

Rochester

Public Transit

Agency Safety Plan

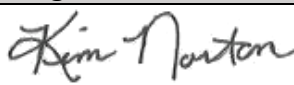
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1. Transit Agency Information

Transit Agency Name	City of Rochester/Rochester Public Transit		
Transit Agency Address	4300 East River Road NE, Rochester, MN 55906		
Name and Title of Accountable Executive	Ia Xiong, Transit and Parking Systems Manager		
Name of Chief Safety Officer or SMS Executive	First Transit Tabitha Miller, Location Safety Manager		
Mode(s) of Service Covered by This Plan	Fixed Route Bus; Paratransit	List All FTA Funding Types	5307, 5339
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)	Rochester Public Transit (RPT) contracts with First Transit to operate and maintain the buses used for fixed route service. First Transit subcontracts out the operating of Paratransit service yet still maintains the vehicles.		
Does the agency provide transit services on behalf of another transit agency or entity?	No	Description of Arrangement(s)	not applicable
Name and Address of Transit Agency(ies) or Entity(ies) for Which Service is Provided	not applicable		

2. Plan Development, Approval and Updates

Name of Agency That Drafted This Plan	City of Rochester Public Transit	
Signature by the Accountable Executive	Signature of Accountable Executive	Date of Signature
		November 22, 2022
Approval by the City Council	City Council	Date of Approval
<p>The Agency Safety Plan addresses all applicable requirements and standards as set forth in the Federal Transit Administration’s Public Transportation Safety Program and the National Public Transportation Safety Plan.</p>		

ATTEST: 
 CITY CLERK

Version Number and Updates			
Version Number	Section/Pages Affected	Reason for Change	Date Issued
1		New Document	
2	4,17	Inclusion of new Agency Safety Plan requirements	

Annual Review and Update of the Public Transportation Agency Safety Plan
<p>RPT’s Agency Safety Plan and its safety performance targets will be jointly reviewed and updated by the RPT Chief Safety Officer and Transit Operations Manager by July 1st of each year. Updates will be submitted to the Accountable Executive for review and approval any changes. The Accountable Executive will recommend and seek Rochester City Council’s approval. The Chief Safety Officer and the Transit Operations Manager will review changes with staff at a regular scheduled Quarterly meeting</p>

Agency Safety Plan, Inclusion of Frontline Employees in its Development
<p>Based on new requirements issued in February 2022, frontline employees were given an opportunity to provide comments or feedback related to the existing Agency Safety Plan. At the August 19, 2022 Safety Solutions Meeting attended by frontline staff, attendees were made aware that comments and feedback would be accepted in regards to the Agency Safety Plan and given until the September meeting to review the document and provide comments.</p>

3. Safety Performance Targets

Safety Performance Targets							
Targets below are based on review of the previous 5 years of RPT's safety performance data.							
Mode of Transit Service	Fatalities (total)	Fatalities (per 100 thousand VRM)	Injuries (total)	Injuries (per 100 thousand VRM)	Safety Events (total)	Safety Events (per 100 thousand VRM)	System Reliability (VRM/failures)
Fixed Route Bus	0	0	1	.0568	1	.0568	73,291
ADA/ Paratransit	0	0	0	0	0	0	36,900

Safety Performance Target Coordination		
<p>RPT's Accountable Executive shares RPT's safety performance targets with the Rochester Olmsted Council of Governments (ROCOG) each year after its formal adoption by the Rochester City Council. RPT's Accountable Executive also provides a copy of our formally adopted Safety Plan to Minnesota Department of Transportation (MNDOT). RPT personnel are available to coordinate with MNDOT and the ROCOG in the selection of MNDOT and ROCOG safety performance targets upon request.</p>		
Target Transmitted to the State	State Entity Name	Date Targets Transmitted
	Minnesota Department of Transportation	
Targets Transmitted to the Metropolitan Planning Organization	Metropolitan Planning Organization Name	Date Targets Transmitted
	Rochester Olmstead Council of Governments	

4. Safety Management Policy

Safety Management Policy Statement

Safety is the highest priority to RPT. We believe that working safely promotes quality, productivity, and profitability. Prevention of collisions and personal injuries is of critical importance to everyone. We are committed to providing a safe workplace, the proper training, protective equipment, and a work environment conducive to safe practices and policies.

All employees are required to perform their duties safely and with concern for the safety of our passengers, other employees and the public. **RPT and First Transit will not perform any service, nor transport or use a product, unless it can be done safely.**

RPT contracts with First Transit to operate service and maintain vehicles. The vast majority of RPT's workforce are employees of First Transit and therefore receive training, guidance and discipline from First Transit. As such First Transit safety literature may be referenced when appropriate to provide a clear message. First Transit has submitted a separate Agency Safety Plan.

First Transit employs a company-wide safety concept, "**BeSafe**". The main purpose of BeSafe is to reduce collisions and injuries by increasing the communications between employees and managers about safety related issues. As part of this process, employees of all levels are encouraged to initiate reports of any near miss, route and security hazards, or any unsafe condition. When a report about a safety or security concern is filed, it is investigated, which includes follow-up with the reporting employee regarding the resolution of the report.

RPT and/or First Transit will not retaliate against nor impose any other form of retribution on any employee because of his or her good faith reporting of a safety issue/concern, another person's suspected violation of First Transit policies or guidelines, or any alleged violations of federal, state or local laws.

To ensure that each employee understands and performs their job functions in the BeSafe manner, the **BeSafe Handbook**, is issued to each employee and sized to fit in the safety lanyard or vest, which each employee must wear while on duty.

The **BeSafe Principles** provide the basic truths and fundamentals about working safely in our workplace and on our vehicles. All First Transit employees are expected to adopt these principles and put them into practice. Together a safe work environment is created, free from injury to each other and our passengers.

If an employee feels they cannot perform a task safely, they don't perform the task. The employee has been trained and encouraged to stop work and immediately advise management of issues preventing them from working safely and what would be required to perform the task safely.

The BeSafe Principles include:

- **Prevent injury to myself and others.**
 - Be aware of any hazardous condition or practice that may cause injury to people, damage to property, or the environment.

- Use the BeSafe Handbook to record and report.
- **Perform all necessary safety checks and risk assessments of the work area and job to be performed before any work begins.**
 - Speak to management **before** work is started if unsure of the required safety and risk assessments.
- **Follow all safety procedures, signs and instructions.**
 - If these are not understood, speak to management before work begins.
- **Keep work area clean and tidy at all times.**
 - Untidy areas could cause injury to the employee or their colleagues and waste time and energy.
- **Wear protective clothing and equipment (PPE) as required.**
 - Keep PPE in good working order, wear it correctly and ask for a replacement if it becomes damaged or unfit for use.
- **Use only the correct tools and equipment authorized and trained to use for the job.**
 - Check that they are in good condition before use and use them safely.
- **Only adjust and repair any piece of work equipment trained on and authorized to do so.**
 - Never modify any equipment that changes the designed use of the equipment or alters a safety feature.
- **Assess any load and capability to move it before lifting.**
 - Get help with any heavy or awkward items and follow the correct lifting techniques.
- **Report all injuries, incidents and near misses to management.**
 - Seek help immediately and first aid (if necessary).
- **Tell management of any suggestions to prevent injuries in the workplace**
 - Note suggestions made and discuss with management.

The official policy that reflects First Transit’s commitment to safety is included as **Appendix A**.

Safety Management Policy Communication

RPT’s Safety Management Policy Statement will be placed adjacent to other safety documents in a conspicuous location at the Public Works Transit Operations Center where many employees will have viewing access and pass by on a daily basis. City of Rochester (COR) employees with RPT will receive an email of not just the Safety Management Policy Statement but the entire Agency Safety Plan. In addition to the posting of the Safety Management Policy Statement being posted, all First Transit Employees will receive a copy in their employee mailbox

Authorities, Accountabilities, and Responsibilities

<p>Accountable Executive</p>	<p>Ia Xiong – Physical Development Manager</p> <p>The Physical Development Manager serves as RPT’s Accountable Executive with the following authorities, accountabilities, and responsibilities under this plan:</p> <ul style="list-style-type: none"> • Controls and directs human and capital resources needed to develop and maintain the ASP and SMS. • Designates an adequately trained Chief Safety Officer who is a direct report. • Ensures that RPT's SMS is effectively implemented. • Ensures action is taken to address substandard performance in RPT’s SMS. • Assumes ultimate responsibility for carrying out RPT's ASP and SMS. • Maintains responsibility for carrying out the agency's Transit Asset Management Plan.
<p>Chief Safety Officer or SMS Executive</p>	<p>Tabitha Miller – Location Safety Manager (First Transit)</p> <p>The Accountable Executive designates First Transit’s Safety Manager as RPT’s Chief Safety Officer. The Chief Safety Officer has the following authorities, accountabilities, and responsibilities under this plan:</p> <ul style="list-style-type: none"> • Ensures and oversees day-to-day implementation and operation of RPT's SMS. • Manages RPT’s ESRP. • Chairs the Safety Committee and coordinates the activities of the committee; Establishes and maintains RPT’s Safety Risk Register and Safety Event Log to monitor and analyze trends in hazards, occurrences, incidents, and accidents; and maintains and distributes minutes of committee meetings. • Advises the Accountable Executive on SMS progress and status. • Identifies substandard performance in RPT's SMS and develops action plans for approval by the Accountable Executive. • Ensures RPT policies are consistent with RPT’s safety objectives. • Provides Safety Risk Management (SRM) expertise and support for other RPT personnel who conduct and oversee Safety Assurance activities. First Transit’s Resident Management Team also have authorities and responsibilities for day-to-day SMS implementation and operation of RPT’s SMS under this plan.

