STAFF REPORT
INFORMATION ONLY

2014 APTA Audit – Update to Management

Date:	February 9, 2017
To:	Audit & Risk Management Committee
From:	Chief Executive Officer

SUMMARY

The attached document provides an update to the actions being taken to address findings contained in the 2014 TTC APTA (American Public Transportation Association) audit. This audit serves as a due diligence check of the TTC's Safety Management System.

2014 APTA Safety Audit - Audit Review Date: November 17-21, 2014

Total Recommendations	Total Actions	Open	Overdue
54	55	17	0

Total Suggestions	Total Actions	Open	Overdue
55	56	16	0

The attachment shows details of this summary. Green shows items that are complete or on schedule. Yellow indicates close to due date or potentially behind. Red shows items that are at risk or behind schedule.

The next APTA Audit is tentatively scheduled for the fall of 2017.

Financial Summary
This report has no financial impact.

Contact
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Attachments
TTC Safety Initiative Report Responses (open items only as of Nov SX submission)

TTC Response to 2014 APTA Safety Initiative Report

Element / Item #	Finding	TTC Accept or Reject	Safety Improvement Initiative / Rationale for Rejection	Date Due (dd/mm/yyyy)	Individual Responsible (Position and Dept if applicable)	Status	Closed Date (dd/mm/yyyy)
APTA Recommends							
General / Corporate Safety							
General/1	Safety consultants were found to be well received by all departments interviewed. These employees were assigned at nearly every department visited and were working diligently on safety issues, identifying the solutions and then implementing them. Resolution of these safety issues created a need to log, track and keep current on the status on the many issues being dealt with on a database, as well as any additional corporate safety programs that needed implementation at the department level. If one database was not appropriate or did not exist, a new one was created, often in house. This has resulted in a plethora of databases being created with some departments having multiple databases in use. Islands of data exist all over the agency. APTA recommends consolidating data across the agency, making use of existing databases that would serve the whole agency and migrating data from those that are not maintainable or robust enough to support agency needs.	⦿ Accept ◯ Reject	~~ITS Department has conducted an Opportunity Assessment on SH&E needs at a corporate Level. Phase 1 will optimize the use of existing First Priority Enterprise software by configuring the incident management, hazard reporting and corrective action modules. Phase 1 will be complete when these 3 modules are available across TTC.~~ Updated 18/07/2016 - ITS Department is documenting SH&E business requirements at both the corporate and department level. An evaluation of existing software systems will be completed prior to acquiring a commercial off the shelf (COTS) enterprise SH&E software solution. Phase 1 – implement SH&E incident reporting and investigation and corrective action tracking using existing software or purchase a COTS enterprise SH&E software solution. This item is deemed complete when decision is made to use existing system or purchase COTS SH&E software solution.	15/12/2016	B. Hasserjian, Manager SH&E Policy & Strategy, S&E	**1**	
			Phase 2 would entail the purchase of an Enterprise EHS software platform to integrate all remaining needs. Phase 2 will be deemed complete when an approved scope of work is approved for funding in the capital budget. Updated 18/07/ 2016 - Phase 2 would entail the purchase of a COTS enterprise SH&E software solution to manage the remaining SH&E business processes. Phase 2 is deemed complete when the scope of work is approved for funding in the capital budget.	30/04/2017		**1**	
9/5	Presently, there is no corporate level safety action tracking system. Methodologies to track data vary according to whatever degree a department's HS&E representative is comfortable. APTA recommends corporate safety actions tracking system should be purchased and/or developed to enable action plans and actions to be input and updating data can show trends according to the needs of the Commission.	⦿ Accept ◯ Reject	As noted in General 1, Phase #1 of the IT plan is to develop a corrective action tracking system in First Priority Enterprise.	15/12/2016	B. Hasserjian, Manager SH&E Policy & Strategy, S&E	**1**	

Status: 1 - On Schedule or Closed (green)
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10/13	The Corporate-level Safety Management System documentation is "owned" by the corporate safety team; however, they do not own or manage lower level documentation. There is no corporate standard to which the departments must work in developing and updating their individual management systems and associated documentation. This is a significant weakness, which could lead to a mix of "good" and "bad" departmental SMS`s - with no certainty that over time they will be improving. APTA recommends the development of a document management hierarchy system that coordinates development and review of controlled documents.	◉ Accept ○ Reject	S&E is developing a corporate standard for document control which is scheduled for approval at September's SX.	~~01/07/2016~~ 30/09/2016	~~Scott Cameron, Senior Safety Consultant, S&E~~ B. Hasserjian, Manager SH&E Policy & Strategy	**1**	
17/7	The last live emergency drill conducted for the Streetcar Department was reportedly approximately nine years ago (Spadina Station). APTA recommends regular emergency drills be carried out for each transportation department and that SOPs for conducting drills include after-action reports and post-drill meetings or critiques.	◉ Accept ○ Reject	In 2014 before the LFLRV went into service, over 25 simulations were held with the fire department which involved extricating a victim from under the vehicle. These were repeat again in Q2 of 2015. The corporate field exercise for 2016 will center around an LFLRV being evacuated with a crush load in a smoke filled tunnel section.	15/12/2016	R. Duggan, Manager Fire Safety & Emergency Planning, S&E	**1**	
18/23	Part B of the new Incident Investigation (Level 1or 2) Report form asks that if the manager filling out the form thinks the incident could occur in other area that the form be sent to those areas. This method of communication leaves too much to the understanding of the managers of which areas would benefit from the information. APTA recommends a formal process be established to communicate both the HIRAs and the root cause agency-wide so that all employees have access to lessons learned.	◉ Accept ○ Reject	See response to General/1. ~~By using the First Priority Enterprise software for managing incident data as planned in Phase 1, all safety consultants will have access to all incident reports.~~ Providing access to all employees will be considered as part of Phase 2.

