



CobbLinc Agency Safety Plan

Contents

1	AUTHORIZATIONS	1
2	Transit Agency Information	3
3	Plan Development, Approval, and Updates	4
4	Safety Performance Targets	8
5	Safety Management Policy	12
5.1	Safety Management Policy Statement	12
5.2	Safety Management Policy Communication	14
5.2.1	Cobb County Transit Division's Operations Contractor – Transdev	14
5.3	Authorities, Accountabilities, and Responsibilities	17
5.3.1	Accountable Executive	17
5.3.2	CSO or SMS Executive	17
5.4	Agency Leadership and Executive Management	18
5.5	Key Staff	18
5.6	Employee Safety Reporting Program	22
5.6.1	Reporting Options	23
5.6.2	Hazard Tracking	23
5.6.3	Near-Miss and Hazard Reporting	24
5.6.4	Threatening or Suspicious Activity	24
5.6.5	Duty to Report Wrongdoing	24
5.6.6	Self-Reporting	25
5.6.7	Open-Door Policy	25
5.6.8	Accidents/Incidents	25
5.6.9	Required Courtesy Cards	26
5.6.10	Duty to Report Law Enforcement Actions	26
5.6.11	Possible Disciplinary Actions	27
5.6.12	Applying Disciplinary Actions	29
6	Safety Risk Management	30
6.1	Safety Risk Management Process	30
6.1.1	Safety Hazard Identification	31



6.2	Accident/Incident Hazard Identification	33
6.2.1	Safety Risk Assessment	34
6.2.2	Safety Risk Mitigation	36
7	Safety Assurance.....	38
7.1	Safety Performance Monitoring and Measurement.....	38
8	Safety Promotion	46
8.1	Competencies and Training.....	46
8.1.1	Instructors.....	46
1.	Requirements for Operator Training	48
8.1.2	Classroom Training	48
8.1.3	Behind-the-Wheel Training	49
9	Additional Information	54
9.1	Supporting Documentation	54
9.2	Definitions of Special Terms Used in the Safety Plan	54
9.3	List of Acronyms Used in the Safety Plan	56

List of Tables

Table 1	Safety Performance Measures- Motor Bus (MB)	8
Table 2	Safety Performance Measures- Demand Response (DR)	9
Table 3	Safety Performance Measures- Motor Bus (MB)	10
Table 4	Safety Performance Measures- Demand Response (DR)	11
Table 4.	Safety Risk Likelihood	35
Table 5.	Safety Risk Severity	35
Table 6.	Safety Risk Index	35
Table 7.	Sample Hazard Log	37

List of Figures

Figure 1.	Cobb County Organization Chart	6
Figure 2.	Hazard Management Process.....	30



1 Authorizations

Moving Ahead for Progress in the 21st Century (MAP-21) and the Fixing America's Surface Transportation (FAST) Act granted the Federal Transit Administration (FTA) the authority to establish and enforce a comprehensive framework to oversee the safety of transit bus systems throughout the United States. On July 19, 2018, the FTA promulgated its final rule 49 CFR Part 673 - Public Transportation Agency Safety Plan (PTASP), which requires recipients of FTA Chapter 5307 funds to develop and implement a safety plan based on Safety Management Systems (SMS) principles and methods.

CobbLinc has established this Safety Plan as our agency's commitment to system safety and the principles of SMS. The objectives of our plan are to:

- Increase the safety of our transit system by proactively identifying, assessing, and controlling risks;
- Continually improve safety performance;
- Improve the commitment of transit leadership to safety; and
- Foster a culture of safety awareness and responsiveness.

CobbLinc Transit is committed to implementing a systematic and comprehensive safety program. Leadership will visibly demonstrate its commitment to safety by monitoring hazards, enforcing, and supporting safety programs, and promoting an open and transparent environment to discuss and address safety issues.

This Safety Plan was developed by the Georgia Department of Transportation (GDOT), and CobbLinc Transit has adopted it to comply with FTA Part 673 requirements. The Cobb Linc County Commission, the Transit Director, and Chief Safety Officer (CSO) have reviewed and approved this safety plan and assure that its contents establish a comprehensive SMS framework and meet the requirements of Part 673.

To ensure that the necessary processes are in place to accomplish both enhanced safety at the local level and the goals of the National Public Transportation Safety Plan (NPTSP), CobbLinc Transit has adopted this PTASP and the tenets of SMS, including a Safety Management Policy (SMP) and the processes for Safety Risk Management (SRM), Safety Assurance, and Safety Promotion, per 49 USC 5329(d)(1)(A). While safety has always been a primary function at CobbLinc Transit, this document lays out a process over the next several years to fully implement an SMS that complies with the PTASP final rule, as amended.

Additionally, the FTA recently released a Notice of Proposed Rulemaking (NPRM) with proposed revisions to the NPTSP to address the new requirements in the Bipartisan Infrastructure Law (BIL), enacted as the Infrastructure Investment and Jobs Act to further advance transit safety. The revision supersedes the one which the FTA published in January 2017. It lays out a performance-based approach to reduce injuries and fatalities on transit systems under the FTA's safety jurisdiction.

Furthermore, in April 2024, the FTA made important updates to the PTASP regulations to improve safety management and performance monitoring for transit agencies. These updates stress the need for decisions based on data and proactive risk management. Key changes include using advanced safety performance metrics to provide a more complete view of safety by recording a wider range of incidents and near-misses. This helps agencies spot potential hazards earlier and take action to prevent them. Additionally, the FTA now requires more thorough training programs for transit staff, focusing on modern SMS practices and emergency preparedness to create a knowledgeable workforce focused on the culture of safety.

The updated PTASP regulation also adds stronger oversight and accountability measures for 5307 agencies. These agencies must now conduct regular safety audits and submit detailed reports on their safety performance and compliance with SMS as detailed in their PTASP plans. These reports should include specific plans for addressing any safety issues identified and providing a commitment to continuous improvement. The



regulation also highlights the importance of management in promoting a safety-first culture and encouraging executives to be actively involved in safety planning and decision-making processes, thereby promoting safety communications in a top-down and bottom-up feedback.

Safety is a core business function of all public transportation providers and should be systematically applied to every aspect of service delivery. At CobbLinc Transit, all levels of management, administration, and operations are responsible for the safety of their customers and themselves. To improve public transportation safety to the highest practicable level in the state and comply with FTA requirements, the GDOT originally developed this PTASP in collaboration with CobbLincTransit.

This PTASP will be distributed to all transit employees and will be reviewed and updated annually.