<p>Key Staff and Activities</p>	<p>City of Rochester Staff</p> <ul style="list-style-type: none"> • Marketing and Outreach Coordinator • Transit and Parking Assistant • Transit Grants Specialist : Develops RPT's ASP and SMS policies and procedures. • Transit Operations Specialist <p>First Transit Resident Management Team : Comprises of the Location General Manager, Location Assistant Manager, and Location Maintenance Manager to help address reoccurring safety and operations issues and events.</p> <p>Senior Staff Meeting : A bimonthly meeting between First Transit's Resident Management Team and City of Rochester staff that address numerous topics from route schedule planning to equipment orders. These meetings also function as the Safety Committee when any safety hazards reported will be jointly evaluated.</p>
<p>Employee Safety Reporting Program</p>	
<p>RPT is committed to conducting business with honesty and integrity. Employees are encouraged to speak up and raise questions and concerns promptly about any situation that may violate our safety protocols, policies and procedures, the laws, rules, and regulations that govern our business operations.</p> <p>Employees are expected to tell others when witnessing unsafe work practices or conditions. When employees are not comfortable discussing these unsafe conditions with fellow employees, they are encouraged to discuss the situation with management or report it in writing.</p> <p>However, where the matter is more serious, or the employee feels that management has not addressed the concern, or they are not comfortable reporting to their immediate manager, they can report it to the next level manager, or for COR employees the Safety Administrator and for First Transit employees the Region Safety Manager or Human Resources Manager. First Transit employees may also directly file a written or verbal complaint by calling the confidential Ethics and Compliance Toll-free Hotline at 1.877.3CALLFG, (1.877.322.5534); contacting the Hotline intake site at ethicsfirst.ethicspoint.com; or emailing Compliance@firstgroup.com.</p> <p>Retaliation against anyone who, in good faith, reports observations of unsafe or illegal activities; or who cooperates in any investigation of such report, is strictly prohibited and is not tolerated, regardless of the outcome of the complaint.</p> <p>In other words, employees are protected for speaking up in good faith under this Policy. Any manager, or co-worker who retaliates against a complaining employee or anyone involved in an investigation of a complaint is subject to discipline and/or termination.</p> <p>Managers are charged with assuring that they and their staff comply with the whistleblower protections and that no retaliation occurs because of a reported safety related issue.</p>	

Reporting Options

At COR and First Transit reporting unsafe practices, policy violations, violations of the law, etc. is encouraged, and in many instances required, of all employees. The primary goal is to be able to identify areas where risk of injury to personnel or customers, or destruction of property may exist; and develop measures to mitigate those risks.

Unless the employee's action or in-action is egregious, disciplinary action is not warranted.

Employees that fail to report mandatory items, such as:

- Failure to report defective equipment
- Failure to report a safety hazard
- Failure to procure necessary information for an accident report or
- Submitting an inaccurate or incomplete report

that could lead to serious harm, are subjected to the disciplinary process describe later in this section.

Duty to Report Law Enforcement Actions

Employees of both COR and First Transit are required to report any arrests, indictments or convictions to their immediate manager or Human Resources immediately, but no later than prior to the next scheduled work shift, to the extent permitted by applicable law. If the circumstances and the offense charged, in our judgment, present a potential risk to the safety and/or security of our customers, employees, premises and/or property, such events may result in disciplinary or other appropriate action to the extent permitted by applicable law.

Operators and safety sensitive employees are required to report all Driving Under the Influence (DUI) or Driving While Intoxicated (DWI) related charges, vehicular collisions, and any moving violation citations received in any vehicle immediately if possible, but no later than prior to their next scheduled work shift, consistent with applicable law.

The following apply to employees of COR.

Grounds for Disciplinary Action

COR deems the following behaviors or actions, which are only listed as examples and are not intended to be all inclusive, constitute a sufficient basis for disciplinary action:

1. Willful violation of a safety rule or practice.
2. Conviction of any criminal offense committed outside of the scope of employment, but which interferes with or adversely affects the employee's ability to competently perform his or her City employment.
3. Dishonesty, including falsification of safety reports or documents prepared on behalf of the City.
4. Careless, negligent, inefficient or incompetent behavior regarding safety occurring during the scope of employment.

Possible Disciplinary Actions

COR generally adopts the principles of progressive discipline to promote corrective action in a fair and consistent manner. Relative to conduct of a serious nature, the City reserves the right to take action commensurate with the offense which may or may not align with the progressive disciplinary steps. Further, the City recognizes that situations appearing similar in scope may have extenuating circumstances resulting in different disciplinary actions. The City retains the right to treat each disciplinary action independently without creating a precedent for other future cases. The following progressive disciplinary steps are listed in order of increasing formality and severity. These disciplinary steps do not prescribe an order of issuance or guarantee that one step must precede another step when addressing issues. As previously stated, the City reserves the right to deviate from the process and skip any or all degrees of discipline at its discretion.

Safety Accountability/Enforcement Program adopted 4/11/2017

- A. **Corrective Coaching:** When corrective coaching is conducted solely for disciplinary purposes, it must be documented in written form. Coaching documentation shall be provided to the employee with a copy placed in the employee's personnel file.
- B. **Reprimand:** A reprimand is written notification given to the employee regarding unsatisfactory performance or other violations of City policies and/or practices. As noted above, this notification describes specific disciplinary infractions, such as inappropriate conduct, poor performance or violation of work rules/policies.
- C. **Suspension:** A suspension is a form of disciplinary action which results in removing an employee from the workplace, with-out pay, for a specified period of time. The supervisor, in consultation with Human Resources, will determine the period of suspension.
- D. **Demotion:** This action removes an employee from his or her current position and into a lower job classification in which the employee is qualified. If an employee is demoted, his or her wage rate will be adjusted to be commensurate with the wage rate of the new position.
- E. **Termination:** An employee may be permanently dismissed from employment with the City. Termination occurs by written notice in compliance with the Home Rule Charter and any other applicable laws. An employee may have pre-termination hearing rights and post termination appeal rights provided by the Home Rule Charter, Civil Service rules, collective bargaining agreement or applicable law. The City also reserves the right to terminate an employee at any time during the probationary period for un-satisfactory performance. If an investigation [2] is warranted due to a serious allegation which may result in a suspension or termination, approval must be obtained by the City Administrator and Human Resource Director who will select the investigator and ensure a timely process. Prior to taking any disciplinary action for suspensions, demotions, or termination of employment, the supervisor shall consult with the Human Resource Department. Supervisors, or other investigators, may meet with an employee for the purpose of gathering information that could lead to disciplinary action. In these situations and as determined by HR, a Tennesen Warning may be provided to the employee.
- F. **Exceptions:** This policy does not apply to a city employee whose discipline is determined exclusively by state or federal law.

The following apply to employees of First Transit.

First Transit uses a tiered approach to determine possible disciplinary actions. Infractions that lead to disciplinary action are categorized into four categories;

- Class 1 – Dischargeable Offenses, the most serious and unacceptable behavior
- Class 2 – Serious violations of the First Transit performance code
- Class 3 – Secondary violations of the First Transit performance code
- Class 4 – Lesser violations of the First Transit performance code that may result in disciplinary action depending on the circumstances or repeated violations

Examples of **Class 1 Dischargeable Offenses** include:

- Convictions and imprisonment for such offenses as DUI, DWI, child abuse, etc.
- Safety; some offenses are of such a serious nature that termination is appropriate for the first offense. Those include but are not limited to:
 - Failure to properly secure mobility devices
 - Cell phone use while operating a company vehicle
 - Striking a pedestrian
 - Colliding into the rear of another vehicle or stationary object
 - Running a red light or stop sign
 - Entering a railroad crossing when the lights are flashing
- Violation of the Drug & Alcohol Policy
- Dishonesty
- Stealing/Theft
- Unauthorized Use or Removal of Company / Client Property or Vehicle
- Violence / Fighting / Threats
- Harassment
- Insubordination
- Security
- Sleeping on the Job
- Destruction of Property
- Failure to Return to Work
- Leaving Bus or Passengers
- Failure to Follow Sleeping Passenger Rules

Examples of **Class 2 Infractions** considered to be serious violations of the First Transit performance code include:

- Abusing or misusing sick leave
- Exchanging work assignments (trade) without proper authority
- Stopping work prior to the end of any shift without management's permission

- Excessive absenteeism, tardiness, starting work late after on the clock, or a pattern of unexcused absences unless otherwise permitted by law
- Reporting for work in an unfit condition
- Failing to obtain permission to leave work during normal working hours
- Discourteous or inappropriate attitude or behavior toward passengers or other members of the public
- Failure to comply with PPE directives
- Failure to wear a High Visibility Safety Vest, Reflective Safety Vest, or Company issued High Visibility Uniform Shirt according to Company policies
- Failure to wear Safety Glasses in compliance with PPE directives
- Failure to wear Company Assigned Shoe Grips when directed to do so
- Violation of vehicle operating regulations
- Failure to observe safety, sanitation, or disciplinary policies of the client or Company, or laws and regulations of Local, State, or Federal governments
- Failure to comply with the Risk Assessment policy
- Working more than an employee's regularly scheduled hours without advance approval of the Company
- Failure to operate a Company vehicle according to assigned route or timetable
- Failure of any Operator, Safety Sensitive Employee or employee required to be licensed for driving, to renew and maintain a valid, appropriate driver's license with required endorsements and a medical certificate for driving a Company vehicle
- Failure to wait for connections or passing up passengers
- Transport of unauthorized persons
- Attempting to enter, entering or assisting any person to enter, or attempt to enter a Company location or restricted areas without proper authority