Updated 18/07/2016 - By using an integrated system (either existing or COTS solution), all safety professionals will have access to incident data and reports. | 30/04/2017 | B. Hasserjian, Manager SH&E Policy & Strategy | **1** | |
| 18/24 | The Incident Investigation (Level 1or 2) Report is only reviewed by the safety consultants at the manager's discretion. To improve tracking, the consistency of determining the root cause analysis and managing corrective actions, APTA recommends all Level 1 & 2 Reports be reviewed and signed by the safety consultants. | ◉ Accept ○ Reject | The TTC agrees to having all Level 2 reports reviewed and signed by the Safety Consultants and evaluate the quality of a set sample size of Level 1 incident reports.

Updated 19/07/2016 - The Corporate Program – Incident Reporting and Investigation is currently under review and will be updated accordingly. | ~~31/12/2015~~ 28/02/2017 | ~~Scott Cameron, Senior Safety Consultant, S&E~~ B. Hasserjian, Manager SH&E Policy & Strategy | **1** | |
| 19/10 | Fluid tank management is a risk concern and is periodically audited by Corporate Safety to ensure proper mitigation measures are in place. However, there is no tank management program or programmatic inspection program in place to monitor this exposure risk. APTA recommends that the TTC evaluate this risk and exposure associated with its fluid tank management program and initiate additional program measures as required to achieve an acceptable risk level. | ◉ Accept ○ Reject | An updated Environmental Plan was prepared under the new SHE Management System. An element of the Plan is a Tank Management Program which will bring together all the individual initiatives currently being done by various departments with respect to tank management. In the interim, the risk is being managed through tank inspections conducted by various TTC Departments. | ~~13/12/2016~~ 15/03/2017 | ~~M. Langdon~~ S. Fortin, Manager Occupational Hygiene & Environment, S&E | **1** | |

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	Operations						
14/11	Other than at Rail Cars and Shops, there is no formalized Fleet Maintenance Plan that establishes preventive maintenance / overhaul policy, employee training / certification, Department objectives, spare ratio goal, procedures, etc. APTA recommends that Fleet Maintenance policies be codified to ensure safety critical processes are adequately addressed. A Fleet Maintenance Plan is typically used, per industry practice, to serve this need.	⦿ Accept ◯ Reject	Fleet plans are presently being updated for 2016. Updated 22/07/2016 - Bus, Streetcar and Subway Departments all have Fleet Plans which will form the basis of a more comprehensive Fleet Maintenance Plan that APTA has recommended. RCS has started the development of a Fleet Maintenance Plan. Bus Maintenance and Streetcar Departments will follow suit once a rough template for this plan has been established by RCS.	~~31/12/2015~~ 30/12/2016	~~G. Shortt, COO~~ M. Palmer, COO R. Leary, CSO	**1**	
	Risk Management						
7/9	Hazard and Risk analysis departmental work methods are not consistent in their application. APTA recommends the establishment of a standardized hazard management database process to capture hazards across the organization (Hazard Log) that can be transferred to risk register as designed.	⦿ Accept ◯ Reject	HIRA database already exists, however as indicated the application is not consistent. A standard process for risk management will be issued by end of 2015. Updated due date on 18/07/2016	~~22/12/2015~~ 1/9/2016	Mohamed Ismail, PRA, RMO, S&E	**1**	
7/10	The hazard management processes are focused on occupational health and safety needs. New assets/systems are developed by the contractors and turned over to TTC upon project acceptance to add to the risk register. However, there is a need to apply hazard management processes to existing systems, customer and general public safety related exposures. APTA recommends extension of the hazard management process into the areas of existing systems, customer and general public safety.	⦿ Accept ◯ Reject	ERM scope covers all risks to TTC including safety risk to our passengers, employees, and the public. A mature risk register will be in place by the end of 2017.	22/12/2017	Mohamed Ismail, PRA, RMO, S&E	**1**	

