Jump Around Carson (JAC) Transit System

Federal Fiscal Year 2024
PUBLIC TRANSPORTATION AGENCY SAFETY PLAN (PTASP)

1. Transit Agency Information

Transit Agency Name	Jump Around Carson (JAC)
Transit Agency Address	3505 Butti Way, Carson City, NV 89701
Name and Title of Accountable Executive	Christopher Martinovich, Transportation Manager
Name of Chief Safety Officer	Dan Kelsey, Transit Coordinator

Mode(s) of Service Covered by This Plan	Fixed Route; Complementary Paratransit	**List All FTA Funding Types (e.g., 5307, 5310, 5311)**	5307, 5310, 5339

Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)	Fixed Route; Complementary Paratransit		
Does the agency provide transit services on behalf of another transit agency or entity?	Yes ☐ No ☒	**Description of Arrangement(s)**	N/A
Name and Address of Transit Agency(ies) or Entity(ies) for Which Service Is Provided	N/A		

2. Plan Development, Approval, and Updates

Name of Entity That Drafted This Plan	Jump Around Carson	
Signature by the Accountable Executive	Signature of Accountable Executive	Date of Signature
	[signature]	12/13/2023

Approval by the Board of Directors or an Equivalent Authority	Signature/Name of Individual/Entity That Approved This Plan	Date of Approval
	[signature] Lori Bagwell, Chair, Carson Area Metropolitan Planning Organization	12/13/2023
	Relevant Documentation (title and location)	
	The Carson Area Metropolitan Planning Orgnaization Board certified this plan as so indicated by the signature of the Board Chair on the date noted above and confirmed by meeting munites from December 13, 2023 available on CAMPO's website.	

Certification of Compliance	**Name of Individual/Entity That Certified This Plan**	
	Christopher Martinovich, Accountable Executive	
	Relevant Documentation (title and location)	
	Transportation Manager, Carson Area Metropolitan Planning Organization	

Certification by Frontline Employees on developing and updating the ASP	**Name of Individual/Entity That Certified This Plan**	**Date of Certification**
	[signature]	12/13/2023
	Michael Peoples	12/13/2023
	Relevant Documentation (title and location)	
	General Manager, First Transit, Carson City	12/13/2023

Version Number	Section/Pages Affected	Reason for Change	Date Issued
3	Sections 2, 3	Recertification of Document with changes noted below. -Updated Approval Section to reflect addition of Frontline Employee review and certification. -Updated performance targets to reflect FFY 2023 goals.	December 14, 2022
4	Sections 1, 2, 3	Recertification of Document with changes noted below. -Updated Chief Safety Officer -Updated Approval Section with new Frontline Employee -Updated performance targets to reflect FFY 2024 goals.	December 13, 2023

Annual Review and Update of the Public Transportation Agency Safety Plan

Describe the process and timeline for conducting an annual review and update of the Public Transportation Agency Safety Plan.

The Accountable Executive and Chief Safety Officer will review the plan each year during the fourth quarter of the federal fiscal year and make changes and updates as necessary, including annually establishing safety performance measures. Further updates will be made at any point when information, processes, or activities required under 49 CFR 673 undergo significant changes.

3. Safety Performance Targets

Safety Performance Targets

Specify performance targets based on the safety performance measures established under the National Public Transportation Safety Plan.

Jump Around Carson worked to set Safety Performance Targets that reflect the importance of safety at Jump Around Carson. Using the incidence of fatalities, injuries and safety events per Vehicle Revenue Mile will allow Jump Around Carson to assess the level of safety of the transit system as a whole. For FFY 2024, Jump Around Carson has chosen to continue FFY 2023's strong safety targets that show a commitment to zero fatalities and zero injuries.

- *Fatalities*, and *Fatalities per Vehicle Revenue Mile:* Total number of reportable fatalities and Rate of Fatalities per total vehicle revenue miles (VRM), by mode.
  - JAC's performance target will be zero fatalities.
- *Injuries*, and *Injuries per Vehicle Revenue Mile:* Total number of reportable injuries and Rate of Injuries per total vehicle revenue miles (VRM), by mode.
  - JAC's performance target will be zero injuries for the year, and .00001 injuries per VRM (1 injury per 50,000 VRM) for fixed route and .00001 injuries per VRM (1 injury per 100,000 VRM) for paratransit.
- *Safety Events*, and *Safety Events per Vehicle Revenue Mile:* Total number of reportable events (Event, as defined in the 2021 NTD Reduced Reporter Policy Manual) and rate of reportable events per total vehicle revenue miles (VRM), by mode.
  - JAC's performance target will be two (2) safety events in total for the year for fixed route and zero (0) safety events for paratransit for the year. The goals per Vehicle Revenue Mile will be .00001 safety events per VRM (1 Safety Event per 100,000 VRM) for fixed route and .00001 safety events per VRM (1 Safety Event per 100,000 VRM) for paratransit.
- *System Reliability:* Mean (or average) distance in miles between major mechanical failures, by mode.

	Fatalities	Injuries	Safety Events	System Reliability	Fatalities / VRM	Injuries / VRM	Safety Events / VRM
Fixed Route	0	0	2	3,000	0	0.00001	0.00001
Paratransit	0	0	0	4,000	0	0.00001	0.00001

Safety Performance Target Coordination

Describe the coordination with the State and Metropolitan Planning Organization(s) (MPO) in the selection of State and MPO safety performance targets.

JAC, as the transit provider operating under an agreement between the Consolidated Municipality of Carson City, the Carson City Regional Transportation Commission, and the Carson Area Metropolitan Planning Organization (CAMPO), coordinates the selection of its safety performance targets with the Nevada Department of Transportation (NDOT) on an ongoing basis through participation in the Planning Executive Group. NDOT works closely with the MPO and transit provider to develop the safety performance targets.

Targets Transmitted to the State	State Entity Name	Date Targets Transmitted
	Nevada Department of Transportation	12/14/2023
Targets Transmitted to the Metropolitan Planning Organization(s)	**Metropolitan Planning Organization Name**	**Date Targets Transmitted**
	Carson Area Metropolitan Planning Organization	12/13/2023

4. Safety Management Policy

Safety Management Policy Statement

Include the written statement of safety management policy, incorporating safety objectives.

JAC, CAMPO, and Carson City are committed to the safe operation and administration of a public transit system that offers reliable, accessible, and convenient service. Implementation of this agency safety plan is done for federal compliance purposes. Implementation is also to be used as an administrative management process that combines the actions of agency communication, safety, and performance measurement with the desired outcome of a safe and reliable transit system. It is believed that implementing this Agency Safety Plan (ASP) will allow us to meet our overarching objective of providing safe, efficient, reliable, and accessible public transit to the Carson City area and its residents. JAC is committed to achieving this objective through the following methods:

- Communication of purpose and benefits of the Safety Management System (SMS) to all staff, managers, supervisors, and employees.
- Provide appropriate management involvement and the necessary resources to establish an effective employee safety reporting program (ESRP) that will encourage employees to communicate and report any unsafe work conditions, hazards, or at-risk behavior to the management team.
- Provide a culture of open reporting of all safety concerns, ensuring that no action will be taken against any employee who discloses a safety concern through the ESRP, unless such disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures.
- Identify hazardous and unsafe work conditions and analyze data from the ESRP. After thoroughly analyzing relevant data, managers and key staff will develop processes and procedures to mitigate any identified safety risk to an acceptable level.
- Establish safety performance targets that are realistic, measurable, and data driven. Continually improve safety performance through management processes that ensure appropriate safety management action is taken and is effective.

