



Developing the Safety Management Policy Statement

Checklist and examples for creating a Safety Management Policy Statement for your transit agency.

The Federal Transit Administration (FTA) prepared this guide to help your transit agency develop a Safety Management Policy Statement (Policy Statement) to support implementation of your Safety Management System (SMS) and to help you comply with the Public Transportation Agency Safety Plan (PTASP) regulation at 49 C.F.R. Part 673. This document discusses Part 673 requirements for the Policy Statement, provides considerations for Policy Statement development, and offers examples that may be useful to your agency.¹

What Is the Safety Management Policy Statement?

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

Checklist of Key Elements

Requirements

As specified in § 673.23, your agency's Policy Statement must:

- Be a written document.
- Include your agency's safety objectives.
- Be communicated throughout your agency.

¹ The guidance in this document is not legally binding in its own right and will not be relied upon by the Federal Transit Administration as a separate basis for affirmative enforcement action or other administrative penalty. Compliance with the guidance in this document (as distinct from existing statutes and regulations) is voluntary only, and noncompliance will not affect rights and obligations under existing statutes and regulations



Considerations

In addition, as discussed in the preamble to Part 673, your agency's Policy Statement may:

- Explicitly commit your agency to SMS.
- Specify the safety management authorities, accountabilities, and responsibilities of agency personnel.
- Convey your agency's safety objectives through safety performance targets.
- Describe or reference your agency's Employee Safety Reporting Program.

Required Elements

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

Be a written document.

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

Examples provided in the sections below include text that can be used by your agency to support development of the written Policy Statement. Appendix A also includes several complete sample statements for your review.²

Include your agency's safety objectives.

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

² Examples are provided for illustration purposes only.

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

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

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

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

Additional examples of safety objectives include:

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

Be communicated throughout your agency.

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

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

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

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

Elements for Consideration

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

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

Explicitly commit your agency to SMS.

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

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

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



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

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

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

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

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

- *Executive management will lead the development of an organizational culture that promotes safe operations and provides appropriate resources to supporting this core management function by fostering and ensuring safe practices, improving safety when needed, and encouraging effective employee safety reporting and communication. [Agency Name] will hold executives, managers, and employees accountable for safety performance.*



- *Ultimate responsibility for safety rests with me as the Accountable Executive. Responsibility for making our operations safer for everyone lies with each one of us—from executive management to frontline employees. Each manager is responsible for implementing the Safety Management System in their area of responsibility and will be held accountable to ensure that all reasonable steps are taken to perform activities established as part of the SMS.*
- *All levels of management are responsible for ensuring the performance of [Agency Name]'s Safety Management System. Managers must take an active role in the Safety Risk Management process and ensure that Safety Assurance functions are adequately supported. Managers also are responsible for ensuring that Safety Risk Management is being performed in their operational areas of control so that safety risk associated with safety hazards is assessed and mitigated. As of July 1, 2020, safety performance targets will be an important part of performance evaluations for [Agency Name] managers and employees. All employees and contractors will support safety management by ensuring that safety concerns are identified and reported.*
- *All levels of management and all employees are accountable for the delivery of the highest level of safety performance, starting with the Accountable Executive. [Agency Name] will integrate the management of safety among the primary responsibilities of all managers and employees, as defined in all [Agency Name] job descriptions.*

Convey your agency's safety objectives through safety performance targets.

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

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

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



By including safety performance targets, the Policy Statement can:

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

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

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

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

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

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

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

Describe or reference your agency’s Employee Safety Reporting Program.

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



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

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

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

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



Appendix A: Sample Safety Management Policy Statements

The following sample Policy Statements may be useful to consider as you begin development of your agency's Policy Statement. Please note, the samples below include text that is not explicitly required for your Policy Statement under Part 673. The examples are provided for illustration purposes only.

Sample Policy Statement #1

[Agency Name] will maintain an active Safety Management System (SMS) that encourages the open sharing of information on all safety issues. We expect our employees to report their safety concerns to agency management. No employee will be asked to compromise safety to “get the job done.”

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

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

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

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

Ultimate responsibility for safety at [Agency Name] rests with me as the Accountable Executive.

Responsibility for making our operations safer for everyone lies with each one of us—from executive management to frontline employees. Each manager is responsible for implementing the SMS in their area of responsibility and will be held accountable to ensure that all reasonable steps are taken to perform activities established as part of the SMS.



Sample Policy Statement #2

Safety is [Agency Name]'s first priority. [Agency Name] is committed to implementing, developing, and improving strategies, management systems, and processes to ensure that all our activities uphold the highest level of safety performance and meet required safety standards.

We will develop and embed a safety culture in all our activities that recognizes the importance and value of effective safety management and acknowledges at all times that safety is paramount.

We will clearly explain for all staff their accountabilities and responsibilities for the development and operation of the Safety Management System.

For passengers and employees, we will minimize the safety risk associated with transit service to as low as reasonably practicable and we will work to comply with and, wherever possible, exceed legislative and regulatory requirements and standards. We also will work to ensure that all employees are provided with adequate and appropriate safety information and training, are competent in safety matters, and are only allocated tasks commensurate with their skills.

We have established safety performance targets to help us measure the overall effectiveness of our processes and ensure we meet our safety objectives. We will issue quarterly reports to the entire organization documenting how well we met our safety performance targets and describing the safety risk mitigations we implemented to reduce safety risk.



Sample Policy Statement #3

Safety is a core value of [Agency Name], and managing safety is a core business function of the authority/agency. [Agency Name] is committed to developing, implementing, maintaining, and continuously improving processes to ensure the safety of its customers, employees, and the public. [Agency Name] will use safety management processes to direct the prioritization of safety and allocate its organizational resources—people, processes, and technology—in balance with its other core business functions. [Agency Name] aims to support a robust safety culture, and achieve the highest level of safety performance, meeting all established safety standards.

