

Review  
of the  
Public Safety Report  
*2021 Edition*

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*For the Period ending April 30, 2021*

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## Executive Summary

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The mission of the Safety and Risk Officer (“SRO”) is to provide the Technical Standards and Safety Authority (“TSSA”) Board of Directors with an independent review of the public safety responsibilities assigned to the TSSA pursuant to the Act. Included in my duties is the review of the Corporation’s Annual Public Safety Report (“PSR”) for the purpose of assessing the quality, accuracy and clarity of the data used within the report.

The results of my review of the fiscal year 2021 (“FY21”) PSR are provided in this report. This report is intended for the sole purpose of assisting the TSSA Board of Directors and management in taking steps to continually strengthen the value of the PSR in measuring safety outcomes and communicating them to the public.

The report that follows provides an opinion on the quality, accuracy, and clarity of data in the FY21 PSR and provides observations and recommendations to continue to strengthen the reliability of the PSR report on the state of safety in the sectors that TSSA regulates.

In undertaking the review of the PSR I collaborated with TSSA Internal Audit and MNP LLP<sup>1</sup> to develop a robust approach to assess the quality, accuracy and clarity of the data reported. I directed and relied upon the work of MNP LLP in determining an appropriate scope and approach to providing limited assurance as to the accuracy of ‘in scope’ data disclosed in the PSR. In addition, I independently reviewed specific processes and controls related to the quality and clarity of selected data disclosures.

MNP LLP completed a CSAE<sup>2</sup> 3001 limited assurance engagement to assess the accuracy and completeness of ‘in scope’ data disclosures reported in the PSR and my assessment of quality and clarity was conducted with reference to the Performance Reporting Principles For the British Columbia Public Sector<sup>3</sup> (“Reporting Principles”)

The engagement was restricted to assessing the design and operating controls for the three ‘in scope’ data disclosures as noted below, across TSSA’s three safety programs as reported in the PSR during the period of May 1, 2020 to April 30, 2021:

- The risk of injury and fatality;
- Observed injury burden; and,
- Incidents and near misses.

Criterion to guide the review was developed and agreed upon with TSSA management.

In my opinion, based on the limited procedures performed and evidence obtained assessing the accuracy and completeness of ‘in scope’ data disclosures no matter(s) has come to my attention that causes me to believe that the underlying subject matter does not conform, in all significant respects, with the applicable criteria.

With respect to the quality and clarity of the ‘in scope’ data disclosures, based on the results of the limited work that I completed, I can conclude that the quality and clarity of data disclosed in the FY21 PSR satisfies the criteria.

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<sup>1</sup> MNP LLP is a leading Canadian accounting, tax and business consulting firm and is currently engaged by the TSSA to provide assurance and advisory services.

<sup>2</sup> Canadian Standards on Assurance Engagements (CSAE), as issued by the Chartered Professional Accountants (CPA) Canada

<sup>3</sup> Performance Reporting Principles for the British Columbia Public Sector, issued by the Province of British Columbia and the Office of the Auditor General of British Columbia, November 2003

In reviewing the FY21 PSR I also followed up on my recommendations from last year's review and the status of management's action plan. Two of the three recommendations are closed and I will continue to follow up as management completes the remaining steps in their action plan in FY22. Details of the recommendations and the status of management's action plan are provided in Appendix A: Details of FY20 Recommendations and Status Update.

Several observations were noted during my review this year which, in my professional judgement, are of significance for management's consideration to further strengthen the quality, clarity and accuracy of future disclosures in the PSR report. These matters were discussed with TSSA management in the context of the review of the PSR, and in forming overall conclusions related to reliability of the disclosures. Details of the observations and recommendations are provided at the end of this report. Overall, the quality, accuracy and clarity of the data used in the PSR continue to be strengthened.

## Introduction

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Mandated by the Government of Ontario, the Technical Standards and Safety Authority (“TSSA”) is Ontario’s public safety regulator in the following key sectors: Fuels Safety; Elevating Devices, Amusement Devices and Ski Lifts; and Boilers, Pressure Vessels and Operating Engineers. TSSA is governed by a 13-member board of directors and is accountable to the government of Ontario, residents of Ontario and other stakeholders. The Ministry of Government and Consumer Services (“MGCS”) is the Ontario government body that sets public safety policy, oversees the delivery of safety services and TSSA’s organizational performance and retains authority for the Technical Standards and Safety Act, 2000 (“Act”).

A Memorandum of Understanding (“MOU”) between the MGCS and the TSSA clarifies the roles, duties, and responsibilities of each party in relation to the administration of the Act. The Safety and Risk Officer (“SRO”) position is established through the Act and is further outlined in the MOU. The creation of this position was aimed at improving technical safety in the province. TSSA has taken steps to strengthen the effectiveness of the SRO role over the last year.

