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INVESTIGATION OF THE TRILLIUM LINE TRAINING PROGRAM



Office of the
Auditor General
City of Ottawa

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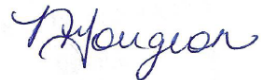
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Acknowledgement

The team responsible for this investigation was comprised of Anna Koldewey from the Office of the Auditor General and an independent external consultant, under the supervision of Joanne Gorenstein, Deputy Auditor General and my direction. My colleagues and I would like to thank those individuals who contributed to this project, and particularly, those who provided insights and comments as part of this investigation.

Respectfully,



Nathalie Gougeon, CPA, CA, CIA, CRMA, Comma
Auditor General

Introduction

As a result of several reports received through the City's Fraud and Waste Hotline (FWHL), the Office of the Auditor General (OAG) undertook an investigation to assess concerns with respect to the training program for the O-Train Lines 2 and 4, also known as the Trillium Line.

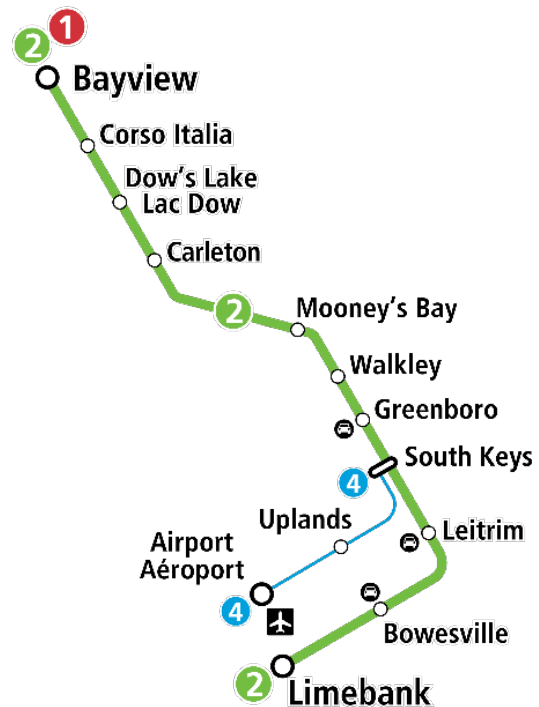
Background and context

In March 2019, Council approved a 12-kilometre extension to the existing north-south O-Train Line 2, along with a 4-kilometre spur line to the Ottawa Airport, the O-Train Line 4. Revenue service¹ commenced in January 2025. The O-Train Lines 2 and 4 (Trillium Line) features a new signalling system and the addition of the Stadler FLIRT vehicle and the refurbished Alstom LINT vehicle.

For the design, construction, and maintenance of the Trillium Line, the City of Ottawa (the City) signed a contract (Project Agreement) with TransitNEXT (TNext), a wholly owned subsidiary of AtkinsRéalis (previously known as SNC-Lavalin Group). As part of this agreement, the City is responsible for operating and overseeing dispatch and rail control functions of the Trillium Line, with maintenance services contracted to TNext. Specific to training, the Project Agreement stipulates that TNext was responsible for developing all operations training programs. This included creating a fully developed training curriculum and materials, in addition to training and certifying eight (8) OC Transpo Trainers (diesel rail instructors) and twelve (12) diesel rail controllers (controllers). In turn, the diesel rail instructors were responsible for training the diesel rail operators (operators).

Regulatory environment

The City operates the Trillium Line under the regulatory name of Capital Railway as a federally regulated railway, which is overseen by Transport Canada (the "Regulator") and governed by the federal [Railway Safety Act](#) and other regulatory requirements. This



¹ Revenue service in the context of the Trillium Line was when the diesel light-rail service commenced operations to paying customers.

means the City must comply with all the regulatory requirements when in revenue service, including the training and qualification of all operating employees as required under the [Railway Employee Qualification Standards Regulations](#) (the “Regulations”). While the Regulations were not yet in effect at the time of initial training, it remains the railway’s (in this case, the City’s) responsibility to ensure the safety of its operations and to anticipate future compliance with regulatory requirements.