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	Safety Consultants						
8/5	While supervisors are adequately trained to respond to and investigate collisions and incidents, department safety consultants do not receive such training. APTA recommends all safety consultants be trained on safety incident/accident reporting, investigation, and analysis SOPs.	◉ Accept ○ Reject	All Safety Consultants will have received formal accident investigation training by the end of 2017	31/12/2017	J. O'Grady, CSO (S. Cameron)	**1**	
	Streetcar						
15/19	The 2013 revision of the Streetcar Department Rulebook largely did not involve front-line employees or line managers from all departments involved with Streetcar operations. Accountability for the Streetcar Rulebook was not clear in the discussions with staff. There does not appear to be a rules committee in place for assessing and updating rules, nor does the rule book appear to be issued over the signature of someone in authority. APTA recommends that ownership be assigned to the Streetcar Rulebook. APTA recommends rulebooks, directives and SOPs be regularly reviewed and that front-line employees be provided the opportunity to participate in the review process.	◉ Accept ○ Reject	Ownership for the Streetcar Rulebook has been assigned to the Streetcar Department. Two Safety Consultant vacancies in the Streetcar Department will be filled by September 2015. One of the Safety Consultants will be assigned responsibility in January 2016 to develop a Streetcar Rulebook Committee and processes for the review and updating of the rulebook. Updated 22/07/2016 - Streetcar Transportation has started the Rulebook Review process. Tom Gardiner is responsible for the Rulebook review. Currently, Stations and Bus Transportation are working with Streetcar to develop those rules that are homogeneous to all surface service. Streetcar transportation has reached out to Equipment working on legacy and low floor (LF) streetcars and the new carhouse (Leslie Barns) issues. A larger group with Track, Overhead, Equipment, TCC and Transportation will be set up soon.	~~31/07/2016~~ 30/04/2017	~~G. Shortt, COO~~ ~~M. Palmer, COO &~~ R. Leary CSO	**1**	
18/20	APTA recommends that the items / elements contained in the safety briefing at the Roncesvalles Streetcar Maintenance facility is codified to a checklist, which can be used by any individual who may be conducting such a briefing at the facility.	◉ Accept ○ Reject	A Visitor Safety Briefing has not been a normal function of the Streetcar Carhouses. We are taking this opportunity from the recommendations provided to address this deficiency in our procedures.In response to the above item the Safety Briefing contained above has been addressed through a "Visitor Information package". This package is still in draft format, with anticipated edits and corrections. Final information package is expected to be completed by the end of August 2015. Updated 20/07/2016 - A draft Streetcar Department visitor and new employee orientation safety policy has been completed and will be ready for sign-offs in Q3 2016. The policy includes a checklist for new employee safety orientation; and a checklist for visitors to a streetcar facility."	~~30/08/2015~~ 30/09/2016	S. Lam, Head of Streetcars	**1**	

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			Subway Operations				
22/3	There is no ongoing "competence management" of track safety as such, just refresher training. The Corporate Quality team does undertake checks / audits, but there are no line management competence assessments. APTA recommends that Line Management and their superiors conduct quality checks of the track safety program.	◉ Accept ○ Reject	As part of the introduction of the TAC, an auditing role will be introduced of working being carried out on the track as part of the new access arrangements. One of the new workstreams for the SSSG is introcuding a competency management system including ongoing assessment of individuals to carry out roles. A new licensing system including measureing of competence to carry out a role is being developed for introduction through 2016. This includes the introduction of a log book where individuals will be required to maintain a record of "flying hours" as part of their demonstration of competence. Updated 20/07/2016 - Quality checks are carried out by both the Safety and subway teams and the following audits are carried out on a period / quarterly basis. The Safety Assurance checks that pertain to Employee safety at track level are: 714, 758, 768, 775, 799, 805 The Safety Assurance checks performed that pertain to Infrastructure safety at track level are: 713, 737, 738, 741 The checks that are related to track level safety conducted by Subway Supervisors are: SC-1, SC-2, SC-3 The checks that are related to track level safety conducted within Transit Control are: TC-1, TC-4, TC-5 Work is progressing with the new Head of Training for the TTC to move to a competence management programme for all roles carried out in the SRB. The move will assess skills, knowledge and experience for each role carried out ie PIC, WAC as opposed to a person's job description. A new pocket log book has been provided to all PICs for use in the field. Track Access Controllers (TACs) (3 in total) are now recruited and are in the process of starting up site visits to audit all planned work to ensure compliance with the plan including confirmation completion of all log book fields. These log books will also be available for inspection by respective Heads and safety consultants to ensure compliance at a group level	31/12/2016	M. Palmer, ~~DCOO~~	**2**	

