What is the Safety Management Policy Statement?

In the preamble to Part 673, FTA describes the Policy Statement as a written document that clearly states the organization’s safety objectives and sets forth the policies, procedures, and organizational structures necessary to accomplish the safety objectives. In addition, the document clearly delineates management and employee responsibilities for safety throughout the organization. The Policy Statement can help ensure management is actively engaged in the oversight of the organization’s safety performance because the PTASP, as a whole, must be reviewed and signed annually by the designated Accountable Executive.

Checklist of Key Elements

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| Requirements | | |
| As specified in § 673.23, your agency’s Policy Statement must: | | |
|  | □ | Be a written document |
|  | □ | Include your agency’s safety objectives |
|  | □ | Be communicated throughout your agency |
| Considerations | | |
| In addition, as discussed in the preamble to Part 673, your agency’s Policy Statement may: | | |
|  | □ | Explicitly commit your agency to SMS |
|  | □ | Specify the safety management authorities, accountabilities, and responsibilities of agency personnel |
|  | □ | Convey your agency’s safety objectives through safety performance targets |
|  | □ | Describe or reference your agency’s Employee Safety Reporting Program |

Required Elements

The Safety Management Policy Statement, just like your SMS, will reflect your agency’s unique size and operating characteristics. You may choose to consider these examples as you develop policy text tailored to your system.

Be a written document

The Policy Statement must be written down. It can be one paragraph, one page, or multiple pages. It can stand alone or reference other plans, policies, or procedures. It can be issued in paper or electronic copy, as part of the PTASP or separately. The Accountable Executive may choose to sign it separately or it may be included as part of the signed PTASP.

Examples provided in the sections below include text that can be used by your agency to support development of the written Policy Statement, and also includes several complete sample statements for your review.

Include your agency’s safety objectives

Safety objectives provide a broad description of your agency’s overarching safety goals, which usually reflect your agency’s unique needs and circumstances. The objectives can be brief, high-level statements that set the foundation for safety performance targets that may be used by your agency to assess its safety performance and the effectiveness of its SMS. Each year you will need to review and update, as needed, your safety objectives (along with the rest of the PTASP) will be reviewed and updated, as needed, every year, and therefore can be most useful when they address your agency’s immediate safety priorities.

Agencies may choose to develop safety objectives based on the following:

* Leadership goals and priorities
* Targeted areas for improvement
* Strategic and long-term goals, and/or
* Local, regional, or state concerns

Most agencies have already developed and implemented safety objectives that can serve as a starting point for the Policy Statement. Before including existing safety objectives in the Policy Statement, your agency may find it helpful to ensure the objectives reflect current operating realities and fit into the agency’s safety management approach.

Safety objectives may be broadly worded, for example “to ensure employee and passenger safety,” “to continually improve safety performance,”or “to implement an effective SMS.” They can also be more specific, for example“reduce slips and falls on escalators in our system.,” “improve mobility device securement on fixed-route buses,” or “decrease employee injuries on duty.”

Additional examples of safety objectives include:

* **TRANSIT AGENCY** aims to support a robust safety culture. We will conduct an annual safety culture survey of our employees and share results throughout our organization, working with our employees to develop and track initiatives that support continuous improvement.
* We will support [city name]’s Vision Zero strategy by reducing the number of safety events caused by excessive speeds of our transit vehicles.
* For our first annual PTASP, we will reduce safety events overall, as specified in our safety performance targets.
* We are committed to improving our preventative maintenance practices and reducing our annual number of maintenance road calls.
* We plan to double the current level of coaching provided to our operators, enhancing their skills, and making them the safest drivers on the road.

Be communicated throughout your agency

The Policy Statement must be communicated throughout the transit agency, including to the Board of Directors (or equivalent authority), all employees, and contractors.

Here are a few examples of how transit agencies may describe safety management policy communication in the Policy Statement or the PTASP:

* This Safety Management Policy Statement will be communicated., with visible endorsement by [Accountable Executive’s name], throughout the organization.
* **TRANSIT AGENCY** will distribute this Safety Management Policy Statement to each employee as an attachment to payroll and will review it with employees during employee safety meetings and toolbox talks with supervisors. A special session will be conducted with our Board of Directors to review the Policy Statement and discuss SMS implementation.