2 Transit Agency Information

Transit Agency Name	Cobb County (CobbLinc)		
Transit Agency Address	463 Commerce Park Drive, Suite 112, Marietta, Georgia 30080		
Name and Title of Accountable Executive	Theophalas Letman, Cobb County Department of Transportation Transit Division Manager		
Name of Chief Safety Officer or SMS Executive	Robert Zuco, Customer Service Manager		
Mode(s) of Service Covered by This Plan	Commuter Bus, Motor Bus, Demand Response	List All FTA Funding Types (e.g., 5307, 5310, 5311)	5307, 5337, and 5339
Mode(s) of Service Provided by the Transit Agency (Directly operated or contracted service)	CobbLinc is the bus public transportation system in Cobb County that provides commuter bus, motor bus, and demand response services. CobbLinc operates 9 local and 3 express bus routes, 2 Circulator routes, 3 FLEX zones, and paratransit service. All express routes connect with MARTA rail stations and downtown employment centers. CobbLinc also offers 2 transfer centers (Marietta and Cumberland) and 8 park-and-ride lots. CobbLinc has an average annual ridership of 1,096,025 passenger trips (FY2024). As of 2024, CobbLinc's total fleet consists of 113 buses: 70 local route buses, 19 express buses, 19 paratransit buses, and 5 Flex buses. CobbLinc is operated through a contracted service agreement with Transdev, a private operator providing fixed-route operations, paratransit operations, maintenance, safety, and customer service.		
Annual VRM (CY 2024)	Fixed-Route Bus VRM	Demand Response/Paratransit VRM	
	3133731	431295	
Annual Unlinked Passenger Trips (UPT) (CY 2024)¹	Fixed-Route Bus UPT	Demand Response/Paratransit UPT	
	1283861	56063	

¹ Data derived from: <https://www.transit.dot.gov/ntd/data-product/safety-security-major-only-time-series-data>



3 Plan Development, Approval, and Updates

Name of Entity That Drafted This Plan	Cobb County (CobbLinc)	
Signature by the Accountable Executive	Signature of Accountable Executive	Date of Signature
	Theophalas Letman	8/4/26
Approval by Safety Committee	Safety Committee Chair Signature	Date of Approval/Signature
	<i>[Signature]</i>	8/04/2026
Approval by the Board of Directors or an Equivalent Authority	Name of Individual/Entity That Approved This Plan	Date of Approval
	Cobb County Board of Commissioners	
	Relevant Documentation (title and location)	
Certification of Compliance	Name of Individual/Entity That Certified This Plan	Date of Certification
	Robert Zuco, Customer Service Manager	8-4-26
	Relevant Documentation (title and location)	
	Resolution, Board of Commissioners Meeting	

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 CobbLinc Agency Safety Plan	June 2020
1	Safety Management Policy Safety Performance Targets Corporate Communication of Safety Concerns Hazard Tracking Competencies and Training	Agency informational changes Bipartisan Infrastructure Law Requirements Safety Committee additions	December 2022



Version Number and Updates

Record the complete history of successive versions of this plan.

Version Number	Section/Pages Affected	Reason for Change	Date Issued
2	Full document Safety performance targets	Agency informational changes Bipartisan Infrastructure Law Requirements	December 2023
3	Safety performance targets	Agency Informational changes April 2024 FTA PTASP update Requirements	December 2024
5	Safety performance targets	Agency Informational changes. FTA PTASP update Requirements	December 2025
6	Safety Performance Targets	Recommended revisions for compliance Include missing measures for performance targets; Update Safety Performance Target table	July 2026

Cobb County Organization Chart

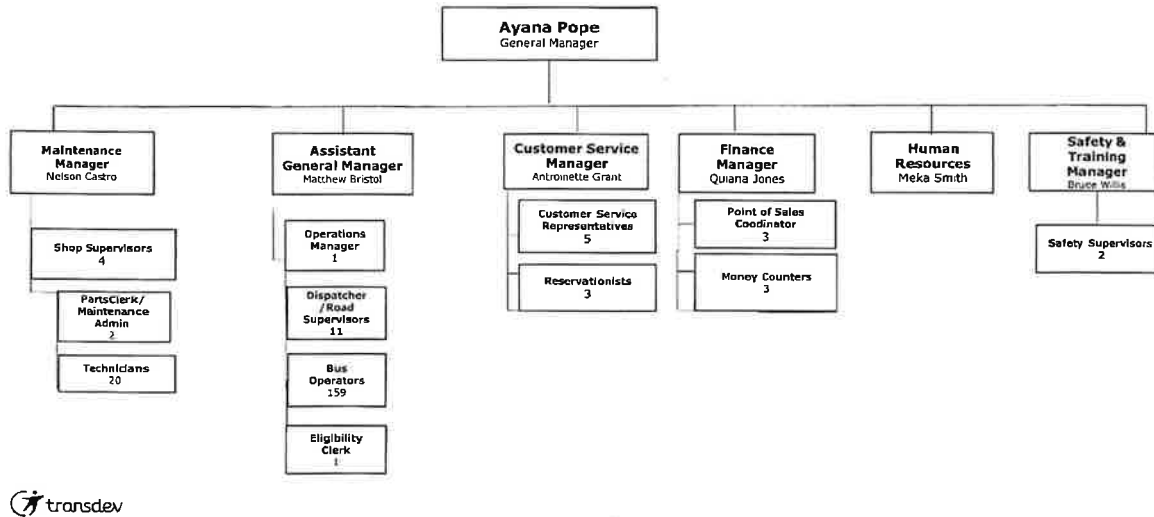


Figure 1. Cobb County Organization Chart

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 Cobb County Transit Division Agency Safety Plan (ASP) Annual Review is conducted via a four-step review process initiated by the transit operations manager and the chief safety officer (CSO) or his/her designee.

- Step 1 – Establish a timeline for the update. The process typically begins on or around October 1st of each year and is planned/scheduled to be completed by January 31st the following year. Prior to the beginning of each fiscal year, Transdev's Safety Plan is reviewed by executive management, revised based on the safety data collected, and analyzed according to the changes to policies and procedures made throughout the year.
- Step 2 – Review the county's transit agency personnel information to ensure leadership changes are incorporated and the signature pages and approvals are updated to reflect the current leadership. Furthermore, each section and element of the plan is reviewed in detail and changes are included in the review documentation. Transdev's 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.



- Step 3 – The transit operations manager and CSO coordinate an ASP review team meeting with Transdev's local team to review and comment on the changes recommended for incorporation into the updated ASP document.
- Step 4 – Cobb Transit Division staff will review the Public Transportation Agency Safety Plan (PTASP) to reflect new leadership, practices, policies, and procedures.



4 Safety Performance Targets

There are 14 total Safety Performance Measures targets defined by the FTA required for the PTASP. This includes 8 targets (in bold) required for the Safety Risk Reduction Program (SRPP). All measures in Table 1 and 2 will be evaluated over a calendar year period and target is set for a 5% yearly reduction for all measures.

Whereas safety performance target (SPT's) (see table 3 and 4) will be set and evaluated against a 3-year average of data reported to the National Transit Database (NTD). The SRPP targets are determined by the joint management-labor committee and must reflect an annual reduction in the associated safety performance measure. To reflect an annual reduction, the safety performance target must be set below the 3-year rolling average, with a 5% reduction rate.