Examples of **Class 3 Infractions**, considered to be secondary violations of the First Transit performance code, include:

- Mandatory Reporting failure including:
 - Failure to report defective equipment
 - Failure to report a safety hazard
 - Failure to procure necessary information for an accident report or submitting an inaccurate or incomplete report
 - Failure to report law enforcement actions
- Posting, circulating or distributing written or printed material during working times and in working areas
- Failure to adhere to the Company Reverse Parking policy for Company vehicles and personal vehicles
- Use of a Company-owned radio or cell phone for non-Company business during working time

- Failure of any Operator to have in his or her possession a valid, appropriate driver's license with required endorsements and a medical certificate while driving a Company vehicle

Examples of **Class 4 Infractions**, considered to be lesser violations of the First Transit performance code that may result in disciplinary action depending on the circumstances or repeated violations, include:

- Failure to comply with the dress code, uniform policy, cleanliness, personal hygiene, personal grooming habits, or other requirements established by the client or Company
- Reporting for duty in an improper uniform, presenting an untidy, unkempt or dirty appearance of person or uniform, or improperly displaying uniform articles, Company emblem, or authorized pins and badges
- Parking a personal vehicle in a restricted area at a Company location
- Neglect of job duties and responsibilities, or lack of application or effort on the job
- Incompetence or failure to meet reasonable standards of efficiency or effectiveness
- Failure to provide First Transit with a current address or telephone number
- Failure to inform First Transit of changes in status of dependents for insurance coverage
- Littering the employee lounge area, restrooms, or any other company property
- Failure to read notices and bulletins and not making an effort to stay informed

Applying Disciplinary Actions

Although employment may be terminated at-will by either the employee or First Transit at any time in accordance with applicable law, without following any formal system of discipline or warning, First Transit may exercise discretion to utilize forms of discipline that are less severe than termination.

Whenever an employee is subject to discipline, the employee's work record, including violations occurring in the relevant time period, is reviewed before determining penalty. The chart below describes how disciplinary actions are applied.

Class of Infraction	Discharge	Suspension	Written Warning
1	1st Offense	-----	-----
2	2nd Offense*	1st Offense	-----
3	3rd Offense*	2nd Offense*	1st Offense
4	4th Offense*	3rd Offense*	1st & 2nd Offense*

*Within 12 months of first offense, 36 months for safety

Additionally, First Transit may use the following criteria to determine discipline specific to any type of traffic violation or preventable accident.

Major Offenses	Action
One violation	Discharge
Serious Violations	Action
One violation	Written warning
Two violations within any 36-month period	Discharge
Moving Violations	Action
Two violations within any 36-month period	Three-day Suspension
Three violations within any 36-month period	Discharge
Two violations within any 12-month period	Discharge
Preventable Vehicle Accidents	Action
One preventable accident	Written warning
Two preventable accidents within any 36-month period	Five-day Suspension
Three preventable accidents within any 36-month period	Discharge
Two preventable accidents within any 12-month period	Discharge

Details of First Transit's reporting requirements, infractions of company policy, and disciplinary actions that may be taken are described in more detail in the **First Transit Employee Handbook**.

5. Safety Risk Management

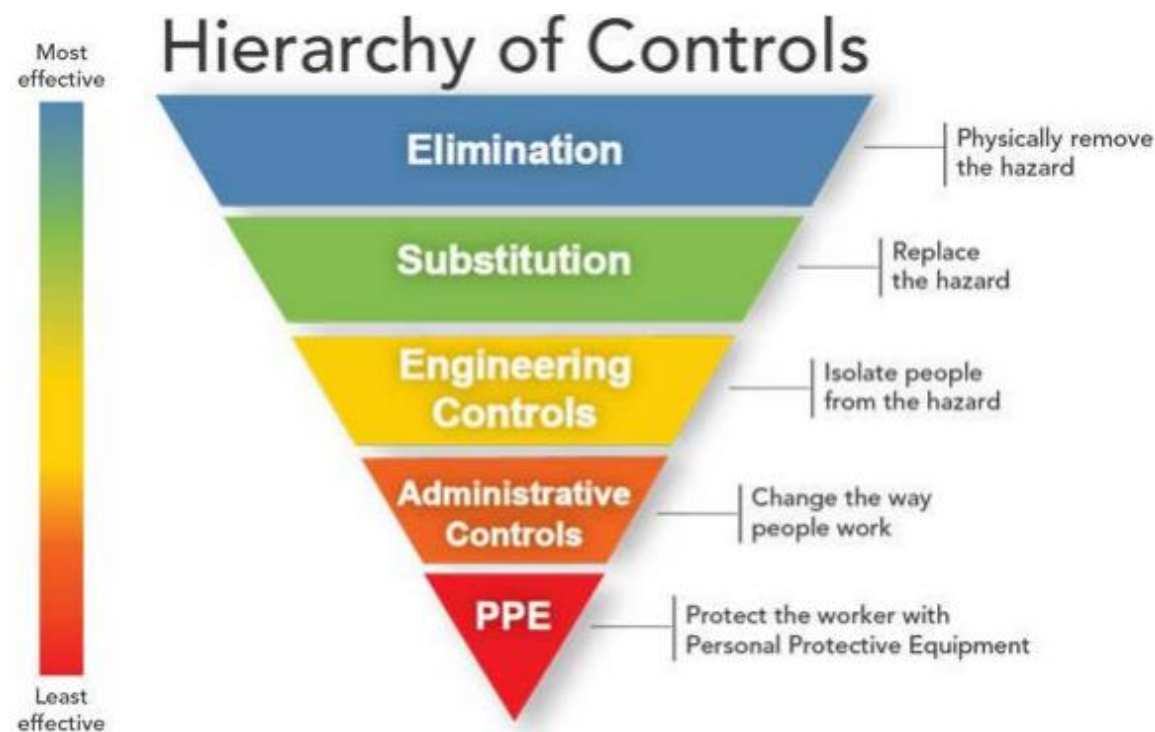
Safety Risk Management Process

Safety management is at the core of everything done at RPT. All employees are responsible for performing their jobs in a safe manner, which includes identifying safety risks and participating in developing and implementing effective mitigation techniques, and consistent with guidelines of the Centers for Disease Control and Prevention or a State health authority, minimize exposure to infectious diseases. To identify potential and/or actual hazards that exist in the workplace, the City of Rochester will:

1. Work toward developing job hazard analysis for potentially hazardous job tasks within the City, as identified by supervisors with the assistance of the City's safety consultant.
2. Routinely conduct inspections of equipment, facilities and operations (both indoors and outdoors) to ensure safe working conditions.
3. Review Injury/Illness Reports, Accident Reports, OSHA 300A Reports, and safety statistics to assess existing workplace hazards.
4. Solicit employee input on safety hazards that exist in their work environment.

Workplace hazards identified through any of the methods described above will be analyzed to determine if engineering controls, operating procedures, training or personal protective equipment can be provided to minimize or eliminate the hazard.

To mitigate the hazards that exist in the workplace, the City of Rochester will follow the hierarchy of controls model (as shown below):



Safety Hazard Identification

This process is a vital component in COR and First Transit's efforts to reduce safety risks and improve overall delivery of service. Safety Hazard Identification data from internal sources such as employee reporting, customer feedback, maintenance records; and external sources such as the Federal Transit Administration and local oversight authority is used to implement immediate corrective actions and to proactively identify hazards and potential consequences before they cause future accidents or incidents.

The objective of hazard identification is to identify those conditions that can cause an accident or create an unsafe condition and determine possible consequences if the unsafe condition is not corrected. First Transit routinely analyzes records from operations and external sources as they become available to identify accident causation based on history. Current traffic conditions are periodically analyzed, and management inspection of established prevention processes are routinely performed.

First Transit also takes an additional proactive step with its **SOP #208 – Safety Validation of Change** to identify hazards and consequences **PRIOR** to implementing any changes to operations.