Christopher Martinovich, Transportation Manager and Accountable Executive

Safety Management Policy Communication

Describe how the safety management policy is communicated throughout the agency's organization. Include dates where applicable.

The Chief Safety Officer and Account Executive will work with JAC's contract operator to communicate the Safety Management Policy as referenced on page 7 of Appendix 1, "Communication of Local Safety Concerns". The Chief Safety Officer and Account Executive will work with the Location Safety Manager and General Manager to ensure the Location Safety Manager compiles all safety reports referenced on page 7 of Appendix 1 and will be debriefed on any issues brought forth during the Safety Solutions Team meetings. All safety reports will be transmitted to the Chief Safety Officer, as described in Section 8 of this ASP, to be retained for a minimum of three (3) years.

Authorities, Accountabilities, and Responsibilities	
Describe the authorities, accountabilities, and responsibilities of the following individuals for the development and management of the transit agency's Safety Management System (SMS).	
Accountable Executive	Carson City/CAMPO's Transportation Manager serves as the Accountable Executive for JAC and has the following authorities, accountabilities, and responsibilities under this plan: • Designates an adequately trained Chief Safety Officer who is a direct report. • Ensures that JAC's SMS is effectively implemented by Jump Around Carson staff and the contract operator. • Maintains responsibility for carrying out JAC's Transit Asset Management Plan.
Chief Safety Officer	The Accountable Executive designates the Transit Coordinator as the Chief Safety Officer. The Chief Safety Officer has the following authorities, accountabilities, and responsibilities under this plan: • Ensures and oversees contract operator's day-to-day implementation and operation of JAC's SMS. • Advises the Accountable Executive on SMS progress and status. • Identifies substandard performance in JAC's SMS and develops action plans for approval by the Accountable Executive. • Ensures JAC policies are consistent with JAC's safety objectives.
Agency Leadership and Executive Management	Agency leadership and executive management have authorities and responsibilities for day-to-day SMS implementation and operation of JAC's SMS under this plan. Carson City contract operator leadership and executive management include the following positions: • Contract operator location General Manager • Contract operator location Operations Manager/Safety Manager Leadership and management personnel have the following authorities, accountabilities, and responsibilities: • Participate as members of JAC's Safety Solutions Team (SST) as defined on page 22 of Appendix 1 • Complete training on SMS and JAC's ASP elements. • Oversee day-to-day operations of the SMS. • Modify policies in their departments consistent with implementation of the SMS, as necessary.
Key Staff	Additional Key staff include Contract Operator representatives, as listed in Appendix 1, page 10: Vice President of Safety – First Transit Senior Director of Safety Region Safety Director – West Region Region Safety Manager – West Region Please refer to page 11 of Appendix 1 for the Safety Responsibility and Task Matrix for local contract operator staff.

Employee Safety Reporting Program
Describe the process and protections for employees to report safety conditions to senior management. Describe employee behaviors that may result in disciplinary action (and therefore, are excluded from protection).
Jump Around Carson has implemented the ESRP found on page 14 of Appendix 1. Possible behaviors that may result in disciplinary action can be found on page 18 of Appendix 1.

5. Safety Risk Management

Safety Risk Management Process

Describe the Safety Risk Management process, including:

- *Safety Hazard Identification: The methods or processes to identify hazards and consequences of the hazards.*

- *Safety Risk Assessment: The methods or processes to assess the safety risks associated with identified safety hazards.*

- *Safety Risk Mitigation: The methods or processes to identify mitigations or strategies necessary as a result of safety risk assessment.*

The Safety Risk Management process is outlined in Appendix 1, beginning on page 22, and includes:

- Safety Hazard Identification: Beginning on page 23 of Appendix 1
- Safety Risk Assessment: Beginning on page 25 of Appendix 1
- Safety Risk Mitigation: Beginning on page 27 of Appendix 1

The Location General Manager will communicate to the Chief Safety Officer as items move through the Safety Hazard Identification process into the Safety Risk Assessment and the Safety Risk Mitigation process. This will keep the Chief Safety Officer aware of any potential safety issues as they are happening.

6. Safety Assurance

Safety Performance Monitoring and Measurement
Describe activities to monitor the system for compliance with procedures for operations and maintenance.
The Chief Safety Officer will work with the Location General Manager and Location Safety Manager to ensure compliance as indicated on page 28 of Appendix 1, and will routinely audit the SMS to ensure compliance, including at minimum, annually.
Describe activities to monitor operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.
The Chief Safety Officer and Location Safety Manager will review the performance of individual safety risk mitigations during Safety Solutions Team meetings and driver meetings. The Chief Safety Officer and Location Safety Manager will jointly determine if a specific safety risk mitigation has not been implemented or is not performing as intended. If the mitigation has not been implemented or is not performing as intended, the Safety Solutions Team will propose a course of action to modify the mitigation or take other action to manage the safety risk. The Chief Safety Officer will approve or modify this proposed course of action, will document the approval, and will oversee its execution.   The Chief Safety Officer and Safety Solutions Team monitor JAC's operations to identify mitigations that may be ineffective, inappropriate, or not implemented as intended.   The Chief Safety Officer works with the Safety Solutions Team and communicates with the Accountable Executive to carry out and document all monitoring activities.
Describe activities to conduct investigations of safety events to identify causal factors.
The Chief Safety Officer, along with the contract operator, will conduct investigations according to the processes described on page 29 of Appendix 1. The results of any investigations will be documented by the Chief Safety Officer and retained for a minimum of three (3) years.
Describe activities to monitor information reported through internal safety reporting programs.
The Chief Safety Officer, along with the contract operator, will monitor information reported according to the processes described on page 30 of Appendix 1. Monitoring information will be used to inform the annual review and update of this ASP and annual performance measure target setting.

7. Safety Promotion

Competencies and Training

Describe the safety training program for all agency employees and contractors directly responsible for safety.

The Chief Safety Officer, upon hire, will be trained on all relevant policies and procedures by the Accountable Executive and will undergo refresher training annually along with an annual review of the ASP. Training for agency employees will be conducted according to the training program beginning on page 36 of Appendix 1. The Chief Safety Officer will work with the Location Safety Manager to ensure all training is being done in a timely fashion for all affected employees. JAC staff (Carson City Public Works Department, Transportation Division) will be required to review this ASP, including information on hazards and safety risks relevant to employees' roles and responsibilities annually.

Safety Communication

Describe processes and activities to communicate safety and safety performance information throughout the organization.

JAC will utilize the processes and activities outlined on page 43 of Appendix 1 to communicate safety and safety performance information throughout Jump Around Carson. The Chief Safety Officer will work closely with the Safety Solutions Team to ensure reciprocal communication between Carson City and the contract operator.

8. Additional Information

Supporting Documentation

Include or reference documentation used to implement and carry out the Safety Plan that are not included elsewhere in this Plan.