Table 1 Safety Performance Measures- Motor Bus (MB)

MB/DO				
Measure		Definition	Actual 2024	Target 2026
Measure 1a	Major Events	Total number of Major Events	8.00	7.60
Measure 1b	Major Event Rate	Major Event rate per 100,000 vehicle revenue miles	0.26	0.24
Measure 1.1	Collision Rate	Collision rate per 100,000 vehicle revenue miles	0.22	0.21
Measure 1.1.1	Pedestrian Collision Rate	Pedestrian Collision rate per 100,000 vehicle revenue miles	0.00	0.00
Measure 1.1.2	Vehicular Collision Rate	Vehicular Collision rate per 100,000 vehicle revenue miles	0.22	0.21
Measure 2a	Fatalities	Total number of Fatalities	0.00	0.00
Measure 2b	Fatality Rate	Fatality rate per 100,000 vehicle revenue miles	0.00	0.00
Measure 2.1	Transit Worker Fatality Rate	Transit Worker Fatality rate per 100,000 vehicle revenue miles	0.00	0.00
Measure 3a	Injuries	Total number of Injuries	9.00	8.55
Measure 3b	Injury Rate	Injury rate per 100,000 vehicle revenue miles	0.29	0.27
Measure 3.1	Transit Worker Injury Rate	Transit Worker Injury rate per 100,000 vehicle revenue miles	0.00	0.00
Measure 4a	Assaults on Transit Workers	Total number of Assaults on Transit Workers	1.00	0.95
Measure 4b	Rate of Assaults on Transit Workers	Assault on Transit Workers per 100,000 vehicle revenue miles	0.03	0.03
System Reliability	Means distance between vehicle failure	Average miles between major mechanical failures	29,287	27,822.85



Table 2 Safety Performance Measures- Demand Response (DR)

DR/DO				
Measure		Definition	Actual 2024	Target 2026
Measure 1a	Major Events	Total number of Major Events	1.00	0.95
Measure 1b	Major Event Rate	Major Event rate per 100,000 vehicle revenue miles	0.03	0.03
Measure 1.1	Collision Rate	Collision rate per 100,000 vehicle revenue miles	0.03	0.03
Measure 1.1.1	Pedestrian Collision Rate	Pedestrian Collision rate per 100,000 vehicle revenue miles	0.00	0.00
Measure 1.1.2	Vehicular Collision Rate	Vehicular Collision rate per 100,000 vehicle revenue miles	0.03	0.03
Measure 2a	Fatalities	Total number of Fatalities	0.00	0.00
Measure 2b	Fatality Rate	Fatality rate per 100,000 vehicle revenue miles	0.00	0.00
Measure 2.1	Transit Worker Fatality Rate	Transit Worker Fatality rate per 100,000 vehicle revenue miles	0.00	0.00
Measure 3a	Injuries	Total number of Injuries	3.00	2.85
Measure 3b	Injury Rate	Injury rate per 100,000 vehicle revenue miles	0.10	0.09
Measure 3.1	Transit Worker Injury Rate	Transit Worker Injury rate per 100,000 vehicle revenue miles	0.03	0.03
Measure 4a	Assaults on Transit Workers	Total number of Assaults on Transit Workers	0.00	0.00
Measure 4b	Rate of Assaults on Transit Workers	Assault on Transit Workers per 100,000 vehicle revenue miles	0.00	0.00
System Reliability	Means distance between vehicle failure	Average miles between major mechanical failures	35,941	34,144.19

The five KPI's used for safety performance target include: Collisions, Injuries, Major Safety Events, Assaults on Transit Workers, and System Reliability. Each measure also has their rates calculated against the VRM for the year.

- **Collision** – Any impact between a transit vehicle and any other vehicle, object, or any person.
- **Assault on Transit Workers**– An event where an individual knowingly, without lawful authority, and with intent to endanger safety or reckless disregard for life, interferes with, disables, or incapacitates a transit worker while they are performing their duties
- **Injuries** – Total number of reportable injuries and rate per total VRM by mode;
- **Safety Events** – Total number of reportable events and rate per total VRM by mode; and
- **System Reliability** – Mean distance between major mechanical failures by mode.



These safety performance targets (SPTs) are based on data submitted to NTD. The SPTs were identified based on a 3-year rolling average of data from 2022 to 2024. The annual performance targets for these measures for Fiscal Year (FY) 2026 are as below. Additionally, these SPTs are reviewed and assessed by the safety committee to ensure consistency with risk reduction programs. These SPTs will be shared with the Atlanta Regional Commission Metropolitan Planning Organization (MPO) and the Georgia Department of Transportation (GDOT) to aid in the planning process. CobbLinc will coordinate with GDOT and Atlanta Regional Commission in the selection of state and regional performance targets as requested.

In accordance with 49 USC 5329(d)(1)(I)(i), these SPTs are set to work toward a reduction of vehicular and pedestrian accidents involving buses. In order to reduce such events, CobbLinc will utilize the safety risk management process. Mitigations that may be taken to reduce events may include measures to reduce visibility impairments for bus operators that contribute to accidents, including retrofits to buses in revenue service and specifications for future procurements that reduce visibility impairments.

Additionally, per 49 USC 5329(d)(1)(I)(ii), CobbLinc will also continue to take further measures to mitigate assaults on transit workers, including the deployment of assault mitigation infrastructure and technology on buses, such as barriers to restrict the unwanted entry of individuals and objects into the workstations of bus operators. To conduct this review, the safety committee will conduct risk analyses to determine if such physical mitigations are necessary to reduce assaults and injuries to transit workers.

Table 3 Safety Performance Measures- Motor Bus (MB)²

MB/DO (per 100,000 VRM)									
Mode - MB	Collisions	Rate* of Rate of Collisions	Injuries	Rate of Injuries	Assaults on Transit Workers	Rate of Assaults	Major Events ³	Rate of Major Events	System Reliability **
2022 Actual	5	0.17	6	0.20	0.00	0.00	5	0.17	118,756
2023 Actual	13	0.42	25	0.80	0.00	0.00	13	0.42	26,473
2024 Actual	7	0.22	9	0.29	1.00	0.03	8	0.26	29,287
Average	8.33	0.27	13.33	0.43	0.33	0.01	8.67	0.28	58172.34
2026 SPT (MB)	7.92	0.26	12.67	0.41	0.32	0.01	8.23	0.27	55263.72

² The 5% reduction target may not represent a whole number due to calculation average of a 3-year rolling average. Assessments regarding meeting the target would be analyzed against the whole number reported by the agency for the respective year.

³ Major Events is derived from NTD data, reported as "Events Total" (sum of total number of Collisions, Fires, Security Events, Assault on Transit Workers, and another NOC Total, latest revision available at the time of preparation).



Table 4 Safety Performance Measures- Demand Response (DR)

DR/DO (per 100,000 VRM)									
Mode - DR	Collisions	Rate* of Rate of Collisions	Injuries	Rate of Injuries	Assaults on Transit Workers	Rate of Assaults	Major Events	Rate of Safety Events	System Reliability
2022 Actual	0	0.00	0	0.00	0.00	0.00	0	0.00	18,405
2023 Actual	1	0.25	1	0.25	0.00	0.00	1	0.25	26,754
2024 Actual	1	0.23	3	0.70	0.00	0.00	1	0.23	35,941
Average	0.67	0.16	1.33	0.31	0.00	0.00	0.67	0.16	27033.40
2026 SPT (DR)	0.63	0.15	1.27	0.30	0.00	0.00	0.63	0.15	25681.73

*Rate = events per 100,000 VRM

**System Reliability = miles between major mechanical failures

Safety Performance Target Coordination		
Cobb County coordinates with the Atlanta Regional Commission.		
Targets Transmitted to the State	State Entity Name	Date Targets Transmitted
	Georgia Department of Transportation	Annually, following the annual Federal Transit Administration (FTA) Certifications and Assurances submission
Targets Transmitted to the Metropolitan Planning Organization(s)	Metropolitan Planning Organization Name	Date Targets Transmitted
	Atlanta Regional Commission	Annually, following the annual FTA Certifications and Assurances submission



5 Safety Management Policy

5.1 Safety Management Policy Statement

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

Safety management is one of our core business functions. CobbLinc 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.