First Transit relies on employees to assist in the hazard identification and resolution process. Working with the location safety personnel and through a structured process, employees help:

- Identify Critical Factors in Mitigation of safety risk
- Develop and Recommend an Action Plan
- Implement Action Plan
- Measure Performance Against Safety Objectives
- Monitor the Process
- Modify the Process
- Secure Outside Assistance (when needed)
- Audit for Compliance

Several tools exist for hazard identification. Among them are:

- **SOP #802 and #802a - Daily Safety & Health Walkthrough and Checklist**
 - A routine safety and health check walkthrough to promptly identify hazardous conditions at our facilities and notify employees of the hazards identified and mitigation measures to help protect them from personal injury.
- **SOP #804 - Positive Check-In Procedures & Reasonable Suspicion**
 - Positive Check-In procedures are to ensure our operators reporting to work are fit-for-duty.
- **SOP #900 – Facility Hazard Recognition Manual**
 - This Hazard Recognition Manual is intended to be a tool for recognizing potential hazards that may be present at First Transit facilities. Although it does not represent all conditions that could exist, the photos and narrative provide:
 - A reference guide for conducting safety inspections at a facility, and
 - A training document to educate and train employees to conduct effective safety inspections.
- **Vehicle Maintenance Risk Assessment**

- All employees who perform maintenance and repairs to vehicles within transit centers and bus yards or on road calls complete a risk assessment using **SOP #503a – Vehicle Maintenance Risk Assessment Form** prior to performing any work on a vehicle.
- The Risk Assessment process, **SOP #503 – Vehicle Maintenance Risk Assessment**, requires employees about to perform a maintenance task to confirm they possess the training, skills, knowledge, abilities, tools, and equipment to safely perform the task at hand. The assessment includes determining the following.
 - Are You Properly Trained to Perform the Task?
 - If Task Requires Lifting, Are Lifts Secured, Are Jack Stands Used Correctly?
 - Are You Wearing the Appropriate Personal Protective Equipment (PPE)?
 - Have You Performed the Proper Lock-Out/Tag-Out (LOTO) procedures?
 - Are You Aware of the Potential Risks of Performing this Repair?
- If the answer is “NO” to any of the above assessments the technician is to immediately contact their manager.
- **Pre-Survey Job Hazard Analysis**
 - Prior to beginning a job hazard analysis, a pre-survey of the working conditions, using **SOP #503b – Pre-Survey Job Hazard Analysis Form**, under which the job is performed is conducted to evaluate the general conditions. A few of the potential hazards being considered include:
 1. Are there tripping hazards in the job vicinity?
 2. Is the lighting adequate for work conditions?
 3. Are there explosive hazards associated with the job?
 4. Are there electrical hazards associated with the job?
 5. Are tools associated with the job in good condition?
 6. Is the noise level excessive (below 85-dba)?
 - **Facility Parking Risk Management Assessment**
 - Inadequate turning areas, blind corners, uneven walking surfaces can all cause collisions or employee injury in parking areas. **SOP #501 - Facility Parking Risk Assessment** will help identify and prevent these types of collisions for both buses and personal vehicles.
 - The Location Manager must ensure compliance with all provisions of this SOP.
 - The risk of each facility is assessed as follows:
 - Annually
 - **Unscheduled** – Whenever a significant vehicle collision or a pedestrian strike occurs in the bus yard or on company premises
 - **Start-up locations** – Before operating out of the new location.
 - **SOP #501a – Facility Parking Risk Assessment Guide**, and
 - **SOP #501b – Facility Parking Risk Assessment Form** are tools to help with this assessment.

Accident/Incident Hazard Identification

Procedures exist and are followed regarding resolution of accidents and incidents and capturing data. Although this information is used proactively, First Transit takes advantage of these opportunities to determine which, if any hazards existed that may have contributed to the accident or incident and develop mitigation measures to reduce the risk of a recurrence.

There are five (5) main areas reviewed in this Hazard Identification process:

1. **Environment**
 - a. Weather
 - b. Road Surface Condition

c. Visibility

2. Transit Service Characteristics and Agency Policies

- a. Incentives for Safe Driving
- b. Equipment Maintenance Policies
- c. Stop Intervals
- d. Route Design
- e. Driver Scheduling
- f. Passenger Demand Schedules

3. Operator

- a. Experience
- b. Physical Ability
- c. Personality
- d. Psychological Condition
- e. Physical Condition

4. Road Layout

- a. Width
- b. Speed Limit
- c. Geometric Design
- d. Traffic Volume
- e. Capacity
- f. Parking
- g. Adjacent Lane Use
- h. Street Lighting
- i. Pedestrian Volume

5. Hazard Identification – Accident Prevention/Resolution

- 1st: Identify the Hazard
- 2nd: Remove the Hazard
- 3rd: When the Hazard cannot be removed, Train for the Hazard as a “known condition”

▪ On-Board Video Technology

- **SOP #704 – On-Board Video Technology** provides a summary of the on-board video system and Company standards that all First Transit employees must follow when operating a company or customer vehicle equipped with onboard video technology.
- This technology is a valuable resource and another tool that helps First Transit instill positive driving behaviors by providing opportunities to view recorded driving events, driver history and company trends.
- The goal of this in-cab camera technology is to proactively identify unsafe behaviors and improve those identified behaviors through coaching, retraining and, if necessary, disciplinary measures in accordance with the provisions of the Employee Handbook and applicable Collective Bargaining Agreements.

Information learned from this identification process is used to improve training and reduce or eliminate the underlying causes.

Safety Risk Assessment

Once the hazard has been identified, they are categorized into the following severity levels. The categorization of hazards is consistent with risk-based criteria for severity; it reflects the principle that not all hazards pose an equal amount of risk to personal safety.

Category 1 – Catastrophic: operating conditions are such that human error, design deficiencies, element, subsystem or component failure, or procedural deficiencies may cause death or major system loss and require immediate termination of the unsafe activity or operation.

Category 2 – Critical: operating conditions are such that human error, subsystem or component failure, or procedural deficiencies may cause severe injury, severe occupational illness, or major system damage and require immediate corrective action.

Category 3 – Marginal: operating conditions are such that they may result in minor injury, occupational illness or system damage and are such that human error, subsystem or component failures can be counteracted or controlled.

Category 4 – Negligible: operating conditions are such that human error, subsystem, or component failure or procedural deficiencies will result in less than minor injury, occupational illness, or system damage.

The next step in assessing the hazard is to determine the likelihood of it occurring. Likelihood of occurrence is determined based on the analysis of transit system operating experience, evaluation of First Transit safety data, the analysis of reliability and failure data, and/or from historical safety data from other passenger bus systems. The following chart describes the likelihood of occurrence categories.

Likelihood of Occurrence of a Hazard			
Description	Level of Likelihood of Occurrence	Frequency for Specific Item	Selected Frequency for Fleet or Inventory
Frequent	A	Likely to occur frequently	Continuously experienced
Probable	B	Will occur several times in the life of the item	Will occur frequently in the system
Occasional	C	Likely to occur sometime in the life of an item	Will occur several times in the system
Remote	D	Unlikely but possible to occur in life of an item	Unlikely but can be expected to occur
Improbable	E	So unlikely, it can be assumed occurrence may not be experienced	Unlikely to occur but possible

Identified hazards are placed into the following Risk Assessment Matrix to enable the decision makers to understand the amount of risk involved in accepting the hazard in relation to the cost (schedule, cost, operations) to reduce the hazard to an acceptable level.

Hazard Frequency	Severity Category 1	Severity Category 2	Severity Category 3	Severity Category 4
Frequent (A)	1A	2A	3A	4A
Probable (B)	1B	2B	3B	4B
Occasional (C)	1C	2C	3C	4C
Remote (D)	1D	2D	3D	4D
Improbable (E)	1E	2E	3E	4E

Based on company policy and the analysis of historical data, First Transit has made the following determinations regarding risk acceptance.

Hazard Risk Index	Criteria by Index
1A, 1B, 1C, 2A, 2B, 3A	Unacceptable
1D, 2C, 2D, 3B, 3C	Undesirable (Management decision)
1E, 2E, 3D, 3E, 4A, 4B	Acceptable with Management Review
4C, 4D, 4E	Acceptable without Management Review

Safety Risk Mitigation

Mitigation Determination

After the assessment has been completed, the follow-up actions will be implemented as follows.

- **Unacceptable:** The hazard must be mitigated in the most expedient manner possible before normal service may resume. Interim corrective action may be required to mitigate the hazard to an acceptable level while the permanent resolution is in development.
- **Undesirable:** A hazard at this level of risk must be mitigated unless the Location General Manager and Location Safety Manager issue a documented decision to manage the hazard until resources are available for full mitigation.
- **Acceptable with review:** The Location General Manager and Location Safety Manager must determine if the hazard is adequately controlled or mitigated as is.
- **Acceptable without review:** The hazard does not need to be reviewed by the management team and does not require further mitigation or control.

Mitigation of safety risk

Mitigation of safety risk consists of reducing the risk to the lowest practical level. Not all safety risks can be eliminated completely. Resolution of hazards will utilize the results of the risk assessment process. The objectives of the mitigation of safety risk process are to:

1. Identify areas where mitigation of safety risk requires a change in the system design, installation of safety devices or development of special procedures.
2. Verify that hazards involving interfaces between two or more systems have been resolved.
3. Verify that the resolution of a hazard in one system does not create a new hazard in another system.

The SST, who was identified earlier in this plan as the team responsible for local safety review, uses the following methodologies to assure that system safety objectives are implemented through design and operations, and hazards are eliminated or controlled:

1. Design to eliminate or minimize hazard severity. To the extent permitted by cost and practicality, identified hazards are eliminated or controlled by the design of equipment, systems and facilities
2. Hazards that cannot reasonably be eliminated or controlled through design are controlled to the extent practicable to an acceptable level through the use of fixed, automatic, or other protective safety design features or devices.
3. Provisions are made for periodic functional checks of safety devices and training for employees to ensure that system safety objectives are met.
4. When design and safety devices cannot reasonably nor effectively eliminate or control an identified hazard, safety warning devices are used (to the extent practicable) to alert persons to the hazard.
5. Where it is impossible to reasonably eliminate or adequately control a hazard through design or the use of safety and warning devices, procedures and training are used to control the hazard.
6. Precautionary notation is standardized, and safety-critical issues require training and certification of personnel

Additional documentation, such as corrective action plans, are developed for those hazards requiring complex and multifaceted resolutions.