Supporting documentation can be found at page 45 of Appendix 1. ASP documentation will be maintained for a minimum of three years. JAC will provide these documents to the FTA and other federal/state entities upon request. The Chief Safety Officer will maintain on file Safety Solutions Team minutes, information collected as part of the hazard identification process, completed Daily Safety & Health Walkthrough and Checklist forms and additional information collected or created for a period of three years from the date of generation. SMS documentation and records will also be readily available to those with accountabilities for SMS performance or responsibilities for SMS implementation and operation. Below is a categorized list of information and documentation that may be kept as part of the ASP file:

- Existing safety performance measures (under NTD)
- Casualties
    - Fatalities (customers, employees, and the public)
    - Injuries (customers, employees, and the public)
- Property damage
- Reportable events (Accidents) found in Safety Toolbox (pg. 28 of Appendix 1)
    - Collisions (vehicle-to-vehicle, vehicle-to-person, vehicle-to-object)
    - Collisions at grade-crossings
    - Fires
    - Evacuations for life safety reasons

- Results from reportable event (accident) investigations found in Safety Toolbox (pg. 28 of Appendix 1)
    - Probable cause
    - Contributing factors
    - Corrective actions

- Safety risk management and monitoring information
    - Safety Responsibility and Task Matrix (pg. 11 of Appendix 1)
    - Daily Safety & Health Walkthrough & Checklist (pg. 24 of Appendix 1)
    - Hazard Recognition Manual (pg. 24 of Appendix 1)
    - Facility Parking Risk Management Assessment (pg. 25 of Appendix 1)
    - On-Board Video Technology (pg. 25 of Appendix 1)
    - Risk Assessment Matrix (pg. 25 of Appendix 1)

Relation to the Transit Asset Management (TAM) Plan:

While there are no formal requirements linking TAM and SMS, there are many opportunities to share information and analysis between the two processes, thus improving actions and decision-making agency wide. The following are key linkages between the two plans:

- The Accountable Executive reviews and approves both the TAM and ASP plans.
- Condition assessments, which are required under the TAM rule, can identify potential safety issues. The result of a condition assessment required under the TAM rule may compel JAC to perform risk assessment and quality assurance in accordance with SMS, for facilities, equipment, rolling stock, and infrastructure in poor condition.
- TAM data and analysis can be used for performance monitoring and measurement in safety assurance.
- The outcome of a safety risk assessment in SRM, or safety performance monitoring and measurement in safety assurance, could inform resources for TAM, and the prioritization of an asset for repair or replacement.
- The outcome of a safety risk assessment in SRM, or safety performance monitoring and measurement in safety assurance, could inform resources for TAM.

9. Definitions of Special Terms Used in the Safety Plan

JAC incorporates all of FTA's definitions listed in 49 CFR § 673.5 of the Public Transportation Agency Safety Plan regulation.

Term	Definition
Accident	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	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	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	Any Accident, Incident, or Occurrence
Hazard	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	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	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	The plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53
Occurrence	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)	A provider of public transportation as defined under 49 U.S.C. 5302
Performance Measure	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	A quantifiable level of performance or condition, expressed as a value for the measure, to be achieved within a time period required by the FTA

Term	Definition
Public Transportation Agency Safety Plan (or Agency Safety Plan)	The documented comprehensive Agency Safety Plan for a transit agency that is required by 49 U.S.C. 5329 and Part 673
Risk	The composite of predicted severity and likelihood of the potential effect of a hazard
Risk Mitigation	A method or methods to eliminate or reduce the effects of hazards
Safety Assurance	The processes within a transit agency's Safety Management System that function 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 Management Policy	A transit agency's documented commitment to safety, which defines the transit agency's safety objectives and the accountabilities and responsibilities of its employees regarding safety
Safety Management System	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 Performance Target	A performance target related to safety management activities
Safety Promotion	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	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	A process within a transit agency's Agency Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk
Serious Injury	Any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date when 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
Transit Agency	An operator of a public transportation system
Transit Asset Management Plan	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. List of Acronyms in the Safety Plan

Acronym	Definition
ASP	Agency Safety Plan
CAMPO	Carson Area Metropolitan Planning Organization
CFR	Code of Federal Regulations
ESRP	Employee Safety Reporting Program
FFY	Federal Fiscal Year
FTA	Federal Transit Administration
JAC	Jump Around Carson
MPO	Metropolitan Planning Organization
NDOT	Nevada Department of Transportation
NTD	National Transit Database
SMS	Safety Management System
SST	Safety Solutions Team
TAM	Transit Asset Management
VRM	Vehicle Revenue Mile

Appendix 1

First Transit Agency Safety Plan

First Transit Agency Safety Plan

1. Transit Agency Information

Transit Agency Name	First Transit
Transit Agency Address	600 Vine Street, Ste. 1400 Cincinnati, Ohio, U.S. 45202
Name and Title of Accountable Executive	David Perez, Vice President of Safety – First Transit
Name of Chief Safety Officer or SMS Executive	Paul Meredith, Senior Director of Safety

Mode(s) of Service Covered by This Plan	Transit Bus	**List All FTA Funding Types (e.g., 5307, 5310, 5311)**	
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)	First Transit is a business unit of First Group America, the U.S. based North American Operating Unit of FirstGroup plc (First Group), a United Kingdom-based passenger transportation company. First Group is the U.K.'s largest bus operator, with a fleet of more than 9,000 vehicles, and also one of the U.K.'s leading train operators. First Transit services the U.S. transportation industry through two unique service approaches: Transit Contracting, and Transit Management. With these two service approaches, First Transit has participated on assignments of all types, sizes and scopes throughout the world. **Transit Contracting** provides the design, implementation and operation of flexible, cost-effective transportation systems throughout the United States. Transit Contracting provides a turnkey or tailored service approach that supplies all or most components of operations including equipment, facilities, staffing, management and so forth. Such operational experience encompasses dial-a-ride, shared-ride taxi, services for the elderly and persons with disables, airport shuttle, commuter express, and fixed route service. **Transit Management Services** provides resident teams to manage public transit systems in various locations throughout the United States. Our approach to excellence combined with our teams' experience has yielded unmatched operating results and awards in the industry. First Transit offers a unique six-part approach to our **Safety Management System (SMS)** • Location Management Team (General Manager, Safety Manager) • Region Staff (Region Safety Manager, Region Safety Director, Region Maintenance Director & Region Vice President)		

- Senior Director of Safety
- Vice President of Safety
- Vice President of Maintenance
- President

A **Resident Management Team** is assigned to each location consisting of, in part, a Location General Manager (LGM) and a Location Safety Manager (LSM).
- The LGM participates fully with the client to ensure the operation is running effectively and acts as mediator when safety related problems arise. The LGM is also responsible for ensuring implementation of the National Safety Program.
- The LSM routinely is in contact with the operation and is responsible for ensuring their locations have the current safety programs in place; auditing local safety efforts; reviewing all accident and injury claims; reviewing performance statistics; and coordinating corporate assets to address specific deficiencies found on the local level.

Our **Region Staff** consists of a Region Safety Manager, Region Safety Director, Region Maintenance Director, Region Director of Operations, Region Vice Presidents.
- The Region Maintenance Director, The Region Director of Operations and Region Vice Presidents are responsible for the oversight of all First Transit locations within the region. They provide direction and assistance to location managers, including P&L, budgets, and personnel.
- The Region Safety Manager and Region Safety Director ensures management services are provided according to local governing board policies, as well as maintaining quality and client satisfaction, and their locations have the current safety programs in place.

The **Vice President of Safety** provides oversight for each individual region of First Transit. This person works with each Region Safety Manager and Region Director of Safety to ensure First Transit is in compliance with all FTA and DOT regulations.

The **Vice President of Maintenance** provides technical assistance, training, and "best practices" information to all of First Transit's managed systems.

The **President of First Transit** works closely with the Vice President of Safety - First Transit and Vice President of Maintenance. All safety processes are reviewed and approved before any decision regarding safety is approved.

Does the agency provide transit services on behalf of another transit agency or entity?	Yes X	No	**Description of Arrangement(s)**	FGA operates 335 contracts throughout North America to provide fixed-route and paratransit public bus service for state transportation departments and administrations; transit agencies; and universities.