The mission of the SRO is to provide the TSSA Board of Directors with an independent review of the public safety responsibilities assigned to the TSSA pursuant to the Act. To this end, the SRO will provide analysis, recommendations and information concerning safety activities and strive to be an advocate for best practices. SRO duties include a review of the Corporation’s Annual Public Safety Report (“PSR”) for the purpose of assessing the quality, accuracy and clarity of the data used within the report.

The annual PSR relays critical information about the documented state of safety in the places where Ontarians live, work and play. It provides key safety related information on the sectors that the TSSA regulates, estimates the level of risk Ontarians are exposed to through TSSA-regulated technologies, devices, equipment, and certified trades people and provides an evaluation on TSSA’s own performance.

The results of my review of the fiscal year 2021 (“FY21”) PSR are provided in this report. This report is intended for the sole purpose of assisting the TSSA Board of Directors and management in taking steps to continually strengthen the value of the PSR in measuring safety outcomes and communicating them to the public. As such, the observations and recommendations expressed in this report are written exclusively for the use of the TSSA Board of Directors and management and will not be suitable for other purposes. This report is not to be interpreted as the results of an audit, review, or assurance engagement as defined by the Canadian Standard on Assurance Engagements.

The report that follows provides an opinion on the quality, accuracy, and clarity of data in the FY21 PSR and provides observations and recommendations to continue to strengthen the reliability of the PSR report on the state of safety in the sectors that TSSA regulates.

## Opinion

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The annual PSR provides key safety related information about the documented state of safety by estimating the level of risk Ontarians are exposed to through TSSA-regulated technologies, devices, equipment, and certified trades people. Ensuring that the PSR presents quality, accurate and clear data is necessary to ensure a reliable picture of the state of safety and to assure readers that the regulated sectors do not present an unacceptable risk of harm.

In undertaking the review of the PSR I collaborated with TSSA Internal Audit and MNP LLP<sup>4</sup> to develop a robust approach to assessing the quality, accuracy and clarity of the data reported.

For the purposes of my review, I referenced the definition of “quality” as provided by the International Organization for Standardization (“ISO”) and specifically ISO 8000 – 2:2020<sup>5</sup>. The ISO definition describes quality of data using five attributes:

- Accuracy
- Completeness
- Reliability
- Relevance
- Timeliness

For the term “clarity” I relied on the following OECD<sup>6</sup> (Organisation for Economic Co-operation and Development) definition:

*“Clarity refers to the data’s information environment: whether data are accompanied with appropriate metadata, illustrations such as graphs and maps, whether information on their quality also available (including limitation in use) and the extent to which additional assistance is provided by National Statistical Institutes.”<sup>7</sup>*

I directed and relied upon the work of MNP LLP in determining an appropriate scope and approach to providing limited assurance as to the accuracy of ‘in scope’ data disclosed in the PSR. In addition, I independently reviewed specific processes and controls related to the quality and clarity of selected data disclosed in the report.

#### Conclusion on Accuracy and Completeness of Select Disclosures

MNP LLP completed a CSAE<sup>8</sup> 3001 limited assurance engagement to assess the accuracy and completeness of three ‘in scope’ data disclosures reported in the PSR across TSSA’s three safety program areas (Elevating and Amusement Devices Safety Program, Fuels Safety Program and Boilers and Pressure Vessels, and Operating Engineers Safety Program). The CSAE 3001 standard can be applied when assurance on non-financial information is required, such as on the accuracy of the data reported within the PSR. This standard allows for an objective and structured approach to be used for evaluating data against applicable criteria and for expressing a conclusion that provides assurance to users of the data.

A ‘limited assurance’ engagement requires the collection of evidence, performance of audit tests and provides assurance focused on a specific subject matter. In this instance, it was utilized to provide assurance on select disclosures related to the accuracy and completeness of data within the PSR. Limited assurance engagements are often used for evaluating selected criteria (which are noted below), limited to a specific review period. In executing the CSAE 3001 limited assurance engagement, MNP LLP complied with independence and other ethical requirements required by the Institute of Internal Auditors and CPA Canada.

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<sup>4</sup> MNP LLP is a leading Canadian accounting, tax and business consulting firm and is currently engaged by the TSSA to provide assurance and advisory services.