6. Safety Assurance

Safety Performance Monitoring and Measurement

As discussed in Section 1 of this plan, First Transit employs a Resident Management Team at each RPT. This team consists of the Location General Manager, Location Safety Manager, Location Assistant Manager and the Location Maintenance Manager who oversee the safety of the operation.

Additionally, First Transit at RPT employs Street Supervisors, Dispatchers, and Instructors; all of whom are responsible for oversight of the daily operations and training. All safety risks identified are reported to the Location General Manager and Location Safety Manager. Any risks that can be addressed immediately are corrected but still reported. RPT also establishes a Safety Solutions Team (SST), described in Section 5: Safety Risk Management of this plan, which uses the following methodologies to ensure a proactive approach to safety at each location.

- Safety audits,
- Informal inspections,
- Regular review of onboard camera footage to assess drivers and specific incidents,
- Safety surveys,
- ESRP,
- Investigation of safety occurrences,
- Safety review prior to the launch or modification of any facet of service,
- Daily data gathering and monitoring of data related to the delivery of service, and
- Regular vehicle inspections and preventative maintenance.

Results from the above processes are compared against recent performance trends quarterly and annually by the Chief Safety Officer to determine where action needs to be taken. The Chief Safety Officer enters any identified non-compliant or ineffective activities, including mitigations, back into the SRM process for reevaluation by the Safety Committee.

The Location Safety Manager manages resolution of identified hazards. The mitigation of safety risk process is managed through the “**Safety Toolbox**”, which is an online tool used by management, from Road Supervisors to Executive Management, to record the occurrence of safety-related events, review safety critical data, and track corrective actions as necessary.

The Safety Toolbox is a powerful tool to help understand the work area’s safety environment. This includes:

- Understanding and improving observations of safety critical behaviors
- Reviewing recorded debriefs to ensure that the “BeSafe” process is in place and working.
- Reviewing findings from BeSafe tours and determine if tasks/actions have been closed out

The Safety Toolbox includes information regarding:

- BeSafe (BeSafe Debriefs, BeSafe Tours, BeSafe Touchpoints)
 - Debrief meetings conducted in order to assure quality.
 - Safety Critical Behavior is the main focus of touchpoints; and shared and discussed during debrief meetings.
- Contacts (e.g. Near Misses, Hazard reports, Commendation, Safety Issue)
 - **Near Misses.** Reporting an event that occurred and could have caused injury.
 - **Hazard Reports.** Reporting an event that occurred and could have caused injury.

- **Commendation.** A report of commendable safety actions/conduct performed by a colleague within the business.
- **Safety issues.** A report on any safety issue that has a specific cause – i.e. maintenance, housekeeping, environment and behavior etc.
- **Safety Leadership Activities** (e.g. Participate in safety meetings, risk assessment, section observation)
 - **Participation in a Safety meeting.** Actively leading or participating in the location in-service safety meeting.
 - **Intersection observation or risk assessment.** Risk assessment or driver observations conducted at nearby intersections, and delivery of positive reinforcement or coaching as indicated.
 - **Planned general inspections.** A systematic inspection where a location is forewarned.
 - **High interest driver.** A report of a driver's performance that has indicated a level of risk taking through observations, review scores, and skills evaluations.

Additional documentation, such as corrective action plans, are developed for those hazards requiring complex and multifaceted resolutions

Describe activities to conduct investigations of safety events to identify causal factors.

RPT has a “zero” tolerance for preventable injuries and collisions. Elimination of preventable injuries and collisions is our number one goal.

Any injury, collision or incident that occurs is investigated to determine preventability or non-preventability. Investigations include all instances in which:

- a vehicle was damaged
- a vehicle leaves the traveled roadway
- a passenger is injured or
- an employee is injured

The following First Transit SOP is applied.

SOP #700-Accident & Safety Data Acquisition describes the data collection process including

- Defining the Event & What to Do
- Accidents – Defining the Accident
- “Five Cardinal Rules That Apply to an Accident”
- Operator Responsibility
- Dispatcher on Duty Accident Investigation Responsibility

SOP #700 also describes the Operators and the Dispatchers responsibilities for protecting the customers and managing the scene.

The groups described in **SOP #702 – Accident Review Committee (ARC)**, and **SOP #803 – Safety Solutions Team (SST)**, review the data collected to determine if the accident/incident was preventable or non-preventable,(ARC); and identify measures to reduce the risk of the accident/incident occurring in the future (SST).

Describe activities to monitor information reported through internal safety reporting programs.

Risk/Safety Data Flow								
Weekly Data Review								
Information Collected Daily	Location	Third Party Data Collected	Risk Dept	Safety Dept	Location			
Collisions/ Injuries/ Workers Comp	Incident Occurs, claim report created, then sent to Third Party Data Collector via website, phone, fax.	Report received from Location.	Information from Third Party Data Collector created as weekly report then sent to Region Safety.	Weekly reports are reviewed and distributed for weekly management oversight conference calls.	Review data with Senior Region Leadership during weekly teleconference.			
Period Data Review (e.g. Quarterly/Monthly)								
	Risk Dept	Shared Services Dept	Region Safety Managers	Shared Safety Services Dept				
Collisions/ Injuries/ Workers Comp	Send all raw risk data gathered from weekly reports to the Shared Safety Services Dept.	Reorganizes raw data regionally then distributes to Region Safety Dept.	Review period data and distribute to locations.	Develops company, region, and location specific performance measures and distributes through Target & Goal Spreadsheet.				

The Location Safety Manager (LSM) and/or Location General Manager (LGM) routinely reviews all location safety and hazard data, which includes searching for repetitive events that might have safety implications. When accident/incident reports and statistics indicate repetitive accidents/incidents, the LSM and LGM investigate to determine the root cause.

The following chart describes how the hazard data flows and is monitored by First Transit; from each operating location, to Region management, to corporate and parent company management.

Period Data Analysis								
	Shared Services Dept	UK	Safety Dept	First Group Executive Safety Committee (ESC)	First Group Safety Council	First Group America Safety Council	Performance Review Management (PRM)	Safety Advisory Committee
Collisions/ Injuries/ Workers Comp	Final reports sent to UK and Directors of Safety for each business group.	Processes data; analyzes; creates reports; categorizes risk factors; and gathers commentary from First Group companies for trend analysis.	Processes data; analyzes; creates reports; categorizes risk factors; and creates commentary for trend analysis.	This committee consists of President, COO, and Safety Vice President of each operating group. Discussions include safety performance, trend analysis, program oversight.	This committee consists of Vice Presidents of Safety for all operating divisions. Discussions include safety performance, trend analysis, and safety oversight.	This committee consists of Safety Senior Directors and Safety Vice Presidents. Discussions include safety performance, trend analysis, best practices, and program oversight.	This review consists of Senior Region Vice Presidents, Region Vice Presidents, Region Directors of Operations, and Region Safety Managers. Discussions include regions safety performance.	This committee consists of Location General Managers, Region Directors of Operations, and Region and Local Safety Managers. Discussions include review of policy and procedures, training, and safety awareness.

Continuous Improvement

The process described previously in this section for monitoring safety data incorporates continuous improvement. As safety risk is identified, then reported on, a determination is made as to whether the risk can be mitigated immediately or requires more time and resources.

Risk mitigations that can address the safety concerns immediately are carried out but still reported. The reporting of these concerns includes the mitigation steps that have been taken. Monitoring of the risk continues to ensure that the mitigation strategy is effective.

Section 5 of this plan, Safety Risk Management, describes the risk assessment and mitigation procedures used that determine how to proceed with improvement strategies that require more time and resources. Which improvement strategies to implement for longer term issues is based on severity and likelihood of risk occurrence. Additionally, safety hazard identification data is used to implement immediate corrective actions and to proactively identify hazards before they cause future accidents or incidents.

The objective of hazard identification is to distinguish those conditions that can cause an accident or create an unsafe condition. First Transit routinely analyzes records from our operation to identify accident causation based on history. Current traffic conditions are periodically analyzed, and management inspections of established prevention processes are routinely performed.

The Risk/Safety Data Flow Chart previously described in this section, illustrates how this information is shared throughout the organization.