Additional documentation may be necessary to demonstrate this communication, pursuant to §673.31.

Elements for Consideration

A Safety Management Policy Statement helps to ensure that individuals at all levels of a transit agency understand the agency’s principal safety management commitments and policies. The Policy Statement can serve to introduce the SMS within the broader context of the transit agency’s mission and commitment to safety. Also, it can express the value agency leadership and executive management place on employee safety reporting, among other elements of an SMS. Other parts of a PTASP may provide more detailed guidance on how the SMS will operate and continuously improve.

This section provides information and examples regarding elements your agency may choose, but is not required, to include in the Policy Statement.

Explicitly commit your agency to SMS

The Policy Statement provides an opportunity to explicitly commit the transit agency and its leadership and executive management to the SMS. In carrying out this function, the Policy Statement may, for example:

* Make a clear statement of commitment to SMS,
* Commit executive management to ensuring availability of necessary resources and people to implement the SMS effectively, and/or
* Commit executive management to leading the development of a strong safety culture.

Here are a few examples of how transit agencies may express commitment to SMS in the Policy Statement:

* **TRANSIT AGENCY** will maintain a(n) SMS appropriately scaled to the size, scope, and complexity of the agency.
* The management team at **TRANSIT AGENCY** will embrace the SMS and is committed to developing, implementing, maintaining, and constantly improving processes to ensure the safety of our employees, customers and the general public.
* Safety is a core value of **TRANSIT AGENCY**. **TRANSIT AGENCY** will use SMS processes to direct the prioritization of safety and allocate our organizational resources-people, processes, and technology-in balance with our other core business functions.
* **TRANSIT AGENCY** commits to implementing a(n) SMS to support the management of safety through the provision of appropriate resources and the encouragement of an organizational culture that fosters safe practices, and enables effective employee safety reporting and communication.

Specify the safety management authorities, accountabilities, and responsibilities of agency personnel

The Policy Statement may describe at a high level, or reference, the safety management authorities, accountabilities, and responsibilities required as part of Safety Management Policy at§ 673.23. The Policy Statement may commit the transit agency to defining accountabilities and responsibilities, and to holding individuals at all levels accountable for delivery of safety performance and the performance of the SMS. For example, the Policy Statement may clarify that:

* Safety management authorities, accountabilities, and responsibilities will be defined;
* Safety management roles and responsibilities will be different for different job functions; and/or
* Everyone, including agency leadership and executive management, will be held accountable for carrying out their individual responsibilities regarding safety performance and performance of the SMS.

Here are a few examples of how transit agencies may choose to address safety management authorities, accountabilities, and responsibilities at a high level in the Policy Statement:

* Executive management will lead the development of an organizational culture that promotes safe operations and provides appropriate resources to supporting this core management function by fostering and ensuring safe practices., improving safety when needed., and encouraging effective employee safety reporting and communication. **TRANSIT AGENCY** will hold executives., managers., and employees accountable for safety performance.
* Ultimate responsibility for safety rests with me as the Accountable Executive. Responsibility for making our operations safer for everyone lies with each one of us­ from executive management to frontline employees. Each manager is responsible for implementing the SMS in their area of responsibility and will be held accountable to ensure that all reasonable steps are taken to perform activities established as part of the SMS.
* All levels of management are responsible for ensuring the performance of **TRANSIT AGENCY**‘s SMS. Managers must take an active role in the Safety Risk Management (SRM) process and ensure that Safety Assurance (SA) functions are adequately supported. Managers also are responsible for ensuring that SRM is being performed in their operational areas of control so that safety risk associated with safety hazards is assessed and mitigated. As of July 1, 2020, safety performance targets will be an important part of performance evaluations for **TRANSIT AGENCY** managers and employees. All employees and contractors will support safety management by ensuring that safety concerns are identified and reported.
* All levels of management and all employees are accountable for the delivery of the highest level of safety performance, starting with the Accountable Executive. **TRANSIT AGENCY** will integrate the management of safety among the primary responsibilities of all managers and employees., as defined in all **TRANSIT AGENCY** job descriptions.