Name and Address of Transit Agency(ies) or Entity(ies) for Which Service Is Provided	

2. Plan Development, Approval, and Updates

Name of Entity That Drafted This Plan *(Location Code)*	First Transit: *Loc #52753-Carson City*	
Signature by the Accountable Executive *(Location General Manager)*	**Signature of Accountable Executive**	**Date of Signature**
		9/17/2020
Approval by the Board of Directors or an Equivalent Authority *(Local Contract Authority)*	**Name of Individual/Entity That Approved This Plan**	**Date of Approval**
	Relevant Documentation (title and location)	
Certification of Compliance	**Name of Individual/Entity That Certified This Plan**	**Date of Certification**
	(Client Approver)	
	Relevant Documentation (title and location)	
	(First Transit Safety Plan and other Client Documentation)	

Version Number and Updates			
Record the complete history of successive versions of this plan.			
Version Number	**Section/Pages Affected**	**Reason for Change**	**Date Issued**
Original	All pages are original version	First Official version of Safety Plan	May 2019

Annual Review and Update of the Public Transportation Agency Safety Plan
Describe the process and timeline for conducting an annual review and update of the Public Transportation Agency Safety Plan.
At First Transit, review of safety practices is an ongoing process, not one limited to scheduled reviews. As policies/procedures and training techniques change throughout the year they are updated and communicated throughout the organization. All changes are reviewed and approved by the Senior Director of Safety and the Vice President of Safety – First Transit. Prior to the beginning of each fiscal year, First Transit's Safety Plan is reviewed by Executive management and revised based on the safety data collected and analyzed, and changes to policies and procedures made throughout the year. The revised plan is then disseminated to all First Transit locations for implementation.

3. Safety Performance Targets

Safety Performance Targets
Specify performance targets based on the safety performance measures established under the National Public Transportation Safety Plan.
Safety Targets are established in the main Agency Safety Plan, above.

4. Safety Management Policy

Safety Management Policy Statement

Include the written statement of safety management policy, incorporating safety objectives.

At First Transit, safety is more than a policy statement. Management believes that working safely promotes quality, productivity, and profitability. Prevention of collisions and personal injuries is of critical importance to everyone. Management is 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. **First Transit will not perform any service, nor transport or use a product, unless it can be done safely.**

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.

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 Company 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.

The motto for the BeSafe Principles is: **"Think Safe, Act Safe, BeSafe."** This motto is each employee's instruction to work safely at all times.

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 <u>before</u> any work begins.**
    - Speak to management **<u>before</u>** 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 **Attachment A.**

Safety Management Policy Communication

Describe how the safety management policy is communicated throughout the agency's organization. Include dates where applicable.

Communication of Local Safety Concerns

The Location Safety Manager is at the center of the local safety communication process and is responsible for compiling safety reports to include the following:
- Accident and injury data for previous month
- Security incident data
- Safety and security audit data and recommendations
- Safety Solutions Team (SST) meeting minutes
- BeSafe near miss and hazard reporting

This person reports directly to the Location General Manager (LGM) and routinely meets formally with the LGM, one-on-one, to provide updates on safety issues, safety priorities, and hazard management. The Location Safety Manager (LSM) also meets informally with the LGM to provide updates on safety issues on an as-needed basis.

The Location Safety Manager also participates in the Safety Solutions Team (SST) meetings to discuss safety priorities, safety issues, and hazard management, and to communicate safety-related information across all departments.
- The LSM and the LGM have the authority to correct or suspend work for conditions determined to be unsafe, or pose a hazard to customers, employees, contractor employees, the general public, or endangers the safe passage of vehicles, until the unsafe condition or hazard can be mitigated or corrected.

The Region Safety Managers also conduct regular internal reviews of local operations. They are to ensure that each location is audited at least every two to three years, with high risk locations audited annually for compliance using the risk-based **Location Safety Review.**

Location Safety Review	
Category	**Description**
Scope of Safety Reviews	First Transit locations are selected based upon risk-based criterion. Individual locations receive a review every 2-3 years
Risk-Based Selection Criterion	Locations selected based on declining 3-year reviews; sites with new location managers; high collision/injury Accident Frequency Rate (AFR); prior year failing score

Review Format	More narrow and focused audit template which includes a balance of compliance assurance as well as location-specific risks and safety performance.	
Findings and Follow-Up	Action plans are developed in conjunction with location staff and use a red/yellow/blue/green method to prioritize. All action items are entered, and incomplete action items are tracked within the **Safety Toolbox**.	

Escalation Process	Items requiring escalation to Senior Director of Safety/Vice President of Safety – First Transit remain intact. Through the use of Safety Toolbox, unresolved actions are designed to escalate to the Location General Manager/Region Safety Manager.	
Visibility	Review results and action items are routinely shared with the Location General Manager/Region Safety Manager/Executive Management. This is augmented by the escalation process for unresolved action items as noted above.	

Corporate Communication of Safety Concerns

Executive Safety Meetings are routinely held where each department discusses their concerns and progress in the area of safety and safety related concerns. Recommendations are considered, and necessary changes implemented. All complaints by departments are addressed immediately.

Minutes from the Executive Safety meeting are distributed to and posted at each location. Action items are addressed at the following meeting.

Executive safety meetings are conducted in the following formats.
First Group Executive Safety Committee (ESC)
- Consists of President, COO, and Safety Vice President of each operating group

- Discussions include safety performance, trend analysis, program oversight

<u>First Group Safety Council</u>
- Consists of Vice Presidents of Safety for all operating divisions
- Discussions include safety performance, trend analysis, and safety oversight

<u>First Group America Safety Council</u>
- Consists of Safety Senior Directors and Safety Vice Presidents
- Discussions include safety performance, trend analysis, best practices, and program oversight

<u>Performance Review Management (PRM)</u>
- Consists of Senior Region Vice Presidents, Region Vice Presidents, Region Directors of Operations, Region Director of Maintenance, Region Directors of Safety and Region Safety Managers
- Discussions include regions safety performance

<u>Safety Advisory Committee</u>
- Consists of a sampling of Location General Managers, Region Directors of Operations, Region Safety Directors and Region and Local Safety Managers
- Discussions include review of policy and procedures, training, and safety awareness

Authorities, Accountabilities, and Responsibilities	
Describe the authorities, accountabilities, and responsibilities of the following individuals for the development and management of the transit agency's Safety Management System (SMS).	
Accountable Executive	Carson City/CAMPO's Transportation Manager
Chief Safety Officer or SMS Executive	Carson City/CAMPO's Transit Coordinator
Agency Leadership and Executive Management	Michael Jacobs, General Manager Paul Meredith, Senior Director of Safety
Key Staff	Vice President of Safety – First Transit Senior Director of Safety Region Safety Director – West Region Region Safety Manager – West Region *(Location Safety Managers)**

Additional Accountability	To ensure safety responsibility and accountability throughout the organization from local operations to corporate management, First Transit uses the following **Safety Responsibility and Task Matrix**. Responsibilities are assigned at the local level.
(Local Staff Responsibility)	The responsibilities and tasks are assigned to Maintenance, Operations, or Human Resources and the responsible person for each is identified for each First Transit location.
	This process ensures that the pertinent safety items are covered, and that each person knows his or her areas of responsibility.