7. Safety Promotion

Competencies and Training

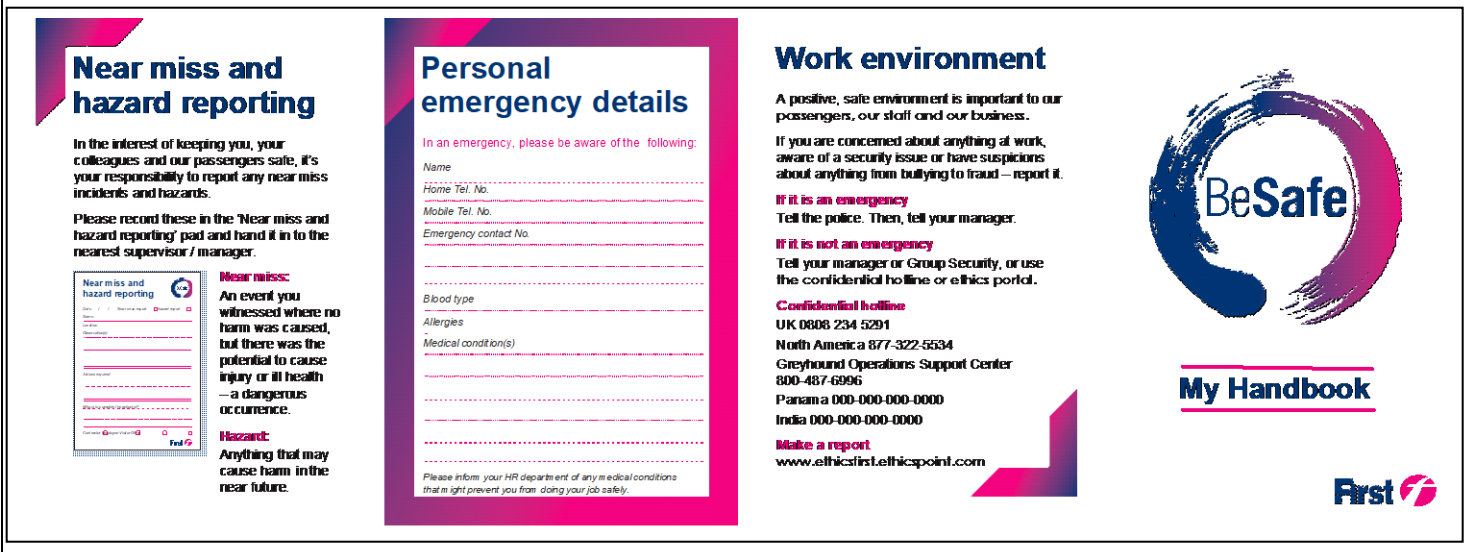
Employee Training

Training employees to assess risks and recognize and avoid hazards in the workplace is critical to the overall safety of the workplace.

All COR employees are required to attend new employee training. New employee training explains the importance of key workplace safety topics such as safety committees, fall protection, protective equipment, confined space, hazard communications, blood borne pathogens, and much more. Depending on the employee’s job responsibilities additional job specific safety training may be provided. Training courses are offered online via Safe Personnel Training found on the City of Rochester’s intranet.

Every First Transit employee is trained in “**BeSafe**” and “**Safe Work Methods**”, which are described later in this section. “**BeSafe**” is our company-wide approach to safety management. This program takes our safety performance to the next level through behavioral change. “**BeSafe**” is inclusive, collaborative and focuses on recognizing and acknowledging safe behavior and actions through positive reinforcement such as debriefs, tours, and touchpoints. All employees are trained in the principles of “**BeSafe**”.

The “**BeSafe**” concept is described in the following brochure.



Near miss and hazard reporting

In the interest of keeping you, your colleagues and our passengers safe, it's your responsibility to report any near miss incidents and hazards.

Please record these in the 'Near miss and hazard reporting' pad and hand it in to the nearest supervisor / manager.

Near miss:
An event you witnessed where no harm was caused, but there was the potential to cause injury or ill health – a dangerous occurrence.

Hazard:
Anything that may cause harm in the near future.

Personal emergency details

In an emergency, please be aware of the following:

Name _____
 Home Tel. No. _____
 Mobile Tel. No. _____
 Emergency contact No. _____

Blood type _____
 Allergies _____
 Medical condition(s) _____

Please inform your HR department of any medical conditions that might prevent you from doing your job safely.

Work environment

A positive, safe environment is important to our passengers, our staff and our business.


If you are concerned about anything at work, aware of a security issue or have suspicions about anything from bullying to fraud – report it.

If it is an emergency
Tell the police. Then, tell your manager.


If it is not an emergency
Tell your manager or Group Security, or use the confidential hotline or ethics portal.

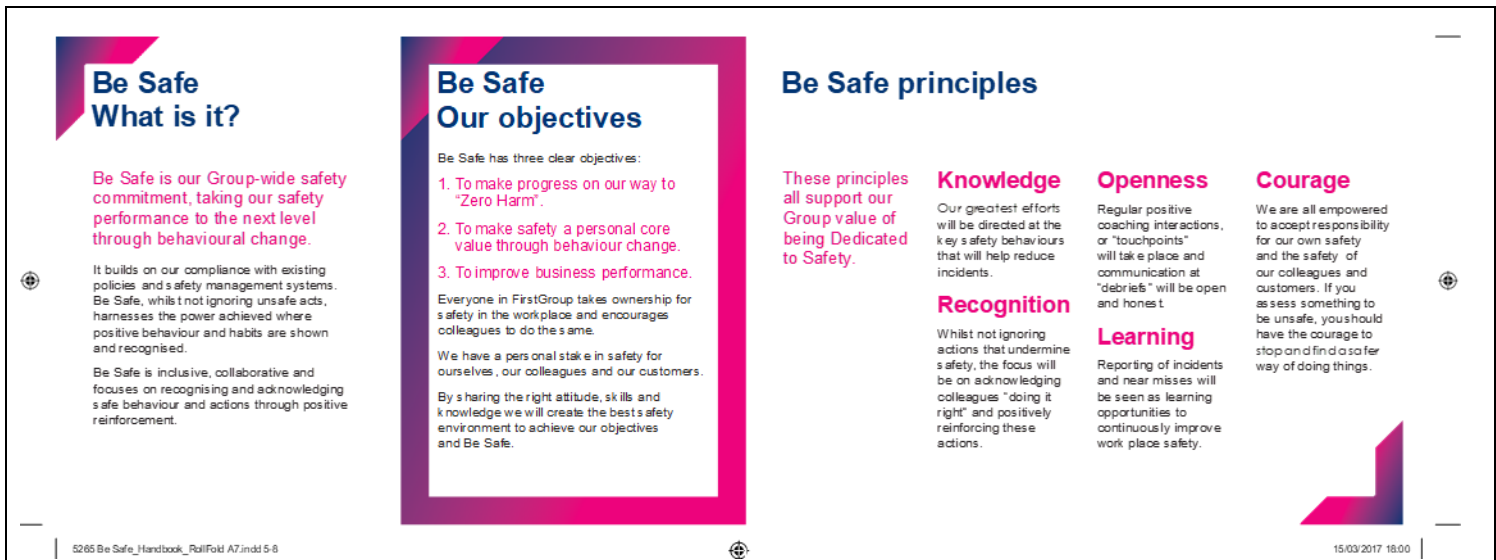
Confidential hotline
 UK 0808 234 5291
 North America 877-322-5534
 Greyhound Operations Support Center 800-487-6996
 Panama 000-000-000-0000
 India 000-000-000-0000

Make a report
www.ethicsfirst.ethicspoint.com



My Handbook





Be Safe
What is it?

Be Safe is our Group-wide safety commitment, taking our safety performance to the next level through behavioural change.

It builds on our compliance with existing policies and safety management systems. Be Safe, whilst not ignoring unsafe acts, harnesses the power achieved where positive behaviour and habits are shown and recognised.

Be Safe is inclusive, collaborative and focuses on recognising and acknowledging safe behaviour and actions through positive reinforcement.

5265 Be Safe_Handbook_RollFold A7.indd 5-8

Be Safe
Our objectives

Be Safe has three clear objectives:

1. To make progress on our way to "Zero Harm".
2. To make safety a personal core value through behaviour change.
3. To improve business performance.

Everyone in FirstGroup takes ownership for safety in the workplace and encourages colleagues to do the same.

We have a personal stake in safety for ourselves, our colleagues and our customers.

By sharing the right attitude, skills and knowledge we will create the best safety environment to achieve our objectives and Be Safe.

Be Safe principles

These principles all support our Group value of being Dedicated to Safety.

Knowledge
Our greatest efforts will be directed at the key safety behaviours that will help reduce incidents.

Openness
Regular positive coaching interactions, or "touchpoints" will take place and communication at "debriefs" will be open and honest.

Courage
We are all empowered to accept responsibility for our own safety and the safety of our colleagues and customers. If you assess something to be unsafe, you should have the courage to stop and find a safer way of doing things.

Recognition
Whilst not ignoring actions that undermine safety, the focus will be on acknowledging colleagues "doing it right" and positively reinforcing these actions.

Learning
Reporting of incidents and near misses will be seen as learning opportunities to continuously improve work place safety.

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First Transit's "Safe Work Methods" is designed to educate employees on how to identify conditions and actions posing risks to their well-being and that of their coworkers. This training is to be used:

1. In training new hire employees
2. In leading supervisors in identifying root causes of workplace injuries
3. In retraining injured workers so that re-occurrences are avoided
4. To supplement First Transit's First Occupational Rehabilitation Management (F.O.R.M.) light duty and return to work management program, in controlling workers compensation losses

The "Safe Work Methods" training curriculum includes:

- **New Hire Training**
New hire training is designed to educate the new employee to the hazards commonly found in the transportation environments including in vehicle maintenance shops, bus yards, fuel islands, wash bays, and office environments. The program also makes employees aware of injuries that can result from physical activities such as entering and exiting vehicles, assisting persons with disabilities, and handling mobility devices.
 - PPE program including requirements for appropriate
 - Safety eyewear
 - Safety footwear
 - Safety hand wear
 - Hi-Vis vests
 - Disposal contaminated materials
 - Risk Assessment and Injury Avoidance
 - Walking & Climbing
 - Lifting, Carrying, Holding, and Lowering Objects
 - Pushing, Pulling, & Twisting
 - Burns, Scalds
 - Exposed Fluids, Chemicals, Smoke
 - Cuts, Punctures, Abrasions, Lacerations
 - Mobility Device Lifts/Ramps

1. Requirements for Operator Training

Applicants are required to successfully complete a comprehensive training program prior to transporting passengers. Trainees are continually evaluated and tested throughout the training program. Trainees who do not demonstrate the required level of proficiency are provided additional training or are removed from training. The Operator training program combines instructor-led sessions, video instruction, facilitated discussion, and opportunities for the trainees to practice what they have learned. Training topics include:

Classroom Training

The first part of Operator training at First Transit, classroom training, begins the process of instilling the safety culture into each Operator. Helping the student Operators understand the importance of keeping themselves and each passenger safe; and their responsibilities in maintaining a safe environment, is a theme integrated throughout.