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	Training						
16/15	There is no "advanced" training provided for those required to set up work zones or providing protection as watchman (related to section 6 of the TTC Subway / SRT Rule Book 2011). Although for those who have particular technical responsibilities, for example, work on the conductor rail, the training for the role does include more training on setting up worksites. But this is not required, as such, to set up a work site. It was noted by an employee (although 5 years ago) that after only 3 weeks at work with the TTC, he was put in charge of providing a safety for a college placement student in the live track environment. The On-the-Job Training (OJT) that does occur is not documented in any manner. APTA recommends adopting industry On Track Safety standards.	● Accept ○ Reject	A Track Level Safety Steering Committee has been established & is being led by Mike Palmer, DCOO. Training & Development is part of this Committee. Work is underway in to develop & deliver competency based training based on roles & responsibilities while at track level. Updated 18/07/2016 – Work continues on the identification of roles and competencies, contingent upon the availability of subject matter experts representing the affected work groups. First competency-based training modules for PICs and WACs are expected to pilot in Q1 2017.	~~31/12/2015~~ 31/03/2017	~~J. DiBiase~~ P. Maglietta, Head of Training and Development in conjunction with Mike Palmer, ~~DCOO~~	**1**	
16/17	A documented OJT program that includes at least three aspects, including (but may not be limited to), a documented checklist of pre-requisites (up-to-date track level certification, appropriate PPE, the currency of any license / certification, etc.), a documented checklist of safety and mission-critical tasks and a designation of the minimum total number of hours / repetitions deemed necessary to become proficient. Such documentation should be cumulative, with sign-offs as to progress and tracking the number of hours / activities accomplished under the tutelage of the mentor / "student" and finally a statement indicating that the individual's superior and the individual agree that the requirements have been satisfied and proficiency has been attained. APTA recommends that any OJT associated with safety critical tasks be properly documented.	● Accept ○ Reject	As outlined in 16/15, training will be based on competencies. On the job assessments will be developed for a select group of employees to assess. Updated 18/07/2016 – Work continues on the identification of roles and competencies, contingent upon the availability of subject matter experts representing the affected work groups.	~~31/12/2015~~ 31/03/2017	~~J. DiBiase~~ P. Maglietta, Head of Training and Development in conjunction with Mike Palmer, ~~DCOO~~	**1**	

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16/23	Training and qualification for rules seemed to be over simplified. The auditors were informed that everyone goes through a 2-day training qualification program. For example, there is no intensive training for people assuming supervisory / protection roles being considered although most of the staff are familiar with FAMES reports that nearly 50% of all track worker fatalities occur to the employee in charge of the safety onsite. APTA recommends that the TTC review training and qualification process to ensure competency for the respective safety critical roles and responsibilities. Although management discussion have been ongoing over the past few months between Operations and Training, it is further suggested that formal liaison be established between Training and the end user departments in the training program development and focus of the initial and requalification training programs.	◉ Accept ○ Reject	See 16/15 above.	~~31/12/2015~~ 31/03/2017	~~J. DiBiase~~ P. Maglietta, Head of Training and Development in conjunction with Mike Palmer, ~~DCOO~~	**1**	

Transit Enforcement Unit

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security - effective practice 2	TTC was utilizing an "INCREASED VIGILANCE - OBSERVE AND REPORT" program which is identified in the *Corporate Security Escalation Plan, 2009.* This program is similar to "See Something, Say Something", a commonly used and highly effective security best practice which encourages employee and customer vigilance, reporting and further secures the system. APTA acknowledges that TTC was utilizing this program and recommends TTC include it in the System Security Plan**. (16.1)**	◉ Accept ○ Reject	This will be reviewed during the development of the Corporate Security Management program (CSMP) Updated 28/07/2016 - Due date extended as a result of the reorganization of the security function at TTC to reside soley within TEU vs split between TEU and Safety.	~~31/12/2015~~ 31/12/2017	M. Cousins, Head TEU & Ryan Duggan, Manger Fire Safety and Emergency Planning	**1**	
security - action needed 1	APTA recommends the Transit Enforcement Unit (TEU) develop a System Security Plan (SSP) to establish a transit policing philosophy and holistic Security Program to re-establish the security program within TTC after the redeployment in 2011. Senior management should review, approve and endorse the plan (which is similar in format to the System Safety Program Plan) to confirm TTC's commitment to providing a safe, secure and reliable transit system. This plan is necessary for clarifying the security philosophy of TTC, implementing it within the security program and providing strategic resources to adequately perform this critical service. **(1.1)**	◉ Accept ○ Reject	A Corporate Security Management Program (CSMP) is being developed and will be submitted in Q4 2015. This will replace the former SSP. Updated 28/07/2016 - Due date extended as a result of the reorganization of the security function at TTC to reside soley within TEU vs split between TEU and Safety.	~~31/12/2015~~ 31/12/2017	M. Cousins, Head TEU & Ryan Duggan, Manger Fire Safety and Emergency Planning	**1**	

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security - action needed 2	APTA recommends, in addition to the SSP, the TEU should also begin updating other necessary security specific plans including Security Escalation Plan and Security and Emergency Preparedness Plan (SEPP) and work with the appropriate TTC departments to develop a Continuity of Operations Plan (COOP). **(14.1)**	◉ Accept ○ Reject	Security Escalation Plan and Framework Document, System Security Program have been updated. Updated 4/11/2015 - The TTC has developed and implemented a new Security Escalation Plan and it working towards developing a Emergency Management Program (to replace existing system security plan), which will be presented to Sr. Mgt in the first half of 2016. Business Continuity Plans/ Programs will be developed in 2016 on a risk based schedule for key Departments and Operations. Updated 22/07/2016 - Department security escalation plans have been created for all critical infrastructure departments. Plans are under final review by the TEU Security Planner.	~~09/06/2015~~ 31/12/2016	M. Cousins, Head TEU & Ryan Duggan, Manger Fire Safety and Emergency Planning	**1**	

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APTA Suggests

General / Corporate Safety

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General/2	The 5 year Corporate Plan establishes a clear vision for the agency and the value and importance of safety in achieving that mission. The roles and responsibilities for carrying out the safety portion of the business plan seem to be confused. Some of the duties overlap and in some cases there is a gap in ownership or a hesitancy to act on it – is it corporate or departmental? Many times we heard a program referred to as "that's a corporate safety program" or "that's one of our programs" based on where it originated. Almost as if these programs were separate and independent of each other. Clearly there is a lack of vision or ownership that is preventing staff from understanding that there is only one TTC safety plan to which all of these efforts and programs are an integral part of and roll up to. APTA suggests development of graphics and training on Safety Management Systems that display the interconnectivity of programs and departments in leading or supporting safety functions across the organization which will allow staff to "connect" or "visualize" their contribution to the overall effort.	◉ Accept ○ Reject	Corporate training has been updated to reflect SMS content. However, training and communication of the TTC SHE Management System and its relationship to departments will be evaluated and a strategy developed to enhance understanding.	30/09/2016	B. Hasserjian, Manager SH&E Policy & Strategy, S&E	**1**	
9/3	A monthly statistical report ("Report on Key Performance Indicators (KPIs)") is produced for the SX committee. This is a 60-plus page document, with an Agenda Time Allocation of 10 Minutes. It is suggested that the report is reduced in length / summarized by priority for the committee, or that reporting is "by exception" to show only those issues that need resolution. It was noted that the statistics presented do not make use of "control charts" to show statistical significance of trends of particular items, e.g., Lost Time Injuries. The risk here is that the SX Committee may focus on issues that statistically are not issues at all. APTA suggests the monthly report introduces the use of Control Charts where appropriate to better inform the Committee of statistically significant trends in HSE performance.	◉ Accept ○ Reject	An evaluation of the SX KPI report is currently planned in order to improve the report for SX Committee use. The use of control charts will be included in this evaluation. Updated 18/07/2016 - This evaluation has been postponed until onboarding of EHS Research Analyst/Statistician (August 2016).	~~31/03/2016~~ 31/12/2016	B. Hasserjian, Manager SH&E Policy & Strategy, S&E	**1**	
9/8	Corporate Safety has gathered over 30 years of paper industrial health and safety records and testing data for the respective facilities. There is no database available for tracking and analysis by job code or other measurement. These records could be valuable in supporting ongoing industrial health and safety management efforts even if only 5 or 10 years of data was available. APTA suggests TTC evaluate system opportunities to address this need.	◉ Accept ○ Reject	See response to Recommendation General 1. This effort would be part of Phase 2.	30/04/2017	J. O'Grady, CSO	**1**	

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10/6	Controlled Documents usually have a requirement that such documents are to be reviewed / revised as warranted at a specified frequency and the frequency is stated as a part of the document. The "Hazardous Materials Control Program" (Rev #: 00, dated March 12, 2007) contains no such statement and, therefore no apparent reason to be reviewed / revised. APTA suggests the next revision of the Program: · Adds language that specifies the frequency of the Program's frequency of review / revision · Is updated to specify all aspects of the Global Harmonization System (GHS), especially the training requirements, as full implementation was to have been completed.	◉ Accept ○ Reject	The Corporate Hazardous Materials Control Program is currently being reviewed and updated as part of the update to the SHE Management System to reflect GHS requirements. Document control language will be incorporated into this and all future SH&E elements. SX approval on 10/2/2016	~~08/12/2015~~ 10/02/2016	S. Fortin, Manager Occupational Hygiene & Environment, S&E	1	10/02/2016
			The deadline for full implementation of GHS in Canada is December 1, 2018. The Ontario Ministry of Labour has not issued interim deadlines as yet.	01/12/2018	~~M. Langdon~~ S. Fortin, Manager Occupational Hygiene & Environment, S&E	1	
11/2	Presently there is a form on the Finance Department webpage incorporates Safety certification budgetary requirements into the overall budget process for capital projects. There is a whole section in the existing SSP that covers the requirements for Safety Certification and this section is being transitioned into the new SMS but no formal policy or plan exists currently at the corporate level with over one hundred projects in process, APTA suggests a safety certification policy be implemented and that it is applied consistently, led by the corporate safety department.	◉ Accept ○ Reject	As part of the efforts to improve the Corporate Standard – Safety Certification, the need for a policy will be examined following the certification of numerous projects over 2015/6/7.	30/12/2017	A. McKinnon, Manager Safety Engineering Services, S&E	1	

Bus Transportation

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12/12	As part of ongoing "Route Checks" supervisors target their observation of route performance based on informal trend analysis of complaints or newly reported hazards. There are no formal plans or procedures dictating this practice. APTA suggests the Bus Transportation Department further enhances this program by establishing formal procedures which direct the coordination between ongoing hazard analysis with the QA/QC audits / inspections being performed by front-line Supervisors.	◉ Accept ○ Reject	A formal procedure will be created which will encompass frequency, methods and coordination between QA/QC audits and Bus Trans Supervisors. Route Checks will be based on QA/QC reporting and recommendations, trends within Bus Trans, hazard reporting, customer complaints and hot spots/routes. Updated 22/07/2016 - Hazard assessments has been incorporated into the Supervisor Daily Activity schedule. The 2016 Route Improvement Program schedule has been prepared and the route checks are underway. Through this initial process, the protocol is being tested. A formal document will be developed and finalized.	~~31/12/2015~~ 31/12/2016	K. Watson, Head of Bus Transportation	1	

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	Human Resources						
16/25	A recognized vulnerability of the ECE department, as well as many other departments within TTC, lies in the workforce effects anticipated as part of the upcoming directed change to the organization's pension plan. As a result of the change, a wave of employees are expected to retire in from many departments. In some cases new specialized staff positions have been created to actively plan succession, while other departments have developed working groups or committees to assist management. The Materials & Procurement group has asked senior managers to contribute to the creation of an on-the-job training program based on their own expertise, skills, and their respective roles and responsibilities. APTA suggests TTC	◉ Accept ○ Reject	The issue of identifying critical roles has already been underway. Coupled with the implementation of the succession plan will address this concern. It is anticipated that the plan will be implemented early 2016. Update July 22, 2016 - critical roles and potential successors have been identified for Executive and Sr. leadership positions. Next steps are to identify gaps in competencies and initiate developmental plans. Efforts are underway to roll out this exercise across the organization as well.	~~early 2016~~ early 2017	G. Piemontese, Chief People Officer	**1**	
20/9	As noted above, the Materials & Procurement department has initiated a number of excellent management practices which the entire organization could put to good use in their respective areas. Another excellent example that M&P championed was found in the succession planning practice. Senior managers were asked to help create customized, job-specific e-learning modules intended to train and re-train fellow employees, based on their own roles and responsibilities, lessons learned, and experience gained over the years. The modules will be used long after the senior managers involved retire from the TTC. While APTA commends all of these innovative programs, they all could stand to have increased focus brought to bear on safety critical functions. This would build the expectation that safety is an integral part of the way business is done. APTA suggests incorporating safety and security functions into the succession planning effort.	◉ Accept ○ Reject	The succession plan & employee development will incorporate safety & security functions. Updated 22/07/2016 - currently under discussion.	~~early 2016~~ early 2017	G. Piemontese, Chief People Officer	**1**	

Rail Cars & Shops

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TTC Response to 2014 APTA Safety Initiative Report

Element / Item #	Finding	TTC Accept or Reject	Safety Improvement Initiative / Rationale for Rejection	Date Due (dd/mm/yyyy)	Individual Responsible (Position and Dept if applicable)	Status	Closed Date (dd/mm/yyyy)
10/7	Review of the Wilson Car house "Inspection Gauge Check Sheet" (702-777-02, Rev 0 in the Header) with a "Revision Date: May 01, 2014" in the Footer) that indicates being completed October 30, 2014 shows "Required Calibration Frequency" of ten (10) items showing a 12 month cycle that are written over with a "6." Documents specifying "Rev 0" but with a Revision Date and frequency requirements change by hand-written numbers is not considered acceptable practice. APTA suggests review of the procedure to determine if it needs to be improved or if training is less than adequate for those using the procedure.	● Accept ○ Reject	RAMS – procedure section has established a Document control Policy and have created templates that will address this issue. Updated 21/07/2016 - Current actions: ►Documentation Control Policy (RAD-SP-18-00) released July, 2015. ► Documentation Control Process (RAD-SP-01-04) released December, 2015 and subsequently revised May, 2016. New actions: ► Request for Document (RFD) submitted to revise "Inspection Gauges/Measuring Devices & Calibration Requirements" document (RTT-SP-14-6) ► APTA audit identified "hand-written" calibration frequencies, which are a result of assumptions made on Toronto Rocket (TR) gauges' calibration frequencies. ► RTT-SP-14-6 does not yet include calibration frequencies of TR gauges, and is being updated accordingly. ► A review of the complete document will be undertaken when the document is revised. ► Review SMS records, ensuring compliance with (revised) RTT-SP-14.	~~31/12/2015~~ 31/12/2016	R. Trentadue, Head of Rail Cars and Shops	1	
12/13	The Rail Cars and Shops Department has created its Quality Control Program that specifies the management team's audit responsibilities predicated upon their perceived risks. The Program identifies (among other things), the "unmitigated risk" of each item, the average conformance rate of previous audits, the proposed target, the audit structure and frequency, resource requirements and interactions with other departments. The Quality Control Program reviewed by the review team noted the document is undated and references only previous Audit Averages from "2011 / 2012." The document indicates the Quality Control Program has not been implemented to-date in 2014, even though some of the checks are to be conducted quarterly. If fully implemented, such a risk control program could be quite effective. APTA suggests the Rail Cars and Shops Department consider re-activating the program for a prescribed timeframe in a modified configuration and monitor the results for effectiveness.	● Accept ○ Reject	Clarification – Program was never deactivated, affected by resource changes through the development of RAMS. A request for QA staff has been submitted in the 2016 budget process in order to accelerate the program. Currently utilizing front line technical staff (ET's) to assist with QA checks. Priorities for QA checks have been established, development plan for SOP and Standardize QA check-sheets are underway. Budget submission complete for new QA staff.	31/12/2016	R. Trentadue, Head of Rail Cars and Shops	1	