<table>
<tr><th colspan="6">Safety Responsibility and Task Matrix</th></tr>
<tr><th>Responsibilities and Tasks</th><th>OPS</th><th>MNT</th><th>HR</th><th>OTHER</th><th>Responsible Personnel</th></tr>
<tr><td>Establish annual safety objectives for submission to the GM at the beginning of each fiscal year</td><td>X</td><td></td><td></td><td></td><td></td></tr>
<tr><td>Submit a report on the safety performance at the end of each fiscal period</td><td>X</td><td></td><td></td><td></td><td></td></tr>
<tr><td>Submit the following: period operations and safety data; accident and incident reports; and site safety review results</td><td>X</td><td></td><td></td><td></td><td></td></tr>
<tr><td>The LGM or their designee has the authority to direct that work or conditions have been determined to be unsafe or pose a hazard to customers, employees, contractor employees, the general public, or endangers the safe passage of buses be suspended or restricted until the unsafe condition or hazard can be mitigated or corrected</td><td>X</td><td></td><td></td><td></td><td></td></tr>
<tr><td>Management of system safety, occupational health</td><td></td><td></td><td></td><td></td><td></td></tr>
</table>

		and safety, accident and incident investigation, environmental protection and monitoring the implementation of the Safety Management System (SMS) Program Plan	X				
		Review of all safety aspects of departmental procedures including: First Transit policies/instructions; Standard Operating Procedures; HR policies; safety and health policies	X				
		SMS Review and Modification				X	
		Safety Solutions Team Meetings	X				
		Daily Safety & Health Walkthrough	X				
		Safety related reports to external agencies	X				
		Near miss and route hazard report investigations	X				
		Investigation of safety related trends	X				
		Coordination with United States and State Departments of Labor and Occupational Safety and Health Administration (OSHA)	X				
		Environmental Management Oversight				X	
		Hazard Management Process				X	
		Managing Safety Validation of Change Process	X				
		Safety Data Reporting	X				

		X				
	Investigations	X				
	Advise to update SOPs, Rules, and Emergency Plans	X				
	Emergency Response	X				
	Fire Protection				X	
	Shop Safety Hazardous Tools Inspections		X			
	Review Vehicle Maintenance and Failure Data		X			
	Perform Vehicle Maintenance Inspections/Audits		X			
	Training, Certification, Review, and Audit	X				
	Personal Protective Equipment Review	X				
	Hazardous Materials Management				X	
	Drug and Alcohol Abuse Program	X				
	Procurement	X				

Employee Safety Reporting Program

Describe the process and protections for employees to report safety conditions to senior management. Describe employee behaviors that may result in disciplinary action (and therefore, are excluded from protection).

First Transit 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.

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.

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 the Region Safety Manager or Human Resources Manager. 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.

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.

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.

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.

Reporting Options

Near Miss and Hazard Reporting
In the interest of employee and passenger safety, each First Transit employee is issued a **"Near Miss and Hazard Reporting"** pad for documenting and reporting safety, route, and security concerns; and is encouraged to report any near miss incidents and hazards.

If an employee is involved in a near miss or determines something they see to be a hazard, we ask for their help in reporting the event so we all may learn the lessons from it and perhaps prevent a collision or injury from occurring in the future.

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

If the safety or security hazard requires immediate attention, dispatch is notified immediately. If immediate attention is not required, the employee is encouraged to submit the information to management by the end of their workday. Our managers then initiate conversations with employees about their observations of both safe and unsafe behaviors.

The employee's contribution to the cause of the injury or collision is considered in disciplinary action, up to and including termination. If after analysis it has been determined that the incident resulted from an overt decision, disciplinary action is indicated. If not, then the appropriate counseling and/or training is indicated.

SOP #806 – Near Miss & Hazard Reporting describes the reporting process

Threatening or Suspicious Activity

First Transit encourages anyone who sees, hears, or learns of any conduct or statement that seems threatening or suspicious, and/or any weapons on company premises or in company vehicles, to immediately report such conduct or statement, either to his/her Supervisor or Manager, to the Human Resources Department, FirstGroup America Security, and/or to the confidential Ethics and Compliance Hotline at 1.877.3CALLFG, (1.877.322.5534), contact the Hotline intake site at ethicsfirst.ethicspoint.com, or email Compliance@firstgroup.com.

If there is an immediate risk or imminent threat of violence, serious harm, or life-threatening conduct, employees should immediately call 911, local police, or other law enforcement.

Open-Door Policy

A workplace where employees are treated with respect and one that is responsive to their concerns is important to each of us. At First Transit, we recognize that employees may have suggestions for improving our workplace, as well as complaints about the workplace. We feel that the most satisfactory solution to a

job-related problem or concern is usually reached through a prompt discussion with an employee's manager. Each employee is encouraged to do so.

If the matter cannot be resolved with one's immediate manager, the employee may:

- Speak with their Location General Manager or Region Safety Manager who will attempt to facilitate a solution.

- If an employee is unable to resolve the matter through the management chain of command in their location, the employee may choose to speak directly to anyone in division management or Human Resources.

First Transit's Open-Door Policy also allows employees to voice their concerns anonymously.

- If an employee would like to submit an anonymous concern, they may contact the 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.

This Open-Door Policy applies to every employee not covered by a collective bargaining agreement. It also extends to contractors and subcontractors.

In situations involving discrimination or harassment, employees should follow the Complaint Procedure described in the Discrimination, Harassment and Retaliation Reporting Procedure section of their First Transit Employee Handbook without fear of reprisal and should not follow this Open-Door Policy complaint process.

In situations requiring immediate attention, an employee may bypass the chain of command, which begins with his or her manager, and contact any level of management or Human Resources directly, without fear of reprisal, and without the need to follow this Open-Door Policy complaint process.

- This may be done in person, by direct contact, phone call, letter, or email message or by utilizing the Ethics and Compliance Hotline. The Ethics and Compliance Hotline can be reached by calling 1.877.3CALLFG, (1.877.322.5534) or emailing Compliance@firstgroup.com.

Accidents/Incidents

First Transit finds accidents and incidents to be a very serious matter and a valuable learning opportunity to improve safety. **SOP #700 – Accident & Safety Data Acquisition and Reporting**, and the supporting **SOP's, 700a – Auto and General Liability Claim Form; 700b – Courtesy Card; 700c – Operator Incident Report**; ensure that the appropriate actions happen at the scene for the safety and security of First Transit passengers and employees; and that the appropriate data is collected to evaluate the incident, determine culpability; and develop actions to limit or eliminate the possibility of the incident occurring in the future.

Accidents

Accidents are considered to be any collision that occurs while an Operator is on duty. Operators are to report all accidents and collisions to Dispatch immediately upon occurrence. When reporting to Dispatch, the employee must state that he or she is reporting an accident and then answer any questions asked by Dispatch.

Additionally, **SOP #700c – Operator Incident Report** and **SOP #700a – Auto & General Liability Claim Form**, must be completed by the Operator involved and location management for accidents, possible claims of accidents, damage to equipment, injury and possible injury not later than one hour after completion of shift on the day of occurrence. Any vehicle defects that may have contributed to an accident shall be included in the report. To help ensure that this deadline is met, employees are paid to complete the form.

Employees who fail to report an accident may be subject to disciplinary action up to and including termination.

Employees must provide transit management with any additional accident information immediately upon request.

Incidents

Incidents with passengers involving slips and falls on or near the vehicle, fights, police action, or removal of a passenger, must be reported to Dispatch immediately; and require a **SOP #700a – Auto & General Liability Claim Form** to be completed by management before going off duty for the workday.

All other incidents and occurrences out of the norm, no matter how slight, are to be reported to Dispatch upon return to the yard.