Convey your agency’s safety objectives through safety performance targets

As explained in the preamble to Part 673, within the context of the PTASP, an organization’s safety objectives will be articulated through the setting of performance targets based on, at a minimum, the safety performance measures established in the National Public Transportation Safety Plan. These performance measures may be referenced or included in the Policy Statement to illustrate how your agency will assess its overall safety performance.

Since safety objectives may address your agency’s most significant safety priorities, you may choose to include one or more high-level safety performance measures (or indicators), and safety performance targets, for each safety objective in the Policy Statement. While not required, including measures and targets in the Policy Statement can make your safety objectives more easily understood, and perhaps, more meaningful to agency personnel.

By providing safety performance targets that reflect your agency’s safety objectives, the Policy Statement can clearly define the expectations of agency leadership and executive management regarding the agency’s safety performance. These safety performance targets may be the same or different than the targets required under §673.11(a)(3).

By including safety performance targets, the Policy Statement can:

* Explain that safety must be actively managed with attention to results;
* Emphasize the importance of realistic, data-driven safety performance targets;
* Emphasize the importance of safety performance monitoring and measurement; and/or
* Commit the agency to take action to ensure continuous improvement of its SMS.

For example, if one of your safety objectives is to“ensure your employees are well-trained and prioritize safety in all they do,” then your agency may choose to specify, for example, the percentage of safety training that will be completed in the coming year and commit to implementing the new audit program developed to observe workplace safety practices.

Here is an example of how your agency could use safety performance targets in the Policy Statement to address an enhanced emphasis on hazard identification and safety risk mitigation:

Our overall safety objective is to proactively manage safety hazards and their associated safety risk, with the intent to eliminate unacceptable safety risk in our transit operations.

To that end, we will continuously examine our operations for hazards. We will establish a non-punitive employee safety reporting program, train staff on safety management, document our findings and safety risk mitigations, and strive for continuous improvement of our safety performance.

As required by the Federal Transit Administration, we have established annual safety performance targets to help us measure the safety of our transit service. In addition, to address our overall safety objective, we will conduct hazard identification workshops with all frontline, supervisory, and management personnel during this calendar year. We also will work to increase the annual number of voluntary reports received from employees by 20 percent and actively track our safety risk mitigations. To ensure we meet this objective, our safety department will report out each quarter to our entire agency on the number of:

* Hazard identification workshops carried out in the quarter;
* Number and type of hazard reports received per employee in the quarter, versus the same quarter last year; and
* Number and type of safety risk mitigations implementation in the quarter.

Describe or reference your agency’s Employee Safety Reporting Program

The Policy Statement could address the agency’s Employee Safety Reporting Program. This may be particularly useful if the Policy Statement is the primary method for informing agency personnel about the agency’s SMS. For example, the Policy Statement could clarify:

* That the agency will establish and support the program, and make necessary changes to encourage safety reporting; and/or
* How employees will be expected to use the reporting program.

The reporting program should allow employees to report safety conditions to senior management without fear of reprisal from supervisors or other agency personnel. An effective program can put safety critical information in the hands of the individuals who can assign responsibilities and resources to resolve safety concerns before they become safety events.

Here are a few examples of how transit agencies may choose to document employee safety reporting in the Policy Statement:

* Executive management will establish a safety reporting program as a viable tool for employees to voice their safety concerns. No disciplinary action will be taken against any employee who communicates a safety concern through the **TRANSIT AGENCY** safety reporting program unless such disclosure indicates the following: an illegal act, gross misconduct and/or negligence, or a deliberate or willful disregard of **TRANSIT AGENCY** rules, policies, and procedures.
* **TRANSIT AGENCY** commits to providing appropriate management involvement and the necessary resources to establish an effective reporting system that will encourage employees to communicate and report any unsafe work conditions, hazards, or at-risk behavior to the management team. **TRANSIT AGENCY** will ensure that no action will be taken against employees who disclose safety concerns through the reporting system, unless disclosure indicates an illegal act, gross negligence, or deliberate or willful disregard of regulations or procedures.

**TRANSIT AGENCY** will establish and operate an employee safety reporting program as a fundamental source for safety concerns and hazard identification; and ensure that no action will be taken against any employee who discloses a safety concern through the employee safety reporting program, unless disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures.