Ottawa

Office of the Auditor General

Follow-up to the 2017 Audit of the Regulatory Framework for Light Rail Transit

Tabled at Audit Committee
April 27, 2021

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Executive summary

The Follow-up to the 2017 Audit of the Light Rail Transit Regulatory Framework was included in the Auditor General's 2019 Audit Work Plan.

The key findings of the original 2017 audit included:

- There were no gaps in the safety and security regulatory frameworks and that the City was in compliance with delegation agreement
- Only limited assurance could be provided on the completeness of the content of the Safety Management System (SMS) or the Security Management System (SeMS).
- OC Transpo had significant and comprehensive documentation related to incident identification, classification and escalation policies and procedures and guidelines for incidents related to railway operation and maintenance
- OC Transpo consulted many sources during the development and review of the SMS elements, however documentation of consulted sources was not structured or consistent
- The review process for the development, review and update of security documents subject to the delegation agreement was not documented

Table 1: Summary of status of completion of recommendations

Recommendations	Total	Complete	Partially complete	Not started	No longer applicable
Number	3	3	0	0	0
Percentage	100%	100%	0	0	0

Conclusion

Management made good progress by completing all three recommendations. Management should continue to monitor and encourage staff to ensure compliance with the Document Management Program policies and procedures on an ongoing basis.

Acknowledgement

We wish to express our appreciation for the cooperation and assistance afforded the audit team by management.

Detailed report – Assessment of implementation status

The following information outlines management's assessment of the implementation status of each recommendation as of March 1, 2020 and the Office of the Auditor General's (OAG) assessment as of December 1, 2020

Recommendation #1 – Status - Completed

Audit recommendation:

That the City improve the tracking and documentation of the sources consulted during the development/review/updating of all safety documents which are subject to the delegation agreement.

Original management response:

The Safety and Compliance Branch within the Transportation Services Department will follow the document management program (referred to in the response to Recommendations 2 and 3) when amending/updating the SMS. This program includes processes for tracking and logging all sources consulted during the development of OC Transpo documentation, including the annual review and revision of the SMS. Each source utilized will be referenced and logged as each component, or supporting component, of the SMS is created or updated. This program is expected to be finalized by the end of 2017 and implemented in Q1 2018.

Management update:

In order to improve the tracking and documentation of the sources consulted during the development/review/updating of all safety documents which are subject to the delegation agreement, a Document Management Program was finalized and implemented in Q4 2019.

To improve the tracking process of safety documentation, during the annual revision of the SMS, a template is being used to formally track and log all sources consulted. The 2020 update to the SMS, which includes the newly developed template as an appendix, is currently underway and is expected to be completed by Q2 2020.

OAG assessment:

The City developed and implemented research and collaboration tracking logs for the SMS. These logs, found in the October 2020 version of the SMS, identify the sources consulted in its development and revision.

Recommendation #2 – Status - Completed

Audit recommendation:

That the City document the high-level document development/review process to reflect the controls in place, defining each step in the process and the links between them.

Original management response:

A document management program is currently being developed by document control leads from Transit Operations, Transit Fleet Maintenance and Rail Operations within the Transportation Services Department, to incorporate/replace current OC Transpo document management procedures. The document management program will outline the responsibilities of managers, document authors and document control administrators during the development (writing and research), review, revision, approval, communication, distribution and record keeping of OC Transpo documents. The document management program will ensure that controls are in place, define each step in the process, and the links between them. This program is expected to be finalized by the end of 2017 and implemented in Q1 2018.

Management update:

In order to maintain a high-level document development/review process that reflects the controls in place, a Document Management Program (DMP) was finalized and implemented in Q4 2019.

The DMP will be reviewed annually with input from stakeholders across OC Transpo. The Program outlines the responsibilities of management, document authors and document control administrators during the development, review, revision, approval, communication, distribution and record keeping of OC Transpo documents.

The program is supported by the Document Control Administrator, a position reporting to the Program Manager, Training & Development unit, who reports to the Chief Safety Officer of the Transportation Services Department.

This new position, established in Q3 2018, is responsible for monitoring, tracking, and ensuring that OC Transpo's practices, relating to document development, revision and record keeping are compliant with the DMP.

OAG assessment:

The City has developed and implemented a DMP, which outlines the roles and responsibilities of the document author, document control administrator and managers with respect to document development and revision. The DMP was approved by the Chief Safety Officer, the Director of Transit Operations (Rail) and the Director of Transit Operations (Bus).

In practice, we found that the role of the Document Control Administrator is consistent with the DMP. The Document Control Administrator ensured that appropriate approvals were obtained and that the DMP guidelines were applied for changes/updates or development of each document we reviewed within Transit Services.

Recommendation #3 – Status - Completed

Audit recommendation:

That the City improve its documentation of the review process for the development/review/updating of all security documents which are subject to the delegation agreement.

Original management response:

A document management program is currently being developed by document control leads from Transit Operations, Transit Fleet Maintenance and Rail Operations within the Transportation Services Department, to incorporate/replace current OC Transpo document management procedures. The document management program will outline the responsibilities of managers, document authors and document control administrators during the development (writing and research), review, revision, approval, communication, distribution and record keeping of OC Transpo documents.

This program is expected to be finalized by the end of 2017 and implemented in Q1 2018. The development/review/updating of all security documents will follow all processes outlined in the OC Transpo document management program.

Management update:

In order to improve its documentation of the review process for the development/review/updating of all security documents which are subject to the delegation agreement, a Document Management Program was finalized and implemented in Q4 2019.

The Document Management Program will be reviewed annually with input from stakeholders across OC Transpo. The Program outlines the responsibilities of management, document authors and document control administrators during the development, review, revision, approval, communication, distribution and record keeping of OC Transpo documents.

OAG assessment:

The SeMS was reviewed and updated after the DMP was finalized and implemented in Q4 2019. We confirmed that the October 2020 version of the SeMS complies with the DMP. We also observed that the SeMs document titled "Security Management System" Program followed the DMP policies and that the document was approved by the Director of Transit Operations.