



Working Lunch

Non-punitive Safety Reporting

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Rule Overview

The Employee Safety Reporting Policy belongs to Safety Management Policy (SMP)



Employee Safety Reporting Program §673.23(b)

- Must establish and implement a process that allows **all employees** – including relevant contract employees – to **report safety conditions to senior management**
- Intended to help the Accountable Executive and other senior managers get important safety information from across the transit agency
- The program can be an agency's most important source of information



Employee Safety Reporting Program §673.23(b)

- Reported **safety conditions** could include:
 - Hazards
 - Potential consequences of hazards
 - Other relevant safety information
- Must **specify protections** for employees who report safety conditions to senior management (Part 673 does not specify what those protections must be)
- Must describe employee behaviors that may result in disciplinary actions; therefore, would not be covered by protections
- **Must inform employees of safety actions taken in response to reports** submitted through an employee safety reporting program – §673.29(b)



Employee Safety Reporting Program §673.23(b)

- Part 673 does not specify which methods should be used; transit agencies may consider:
 - Hotline
 - SharePoint site or form
 - Paper form
 - Phone or tablet app
 - Safety meetings or toolbox talks



Safety Assurance – Follow-up Procedures

- How often reports are reviewed/discussed?
- How the reports are assigned?
- Prioritization- how this fits in with an overall hazard ranking and tracking system?
- Corrective Action Plans
- How to ensure corrective action plans work effectively?