All levels of management and all frontline employees are accountable for the delivery of the highest level of safety performance, starting with the General Manager of [Agency Name].

[Agency Name] is committed to:

Executive Commitment to Safety: Executive Management will lead the development of an organizational culture that promotes safe operations and provides appropriate resources to supporting this core management function through fostering and ensuring safe practices, improving safety when needed, and encouraging effective employee safety reporting and communication. [Agency Name] will hold executives, managers, and employees accountable for safety performance.

Communication & Training: Employee engagement is crucial to a functioning Safety Management System. Communication systems will be put in place to enable greater awareness of [Agency Name] safety objectives and safety performance targets as well as to provide on-going safety communication up, down, and across the organization. All levels of management must proactively engage employees and work to keep the lines of safety communication honest and open. All employees will be made aware of the importance of [Agency Name]'s Safety Management System and trained in safety reporting procedures.

Responsibility & Accountability: All levels of management will be responsible for delivering safe and quality transit services that represent [Agency Name]'s performance of its Safety Management System. Managers will take an active role in the Safety Risk Management process and ensure that Safety Assurance functions are supported. Managers are responsible for ensuring that Safety Risk Management is being performed in their operational areas of control to assure that the safety risk associated with safety hazards is assessed and mitigated. Safety performance will be an important part of performance evaluations for [Agency Name] managers and employees.

Responsibility of Employees & Contractors: All employees and contractors will support safety management by ensuring that hazards are identified and reported.



Employee Reporting: Executive management will establish a safety reporting program as a viable tool for employees to voice their safety concerns. All frontline employees will be responsible for utilizing this program as part of the Safety Management System. No action will be taken against any employee who communicates a safety condition through the [Agency Name] safety reporting program unless such disclosure indicates the following: an illegal act, gross misconduct or negligence, or a deliberate or willful disregard of [Agency Name] rules, policies, and procedures.

Performance Monitoring & Measuring: [Agency Name] will establish realistic measures of safety performance and establish safety performance targets to ensure continual improvement in safety performance. Managers will verify that the safety risk mitigations put in place are appropriate and effective.

Review & Evaluation: [Agency Name] will measure Safety Management System performance by analyzing key safety performance indicators, reviewing inspections, investigations and corrective action reports, and auditing the processes that support the Safety Management System. These activities will become the basis for revising or developing safety objectives, safety performance targets and plans with the goal of continuous safety improvement.



Sample Policy Statement #4

[Agency Name] recognizes that the management of safety is a core value of our business. The management team at [Agency Name] will embrace the Safety Management System and is committed to developing, implementing, maintaining, and constantly improving processes to ensure the safety of our employees, customers, and the general public. All levels of management and frontline employees are committed to safety and understand that safety is the primary responsibility of all employees.

[Agency Name] is committed to:

- Communicating the purpose and benefits of the Safety Management System to all staff, managers, supervisors, and employees. This communication will specifically define the duties and responsibilities of each employee throughout the organization and all employees will receive appropriate information and SMS training.
- Providing appropriate management involvement and the necessary resources to establish an effective reporting system that will encourage employees to communicate and report any unsafe work conditions, hazards, or at-risk behavior to the management team.
- Identifying hazardous and unsafe work conditions and analyzing data from the employee reporting system. After thoroughly analyzing provided data, the transit operations division will develop processes and procedures to mitigate safety risk to an acceptable level.
- Ensuring that no action will be taken against employees who disclose safety concerns through the reporting system, unless disclosure indicates an illegal act, gross negligence, or deliberate or willful disregard of regulations or procedures.
- Establishing safety performance targets that are realistic, measurable, and data driven.
- Continually improving our safety performance through management processes that ensure appropriate safety management action is taken and is effective.



Sample Policy Statement #5

The management of safety is one of our core business functions. [Agency Name] is committed to developing, implementing, maintaining, and constantly improving processes to ensure that all our transit service delivery activities take place under a balanced allocation of organizational resources, aimed at achieving the highest level of safety performance and meeting established standards.

All levels of management and all employees are accountable for the delivery of this highest level of safety performance, starting with the Accountable Executive.

[Agency Name] commits to:

- Support the management of safety through the provision of appropriate resources, that will result in an organizational culture that fosters safe practices, encourages effective employee safety reporting and communication, and actively manages safety with the same attention to results as the attention to the results of the other management systems of the organization;
- Integrate the management of safety among the primary responsibilities of all managers and employees;
- Clearly define for all staff, managers, and employees, their accountabilities and responsibilities for the delivery of the organization's safety performance and the performance of our Safety Management System;
- Establish and operate hazard identification and analysis, and safety risk assessment activities, including an employee safety reporting program as a fundamental source for safety concerns and hazard identification, in order to eliminate or mitigate the safety risk of the consequences of hazards resulting from our operations or activities to a point which is consistent with our acceptable level of safety performance;
- Ensure that no action will be taken against any employee who discloses a safety concern through the employee safety reporting program, unless disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures;
- Comply with, and wherever possible exceed, legislative and regulatory requirements and standards;
- Ensure that sufficient skilled and trained human resources are available to implement safety management processes;
- Ensure that all staff are provided with adequate and appropriate safety-related information and training, are competent in safety management matters, and are allocated only tasks commensurate with their skills;



- Establish and measure our safety performance against realistic and data-driven safety performance indicators and safety performance targets;
- Continually improve our safety performance through management processes that ensure that appropriate safety management action is taken and is effective; and
- Ensure externally supplied systems and services to support our operations are delivered meeting our safety performance standards.



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