The Trillium Line operates under the [Canadian Rail Operating Rules](#) (CROR). Since the CROR applies to a wide range of railway companies, each railway company can tailor these rules to their specific operations. The City has done this as part of the Trillium Line extension, resulting in the Operating Rules Capital Railway (ORCR). Consequently, all Trillium Line employees involved in train movements must be trained and tested on these rail operating rules.

Training plans

A railway must submit its training and certification program description for all employee training programs to the Regulator. Any changes to the training program must be filed with the Regulator within 90 days.






To meet this regulatory requirement, the City submitted the following two documents (herein referred to as the Training Plans) to the Regulator on November 1, 2023, which collectively describe the minimum training requirements the City has committed to.

- **The Training Certification Plan:** This document outlines the requirements for the certification of Trillium Line training and operations staff.
- **The Integrated Training Plan:** This document describes the process for implementing all training activities among TNext, OC Transpo, and Rail Construction Program (RCP)² stakeholders.

² The Rail Construction Program office leads the Stage 2 Confederation and Trillium Line projects.

Key Trillium Line operating and monitoring roles

The diagram below summarizes the key staff who are responsible for monitoring and operating the Trillium Line, including the instructors who train these staff.

Diesel Rail Operator (Operator)	Diesel Rail Operator Instructor (Operator Instructor)		Diesel Rail Controller (Controller)	Diesel Rail Controller Instructor (Controller Instructor)
	Classroom Instructor	On-job training Instructor		
 <p>Operates the diesel rail trains.</p>	 <p>Provides in-classroom instruction to the operators.</p>	 <p>Provides direct, hands-on instruction and supervision to operators as they learn to operate the trains.</p>	 <p>Monitors train movements in the Transit Operations Control Centre (TOCC).</p>	 <p>Provides in-class and on-job instruction in the TOCC to the controllers.</p>

Operating context

Unlike the Confederation Line (Line 1), the Trillium Line has long sections of single-track rail and uses manually operated diesel-powered trains. This highlights the importance of training key staff responsible for the safe movement of the trains.

While the focus of our investigation was on the training program, we recognize that training is only one component of a Safety Management System (SMS). As outlined in the Capital Railway Trillium Line Safety Management System document, the SMS *“is a framework to integrate safety and risk management in all day-to-day railway operations [...] that encourages the development of a safety culture at all levels of the organization”*. In addition to training, management has stated they have implemented various other safety and monitoring controls, including:

- Fail-safe devices built into the Positive Train Control system which automatically triggers an emergency brake in the event of operator error (e.g. if an operator exceeds designated speeds).
- Operator oversight by the controllers in the Transit Operations Control Center (TOCC) in addition to supervision by the field supervisors and superintendents who conduct in-service performance monitoring such as proficiency tests and spot checks.

- Consultants brought in to provide subject matter expertise and oversight of the controllers both leading up to and during initial revenue service.
- Immediate relief of duties for operators and controllers in the event of a railway rules violation or other significant concern. This is followed by a performance skill building exercise with the training department and approval from their manager to return to active duty.

Since our investigation focused on training, these activities were not included in our scope; however, they are important to take into consideration when reviewing the mitigating controls associated with the findings and recommendations in this report.

Investigation objective and scope

The objective of this investigation was to review the FWHL allegations related to the Trillium Line training program.

The scope of our investigation was limited to assessing whether the allegations had merit, and if so, to determine the appropriate course of action that may be required for each of the issues. The investigation focused on the activities related to the delivery of the training program to operators, controllers, and in-house instructors. This included the training deliverables provided by TNext, the qualifications of the in-house instructors, and exam integrity. We **did not** conduct a technical review of the training program's content. Nor did we assess the qualifications of the operators and controllers. This investigation was limited to the applicable regulations and the minimum standards established within the City's own Training Plans and job requirements. Additionally, this investigation did not include observation of the operators and controllers on the Trillium Line.