<sup>5</sup> <https://www.iso.org/obp/ui/#iso:std:iso:8000:-2:ed-4:v1:en>

<sup>6</sup> <https://stats.oecd.org/glossary/detail.asp?ID=5119#:~:text=Clarity%20refers%20to%20the%20data's,is%20provided%20by%20National%20Statistical>

<sup>7</sup> Ibid

<sup>8</sup> Canadian Standards on Assurance Engagements (CSAE), as issued by the Chartered Professional Accountants (CPA) Canada

The engagement was restricted to assessing the design and operating controls for three 'in scope' data disclosure, noted below, reported in the PSR during the period of May 1, 2020 to April 30, 2021:

- The risk of injury and fatality;
- Observed injury burden; and,
- Incidents and near misses.

As the review was restricted to assessing controls over the identified 'in scope' data disclosures the conclusions cannot be extended to TSSA's entire internal control systems over the accuracy of disclosures in the PSR.

In examining the above data disclosures, MNP LLP considered the following criterion as agreed upon with TSSA management who are responsible for overseeing and reporting the public safety information included within the PSR:

- Are data disclosures clearly defined;
- Are there defined methods of calculating and documenting data disclosures outputs;
- Does documented guidance or procedures exist for data gathering, input and analysis for the data disclosures;
- Are there defined parameters around data extraction from operating systems/data bases for the data disclosures; and
- Are there clearly documented and assigned tasks and controls around quality assurance over the reported data for each of the disclosures?

In developing its conclusion, MNP LLP performed document reviews, met with key internal stakeholders, and reviewed select evidence against the criteria noted above to determine whether appropriate controls existed and were applied to ensure accuracy and completeness of reporting.

Based on the limited procedures performed and evidence obtained, no matter(s) has come to my attention that causes me to believe that the underlying subject matter does not conform, in all significant respects, with the applicable criteria.

#### Conclusion on Quality and Clarity of Disclosures

With respect to my independent review of the quality and clarity of the data used in the PSR for the period of May 1, 2020 to April 30, 2021, I included in scope the same data disclosures as those selected by MNP LLP in their limited assurance engagement:

- The risk of injury and fatality;
- Observed injury burden; and,
- Incidents and near misses.

As there were no clear auditing standards that provide specific assurance on data quality and clarity, my assessment of quality and clarity was conducted with reference to the Performance Reporting Principles For the British Columbia Public Sector<sup>9</sup> ("Reporting Principles"). The Reporting Principles were considered a good fit for the review of quality and clarity of data in the PSR as they provided guidance on reporting to the public on performance.

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<sup>9</sup> Performance Reporting Principles for the British Columbia Public Sector, issued by the Province of British Columbia and the Office of the Auditor General of British Columbia, November 2003

In consultation with Internal Audit and MNP, I selected three principles from the Reporting Principles that appeared to be the most relevant in evaluating data quality and clarity in the PSR. These guided the criteria and activities in reviewing the clarity and quality of data disclosures.

- Reporting Principle 2<sup>10</sup> Link Goals and Results

*Public performance reporting should identify and explain the organization's goals, objectives, and strategies and how the results relate to them.*

- Reporting Principle 6<sup>11</sup> Provide Comparative Information

*Public performance reporting should provide comparative information about past and expected future performance and about the performance of similar organizations when it would significantly enhance a reader's ability to use the information being reported.*

- Reporting Principle 7<sup>12</sup> Present credible information, fairly interpreted

*Public performance reporting should be credible – that is, based on quantitative and qualitative information that is fairly interpreted and presented, based on the best judgement of those reporting.*

My review considered the following criteria that were agreed upon with TSSA management in assessing the quality and clarity of the selected data disclosures against the above principles:

- The reader understands the link between the TSSA goals /objectives and the selected data disclosures as reported in the PSR for each of the three safety programs;
- The selected data disclosures used in the PSR are generally accepted and used within the regulated technologies, devices, and industries;
- Sufficient information is provided on the selected data disclosures to judge performance (relative to the past, others, or standards/benchmarks/best practices);
- Any year over year data inconsistencies is explained for the selected data disclosures;
- Relevant information for the selected data disclosures is offered to put results into context; and
- The selected data disclosures are presented in a format and using language that helps the reader appreciate its significance.

In arriving at my conclusion as to the quality and clarity of selected data disclosures I performed document reviews and meet with key internal stakeholders. Where processes were formalized or controls existed, I reviewed their design and effectiveness in meeting the criteria noted above.

Based on the results of the limited work completed, I can conclude that the quality and clarity of the 'in scope' data disclosures in the FY21 PSR satisfies the noted criteria above.

## Status Update for FY20 Management Action Plan

My report on the review of the FY20 PSR included three recommendations for which TSSA management developed an action plan. Recommendations focused on action to strengthen audience definition, data analysis and interpretation and format and presentation of the report. In reviewing the FY21 PSR I followed up on the status of management's action plan.