Behind-the-Wheel Training

Behind-the-Wheel training is conducted in three phases. Since most people coming to work as a Bus Operator have not been exposed to driving the types of vehicle used at First Transit, the first part of behind-the-wheel training takes place on a closed course. This provides the opportunity for the Instructors to evaluate the skill levels of each employee; and gives each employee the opportunity to make and learn from their mistakes in a safe environment.

The next phase of Behind-the-Wheel training takes place on the road, but in a controlled manner. During the road phase of the training, each student Operator works one-on-one with a First Transit Instructor. The road work begins with the basics; intersections, service stops, and backing. The next advanced stage of the road work addresses roadways, highway driving, and continues the instruction on intersections and service stops. The “Smith Driving System” principles are incorporated throughout the entire Behind-the-Wheel training phase.

2. Requirements for Maintenance Training

Maintenance personnel are trained in shop safety, OSHA standards, and vehicle maintenance, in addition to receiving training in driving techniques and safety. Trainees are continually evaluated and tested throughout the training program. Trainees who do not demonstrate the required level of proficiency are provided additional training or are removed from training.

Maintenance training includes:

- Introduction to First Transit policies & procedures
- Injury prevention and risk assessment
- Substance Abuse Policy
- Defensive Driving
- “Smith System”
- NTI - Security Awareness Warning Signs
- Shop Safety Handbook
- Maintenance Lift Safety
- DVI Procedures
- SafeWork Methods
- Wheel Torque Specifications
- Workplace Violence
- OSHA (R-T-K / MSDS / PPE Training)

3. Requirements for Staff Training

Staff personnel are trained in Safety Leadership and “BeSafe” (described in item #1)

- **Safety Leadership**

This is an interactive CD-ROM course consisting of 5 CD’s and leader’s guides which are designed to educate all levels of First Transit management on the behaviors surrounding accidents. Every level of management takes the course and successfully pass an online test, found on the Safety Resource Center (SRC), with a passing grade of 90% or better.

The course outline is as follows:

- Safety Leadership
 - Accidents
 - Behavior
 - Leadership
- Supervisor Development
 - The Role of the Supervisor
 - Communication
 - Building Trust
 - Conflict Resolution
 - Performance Management
 - Decisions

- **Additional Safety Training**

- Reasonable Suspicion
- Supervisor’s Report of Reasonable Suspicion
- Code of Conduct
- Customer Service
- OSHA Requirements
- Hazard Abatement FORM – CA Only

4. Requirements for Continuing Training and Evaluations

First Transit provides ongoing employee training and evaluations.

The objective of ongoing evaluations is met through a broad spectrum of regularly scheduled management activities including:

- road observations,
- ride along evaluations, and
- daily safety contacts.

Where evaluations and observations identify unsafe acts or conditions, retraining is provided to improve skill levels in accordance with corporate standards.

Safety Meetings

In accordance with Minnesota Statute § 182.676, the City of Rochester established a City Wide Safety Committee comprised of representatives of each department who represent both employee and management staff.

Additionally, each department will either form a safety committee(s) that meets regularly, or includes safety as a recurring section of its staff meeting agendas, and keeps documented minutes of these meetings. As a city

department, RPT's senior staff meetings serves as the Safety Committee as noted in the Key Staff and Activities above.

In addition to COR safety meeting First Transit has Twelve (12) safety meetings are issued to the locations annually with required topics identified by the location and region safety management

- Each meeting is to be a minimum of one (1) hour in length unless otherwise required by state, client or local regulations
- A required topic along with a safety campaign including posters and DVD is sent to each location for presentation to all employees
- Attendance is a condition of employment and is mandatory for all Operators, Management, Operational staff, and Maintenance personnel. *(Unless stated otherwise in the CBA.)*
 - Failure to attend all meetings will result in disciplinary actions up to and including termination.

Retraining

COR and First Transit has a “zero” tolerance for preventable injuries and collisions, elimination of preventable injuries and collisions is our number one goal.

A First Transit employee involved in a preventable injury or collision is placed on administrative leave pending completion of the investigation and completion of any required retraining.

Safety Communication

Safety Awareness Programs

Establishing and maintaining a culture that demands safe behavior at all times is at the core of RPT's safety plan. This is done, in part, by providing a regular flow of positive information and recognizing those who are performing safely.

COR follows its “AWAIR” program in order to promote a safe workplace. COR routinely sends companywide emails in order to update staff on a variety of topics including safety related information.

First Transit's “**BeSafe**” program provides the structure and foundation for communicating safety messages and inspiring safe job performance at all levels. “BeSafe” takes safety to a more personal level. It is a company-wide commitment to safety, with the objective of continuous improvement by making safety a personal goal and incorporating behavioral change as a mitigation measure.

This program inspires safe behavior among employees at all levels by;

- Generating system-wide participation in safety issues through positive reinforcement
- Encouraging all employees to “take ownership” for safety results
- Communicating safety policies, procedures and processes
- Engaging executives and managers at all levels, encouraging their active participation in safety management and communication

8. Additional Information

This ASP may be updated if a new contracted operator is hired. Documentation related to the implementation of this SMS; the programs, policies, and procedures used to carry out this ASP; and the results from its SMS processes and activities will be maintained for three years after creation. They will be available to the FTA or other Federal or oversight entity upon request.

Numerous standard operating procedures (SOP's), in addition to those mentioned in this plan, have been developed and incorporated into the operating practices at each First Transit location.

The SOP's have been designed to create operational consistency, increase awareness of risks and hazards, and provide easily duplicated processes for identifying and mitigating the risks associated with providing transit service. In addition to the SOP's already mentioned throughout this ASP, some of those SOP's are as follows.

- High Interest Driver SOP's #206; #206a; #206b; #206c
- SOP #207 - Railroad Crossing Assessment
- SOP #502 – Sub-Contractors Working on Company Property
- Fire Prevention Plan SOP's #504; #504a; #504b; #504c; #504d
- Winter Safety – Snow Removal Action Plan SOP's #505; #505a; #505b; #505c
- Vehicle Fueling Spill Control SOP's #506; #506a; #506b; #506c; #506d
- SOP #507 - Pedestrian Visibility and Movement on Company Property
- SOP # 508 - Service Truck & Service Vehicle Visibility
- Emergency Action Plan SOP's #807; #807a; #807b; #807c
- First Transit Shop Safety Handbook
- Safety & Security Planning Manual

9. Definitions of Terms Used in the Safety Plan

Accident means an Event that involves any of the following: A loss of life; a report of a serious injury to a person; a collision of public transportation vehicles; a runaway train; an evacuation for life safety reasons; or any derailment of a rail transit vehicle, at any location, at any time, whatever the cause.

Accountable Executive means a single, identifiable person who has ultimate responsibility for carrying out the Public Transportation Agency Safety Plan of a public transportation agency; responsibility for carrying out the agency's Transit Asset Management Plan; and control or direction over the human and capital resources needed to develop and maintain both the agency's Public Transportation Agency Safety Plan, in accordance with 49 U.S.C. 5329(d), and the agency's Transit Asset Management Plan in accordance with 49 U.S.C. 5326.

Equivalent Authority means an entity that carries out duties similar to that of a Board of Directors, for a recipient or subrecipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve a recipient or subrecipient's Public Transportation Agency Safety Plan.

Event means any Accident, Incident, or Occurrence. Hazard means any real or potential condition that can cause injury, illness, or death; damage to or loss of the facilities, equipment, rolling stock, or infrastructure of a public transportation system; or damage to the environment.

Incident means an event that involves any of the following: A personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of a transit agency.

Investigation means the process of determining the causal and contributing factors of an accident, incident, or hazard, for the purpose of preventing recurrence and mitigating risk.

National Public Transportation Safety Plan means the plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53.

Occurrence means an Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of a transit agency.

Operator of a public transportation system means a provider of public transportation as defined under 49 U.S.C. 5302(14).

Performance measure means an expression based on a quantifiable indicator of performance or condition that is used to establish targets and to assess progress toward meeting the established targets.

Performance target means a quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the Federal Transit Administration (FTA).

Public Transportation Agency Safety Plan means the documented comprehensive agency safety plan for a transit agency that is required by 49 U.S.C. 5329 and this part.

Risk means the composite of predicted severity and likelihood of the potential effect of a hazard.

Risk mitigation means a method or methods to eliminate or reduce the effects of hazards.

Safety Assurance means processes within a transit agency's Safety Management System that functions to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that the transit agency meets or exceeds its safety objectives through the collection, analysis, and assessment of information.

Safety Event means any Accident, Incident, or Occurrence.

Safety Management Policy means a transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees in regard to safety.