We conducted this investigation between July and December 2024. From the Technical Briefing for O-Train Lines 2 and 4 Trial Running provided on July 18, 2024, training for the majority of operators and controllers had been completed and it was therefore, deemed appropriate to be considered for inclusion in the investigation. We also acknowledged that the Regulations were not yet in effect, during the course of our investigation, and only came into effect upon revenue service, as of January 6, 2025.

As soon as any issue was identified, it was brought to management's attention, and we understand that management initiated immediate remediation actions before revenue service. To the extent possible, these remediation actions have been highlighted in the body of this report. Any remediation that has been confirmed by management to have been completed prior to revenue service has not been assessed by our Office. This will be done as part of our follow-up procedures.

Readers are cautioned about the important distinction between an investigation and an audit. An audit is designed to provide a high level of assurance over its findings and will typically feature rigorous testing and analysis. While this investigation was conducted in a systematic and professional manner, the extent of activities undertaken by the OAG was narrow compared to an audit and focused solely on the concerns raised to our attention.

Refer to [Appendix 1](#) for additional details on the objective, criteria, and approach to the investigation.

Value of Investigation: This investigation identified gaps related to instructor qualifications and the completeness of training for key positions for the Trillium Line. The timing of our work enabled management to address any training deficiencies before revenue service. The report further highlighted challenges with the training program that was delivered to the City and has provided recommendations for similar, future arrangements.

Conclusion

Overall, evidence available could not demonstrate that specific Trillium Line operator instructors had the expected experience and training prior to commencing instruction. This could have had an impact on the quality of the instruction provided to the operators responsible for operating the diesel trains.

We further found incomplete training records for the diesel rail operators, controllers and instructors. We understand from management that all required training was completed, and training records were updated before revenue service commenced.

While the focus of this investigation was not on the Project Agreement with TNext, we did note challenges where the City did not receive the training deliverables aligned with its expectations and had to supplement with its own curriculum developers, at an additional cost. Further, our procedures demonstrated that in-class testing administered by TNext was not consistently managed appropriately.



While we were able to substantiate specific allegations reported, the lack of specificity of various other allegations and the inability to corroborate the other claims resulted in our

not being able to fully prove or disprove their merit. No further information can be provided on these allegations as we were unable to conclude on them. Each finding in this report has been assigned a rating that prioritizes the associated remediation. Rating definitions are provided in [Appendix 2](#).

Investigation findings and recommendations

1. Diesel rail instructors

1.1 Evidence could not be provided to demonstrate that all diesel rail operator instructors were sufficiently qualified and fully trained before commencing on-job instruction.

Priority Rating:
Moderate

As discussed above, the Regulations outline the minimum qualification standards for railway employees, including on-job training instructors. To qualify as an on-job training instructor, a person must:

- a) “meet the qualification requirements for a locomotive engineer with an overall mark of **at least 90 per cent**; and
- b) complete not less than two years service as a locomotive engineer, including **at least three months service in the area where the locomotive engineer is to give the on-job training**”.³

While we understand the Regulations do not apply until the railway line is in revenue service, given that the City is responsible for the safety of its operations, it is reasonable to expect that the instructors meet these minimum standards before commencing instruction.

During our investigation, we learned that the instructors were mainly selected due to their legacy diesel rail operator experience on the Trillium Line prior to its shutdown for the Stage 2 extension work. For the requirement of two years of experience as a locomotive engineer, we understand that management interpreted this to mean those who were operator certified for at least two years and had accumulated two years of experience in the position (regardless of the number of hours worked). Management was able to demonstrate this for all on-job instructors.

To ensure we held management to the appropriate definition, we consulted with the Regulator to understand their position for demonstrating that an instructor had met the qualification standards defined in the Regulations. In a written response to our Office, the

³ Railway Employee Qualification Standards Regulations SOR/87-150, Section 15 (<https://laws-lois.justice.gc.ca/eng/regulations/sor-87-150/fulltext.html>)

Regulator identified that "*not less than two years' service as a locomotive engineer*" implies a minimum of 24 consecutive months working as a full-time locomotive engineer; this was a much stricter definition than was being used by management. Using this interpretation and based on available evidence, the majority of the on-job training instructors would not have met this requirement. Given that legacy diesel rail operators typically worked on a relief basis rather than full-time, we appreciate how difficult it would be to find instructors with 24 consecutive months of full-time experience from within the City.

Recognizing the disparity between management's interpretation and the response from the Regulator, we chose to look at what we believe the intent of the Regulations represents; that on-job instructors for locomotive engineers are highly qualified and experienced in that they possess both the theoretical and practical skills necessary to effectively train new locomotive engineers. While we could find evidence that all 10 on-job instructors met management's definition, the historical scheduling and payroll records showed that some lacked significant rail operating hour experience. When consulting directly with a sample of instructors, we found inconsistencies between the system information available as compared to the rail experience described by the instructors themselves. While some instructor input indicated higher hours than what we could find in the system records, this information could not be corroborated. We understand from management that data integrity of scheduling and payroll information has historically been a challenge. Given the inconsistencies found, we cannot conclude whether these instructors had the necessary experience before commencing instruction.

In addition to the qualification requirements discussed above, the instructors were subject to a minimum number of on-job training hours themselves, as defined in the Training Plans, to gain the necessary familiarization before instructing. Through interviews, we learned that OC Transpo prioritized the on-job training of the operators over the instructors. This led to instructors training the operators before they, themselves, had completed all their training. Our detailed testing confirmed that most instructors had not met the minimum on-job training hours, per the Training Plans, before they commenced instruction.

Additionally, our review of instructors' training files found that the instructors were supervising each other during the initial on-job training, even though none of them had completed all their required practical training hours.

Inconsistent qualification and training of instructors before they commence instruction can impact the effectiveness of the on-job training program. It should be noted that, as a risk mitigation measure, operator trainees were rotated among instructors during the on-job training to provide exposure to a variety of instructors.

1.2 Limited evidence was available to support the hiring of several diesel rail instructors.

Priority Rating:
Moderate

To address the need for diesel rail instructors, the City hired candidates through temporary, permanent, and relief postings. Relief postings allow individuals to temporarily fill in as required, while allowing them to return to their substantive position afterward. In some cases, relief instructors have been in these positions for over two (2) years.

Through our detailed testing, we determined there is a lack of evidence that demonstrates the City assessed instructor candidates on a consistent basis before placing them in the role of instructor.

1.2.1 Hiring of Relief Instructors

Through review of job competition files and interviews with staff, we were unable to determine the hiring process used to hire nine (9) relief instructors. Of these relief instructors, we found six (6) of these instructors were placed in the role despite being unsuccessful in previous instructor competition processes for the Trillium Line. We confirmed with Human Resources (HR) that the hiring of these candidates as relief instructors was not part of a formal competition process which they were involved in; however, due to a lack of evidence we could not confirm which alternative process was used to bring them into the relief pool.

1.2.2 Hiring of Temporary and Permanent Instructors



During our review of competition records, we identified six (6) successful competitions that led to the hiring of candidates for temporary or permanent instructor positions. When we compared the candidates' experience to the City's job posting requirements, we found that seven (7) out of 10 successful candidates did not fully meet the minimum experience requirements. The candidates hired for the operator instructor position often lacked experience delivering training. We also found that a successful controller instructor candidate lacked the required minimum number of years of certified controller experience for the role. We understand that this instructor is not providing on-job instruction and that the City has, to date, continued to retain TNext instructors to provide on-job training to new controllers.

We understand from management that they selected the instructor candidates based on staff availability and experience, within the constraints of the collective agreement, with the intention of building up the experience of the successful candidates. However, if instructors lack the necessary experience required for the position, this could result in inadequate training delivery.

1.3 There was limited formal evaluation of the diesel rail instructors' skills and competencies.

Priority Rating:
Moderate

Through interviews conducted as part of our investigation, inconsistencies were raised regarding the quality of the instruction delivered by the instructors. As a result, we examined whether the instructors were subject to proper monitoring and supervision while instructing.