The following are examples of incidents that must be reported:

- Broken or cracked windows from unknown causes,
- Cut seats,
- Service delays,
- Passing up passengers,
- Insufficient or excessive running time in schedule,
- Overloads, etc.

If in doubt, immediately contact Dispatch.

Operators Witnessing an Accident shall notify Dispatch immediately, even though their vehicle may not be involved.

Required Courtesy Cards

In the event of an accident or an incident, Operators must distribute **SOP #700b – Courtesy Cards** then retrieve as many as possible from passengers and persons in the immediate area of the accident or incident who may have witnessed the event.

Duty to Report Wrongdoing

First Transit is committed to investigating all good faith claims of wrongdoing so that corrective action may be taken. To that purpose, First Transit encourages any employee, contractor or vendor to report wrongdoing or illegal acts to location management so long as they are not believed to be involved in the fraud, waste or abuse being reported. Management within First Transit ensures the matter is reported to Group Security and First Transit will investigate and take appropriate steps to correct the wrongdoing or potential violation.

Alternatively, reports may be made anonymously using the FGA Ethics & Compliance line at 1.877.3CALLFG, (1.877.322.5534) or by emailing Compliance@firstgroup.com. You may also contact the Healthcare Compliance Officer directly.

Self-Reporting

Self-reporting is also encouraged. Anyone who reports his/her own violation will receive due consideration regarding disciplinary action that may be taken.

Duty to Report Law Enforcement Actions

Employees 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.

Possible Disciplinary Actions

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:

- 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

- 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, unkept 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

Describe the Safety Risk Management process, including:

- *Safety Hazard Identification: The methods or processes to identify hazards and consequences of the hazards*

- *Safety Risk Assessment: The methods or processes to assess the safety risks associated with identified safety hazards*

- *Safety Risk Mitigation: The methods or processes to identify mitigations or strategies necessary as a result of safety risk assessment*

Safety management is at the core of everything done at First Transit. 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. The process for managing hazards, from identification through corrective action and closure, is illustrated by the following flowchart.
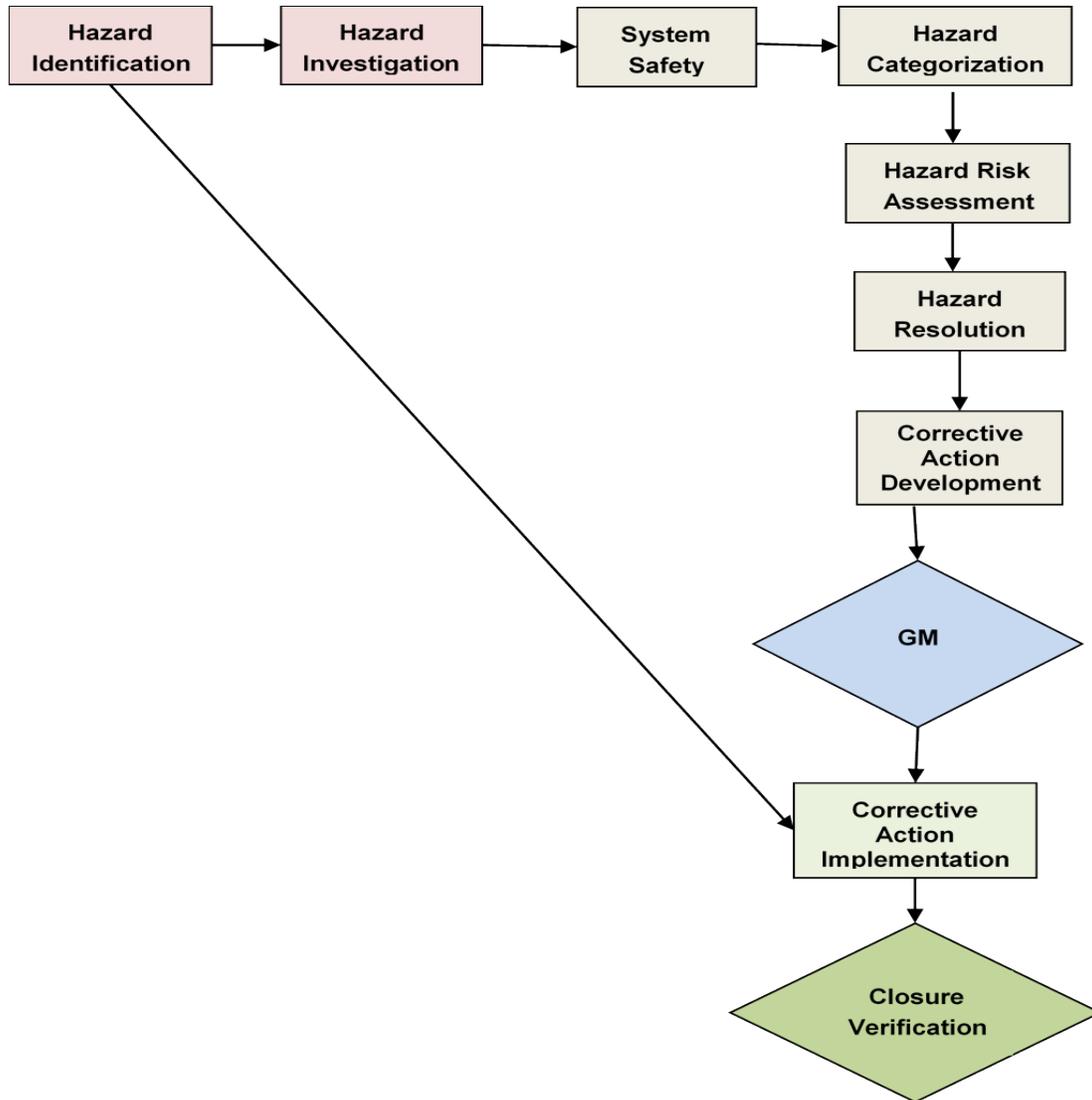
As described earlier, a corporate structure exists to address all safety concerns. To ensure safety at the local levels, each location is required to form a Safety Solutions Team (SST), Accident Review Committee (ARC), and a Local Client Liaison Committee. To ensure consistency at each location, **SOP's #803; #803a; #803b Safety Solutions Team**, and **SOP #702 – Accident Review Committee** describe the procedures which are to be followed in creating and operating a Safety Solutions Team and Accident Review Committee.

These groups are responsible for reviewing safety related accidents and incidents to determine culpability; identify the causes associated with each event; and develop mitigation measures to reduce the risk of the events occurring in the future. Having these groups at each location provides a way for employees to report safety risks in a timely manner and to teams that understand the conditions associated with each specific location. Additionally, the opportunity exists for more timely, appropriate, and effective mitigation measures.

Several tools are used by the Region Safety Managers, Region Safety Directors and the Senior Director of Safety to monitor the local risks and risk management. Among them are Safety Data Reports which outline the monthly and Year to Date safety performance statistics. Also used is a Target & Goal Worksheet to track and analyze the data collected and to target reactive and proactive performance improvement measures.

Safety Hazard Identification

This process is a vital component in First Transit's efforts to reduce safety risks and improve overall delivery of service. 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 inspection of established prevention processes are routinely performed.

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

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"

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 Hazard Resolution

- 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.
- **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.
- **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.

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 <u>determine the probability of it occurring</u>. Probability 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 probability categories.

Probability of Occurrence of a Hazard			
Description	**Probability Level**	**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.