CobbLinc's commitment is 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 alike, their accountabilities and responsibilities for the delivery of the organization's safety performance and the performance of our Safety Management System (SMS);
- Establish and operate hazard identification and analysis and safety risk evaluation 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 risks 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 SPTs;
- 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.
- Ensure that the strategies and guidelines to address infectious disease planning and response are consistent with the Centers for Disease Control and Prevention, the Georgia Department of Public Health, and local health authorities in order to minimize exposure to infectious diseases in accordance with 49 USC 5329 (d)(1)(D).

This ASP describes our safety efforts and programs, and through our thorough implementation of such efforts and



programs, we explicitly show our commitment to system safety based on SMS principles as per 49 CFR Part 673 and requirements dictated in 49 USC 5329.

Signature

A handwritten signature in black ink, appearing to read 'T. Letman', with a long horizontal flourish extending to the right.

Theophalas Letman, Transit Division Manager, AE

Date

8/4/26



Transdev's policy statement and the official policy that reflects Transdev's commitment to safety is included as **Appendix A**.

5.2 Safety Management Policy Communication

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

Training for new transit operations employees includes classroom instruction/discussion and a comprehensive review of the county's and Transdev's policies and procedures.

5.2.1 Cobb County Transit Division's Operations Contractor – Transdev

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
- Be safe near-miss and hazard reporting

The location safety manager 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 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 SST meetings to discuss safety priorities, safety issues, and hazard management and to communicate safety-related information across all departments.

- The location safety manager and the LGM have the authority to correct or suspend work for conditions determined to be unsafe; pose a hazard to customers, employees, contractor employees, or 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 2 to 3 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	Transdev locations are selected based upon risk-based criterion. Individual locations are reviewed every 2 to 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, prior year failing score
Review Format	More narrow and focused audit template that 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 – Transdev remain intact. Through the use of the Safety Toolbox, unresolved actions are designed to escalate to the LGM/region safety manager.
Visibility	Review results and action items are routinely shared with the LGM/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:

Executive Safety Committee

- Consists of president, chief operating officer, and safety vice president of each operating group
- Discussions include safety performance, trend analysis, program oversight

Safety Council

- Consists of vice presidents of safety for all operating divisions
- Discussions include safety performance, trend analysis, and safety oversight

Performance Review Management

- 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

Safety Advisory Committee

- Consists of a sampling of LGMs, regional directors of operations, regional safety directors, and region and local safety managers
- Discussions include review of policy and procedures, training, and safety awareness

Safety Committee

Pursuant to the Bipartisan Infrastructure Law updates to 49 USC Section 5329(d), CobbLinc Transit has created a safety committee composed of an equal representation of frontline employees and management representatives. The safety committee at a minimum, is responsible for:

- Conduct annual review of the PTASP to recommend for approval by the County Commission;
- Identify and recommend risk-based mitigations or strategies necessary to reduce the likelihood and severity of consequences identified through the agency's safety risk assessment;
- Identify mitigations or strategies that may be ineffective, inappropriate, or were not implemented as intended; and,
- Identify safety deficiencies for purposes of continuous improvement.

CobbLinc established the safety committee on January 1, 2022. The CSO will periodically convene meetings of the safety committee to discuss safety program issues, safety data/performance indicators, and Safety and Transit Asset Management (TAM) Plan updates, among various other issues that pertain to overall agency safety matters. The safety committee is a group of executive and frontline staff function, with a 50 percent split of frontline CobbLinc staff, and will be chaired by the CSO. The objectives of regular meetings of the safety committee are to ensure that the Transit Division Manager well versed in the implementation of the Safety Plan, KPIs, and other important data and that executive-level staff have a regular multidisciplinary forum to discuss pertinent safety issues and policy, including risk reduction activities.



Monthly safety committee meetings and minutes are on file and the Safety Risk Management log and tracking spreadsheet are on file and available upon request.

The safety committee consists of the following:

- Robert Zuco Safety Office
- Bruce Willis (Safety Manager)
- Ayana Pope (General Manager)
- Vacant (Maintenance Manager)
- Union representative/bus operator
- Two Frontline Employees (bus operators)

5.3 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).

5.3.1 Accountable Executive

Theophalas Letman, Cobb County Department of Transportation Transit Division Manager—As the accountable executive:

- Carry out the goals and objectives of the SMS
- Control or direct the human and capital resources needed to develop and maintain both the SMS and TAM plans
- Ensure that the SMS is effectively implemented throughout the system in close coordination with the CSO
- Assume accountability for sustainable outcomes
- Ensure departments are performing required SMS operations

5.3.2 CSO or SMS Executive

Robert Zuco, CSO—As the CSO:

- Responsible for reviewing safety and reports prepared and provided by the contractor's location safety manager
- Oversees hazard management practices
- Serves as SMS subject matter expert
- Oversees accident investigations
- Communicates with executive leadership
- Oversees safety certification
- Manages internal safety audit programs



5.4 Agency Leadership and Executive Management

Transit Operations Manager – Theophalas Letman

5.5 Key Staff

Cobb County Transit Division staff and its contractor use the safety committee, as well as the monthly driver's meeting and monthly all-staff meetings, to support its SMS and safety programs:

- **Safety Committee:** Any safety hazards reported will be jointly evaluated by the safety committee and the CSO during the monthly meeting. The safety committee members include the CSO, the county's transit operations manager and transit operations specialist, the contractor's LGM, the contractor's location maintenance manager, the contractor's location safety manager, frontline staff assigned to the committee, and any others who meet monthly to review issues and make recommendations to improve safety.
- **Drivers' Meetings:** A permanent agenda item in all monthly meetings is dedicated to safety. Safety issues are discussed and documented.

Monthly All-Staff Meetings: Hazard reports and mitigations will be shared, safety topics will be brought up for open discussion, further feedback solicited, and hazard self-reporting further encouraged.

Information discussed in these meetings will be documented.