We obtained OC Transpo's *Monitoring Training Instructor Performance* policy document which requires all full-time and relief instructors to undergo regular, documented observations to assess their skills and competencies. These performance observations should be conducted at least twice a year for full-time instructors and once a year for relief instructors.

We requested evidence of the performance observations for all full-time and relief diesel rail instructors for 2023 and 2024, during which a significant amount of training was provided. Based on the review of evidence provided, we found that the instructor observations were not conducted in line with the OC Transpo policy. For 2023, management could not demonstrate that any observations were completed. For 2024 (as of the end of our Conduct Phase in November 2024), a total of three (3) observations were completed. As a result, nine (9) on-job and classroom instructors did not have any performance observations on file for the year.



Without regular monitoring and supervision of the instructors' performance, issues may not be identified and addressed in a timely manner, which could lead to quality issues impacting the effectiveness of the training provided to the operators.

RECOMMENDATION 1 – DEMONSTRATE THE REQUIRED QUALIFICATIONS AND KNOWLEDGE

To demonstrate that instructors, operators, and controllers have the required qualifications and knowledge to execute their roles moving forward and in anticipation of an audit by the Regulator, the General Manager of Transit Services should ensure:

- training records and files clearly demonstrate how staff met the required training plans and experience requirements;
- where exceptions to internal hiring processes were made or varying interpretation in requirements exist, documentation is available to demonstrate how management gained comfort that staff possess the appropriate qualifications, including any risk mitigation strategies that were implemented; and
- processes are in-place to ensure compliance with all key requirements now that the Trillium Line is in revenue service and subject to federal regulations.

MANAGEMENT RESPONSE 1

Management agrees with the recommendation.

The Regulatory Compliance, Quality Control & Assurance team has conducted an independent review of the training plans submitted to the Regulator to ensure compliance with the regulatory requirements and confirmed that processes are in place to ensure full compliance now that the Trillium Line is in revenue service. Given the highly regulated nature of Trillium Line operations, more oversight and quality assurance are required for both Transit Services and its contractor, TNEXT. A strategy is being developed and will be completed by the end of Q1 2025.

A full inventory of missing items from training files for Trillium Line employees has already been completed and a plan to complete all requirements is being executed by the end of Q1 2025. All training records subject to regulatory requirements were in place in the employee files prior to the launch of revenue service. The Regulatory Compliance, Quality Control & Assurance team is responsible for quality assurance for training once in revenue service.

Management has conducted an analysis to ensure that the qualification of the instructors is documented on file, including the documentation of equivalencies and support for any decisions made by hiring managers. Documentation will be updated on all DROI files by the end of Q1 2025.

Given the nature of the expansion of the Trillium Line and based on the candidates who applied for the competitions, the best fit for the instructor positions were experienced legacy operators (LROs) from the pre-construction of the Trillium Line. With the creation of a new system, Management maximized the hiring of uniquely experienced individuals to make up the first group of instructors. The decision of hiring legacy LROs who had the most experience possible operating trains on the pre-construction Trillium Line was taken precisely so as to support the spirit and intent of the regulatory requirements.

RECOMMENDATION 2 – REVIEW OF HIRING PRACTICES FOR RELIEF INSTRUCTORS

The General Manager, Transit Services should review the hiring practices for the relief instructor pool. This should include, as applicable, updating associated process documentation to clarify expectations.

MANAGEMENT RESPONSE 2

Management agrees with this recommendation.

As the Auditor General has noted, hiring managers exercised some discretion (with regard to interview performance) in the past to select the best available candidates, knowing that the instructor cadre would be completing training together and working together as a holistic group. Given the current status of rail operations on the Trillium Line, there are no concerns that a healthy pool of fully qualified candidates exists for future competitions.

Management has since conducted a review of the Diesel Rail Operator Instructor job competition in consultation with Human Resources. Any inconsistencies with established City HR practices will be addressed for future competitions. All subsequent instructor job competitions will be monitored to ensure compliance with established City of Ottawa HR procedures and best practices. The Chief Safety Officer has reviewed internal processes and clarified expectations in writing with hiring managers within the Training & Development team to further ensure that the issues do not reoccur.