Status: 1 - On Schedule or Closed (green)

      2 - Close to due date or potentially behind (yellow)

      3 - At risk or behind (red)

TTC Response to 2014 APTA Safety Initiative Report

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14/12	Review of calibration records of the Wilson Car House for torque wrenches and gauges demonstrated lists that appeared to identify all such wrenches and gauges. However, the lists did not contain any indication of the last date / next date of calibration and, in addition, the list of gauges contained items, e.g., "Go.No.Go" gauges that contained no listing of the OEM, Model # or Serial #. Absent such identifiers indicates the lack of traceability. This was also verified by a November 12, 2014 memo from the Safety Engineering Services Department with a Calibration verification rating less than 85% conforming against the Standard Work Instruction (SWI) 702-777. APTA suggests that the calibration program needs to be improved.	◉ Accept ○ Reject	RAMS – procedure section has established a Document control Policy that will address this issue. Updated 21/07/2016 - As per Item #10/7, both the doc. control policy and process have been released. - As per Item #10/7, an RFD has been submitted to revise RTT-SP-14-6. - Compliance level for calibrated tooling (SWI 702-777) has achieved 97.3% in Q1, 2016. - To improve traceability, we are in the process of piloting the use of controlled/locked cabinets at Wilson Carhouse for inspection gauges and torque wrenches. Additionally we are also looking at the feasibility of a "vending machine" system to control access to tools and restrict access to expired gauges/wrenches.	~~31/12/2015~~ 31/12/2016	R. Trentadue, Head of Rail Cars and Shops	1	

Stations

Element / Item #	Finding	TTC Accept or Reject	Safety Improvement Initiative / Rationale for Rejection	Date Due (dd/mm/yyyy)	Individual Responsible (Position and Dept if applicable)	Status	Closed Date (dd/mm/yyyy)
21/15	The Group Station Manager (Landlord) concept is being developed to address existing issues related to safety responsibility, e.g., fire safety, staff performance and competence. However, at the present time, there are an insufficient number of supervisors and the collectors are not designated to a specific supervisor. APTA suggests, with the projected number of supervisors expanding from the present 56 to approximately 300, the Stations Department can establish a dedicated Landlord – Supervisor – Collector relationship, that "teams" will become the reality, allowing for the establishment of safety and security "promotion" programs / campaigns for stakeholders served by the "Team."	◉ Accept ○ Reject	Stations Department embraces the concept of dedicated teams supporting each station. Multi-disciplinary teams will include Supervisory, Janitorial, Transit Enforcement, and front line employees all engaged in work to maintain a consistently high level of customer service, safety, security, and system readiness. Note that the increased number of staff is subject to a number of factors and is not necessarily as specified in the APTA finding. Updated 22/07/2016 - Available resources are currently applied in a team – based, grouped station model specific to each zone. At the individual station level, the team approach extends to Station Collectors, who will soon be in process of converting to Customer Service Agents with safety specific responsibilities and inspections extending beyond the limits of their current Collector booths. Conversion will take place upon full implementation of the Presto fare payment system, and will further galvanize the reach of our multi-disciplinary, team efforts to maintain a consistently high level of customer service, safety, security, and system readiness.	01/01/2017	C. Greenwood, Head of Stations Department	1	

Subway Operations

Status: 1 - On Schedule or Closed (green)
   2 - Close to due date or potentially behind (yellow)
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TTC Response to 2014 APTA Safety Initiative Report

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15/15	Following an incident in 2008 a "blue light" Train Operator warning system has been instituted in Revenue Hours. The system has not yet been introduced in Non Revenue Hours, although the risks are similar. APTA suggests a hazard analysis be performed on both revenue and non-revenue operations to determine if the risk is being adequately addressed.	● Accept ○ Reject	This recommendation is partially accepted. The role of the blue night in non revenue hours including the cusp between revenue and non revenue hours continues to be discussed with a clear split of opinion. Resolution will be through a wider look at protection in non revenue hours and the transition between the two where the biggest risk is perceived to be. Updated 20/07/2016 - An attempt was made to introduce WAW (blue nights) at night in the spring of 2016. Following a work refusal by night track staff, and a subsequent visit by the MOL, the use of WAW (blue lights) at night has been suspended pending full implementation of the hard wired system due in 2017. Better planning of night work through STARS, the introduction of the TAC and SWZ will reduce risk at night of being hit by work cars. Further work is being conducted to see if anything else can be done until WAW is fully implemented.	~~31/03/2016~~ 2017	M. Palmer, ~~DCOO~~	2	

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TTC Response to 2014 APTA Safety Initiative Report