Safety Management System (SMS) means the formal, top-down, organization-wide approach to managing safety risk and assuring the effectiveness of a transit agency's safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks and hazards.

Safety Management System (SMS) Executive means a Chief Safety Officer or an equivalent.

Safety performance target means a Performance Target related to safety management activities.

Safety Promotion means a combination of training and communication of safety information to support SMS as applied to the transit agency's public transportation system. **Safety risk assessment (SRA)** means the formal activity whereby a transit agency determines Safety Risk Management priorities by establishing the significance or value of its safety risks.

Safety Risk Management means a process within a transit agency's Public Transportation Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk.

Serious injury means any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date of the injury was received; (2) Results in a fracture of any bone (except simple fractures of fingers, toes, or noses); (3) Causes severe hemorrhages, nerve, muscle, or tendon damage; (4) Involves any internal organ; or (5) Involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface.

Small public transportation provider means a recipient or subrecipient of Federal financial assistance under 49 U.S.C. 5307 that has one hundred (100) or fewer vehicles in peak revenue service and does not operate a rail fixed guideway public transportation system.

State means a State of the United States, the District of Columbia, Puerto Rico, the Northern Mariana Islands, Guam, American Samoa, and the Virgin Islands.

State of good repair means the condition in which a capital asset is able to operate at a full level of performance.

Transit agency means an operator of a public transportation system.

Transit Asset Management Plan means the strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit capital assets to manage their performance, risks, and costs over their life cycles, for the purpose of providing safe, cost-effective, and reliable public transportation, as required by 49 U.S.C. 5326 and 49 CFR part 625.

10. Acronyms and Abbreviations.

Acronym or Abbreviation	Meaning
ARC	Accident Review Committee
ASP	Agency Safety Plan
CFR	Code of Federal Regulations
COR	City of Rochester, MN
CSO	Chief Safety Officer
DOT	Department of Transportation
DUI	Driving Under the Influence
DWI	Driving While Intoxicated
ESC	Executive Safety Committee
ESRP	Employee Safety Reporting Program
FGA	First Group America
F.O.R.M.	First Occupational Rehabilitation Management
FTA	Federal Transit Administration
HR	Human Resources
LGM	General Manager
LOTO	Lock-Out/Tag-Out
LSM	Location Safety Manager
MNDOT	Minnesota Department of Transportation
MNT	Maintenance
OPS	Operations
OSHA	Occupational Safety & Health Administration
PPE	Personal Protective Equipment
PRM	Performance Review Management
PTASP	Public Transportation Agency Safety Plan
ROCOG	Rochester Olmsted Council of Governments
RPT	Rochester Public Transit (Both City of Rochester and First Transit)
SMPS	Safety Management Policy Statement
SMS	Safety Management System
SOP	Standard Operating Procedure
SRC	Safety Resource Center
SRM	Safety Risk Management
SST	Safety Solutions Team
UK	United Kingdom
VP	Vice President

Appendix A: First Transit Safety Policy

Safety Management Policy Statement

Introduction

Global in scale and local in approach, First Transit is an organization which combines a robust corporate structure with strong customer-centric, local operations. Throughout the company, our focus is conducting our business in a way that aligns with our core values:

- Committed to our customers
- Dedicated to Safety
- Supportive of Each Other
- Accountable for Performance
- Setting the Highest Standards

We believe these values to be essential components in our aim to achieve ZERO safety events, resulting in ZERO harm to our customers, our employees, our shareholders, and the environments in which we operate. First Transit's Safety Management System (SMS) encourages all First Transit employees to replace risky behaviors and thought processes that jeopardize safety in the workplace. Through the program, we are striving to build a cultural identity that is continually focused on safety. First Transit has adopted the core philosophy of, ***"Think Safe, Act Safe, BeSafe"***

Safety Management Policy

At the core of First Transit's mission is the commitment to protecting the safety and well-being of our passengers and employees. Our ***"Be Safe"*** program is the foundation of First Transit's Safety Management System (SMS) with three clear objectives:

1. To make progress on our way to "Zero Harm"
2. To make safety a personal core value through behavior change
3. To improve business performance

"Be Safe" – the driving force behind First Transit's Safety Management Policy - focuses on recognizing and acknowledging safe behavior and actions through positive reinforcement. All employees are empowered to report unsafe acts and working conditions without fear of reprisal.

Safety Management Policy Statement

The guiding principles that drive First Transit's SMS program are:

- **Knowledge:** Our greatest efforts will be directed at the key safety behaviors that will help reduce incidents.
 - **Recognition:** While not ignoring actions that undermine safety, the focus will be on acknowledging colleagues "doing it right" and positively reinforcing these actions.
 - **Openness:** Regular positive coaching interactions, or "touchpoints" will take place and communication at "debriefs" will be open and honest.
 - **Learning:** Reporting of incidents and near misses will be seen as learning opportunities to continuously improve work place safety.
- Courage:** We are all empowered to accept responsibility for our own safety and the safety of our colleagues and customers. If you assess something to be unsafe, you should have the courage to stop and find a safer way of doing things.

Performance improvement in all aspects of First Transit's operations is based on four key elements: *Leadership and Engagement; Risk Reduction; Safety Management; and Performance Management*. Each element includes safety as a top priority.

Leadership and Engagement depends upon honest and open communication from all employees; data collection from which critical decisions are formulated that impact daily, short term, and long-term operations; resource management; and future direction of First Transit.

Risk Reduction includes our comprehensive audit and inspection regime; hazard identification and reporting; continuous training and safety campaigns; employee safety evaluation reporting programs and procedures; employee and management observation of operations; and compliance assurance of FTA, DOT, and OSHA safety and operating requirements and recommendations.

Safety Management at First Transit has many forms; including Safety Solution Teams, Accident Review Committees, Local Client Liaison Committees at each local operation; the corporate Safety Department which gathers, analyzes, and communicates the safety information throughout the organization; and enforces policies and procedures to ensure all employees are conducting their business in the safest manner possible.

Safety Management Policy Statement

Performance Management, the final key element, uses many Key Performance Indicators relating to safety to evaluate First Transit's progress toward Zero safety events. Daily reports; monthly location scorecards; the Critical Activity Record Entry program which captures and compares safety data monthly; major events calls, which alerts management in real time of safety events; and regular calls and meetings between mid-level and upper management to review safety concerns; are a sampling of the tools employed to ensure that safety is first and foremost in everything we do.

Ongoing Company-Wide Commitment

As President of First Transit, I know our commitment and passion for safety runs far deeper than the words contained in this policy statement. While our roles may vary, everyone in our organization, from the highest levels of management to the employees on the street, has a responsibility for their own safety as well as the safety of colleagues and customers; and to perform the daily tasks of providing public transportation in as safe a manner as possible.

We at First Transit depend on every member of our team to do everything possible to protect our resources and environment from harm, now and into the future. We take great pride in this responsibility and our ability to meet these expectations.

Sincerely,

Bradley A. Thomas

President



REQUEST FOR ACTION

Rochester Public Transit Agency Safety Plan Update

MEETING DATE:

November 14, 2022

ORIGINATING DEPT:

Public Works

AGENDA SECTION:

Consent Agenda

PRESENTER:

Michael Valverde

Action Requested:

Adopting a Resolution approving Rochester Public Transit's Agency Safety Plan update.

Report Narrative:

Rochester Public Transit (RPT) has updated its Agency Safety Plan to comply with new requirements from the recently passed Bipartisan Infrastructure Law that apply to Transit Agencies with an Agency Safety Plan. The new requirements relevant to Rochester Public Transit are the addition of agencies to address strategies to minimize exposure to infectious diseases, consistent with Centers for Disease Control and Prevention or State health authority guidelines, as well as having the Agency Safety Plan developed in cooperation with frontline employee representatives.

These new requirements must be included in Agency Safety Plans by December 31, 2022.

RPT needs the Council to approve the adoption of this plan to finalize the update and be in compliance with Federal Transit Administration (FTA) requirements.

On July 19, 2018, FTA published the Public Transportation Agency Safety Plan (PTASP) Final Rule, which requires certain operators of public transportation systems that receive federal funds under FTA's Urbanized Area Formula Grants to develop safety plans that include the processes and procedures to implement Safety Management Systems (SMS).

The PTASP rule became effective on July 19, 2019. FTA published a Notice of Enforcement Discretion on April 22, 2020, effectively extending the PTASP compliance deadline from July 20 - December 31, 2020.

Priorities & Foundational Principles:

Public Safety

Policy Considerations & DEI Impact:

Having an up-to-date Agency Safety Plan is important to public safety as it assists in creating and implementing processes that reduce safety risks and incidents that occur as part of providing public transportation.

Prior Legislative Actions & Community Engagement:

October 19, 2020: Council Meeting - Approved the original Agency Safety Plan

August 19, 2022: Frontline transit employee representatives were briefed on the mission and purpose of the agency safety plan at a Safety Solutions meeting and given until the following Safety Solutions Meeting on September 16, 2022, to provide comments or other input.

Fiscal & Resource Impact:

Approval of the Agency Safety Plan will not impact the budget.

Alternative Action(s):

No alternative actions are suggested at this time.

Prepared By:

Michael Valverde

Attachments:

[Exhibit - Rochester Public Transit Agency Safety Plan Update](#)

[Resolution - Rochester Public Transit Agency Safety Plan Update](#)