RECOMMENDATION 3 – CONDUCT CONSISTENT PERFORMANCE OBSERVATIONS OF THE DIESEL RAIL INSTRUCTORS

The General Manager, Transit Services should ensure that all diesel rail instructors are subject to the required performance observations and receive the necessary feedback on their performance, including actions to improve the effectiveness of their training.

MANAGEMENT RESPONSE 3

Management agrees with the recommendation.

This recommendation is already an internal organizational practice, which exceeds compliance with the regulatory requirements. Ongoing monitoring of instructor performance is part of continuous improvement under the Safety Management System. Management's intention is to continually improve the effectiveness of training through instructor performance observations. The position of Rail Training Section Manager is being filled in Q1 2025 with a new incumbent and this role is responsible to provide this oversight of the rail instructors. The duties of this role are currently being completed by the Manager, Training & Development until the position is filled.

2. Evidence of training**2.1 We found incomplete training records for several Trillium Line rail employees.**

Priority Rating:
Moderate

As discussed earlier, the Regulations require the City to submit their Training Plans to the Regulator. As a result, we expected to find complete training records, in accordance with the specifications of these Training Plans.

2.1.1 Classroom Training

The in-class training provides trainees with foundational knowledge of the Trillium Line, including vehicle and system familiarization and railway rules training. The City's Training Plans outline the training subjects and the associated deliverables needed to demonstrate completion of the training program. Deliverables often include a written exam and minimum grade requirements for each occupational category (e.g. instructors must obtain 90 per cent). As such, we expected to find corresponding documentation in each employee's training file demonstrating that the minimum passing requirements were met. However, our investigation identified instances that prevented us from verifying whether the required training had been completed. This included examples where:

- No exam was administered when one was required, as outlined in the Training Plans.
- Training records that were either missing or not marked by an instructor.
- Evidence of exam retakes was missing when a trainee did not achieve the established passing grade.

We found that the internally developed training file checklists, used to track each trainee's training records, did not demonstrate that the trainee had completed all training subjects

as outlined in the Training Plans. We also did not see evidence of a final review process, such as a quality assurance check, to verify that all training documentation was completed, in line with the Training Plans, before an individual was deemed to have completed their training. Management has indicated that OC Transpo's Regulatory Compliance, Quality Control and Assurance team conduct these reviews and checks once revenue service commences. Since our investigation preceded revenue service, this was not observed.

We sampled a total of thirty-three (33) operator, controller, and instructor training files. Our testing confirmed that all sampled trainees had evidence of completion of the safety-critical railway rules (ORCR) final exam, with the exception of one (1) issue which we raised to management. However, the following additional issues were identified:

- For **twenty-three (23) trainees**, there was at least one (1) missing exam in their training file.
- We found **twenty-one (21) instances** where there was no record of an exam retake on file, when one was required.

We understand that due to a clerical staff shortage, this may have impacted the proper maintenance of training files. However, without evidence of completion of training, as per the Training Plans, OC Transpo cannot demonstrate successful completion of the training program by Trillium Line employees.

2.1.2 On-Job Training

The Training Plans describe the minimum hour requirements for on-job training for the operators and operator instructors, culminating in a final assessment. This allows for hands-on experience to develop their skills and competencies needed to carry out their duties effectively.

The Training Plans specify a total of 60 hours of on-job training on each of the Alstom LINT and Stadler FLIRT vehicles, as well as 30 hours of training on a train simulator, for a total of 150 hours of on-job training with a dedicated instructor. However, our detailed testing confirmed that the on-job training provided to operators and operator instructors did not always meet these minimum requirements. Interviews confirmed that OC Transpo was basing their instruction on a minimum requirement of 36 hours of on-job training on each train vehicle with an



instructor. This was based on an outdated version of the Training Plans that did not align with the hours established in the version submitted to the Regulator.

As a result of OC Transpo basing their instruction on a minimum of 36 hours on each train vehicle, the majority of operators had not completed the total 150 hours of on-job training with an instructor at the time of our investigation procedures. This was brought to management's attention in September 2024, and we understand they took immediate action to remediate this prior to the commencement of revenue service.