Additional Accountability	To ensure safety and responsibility and accountability throughout the organization, the following Safety Responsibility and Task Matrix assigns safety responsibilities for the tasks listed. This process ensures that the pertinent safety items are covered and that each person knows his or her areas of responsibility. AE: Accountable Executive CSO: Chief Safety Officer OPS: Operations MNT: Maintenance HR: Human Resources AL: Agency Leadership KS: Key Staff																														
	<table><tr><th colspan="8">Safety Responsibility and Task Matrix</th></tr><tr><th>Responsibilities and Tasks</th><th>AE</th><th>CSO</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 at the beginning of each fiscal year</td><td>☒</td><td>☒</td><td>AL:☒ KS:☒</td><td>AL:☐ KS:☐</td><td>AL:☐ KS:☐</td><td>AL: ☐ KS: ☐</td><td>Transit Division Manager</td></tr></table>								Safety Responsibility and Task Matrix								Responsibilities and Tasks	AE	CSO	OPS	MNT	HR	OTHER	Responsible Personnel	Establish annual safety objectives for submission at the beginning of each fiscal year	☒	☒	AL: ☒ KS: ☒	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐
Safety Responsibility and Task Matrix																															
Responsibilities and Tasks	AE	CSO	OPS	MNT	HR	OTHER	Responsible Personnel																								
Establish annual safety objectives for submission at the beginning of each fiscal year	☒	☒	AL: ☒ KS: ☒	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	Transit Division Manager																								



	Responsibilities and Tasks	AE	CSO	OPS	MNT	HR	OTHE R	Responsible Personnel
	Submit a report on the safety performance at the end of each fiscal period	☒	☒	AL: ☒ KS: ☒	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	Transit Division Manager
	Submit period operations and safety data; accident and incident reports; and site safety review results	☐	☒	AL: ☒ KS: ☒	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☒	General Manager
	Direct that work or conditions have been determined to be unsafe or pose a hazard to customers, employees, or the general public, or it endangers safe passage such that buses must be suspended or restricted until the unsafe condition or hazard can be mitigated or corrected	☐	☐	AL: ☒ KS: ☒	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☒	General Manager
	Management of system safety, occupational health and safety, accident and incident investigation, environmental protection, and monitoring the implementation of the SMS Program Plan	☐	☒	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☒	Safety Manager



	Responsibilities and Tasks	AE	CSO	OPS	MNT	HR	OTHER	Responsible Personnel
	Review of all safety aspects of departmental procedures including: Transdev policies/instructions; Standard Operating Procedures	☐	☒	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☒	Safety Manager
	SMS Review and Modification	☐	☒	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☒	Safety Manager
	SST Meetings	☐	☒	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☒	Safety Manager
	Daily Safety & Health Walkthrough	☐	☐	AL: ☐ KS: ☐	AL: ☐ KS: ☒	AL: ☐ KS: ☐	AL: ☐ KS: ☐	Transdev Maintenance Manager
	Safety related reports to external agencies	☐	☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☒	Transdev General Manager
	Near-miss and route hazard report investigations	☐	☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☒	Transdev Road Supervisors
	Investigation of safety-related trends	☐	☒	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	Safety Manager



	Responsibilities and Tasks	AE	CSO	OPS	MNT	HR	OTHER	Responsible Personnel
	Coordination with the U.S. and State Departments of Labor and Occupational Safety and Health Administration (OSHA)	☐	☒	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	Safety Manager
	Environmental Management Oversight	☐	☒	AL: ☐ KS: ☐	AL: ☐ KS: ☒	AL: ☐ KS: ☐	AL: ☐ KS: ☐	Maintenance Manager
	Hazard Management Process	☐	☒	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	Safety Manager
	Managing Safety Validation of Change Process	☐	☒	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☒	General Manager
	Safety Data Reporting	☐	☒	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☒	Safety Manager
	Investigations	☐	☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☒	Safety Manager
	Advise to update SOPs, Rules, and Emergency Plans	☐	☒	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	Safety Manager
	Emergency Response	☐	☒	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☒	Safety Manager
	Fire Protection	☐	☒	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☒	Maintenance Manager



	Responsibilities and Tasks	AE	CSO	OPS	MNT	HR	OTHER	Responsible Personnel
	Shop Safety Hazardous Tools Inspections	☐	☒	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☒	Maintenance Manager
	Review Vehicle Maintenance	☐	☒	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☒	Maintenance Manager
	Perform Vehicle Maintenance Inspections/Audits	☐	☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☒	Maintenance Manager
	Training, Certification, Review and Audit	☐	☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☒	Safety Manager
	Personal Protective Equipment	☐	☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☒	Maintenance Manager
	Hazardous Materials Management	☐	☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	Maintenance Manager
	Drug and Alcohol Abuse Program	☐	☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	Safety Manager
	Procurement	☐	☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☐	AL: ☐ KS: ☒	Transit Contracts Manager

5.6 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).

Cobb County Transit Division staff and their transit operations and maintenance contractor, Transdev, are 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, procedures, 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, 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, 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 hotline.

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.

5.6.1 Reporting Options

Cobb County Transit Division and Transdev staff reporting of unsafe practices, policy violations, violations of the law, etc. is encouraged, and in some instances required, of all employees. The primary goal is to be able to identify areas where risk of injury to personnel or customers or destruction of property may exist and develop measures to mitigate those risks.

Unless the employee's action or in-action is egregious, disciplinary action is not warranted.

Employees that fail to report the below mandatory items or submit an inaccurate or incomplete report that could lead to serious harm are subject to the disciplinary process described later in this section:

- Defective equipment
- Safety hazards
- Necessary information for an accident report

5.6.2 Hazard Tracking

More complex hazards may require the use of a tracking log that may consist of the following information:

Your road to reporting...

fraud, bribery, security breaches, dishonesty, discrimination or harassment, conflicts of interest, misconduct, safety violations, financial irregularities, violations of law, regulation or policy, workplace violence

Report your concerns!
If you have concerns about this or any other issues, contact the Ethics Hotline. It's operated by an external company, not by FirstGroup, so you can confidentially report a concern and remain anonymous. The Hotline is open 24 hours a day, every day of the year.

ETHICS HOTLINE: 3 ways to report

CALL: **1-877-322-5534**
VISIT: www.ethicsfirst.ethicspoint.com
EMAIL: compliance@firstgroup.com

Take Action!
Get a QR reader? You can now report anonymously by using a smart device to scan the QR code. Visit the ethics point website for more information on how to report. We value your input.

Near miss and hazard reporting



Date / / Near miss report ☐ Hazard report ☐
Name
Location
Observation(s)

Actions required

Who is to complete the action(s)?

Contractor ☐ Employee ☐ Visitor ☐ Other ☐





- Assigned hazard number;
- Date hazard identified;
- Hazard title;
- Hazard description;
- Sources from which a hazard was identified;
- The element of operation affected by the hazard;
- Initial hazard classification;
- Current hazard classification; and
- Corrective Action Plan (CAP).

Employees are **encouraged** to report:

5.6.3 Near-Miss and Hazard Reporting

In the interest of employee and passenger safety, each Transdev 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

5.6.4 Threatening or Suspicious Activity

Transdev 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 and/or to the Human Resources Department.

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.

5.6.5 Duty to Report Wrongdoing

Transdev is committed to investigating all good faith claims of wrongdoing so that corrective action may be taken. To that purpose, Transdev 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 Transdev ensures the matter is reported to group security, and Transdev will investigate and take appropriate steps to correct the wrongdoing or potential violation.

5.6.6 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.

5.6.7 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 Transdev, 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 LGM 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. Transdev'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.

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 Transdev 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.

Employees are REQUIRED to report the following. Failure to do so WILL lead to disciplinary action.