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Training							
16/16	According to the TTC Policy / Instruction found in Appendix B of the Subway / SRT Rule Book (2011), Procedure B.5 0.10 ("Procedures") specifies, "…who successfully completes Rule Book qualification is given a current copy of the Rule Book and a certification card…" However, the practice of issuing certification cards to employees has ceased to exist. A negative implication is that an employee in the track area, operating a train, etc., is not be able to verify the status of qualification, if questioned. Given that supervisors / forepersons / managers may have a personal liability should an injury occur will find it impossible to determine qualification status on site. APTA suggests that the rules be reviewed for consistency of purpose. [NOTE: Such is not the case for trained contractors, who must be with a qualified TTC employee and are issued the certification card and a dated sticker to attach to their hard hat.]	◉ Accept ○ Reject	See 16/15, a card will be created as a rollout to the competency based track level training. Updated July 18, 2016 – While card options are being explored, Transit Control Assistant Managers have been provided with access to Pathlore, the TTC's LMS, for the purpose of confirming employees' qualifications upon request.	31/12/2017	~~J. DiBiase~~ P. Maglietta, Head of Training and Development in conjunction with Mike Palmer, ~~DCOO~~.	**1**	
Transit Enforcement Unit							
security - action needed 7	APTA was informed that a Threat and Vulnerability Assessment (TVA) was conducted on TTC in 2011, however several of the recommendations were not addressed or implemented. APTA auditors recommend TTC conduct a new TVA to identify additional risks, vulnerabilities which may have materialized since the last assessment with the expansion of the system and other considerations and system modifications. TTC should address the recommendations, create a timeline and work plan for implementing the recommendations to adequately secure the people, property on and around TTC. **(7.2)**	◉ Accept ○ Reject	As part of the Corporate Security Management Program, a TVA will be conducted in Q4 of 2015 with recommendations being reviewed monthly at the Security Executive meetings until all items have been addressed. A TVA will be conducted every 5 years to ensure continuous identification of new threats and vulnerabilities. Updated 22/07/2016 - A thorough review of the 2006 Threat and Vulnerability Assessment was conducted. Follow-up was performed to determine if recommendations had been implemented. The majority of site specific recommendations are complete, and many of the system-wide recommendations are complete or in progress. This item is scheduled for review next year and a new TVA will be conducted when resources permit.	~~31/12/2015~~ 01/02/2017	M. Cousins, Head Transit Enforcement Unit & Ryan Duggan, Manager of Fire Safety and Emergency Planning	**1**	

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security - action needed 10	TEU estimates that Sexual Assaults are one of the largest unreported crimes on the system. Customers are often embarrassed to report offences for multiple reasons which makes it difficult to eliminate the crime from occurring. APTA suggests TTC address this crime and develop a sexual assault prevention campaign and utilize industry leading best practices in this area, including promoting "See Something-Say Something" campaigns and other customer awareness outreach programs that have been very well received by the general public and have assisted with reducing this crime. This should lead to an increase in the level of reported sexual crimes and the program will ultimately contribute to increasing awareness, encouraging vigilance which will further assist with preventing these crimes from occurring in the 1st place. It is worth noting that these types of customer awareness programs have increased crime stats in other comparable transit agencies and may lead to inquiries regarding the increase of reports for this or similar type crimes. **(16.1)**	◉ Accept ◯ Reject	TEU is working with TTC Corporate Communications and the TPS Sex Crimes Unit to create a joint campaign targeting personal space which includes Sexual Assault. Updated 21/10/2015 - We are all still working on the design and roll out of this campaign. December 31, 2015 is still an anticipated closed date. Updated 22/07/2016 - Items Security - Action Needed 10/11 will be addressed together. The app being developed will include the ability to report sexual crimes. Once the app is ready, a campaign will be launched with Corporate Communications in partnership with Toronto Police Services Sex Crimes that addresses both sexual assaults and the app. The tender for the app is to go out Week 30 or 31, however this has been communicated several times since late 2015. Due to ongoing delays, an accurate completion date on these items is not available at this time.	~~31/12/2015~~ 31/12/2016	M. Cousins, Head Transit Enforcement Unit	1	
security - action needed 11	APTA acknowledges TTCs current customer outreach initiatives and encourages TEU to further collaborate with other departments in promoting and enacting these programs. APTA encourages TTC to develop an "app" which to easily communicates with customers, encourages interaction which will address many of the unreported crimes with customers. TEU should work with the IT, safety and other relevant departments to address this issue. TTC would be well served by inquiring with the transit industry to consider the available options, best practices and which is appropriate for TTC. **(16.1)**	◉ Accept ◯ Reject	TEU is currently working with TPS and App vendors to determine if TEU should have its own App or if we should be part of the TPS App. Updated 21/10/2015 - TEU has met with IT who are currently going through the IT process to acquire the app. Decmber 31, 2015 is still an anticipated closed date. Updated 22/07/2016 - Items Security - Action Needed 10/11 will be addressed together. The app being developed will include the ability to report sexual crimes. Once the app is ready, a campaign will be launched with Corporate Communications in partnership with Toronto Police Services Sex Crimes that addresses both sexual assaults and the app. The tender for the app is to go out Week 30 or 31, however this has been communicated several times since late 2015. Due to ongoing delays, an accurate completion date on these items is not available at this time.	~~31/12/2015~~ 31/12/2016	M. Cousins, Head Transit Enforcement Unit	1	

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