Hazard Resolution

Safety hazard resolution or mitigation 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 hazard resolution process are to:

1. Identify areas where hazard resolution 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.

Hazard Resolution Management and Tracking

Resolution of identified hazards are managed by the Location General Manager and/or the Location Safety Manager. The hazard resolution 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:
- <u>BeSafe</u> (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.
- <u>Contacts</u> (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.
- <u>Safety Leadership Activities</u> (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.
  - **Rail section observation or risk assessment.** Risk assessment or driver observations conducted at rail crossing(s), 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.

6. Safety Assurance

Safety Performance Monitoring and Measurement

Describe activities to monitor operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended.

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

Additionally, each location employs <u>Street Supervisors</u>, <u>Dispatchers</u>, and <u>Instructors</u>; 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. Each location also establishes a <u>Safety Solutions Team (SST)</u>, 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.

- Routine hazard management
- Accident and incident investigation
- Safety data collection and analysis
- Routine internal safety audits
- Facility, equipment, systems and vehicle inspections
- Routine proficiency checks for all vehicle operators and maintenance employees
- Compliance evaluations including onsite inspections
- Regularly communicating safety and hazard data to all employees

A higher level of oversight is conducted by Region management, which includes the <u>Region Safety Manager</u>, <u>Region Safety Director</u>, <u>Region Maintenance Director</u>, and the <u>Region Vice President</u>. From this level, any identified risks and mitigations are shared with other Region local operations as a proactive means to reduce risks.

The last "local level" review comes from the <u>Vice President of Safety</u> and the <u>Vice President of Maintenance</u>. These are corporate level positions that share the identified risks and mitigations throughout the organization as a proactive means to reduce risks. Additionally, the Vice President of Safety and Vice President of Maintenance assist executive level management in using this information to impact operational and budget decisions.

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

First Transit 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

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.

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.

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.				

	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
Period Data Analysis								
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.

Management of Change

Describe the process for identifying and assessing changes that may introduce new hazards or impact safety performance.

First Transit employs a proactive process, **SOP #208 – Safety Validation of Change**, that addresses the procedures to be followed to evaluate the risk of any changes proposed at all levels of the organization. The overall purpose of this process is to provide assurance that any proposed changes which impact operations will not increase safety risk; or where additional risk is identified, that controls are put in place **prior to the changes being implemented**.

Changes to organizational structure; the nature or extent of operations; or to facility or equipment assets; as well as mergers and acquisitions of new businesses are proactively managed through this process to avoid introducing or increasing safety risks.

- The resources required to complete the validation process, in terms of people, finance and materials is included in this validation process.
- The allocation of responsibilities considers the competence of the individuals that are required to carry out the safety validation roles.
- All employees who may be affected by the proposed changes are consulted as part of the process.

The extent and scope of safety validation applied to any change proposal is proportional to the risks (safety, operational, and other risks) associated with its introduction. *(For example, a major change, such as a reorganization of Region Executive roles and responsibilities or start-up of a large new bus operation, requires a more rigorous safety validation than a minor change.)*

In the case of smaller, less complex or well understood changes, the safety validation of change process may be implemented as part of normal operations, using existing organizational arrangements and meeting structures to deliver the required level of assurance.

The process is generally described in the following chart.

Safety Validation of Change Process			
Main Steps	Key Activities	Checklists & Guidance	Completed By
1. Identify Proposal for Change	• Raise change proposal (including Capital Expenditure Approval) • Inform relevant functional Director(s) and Manager(s)	• Complete **SOP #208a – Safety Validation of Change Form**, Section A1	Change proposer

2. Determine Classification of Change Significance	• Classify level of safety validation required • Ensure the extent and scope of validation is proportional to the level of risk	• Complete **SOP #208a – Safety Validation of Change Form**, Section A2	**Category A:** Group Safety Director **Category B:** Divisional head of Safety **Category C:** Location head of Safety
3. Allocate Roles & Responsibilities	• Formally allocate change sponsor and change authorizer • Identify other required resources and roles for consultation	• Complete **SOP #208a – Safety Validation of Change Form**, Section A3	Change proposer (with guidance)
Submit Change Proposal Form			Change proposer
Decide whether safety validation should proceed			Change proposer
4. Prepare Safety Validation of Change Case	• Prepare safety validation documentation • Complete risk assessment of proposed change • Submit for review • Revise and finalize documentation	• Complete risk assessment and document findings • Complete Safety Validation of Change as described in **SOP #208 – Safety Validation of Change** • Complete **SOP #208a – Safety Validation of Change Form**	Change proposer
Submit Safety Validation Checklist with supporting documentation			Change proposer
Approve and Implement, or Reject Change			Change authorizer (or delegated representative)
5. Monitoring and Review	• Monitor implementation of change and safety performance	• Check compliance as part of Region Safety Monitoring • Review effectiveness	Location Safety Manager Corporate Safety Management

		• Review performance process	of the process as part of Region oversight	Vice President of Safety - First Transit

Changes proposed at the Corporate level typically have an impact on the Region and Local levels. To ensure the risks associated with any change consider all levels of the organization, each level must complete **SOP #208 – Safety Validation of Change** as part of the process to ensure specific safety concerns have been identified and addressed.

Similarly, changes proposed at the Region level will typically have an impact on the Local level. Consequently, the Local level must also complete **SOP #208 – Safety Validation of Change** as part of the process to ensure specific safety concerns have been identified and addressed.

Additional responsibilities in the Safety Validation of Change process include:

- The Region Safety Management team provides safety expertise/support to those carrying out the safety validation.

- The Senior Director of Safety:
  o Reviews and approves each Region's safety validation of change process
  o Decides on the level of safety validation required (consulting with other functional heads as necessary) for Category A changes
  o Is consulted on any Category B change proposal
  o Provides safety expertise/support to Region Safety Managers and Vice President of Safety – First Transit during safety validation activities as required.
  o Provides safety expertise/support to those carrying out the safety validation for Category A changes.

An electronic log of all proposed changes, whether approved or not, are maintained by the Region Safety Director.

Communication of changes to policies/procedures regarding safety issues comes from Executive Leadership. This information is then carried down through the Vice President of Safety – First Transit, Senior Director of Safety, Region Safety Directors, Region Safety Managers. Location General Managers, Location Safety Managers, and employees. Notification to the client is communicated through the Location General Manager.

Continuous Improvement

Describe the process for assessing safety performance. Describe the process for developing and carrying out plans to address identified safety deficiencies.

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 probability 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

Describe the safety training program for all agency employees and contractors directly responsible for safety.

The education and training process at First Transit is a highly regimented and professionally developed program built around a curriculum featuring learning opportunities in two major domains:
- Knowledge (education)
- Skills (training)

Various delivery mechanisms such as classroom, multimedia presentations, closed course, observation and behind-the-wheel skills building are used to support the learning process. Learning is evaluated through written quizzes, driving tests and customer service skills evaluations.

Instructors

Successful new operator training starts with selecting and certifying good instructors.

1. **Classroom Instructor:**

   The classroom instructor is responsible for facilitating the classroom portion of New Operator Training. Classroom training requires the development of lesson plans.

2. **Behind-the-Wheel Instructor:**

   The Behind-the-Wheel (BTW) Instructor is responsible for conducting closed course exercises and behind the wheel instruction. The New Operator Training program consists of instructional DVDs, which are accompanied by facilitator guides and participant study guides. The BTW Instructor uses the Operator Proficiency Workbook to document each trainee's progress.

   *New Instructor Candidates can obtain certification as both a Classroom Instructor and a Behind-the-Wheel Instructor.