5.6.8 Accidents/Incidents

Transdev 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 Transdev 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, and injury and possible injury not later than 1 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.

5.6.9 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.

5.6.10 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.



5.6.11 Possible Disciplinary Actions

Transdev 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 Transdev performance code
- Class 3 – Secondary violations of the Transdev performance code
- Class 4 – Lesser violations of the Transdev 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 Transdev 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 Transdev performance code, include:

- Mandatory Reporting failure, including:
 - 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
 - Failure to report law enforcement actions
- 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 Transdev 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 Transdev with a current address or telephone number



- Failure to inform Transdev 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

5.6.12 Applying Disciplinary Actions

Although employment may be terminated at-will by either the employee or Transdev at any time in accordance with applicable law, without following any formal system of discipline or warning, Transdev 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, Transdev 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 Transdev's reporting requirements, infractions of company policy, and disciplinary actions that may be taken are described in more detail in the **Transdev Employee Handbook**.

6 Safety Risk Management

6.1 Safety Risk Management Process

Safety management is at the core of everything done at Transdev. 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.

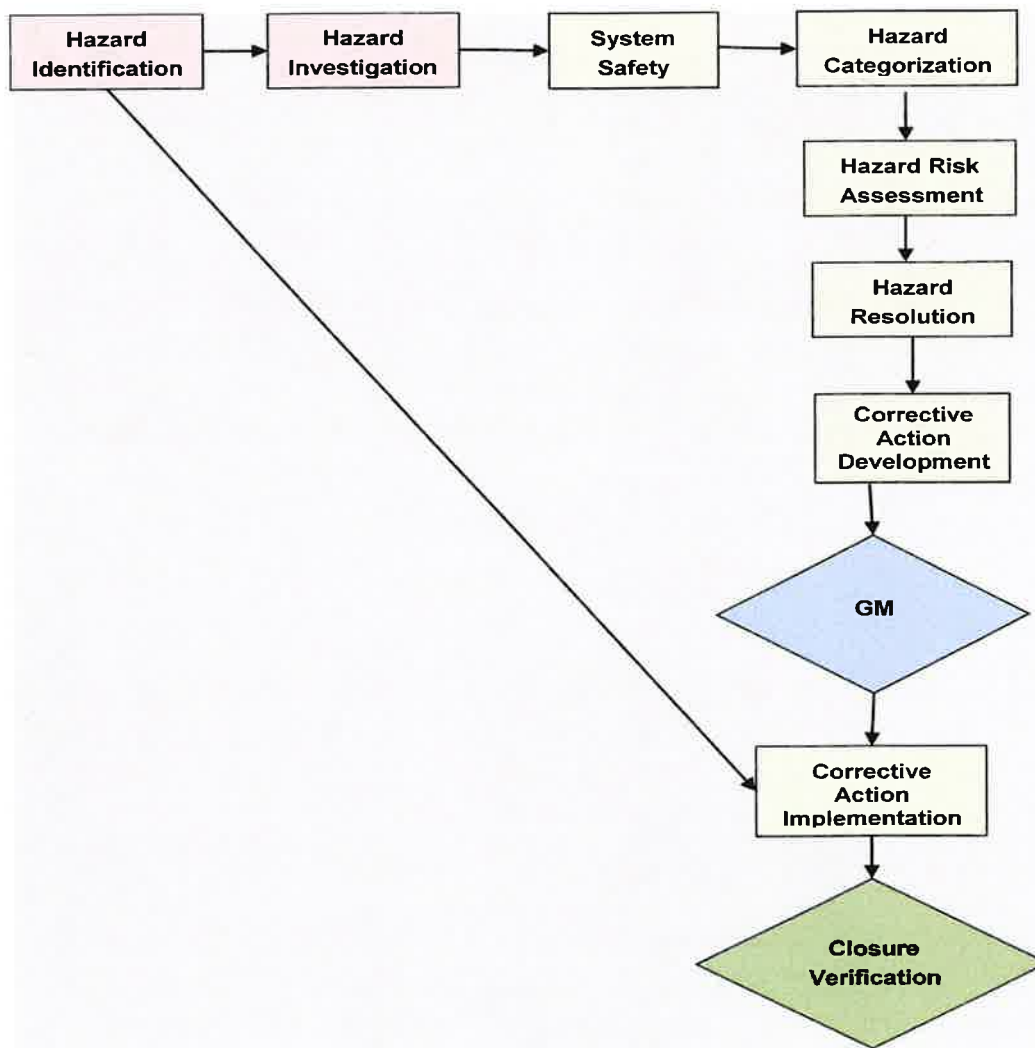


Figure 2. Hazard Management Process

As part of this process, infectious disease exposure control measures are incorporated into our Safety Risk Assessment to address the specific risks associated with potential infectious disease transmission in transit environments. The assessment will evaluate factors such as:

- Risk of Exposure: Identification of high-contact areas and activities where employees and passengers may



face increased exposure to infectious diseases.

- Protective Measures: Availability and use of personal protective equipment (PPE) for staff and appropriate hygiene resources for passengers.
- Hygiene and Sanitization Protocols: Regular cleaning and sanitizing of high-contact surfaces, in accordance with public health guidelines, to reduce the risk of disease transmission.
- Training and Communication: Staff training on infectious disease prevention and ongoing communication of public health guidelines and agency policies.

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 SST, accident review committee (ARC), and a local client liaison committee. To ensure consistency at each location, **SOP's #803; #803a; #803b SST and SOP #702 – Accident Review Committee** describe the procedures which are to be followed in creating and operating a SST and ARC.

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 for teams to 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.

6.1.1 Safety Hazard Identification

This process is a vital component in Transdev's efforts to reduce safety risks and improve overall delivery of service. Safety Hazard Identification data from internal sources such as employee reporting, customer feedback, maintenance records; and external sources such as the FTA and local oversight authority is used to implement immediate corrective actions and to proactively identify hazards and potential consequences before they cause future accidents or incidents.

The objective of hazard identification is to identify those conditions that can cause an accident or create an unsafe condition and determine possible consequences if the unsafe condition is not corrected. Transdev routinely analyzes records from our operation and external sources as they become available to identify accident causation based on history. Current traffic conditions are periodically analyzed, and management inspection of established prevention processes are routinely performed.

Transdev also takes an additional proactive step with its **SOP #208 – Safety Validation of Change** to identify hazards and consequences **PRIOR** to implementing any changes to operations.

Transdev 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 Mitigation of Safety Risk
- 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 Transdev 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.
- **Vehicle Maintenance Risk Assessment**
 - All employees who perform maintenance and repairs to vehicles within transit centers and bus yards or on road calls complete a risk assessment using **SOP #503a – Vehicle Maintenance Risk Assessment Form** prior to performing any work on a vehicle.
 - The Risk Assessment process, **SOP #503 – Vehicle Maintenance Risk Assessment**, requires employees about to perform a maintenance task to confirm they possess the training, skills, knowledge, abilities, tools, and equipment to safely perform the task at hand. The assessment includes determining the following:
 - Are You Properly Trained to Perform the Task?
 - If a Task Requires Lifting, Are Lifts Secured, Are Jack Stands Used Correctly?
 - Are You Wearing the Appropriate PPE?
 - Have You Performed the Proper Lock-Out/Tag-Out procedures?
 - Are You Aware of the Potential Risks of Performing this Repair?
 - If the answer is “NO” to any of the above assessments, the technician is to immediately contact their manager
- **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, or 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
 - **SOP #501b – Facility Parking Risk Assessment Form** are tools to help with this assessment.

