



Employee Safety Reporting Program (Part 2)

Methods and Implementation

In last month's *TSO Spotlight* newsletter, we discussed how [an employee safety reporting program \(ESRP\) can support Safety Risk Management \(SRM\) and Safety Assurance \(SA\)](#) by gathering both incident-based (reactive) and risk-based (proactive) data. When developing an ESRP, an agency may find it helpful to evaluate how their current reporting methods and data gathering support SRM and SA using the following questions.¹

- Is the current data reactive or proactive? (Is there data the agency can use to address safety hazards *before* a safety event occurs?)
- How much actionable information do reporting methods currently capture?
 - Can employees report anonymously and does this result in more reports and actionable information?
 - Is it possible to follow up with reporters whose reports are not anonymous to gather additional information?
- Do the reports support identification of unanticipated safety hazards (SRM)? How?
- Do the reports help confirm the implementation and effectiveness of mitigations (SA)? How?

With the answers to these questions in mind, an agency can determine what kind of ESRP data will best support their SRM and SA goals and can then determine which reporting methods will work best for their employees. The Public Transportation Agency Safety Plan regulation ([49 CFR part 673](#)) does not specify what methods transit agencies must use for their ESRP. The following are common methods for capturing and tracking safety concerns:

- Hotline
- Paper forms
- Employee organizational satisfaction surveys

¹ The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies. Grantees and subgrantees should refer to FTA's statutes and regulations for applicable requirements.

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- Safety meetings/briefings or toolbox talks
- Spreadsheet, database, or another shared internal web-based platform
- Apps for phone and tablets

Within their ESRP, agencies may decide to allow reports to be anonymous, confidential, or a mixture of both.

Implementing an ESRP

When an agency implements its ESRP, it may benefit from clearly communicating how the ESRP works and offering guidelines on reporting.

Guidelines could include the following:

- Who can report
- How to report
- What to report and what **not** to report
- How this information will help the agency address safety concerns before a serious safety event occurs

The agency may want to establish an Employee Safety Reporting Policy—a formal statement reflecting the agency’s commitment to the ESRP. The ESRP policy could, for example, establish employee protections. As stated in § [673.23\(b\)](#), applicable transit agencies must establish “protections for employees who report safety conditions to senior management, and a description of employee behaviors that may result in disciplinary action.” Such protections are an essential part of building the necessary trust for a successful ESRP.

This series on ESRP will continue in next month’s *TSO Spotlight* with suggestions on how to engage employees in the ESRP.



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