3. **Master:**

   The Master Instructor, along with the Regional Director of Safety and Region Safety Manager(s), is responsible for training the Safety Supervisors. The Master Instructor is also responsible for the certification programs for Behind-the-Wheel and Classroom Instructors and the ongoing Train-the-Trainer workshops.

Training the Instructor is a process by which a Certified Instructor works with the selected New Instructor Candidate. During this time, the Certified Instructor conducts a review of all state laws, First Transit policies and procedures, local policies, and client-specified programs and requirements.

The Certified Instructor also provides a review of the Behind-the-Wheel Manual, Classroom Manual, and all First Transit video-based courses.

In addition to the above training, the New Instructor Candidate must complete the Instructor Development Curriculum, which includes the following three self-directed courses:

1. How to Train
2. Coaching the Adult Learner
3. Learning Basics

There are three types of Instructor Certification:

1. Temporary
2. Certified
3. Master

1. **Temporary (Silver)**

   Temporary certificates are issued at the local level. A temporary certificate is issued to a New Instructor Candidate upon successful completion of the New Instructor training program at his or her location, conducted by a certified trainer at that location. Certificates are issued throughout the year prior to the annual Train-the-Trainer program.

   Temporary certificates are valid for one year, and one year only, from the date of issue. Temporary certification is accompanied by silver achievement emblems for Classroom, BTW or both.

   To continue in the program, a New Instructor must obtain Gold Certification.

2. **Certified (Gold)**

   The Certified Instructor certificate is issued to a New Instructor who has successfully completed the annual Train-the-Trainer program, conducted by a Master Trainer. The annual Train-the-Trainer program combines all elements of the temporary certification, with the exception of the classroom evaluation. At the annual Train-the-Trainer program, Classroom Instructor Candidates are required to develop a lesson plan and give a presentation.

   Prior to attending the annual Train-the-Trainer program, all New Instructors must complete the "Safety Leadership" course and pass the final exam with a grade of 90% or above.

   The Senior Director of Safety is the only person authorized to approve and issue a Certified Instructor certificate with gold achievement emblems for Classroom, BTW, or both.

3. **Master**

   The Master Instructor Certification program ensures that First Transit Policies and Procedures are correctly implemented throughout the company.

   Master Instructor Certification is required for all area safety managers and above.

   The Master Instructor:
   - Provides support to the Location General Manager and the Region Safety Manager,
   - Is involved with training new Safety and Training Supervisors, and re-training current Safety and Training Supervisors if required,
   - Conducts the annual Train-the-Trainer program for BTW and Classroom Instructor Certification

- Conducts Safety and Training audits in the region and reports the findings to the Region Safety Manager, if required.

Employee Training

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

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.

Recognition
Whilst 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 workplace 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.

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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.
   - **Unit 1 - Introduction**
     - Welcome and Introduction
     - Title VI Civil Rights Act 1964
     - Employee Handbook
     - BeSafe - Making Safety Personal
     - Hazardous Communication
     - Bloodborne Pathogens

- **Unit II - Fundamentals**
  - Safe Work Methods
  - Basics of Safety
  - Managing Emergencies
  - Security Awareness
  - Map Reading
  - Communication Devices
  - Navigation and Fare Policies
  - Smith System
- **Unit III - The Operator**
  - Drug and Alcohol Awareness
  - Distracted Driving
  - Fatigue and Sleep Apnea Awareness
- **Unit IV - Transporting Passengers with Disabilities**
  - Transporting Passengers with Disabilities
  - Interacting with Passengers
  - Diffusing Conflict
  - Passenger Care While Loading and Unloading
  - Mobility Aids and Devices
- **Unit V - Driving Fundamentals**
  - Driving Fundamentals I
  - Driving Fundamentals II
  - Roadway Types
  - Railroad Crossings

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.

- **Closed Course (Group Work)**
  - Vehicle Orientation
    - Pre-Trip Inspection
    - Seat Adjustment
    - Mirror Adjustment
    - Braking, Accelerating, and Transmission
    - Wheelchair Securement
  - Reference Points
    - Lane Position
    - Right Side / Left Side
    - Backing Point
    - Forward Stop

- Pivot Points
- Turning Points
  - o Vehicle Control
    - Straight in Lane
    - Left Turn
    - Right Turn
    - Lane Changing - Moving Right or Left
- **One on One Instruction Behind the Wheel**
  - o **Basic Road Work**
    - "Smith System"
    - Intersections
    - Service Stops
    - Backing
- **Advanced Road Work**
  - o "Smith System" Commentary Driving
  - o Roadways
  - o Expressway / Highway Driving
  - o Intersections
  - o Service Stops
- **Final Evaluation**
  Upon completion of the training program, before an Operator can be placed into service, they must successfully demonstrate their mastery of the skills and practices learned during the training program.
- **Cadet Training**
  Once a new Operator has been placed into service there is period of observation where an experienced Operator, Instructor, or Supervisor periodically rides-along to ensure the skills learned in training have successfully transferred to providing service. This includes the securement and transportation of a person with a disability.

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 leaders 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.

In addition to First Transit's formal employee training program, the following safety training is also conducted.

Safety Meetings

- 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.

- Client/Contract requirements may require safety meetings to be conducted on a more frequent basis than the First Transit minimum standards

Retraining

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

An 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

Describe processes and activities to communicate safety and safety performance information throughout the organization.

Safety Awareness Programs

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

This is where our **"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.

"BeSafe" focuses on positive change through routine personal "touchpoints" and coaching interactions between front-line employees and management. To reinforce the touchpoints, discussions and feedback sessions are conducted as needed.

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

- Sharing safety results at the individual, project, region and national levels by celebrating success stories

  o **Individual Motivators – Individual Achievement Awards:** The "cultural carrot" to help affect individual safety improvement through the use of personal recognition awards. Currently established safety awards for First Transit employees are:

    - Annual Safe Driver Awards

    - Safety Solutions Team Recognition

- **A Safety Leadership Group - The Safety Solution Team (SST):** Four to 10 location teammates dedicated to making safety "top-of-mind " by identifying and resolving safety issues.

  o SST
    - Review the safety concerns they have worked on and improvements that have been implemented
    - Record and distribute SST meeting minutes

  o GM
    - Review " Daily Safety & Health Walkthrough"

  o GM and SST
    - Recognize individuals who have earned years of safe driving
    - Pins and Certificates
    - Include bullets from SST Meeting minutes

- **A Communication Tool:** "First Transit Connect" employee app, a peer to peer safety communication tool offering safety tips, best practices, recognition, offering ideas on "What Works", Safety Happenings, and Safety Pep Rallies

Additional Information

Supporting Documentation

Include or reference documentation used to implement and carry out the Safety Plan that are not included elsewhere in this Plan.

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. Some of those SOP's are as follows.

- High Interest Driver SOP's #206; #206a; #206b; #206c: #206d

- 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 #806; #806a; #806b; #806c; #806d

- First Transit Shop Safety Handbook

- Safety & Security Planning Manual

Definitions of Special Terms Used in the Safety Plan

Term	Definition

List of Acronyms Used in the Safety Plan

Acronym	Word or Phrase
ARC	Accident Review Committee
BTW	Behind-the-Wheel
DOT	Department of Transportation
DUI	Driving Under the Influence
DWI	Driving While Intoxicated
ESC	Executive Safety Committee
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
MNT	Maintenance
OPS	Operations
OSHA	Occupational Safety & Health Administration
PPE	Personal Protective Equipment
PRM	Performance Review Management
SMS	Safety Management System
SOP	Standard Operating Procedure
SRC	Safety Resource Center
SST	Safety Solutions Team
UK	United Kingdom
VP	Vice President

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