

Employee Safety Reporting Program (Part 3)

Encouraging Worker Participation

In the <u>November 2022 Spotlight</u>, we reviewed methods for implementing an Employee Safety Reporting Program (ESRP). As you establish the procedures for your program, it is equally important to encourage participation by addressing organizational, working environment, or individual barriers that could deter workers from reporting.¹



Organizational Barriers

Issue: Workers may believe management is not listening and reporting concerns will not encourage change.

The effectiveness of an ESRP depends on workers seeing that the agency wants to hear and address their safety concerns. Safety Promotion and its safety communication component (<u>49</u> <u>CFR § 673.29(b)</u>) are essential for an effective ESRP. Safety information should flow in two directions — from management to frontline workers and from frontline workers to management. When management informs workers of safety actions taken in response to reports submitted to the ESRP, workers can see evidence that management is listening to their concerns.

To encourage participation and support, consider taking the following actions:

- Emphasize the two-way flow of information when sharing information with frontline workers about your ESRP.
- Regularly share safety reporting information with labor representatives, including safety goals, progress, and other news.
- Include labor representatives (and present jointly) in meetings related to the ESRP.

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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Working Environment Barriers

Issue: Reporting procedures may be time-consuming or inefficient, or the agency culture may not emphasize the importance of the ESRP as a part of regular job activities.

To promote an active culture of safety reporting, consider the following:

- Develop and promote simple safety reporting options that require as few steps as necessary to collect actionable information.
- Empower supervisors and managers to regularly communicate the critical role of safety reporting and how it is as much a part of worker activities as pre-service vehicle checks, schedule adherence, post-service vehicle condition reports to maintenance, etc.
- Coordinate with managers and labor organizations to ensure employees have options, such as anonymous reporting channels, to circumvent the risk of potential peer pressure against reporting.

Individual Barriers

Issue: Workers may not believe the ESRP is important, or they may not understand what and how to report. They may also be concerned about punitive results.

The more an agency makes safety an essential part of its culture, the more workers will feel comfortable reporting their concerns. This could include the following:

- Host regular gatherings (e.g., toolbox talks or informal breakroom forums) where workers can engage with management to discuss safety concerns and reporting.
- Make ESRP training part of new worker training and offer refresher training.
- Include protections, as required by <u>§ 673.23(b)</u>, in the Safety Management Policy for employees who report safety conditions to senior management and a description of employee behaviors that may result in disciplinary action.
- Consider working with labor leadership to individually recognize and reward workers for reporting safety concerns and highlight how their reports resulted in specific corrective actions that contributed to risk reduction.

The agency's support of the ESRP conveys the agency's level of commitment. Workers who feel respected and believe their feedback is well received will be more likely to report their safety concerns.