6.2 Accident/Incident Hazard Identification

Procedures exist and are followed regarding resolution of accidents and incidents and capturing data. Although this information is used proactively, Transdev takes advantage of these opportunities to determine which, if any, hazards existed that may have contributed to the accident or incident and develop mitigation measures to reduce the risk of a recurrence.

There are five main areas reviewed in this Hazard Identification process:

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”

On-Board Video Technology

- **SOP #704 – On-Board Video Technology** provides a summary of the on-board video system and Company standards that all Transdev 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 Transdev 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.

Information learned from this identification process is used to improve training and reduce or eliminate the underlying causes.

6.2.1 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 determine the likelihood of it occurring. Likelihood of occurrence is determined based on the analysis of transit system operating experience, evaluation of Transdev 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 likelihood of occurrence categories.

Table 5. Safety Risk Likelihood

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.

Based on company policy and the analysis of historical data, Transdev has made the following determinations regarding risk acceptance.

Table 6. Safety Risk Severity

Hazard Categories					
Frequency	1 Catastrophic	2 Critical	3 Major	4 Marginal	5 Insignificant
A Frequent	1A	2A	3A	4A	5A
B Probable	1B	2B	3B	4B	5B
C Occasional	1C	2C	3C	4C	5C
D Remote	1D	2D	3D	4D	5D
E Improbable	1E	2E	3E	4E	5E
F Eliminated	1F	2F	3F	4F	5F

Table 7. Safety Risk Index

Hazard Risk Index	Risk Decision Criteria
Unacceptable	Hazard must be mitigated
Undesirable	Requires acceptance from management
Acceptable with Review	Hazard may be accepted with management review
Acceptable	Risk level is acceptable
Eliminated	No hazard remains



6.2.2 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 LGM and location safety manager issue a documented decision to manage the hazard until resources are available for full mitigation.
- **Acceptable with review**: The LGM 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.

Mitigation of Safety Risk

Mitigation of safety risk 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 mitigation of safety risk process are to:

1. Identify areas where mitigation of safety risk 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.

Mitigation of Safety Risk Management and Tracking

Resolution of identified hazards are managed by the LGM and/or the location safety manager. The mitigation of safety risk 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.



Table 8. Sample Hazard Log

Hazard ID	Hazard Type	Identification Date	Description	Hazard Rating (Likelihood and Consequence)	Mitigation	Status of Feedback with Reports (f applicable)	Updated Hazard Mitigation Rating (after mitigation)

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 "Be Safe" process is in place and working.
- Reviewing findings from Be Safe tours and determine if tasks/actions have been closed out

The Safety Toolbox includes information regarding:

- Be Safe (Be Safe Debriefs, Be Safe Tours, Be Safe 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.
- Contacts (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.
- Safety Leadership Activities (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.

In addition to the Safety Toolbox, CobbLinc also tracks hazards through a tracking log. The hazard tracking log, when used, is updated regularly until the hazard has been closed out. All captured data is analyzed for the identification of developing trends to ensure future safety risks/hazards can be mitigated and/or eliminated. A sample log is displayed below:

Additional documentation, such as corrective action plans, are developed for those hazards requiring complex and multifaceted resolutions.



7 Safety Assurance

7.1 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, Transdev employs a resident management team at each operation location. This team consists of a LGM and a location safety manager, who oversee the safety of the operation.

Additionally, each location employs street supervisors, dispatchers, and instructors, all of whom are responsible for oversight of the daily operations and training. All safety risks identified are reported to the LGM and location safety manager. Any risks that can be addressed immediately are corrected but still reported. Each location also establishes an SST, 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 region safety manager, region safety director, region maintenance director, and the region vice president. 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 vice president of safety and the vice president of maintenance. 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.

Transdev 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
- 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 dispatchers’ responsibilities for protecting the customers and managing the scene.

The groups described in **SOP #702 –ARC** and **SOP #803 – 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 LSM and/or 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 location safety manager and LGM investigate to determine the root cause.

Additionally, in 2021, CobbLinc unveiled the employee safety reporting program for employees to anonymously report safety and security concerns. Reports of these safety concerns are reviewed by CobbLinc CSO monthly and may also require review(s) by the safety committee as a part of the risk reduction and safety risk management program.

The following chart describes how the hazard data flows and is monitored by Transdev; 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	



Risk/Safety Data Flow

Weekly Data Review

Information Collected Daily	Location	Third-Party Data Collected	Risk Dept	Safety Dept	Location
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.	

Period Data Analysis

	Shared Services Dept	Safety Dept	Executive Safety Committee	Safety Council	Performance Review Management	Safety Advisory Committee
Collisions/ Injuries/ Workers Comp	Final reports sent to directors of safety for each business group.	Processes data; analyzes; creates reports; categorizes risk factors; and creates commentary for trend analysis.	This committee consists of president, chief operations officer, 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 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.

Transdev 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 that 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



Management of Change

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

Main Steps	Key Activities	Checklists & Guidance	Completed By
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



Management of Change

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

	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 • Review performance process	• Check compliance as part of Region Safety Monitoring • Review effectiveness of the process as part of Region oversight	Location safety manager Corporate safety management Vice president of safety	



Management of Change

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

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:
 - Reviews and approves each region's safety validation of change process
 - Decides on the level of safety validation required (consulting with other functional heads as necessary) for Category A changes
 - Is consulted on any Category B change proposal
 - Provides safety expertise/support to region safety managers and vice president of safety during safety validation activities as required.
 - 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, senior director of safety, region safety directors, region safety managers, LGMs, location safety managers, and employees. Notification to the client is communicated through the LGM.

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. Transdev 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.



8 Safety Promotion

8.1 Competencies and Training

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

In accordance with 49 USC Section 5329 (d)(H)(i)(II), Transdev will provide all pertinent safety training, refresher training, and de-escalation training for operations and maintenance personnel. Moreover, Transdev maintains a comprehensive training program with elements directly identified regarding safety.

The education and training process at Transdev 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 (BTW) skills building are used to support the learning process. Learning is evaluated through written quizzes, driving tests and customer service skills evaluations.

8.1.1 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 BTW instructor is responsible for conducting closed-course exercises and BTW 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 BTW 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 BTW 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, Transdev policies and procedures, local policies, and client-specified programs and requirements.

The certified instructor also provides a review of the BTW Manual, Classroom Manual, and all Transdev 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 (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 percent 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 Transdev 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 LGM 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 Transdev employee is trained in "**Be Safe**" and "**Safe Work Methods**," which are described later in this section.

"**Be Safe**" is our company-wide approach to safety management. This program takes our safety performance to the next level through behavioral change. "Be Safe" is inclusive, collaborative, and focuses on recognizing and



acknowledging safe behavior and actions through positive reinforcement such as debriefs, tours, and touchpoints.