We further identified that very few operator instructors had even met the 36-hours of on-job training hours per vehicle before they commenced instruction (see additional details in Observation 1.1). Additionally, we found instances where there was no documentation to confirm all yard training activities (e.g. vehicle equipment checklist/yard assessments) were completed by the operators and their instructors.

Our work allowed us to provide insights to management such that they could remediate before revenue service and ensure they were compliant with their Training Plans. Management has since confirmed that all gaps were remediated prior to revenue service. Refer to Recommendation #1.

3. Future considerations

3.1 **Recognizing that it was not receiving the training deliverables from TNext in line with expectations, the City supplemented with its own curriculum developers. While this mitigated risk, it increased the cost of the training program to the City.**

Priority Rating:
Low

The Project Agreement is clear that TNext was responsible for developing the operations training curriculum and materials that had to meet City standards for training material, including providing material suitable for adult education. However, this section of the Project Agreement neither prescribes the City's standards for training material nor the expected format for adult education.

During the investigation, we saw evidence that OC Transpo was concerned that TNext was not going to deliver training materials in line with their standards and potentially not in the time frame required. As a result, the City assigned internal resources as early as 2020 to commence adapting the training material received from TNext to align with City standards. We understand that this approach was taken as a proactive risk mitigation measure to ensure the City could deliver training and have trained operators and controllers available to run the trains, when necessary. We believe such a decision to have been prudent to facilitate rail operations in time for revenue service and further aligns

with the recommendations outlined in the [Report of the Ottawa Light Rail Transit Public Inquiry](#).

“Resolving operational problems and providing reliable public service must take precedence over all other priorities, including contract enforcement. The resources necessary to address a problem should be mobilized ahead of contractual interpretation and dispute resolution.”

– Recommendation 26 Ottawa Light Rail Transit Public Inquiry

Despite this, we learned from those involved in the curriculum development process that this forced OC Transpo to adjust and update the training program in real time. Feedback from both instructors and trainees indicated that this led to confusion and inconsistencies during the in-classroom instruction.

Had the Project Agreement been more specific about the expectations and requirements of the training program, the City may have been able to avoid taking on some of TNext’s responsibilities for the training program.

3.2 Improper in-class testing practices were observed.

Priority
Rating: Moderate

The detailed testing conducted as part of this investigation identified instances where the integrity of in-classroom exams was not consistently upheld. It is important to highlight that we were only able to observe the testing practices facilitated by TNext as the City-facilitated tests were not video recorded.

We reviewed a sample of video recordings of exams administered by TNext for the instructors and controllers. We found evidence that, at times, some instructors provided hints and direction (beyond clarification) and, on occasion, answers to specific exam questions. We also observed inappropriate behaviour among the trainees, such as talking among each other, copying answers, and making jokes about cheating during the exams. In one case, we observed a trainee taking unauthorized photos of the exam answers which could potentially be shared with other training cohorts.

Without necessary protocols in place to ensure the integrity of the testing process, OC Transpo cannot be assured that those successful candidates have the necessary proficiency to undertake their roles effectively. Further, this could be considered a violation of the City’s *Employee Code of Conduct*. We recognize that the examples we observed were limited to in-class tests, rather than the on-job training, where the candidates had an opportunity to practise and be observed in a more practical environment.

RECOMMENDATION 4 – REINFORCE EXPECTATIONS OF BEHAVIORS DURING EXAMS

Given that training of diesel rail operators and controllers has now moved completely in-house, to avoid future occurrences, the General Manager, Transit Services should develop and circulate communications to OC Transpo staff outlining expectations related to behaviour of both trainees and instructors during training related tests/exams.

MANAGEMENT RESPONSE 4

Management agrees with the recommendation and in Q1 2025 the Chief Safety Officer will circulate communications to Training & Development staff regarding decorum of classrooms and the expectations of Transit Services' high standards during training.

