and employers to be harsher on the bullies amongst the professionals in the workplace.

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