Transdev'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 Transdev's First Occupational Rehabilitation Management light duty and return to work management program, in controlling workers compensation losses

The "Safe Work Methods" training curriculum includes:

- 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:

8.1.2 Classroom Training

The first part of operator training at Transdev, 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
- Be Safe - 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

8.1.3 Behind-the-Wheel Training

BTW 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 Transdev, the first part of BTW 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 BTW 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 Transdev 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 BTW 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
 - Vehicle Control
 - Straight in Lane
 - Left Turn
 - Right Turn
 - Lane Changing - Moving Right or Left
 - One on One Instruction Behind the Wheel
 - **Basic Road Work**
 - “Smith System”
 - Intersections
 - Service Stops
 - Backing
 - Advanced Road Work
 - “Smith System” Commentary Driving
 - Roadways
 - Expressway / Highway Driving
 - Intersections
 - 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.
1. 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 Transdev 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)

2. Requirements for Staff Training

Staff personnel are trained in Safety Leadership and "Be Safe" (described in item #1)

- Safety Leadership

This is an interactive CD-ROM course consisting of 5 CDs and leaders guides which are designed to educate all levels of Transdev 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, with a passing grade of 90 percent 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

Requirements for Continuing Training and Evaluations

Transdev 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 Transdev's formal employee training program, the following safety training is also conducted.

Safety Meetings

- 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 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 Collective Bargaining Agreement 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 Transdev minimum standards

Retraining

Transdev 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 Transdev'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 "**Be Safe**" program provides the structure and foundation for communicating safety messages and inspiring safe job performance at all levels. "Be Safe" 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.

“Be Safe” 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
 - **Individual Motivators – Individual Achievement Awards:** The “cultural carrot” helps affect individual safety improvement through the use of personal recognition awards. Currently established safety awards for Transdev employees are:
 - Annual Safe Driver Awards
 - SST Recognition
 - **A Safety Leadership Group - The SST:** Four to 10 location teammates dedicated to making safety “top of mind” by identifying and resolving safety issues.
 - SST
 - Review the safety concerns they have worked on and improvements that have been implemented
 - Record and distribute SST meeting minutes
 - General Manager
 - Review “Daily Safety & Health Walkthrough”
 - General Manager and SST
 - Recognize individuals who have earned years of safe driving
 - Pins and certificates
 - Include bullets from SST meeting minutes
 - **A Communication Tool:** The “Transdev Connect” employee app, a peer-to-peer safety communication tool offering safety tips, best practices, recognition, ideas on “What Works,” safety happenings, and safety pep rallies.



9 Additional Information

9.1 Supporting Documentation

Numerous SOPs, in addition to those mentioned in this plan, have been developed and incorporated into the operating practices at each Transdev location.

The SOPs 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 SOPs are listed below.

- High Interest Driver SOPs #206; #206a; #206b; #206c; #206dSOP #207 - Railroad Crossing Assessment
- SOP #502 – Sub-Contractors Working on Company Property
- Fire Prevention Plan SOPs #504; #504a; #504b; #504c; #504d
- Winter Safety – Snow Removal Action Plan SOPs #505; #505a; #505b; #505c
- Vehicle Fueling Spill Control SOPs #506; #506a; #506b; #506c; #506d
- SOP #507 – Pedestrian Visibility and Movement on Company Property
- SOP # 508 – Service Truck & Service Vehicle Visibility
- Emergency Action Plan SOPs #807; #807a; #807b; #807c
- Shop Safety Handbook
- Safety & Security Planning Manual

9.2 Definitions of Special Terms Used in the Safety Plan

Accident: An event that involves any of the following—loss of life; a report of a serious injury to a person; a collision of a public transit vehicle; an evacuation for life safety reasons at any location, at any time, whatever the cause.

Accountable Executive: A single, identifiable person who has ultimate responsibility for carrying out the PTASP of a public transportation agency; responsibility for carrying out the Agency's TAM Plan, and control or direction over the human and capital resources needed to develop and maintain both the agency's PTASP, in accordance with 49 USC § 5329(d), and the agency's TAM Plan in accordance with 49 USC § 5326.

Chief Safety Officer: An adequately trained individual who has responsibility for safety and reports directly to a transit agency's chief executive officer, general manager, president, or equivalent officer. A CSO may not serve in other operational or maintenance capacities, unless the CSO is employed by a transit agency that is a small public transportation provider as defined in this part, or a public transportation provider that does not operate a rail fixed guideway public transportation system.

Event: Any accident, incident, or occurrence.

Fatality: A death or suicide confirmed within 30 days of a reported event. Does not include deaths in or on transit property that are a result of illness or other natural causes; a death due to collision (including suicides), fire, hazardous material spill, Acts of God, System or personal security event (including suicides), and other safety events.

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.



Hazard Likelihood: Probability of a hazard consequence to occur.

Hazard Severity: The effect/damaging result of a hazards consequence.

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.

Injury: Any damage or harm to persons that requires immediate medical attention away from the scene because of a reportable event. Agencies must report each person transported away from the scene for medical attention as an injury, whether or not the person appears to be injured.

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.

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.

Reportable: An event occurring on transit right-of-way, in a transit revenue facility, in a transit maintenance facility, or involving a transit revenue vehicle, excluding occupational safety events occurring in administrative buildings.

Risk: An assessed probability and severity calculation to classify the overall potential consequences of a hazard.

Safety Assurance: A list of defined safety performance indicators for reach priority risk and associated targets the Agency will use to determine if it is achieving the specified safety goals.

Safety Events: Include but are not limited to slips, trips, falls, smoke, power failure, maintenance-related issues, or electric shock. To be reported as a major event, these events must **either** meet the fatality, evacuation, or property damage threshold **or** result in two or more injured persons. Other safety events that cause only one person to be immediately transported from the scene for medical attention, and that do not trigger any other reporting threshold, are reported on the Non-Major Monthly Summary Report form. The FTA includes other safety events that occur in a transit maintenance facility and meet a reporting threshold but continues to exclude occupational safety events occurring in administrative buildings.

Safety Performance Target: A performance target related to safety management activities.

Serious Injury: Any injury which 1) requires hospitalization for more than 48 hours, commencing within 7 days from the date 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.



9.3 List of Acronyms Used in the Safety Plan

Acronym	Word or Phrase
ARC	Accident Review Committee
ASP	Agency Safety Plan
BTW	Behind-the-wheel
CSO	Chief Safety Officer
CBA	Collective Bargaining Agreement
CY	Calendar Year
DUI	Driving Under the Influence
DR	Demand Response
DWI	Driving While Intoxicated
FTA	Federal Transit Administration
FY	Fiscal Year
GDOT	Georgia Department of Transportation
KPI	Key performance indicator
LGM	Location general manager
MB	Motor Bus
NTD	National Transit Database
OSHA	Occupational Safety and Health Administration
PPE	Personal protective equipment
PTASP	Public Transit Agency Safety Plan
SMS	Safety Management System
SOP	Standard Operating Procedure
SST	Safety Solutions Team
TAM	Transit Asset Management
UPT	Unlinked Passenger Trip



Acronym	Word or Phrase
VRM	Vehicle revenue mile