As the Auditor General has noted, Training for Diesel Rail Operators and Controllers is now being conducted in-house by OC Transpo, according to City of Ottawa standards and practices. Management has not uncovered any evidence that would suggest that these behaviors have continued since OC Transpo took over training.

TNext/Project Co was responsible for completing the training of the initial group of instructors and applied different standards than those applied by the Transit Services' Training and Development team.

This is a quality assurance issue to be noted for any future P3 training arrangement undertaken by management.

RECOMMENDATION 5 – ESTABLISH AND ARTICULATE SPECIFIC MINIMUM STANDARDS

For future agreements where OC Transpo receives training programs as a deliverable, the General Manager, Transit Services, in consultation with the Chief Procurement Officer, should formally establish and articulate specific minimum standards for the delivery of the training program, including the administration of tests.

MANAGEMENT RESPONSE 5

Management agrees with this recommendation.

Transit Services now has significant internal experience that will allow for more effective oversight over future training delivered by third parties. In this case, Transit Services has taken the lead to bring the training of rail staff in-house so as to ensure a higher standard of quality.

While no contract can provide a comprehensive guarantee of training quality, Transit Services will consult with Finance and Corporate Services to see what improvements could be made to future agreements in this regard.

Appendix 1 – About the Investigation

Investigation objective

The objective of this investigation was to review the FWHL allegations related to the Trillium Line training program.

Scope

The scope of our investigation was limited to assessing whether the allegations had merit, and if so, to determine the appropriate course of action that may be required for each of the issues.

The investigation focused on the activities related to the delivery of the training program to operators, controllers, and in-house instructors. This included the training deliverables provided by TNext, the qualifications of the in-house instructors, and exam integrity. We **did not** conduct a technical review of the training program's content. Nor did we assess the qualifications of the operators and controllers. This investigation was limited to the applicable regulations and the minimum standards established within the City's own Training Plans and job requirements. Additionally, this investigation did not include observation of the operators and controllers on the Trillium Line.

Investigation approach and methodology

To assess the merit of the concerns outlined in the FWHL, we conducted the following:

- **Review of documentation:** This included a review of documents such as the Training Plans, Project Agreement, Railway Employee Qualification Standards Regulations, and Canadian Rail Operating Rules.
- **Interviews, discussions and enquiries:** Interviews, discussions and enquiries were held with OC Transpo's management, employees and consultants, other City staff, and representatives from TNext, and Transport Canada, as well as confidential reporters.
- **Detailed testing:** Testing a sample of training files and HR job competition records, including supporting evidence.
- **Data analysis:** Analysis of SAP and scheduling system reports.
- **Review of other relevant information:** This included a review of video recordings of exam administration, emails, and Light Rail Sub-Committee reports and presentations.

Appendix 2 – Rating Scale for Investigation Findings

The following rating definitions were used to assign priority to the findings associated with this investigation.

Priority Rating	Description
Critical	The finding represents a severe control deficiency, non-compliance or strategic risk and requires an immediate remedy. If left uncorrected, this could have a catastrophic impact on the achievement of the City's strategic priorities, its ongoing business operations, including the risk of loss, asset misappropriation, data compromise or interruption, fines and penalties, increased regulatory scrutiny, or reputation damage.
High	The finding represents a significant control deficiency, non-compliance or strategic risk and requires prompt attention. If left uncorrected, this could have a significant impact on the achievement of the City's strategic priorities, its ongoing business operations, including the risk of loss, asset misappropriation, data compromise or interruption, fines and penalties, increased regulatory scrutiny, or reputation damage.
Moderate	The finding represents a moderate internal control deficiency, non-compliance or is a risk to business operations that should be addressed timely. If left uncorrected, this could have a partial impact on business operations, resulting in loss or misappropriation of organizational assets, compromise of data, fines and penalties, or increased regulatory scrutiny. Typically, these issues should be resolved after any high-priority findings.
Low	The finding should be addressed to meet leading practice or efficiency objectives. Remediation should occur as time and resources permit. While it is not considered to represent a significant or immediate risk, repeated oversights without corrective action or compensating controls could lead to increased exposure or scrutiny.

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