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<sup>10</sup> Ibid

<sup>11</sup> Ibid

<sup>12</sup> Ibid

Good progress by management has been made on recommendation #1 regarding audience definition and it remains open. I will continue to follow up as management completes the remaining steps in their action plan in FY22. All action has been completed for recommendations #2 and #3 and no further follow up is required as they are now closed.

Details of the recommendations and the status on management’s action plan are provided in Appendix A: Details of FY20 Recommendations and Status Update.

## Observations and Recommendations

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Overall, the quality, accuracy and clarity of the data used in the PSR continue to be strengthened. Several observations were noted during my review this year which, in my professional judgement, are of significance for management’s consideration to further strengthen the quality, clarity and accuracy of future disclosures in the PSR report. These matters were discussed with TSSA management in the context of the review of the PSR, and in forming overall conclusions related to reliability of the ‘in scope’ data disclosures.

The following observations and recommendations are intended to help build on existing works in progress and continue to strengthen the value of the PSR in measuring safety outcomes and communicating them to the public.

**Observation #1: The fiscal year 2021 edition of the Public Safety Report continues to be strengthened.**

Data Attributes <sup>13</sup>		
Q	A	C
✓	✓	✓

TSSA continued to strengthen the quality and clarity of data presented in the FY21 PSR despite competing priorities of the Outcome Based Regulator transformation, implementation of a new information technology system and challenges presented by the pandemic. The following improvements were made in the FY21 edition:

- TSSA identified target audiences for the report and improved content targeted to regulated entities.
- Progress was made in implementing quality controls to improve the accuracy of data disclosures.
- Several format enhancements to strengthen the quality and clarity of the information were made including strengthening case studies and Statutory Directors’ messages.

Reader comments on the impact of changes made for FY21 will provide important guidance for continuing with current changes and providing suggestions for future improvements.

### Recommendation:

In seeking feedback from the identified targeted audiences of the PSR it is recommended that TSSA confirm that changes made in FY21 enhanced the quality and clarity of the report for the readers.

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<sup>13</sup> Data Attributes Legend : Q = Quality, A = Accuracy, C= Clarity

**Observation #2: The Risk of Injury or Fatality (RIF) metric may be confusing and of questionable value to readers and TSSA.**

Data Attributes		
Q	A	C
✓		✓

Of the in scope data disclosures reviewed in the FY21 PSR, the Observed Injury Burden (“OIB”) and Incidents and Near Misses indicators are generally accepted and used within the regulated technologies, devices, and industries.

The RIF however is unique to TSSA. It is an abstract, sophisticated metric, used to predict future risk based on past performance. It is not known if it is easily understood or used by the audiences of the PSR. A composite RIF aggregated across three very different safety programs and changes to the formula and presentation of the metric in the FY21 report may increase the difficulty in interpreting its significance.

Without confirming the usefulness of the RIF to the PSR audience there is a risk that the effort invested in the calculation and presentation of the RIF is wasted.

**Recommendation:**

TSSA management plans to review safety performance metrics, including the RIF, to assess whether they are appropriate as metrics to track TSSA’s performance and overall safety. Some results, including next steps identified, are expected early in fiscal year 2023.

It is recommended that TSSA management pay special attention to the RIF in their review and consider the value of the RIF in reporting on TSSA performance and how the PSR audience uses the information. In particular a closer look at the value of presenting a composite RIF reflecting the three safety programs should be examined to determine the value to readers and TSSA.

**Observation #3: The impact of the COVID-19 pandemic on comparable data for current and future years may present a potentially misleading safety picture.**

Data Attributes		
Q	A	C
		✓

The impact of the COVID-19 pandemic on the three safety programs and the data presented in the PSR varied and TSSA provided additional context as necessary to ensure the reader correctly interpreted year over year changes.

It is expected that the impact of restrictions on device usage because of COVID will continue into FY22 and may have longer term impacts yet to be determined. Understanding the impacts on data and its presentation will be necessary in future reports to provide quality data to readers.

**Recommendation:**

It is recommended that TSSA begin to consider how data trends may be affected for fiscal year 2022 and the next few years and what additional context will be needed for readers to correctly interpret the data trends. It may be helpful to look to other regulators for guidance in determining a suitable approach for TSSA.

**Observation #4: Quarterly quality reviews performed by the Public Safety Risk Management (“PSRM”) Department over data were not all completed.**

Data Attributes		
Q	A	C
✓	✓	

The PSRM Department use a variety of quality control processes to help ensure system data is complete and accurate before it is approved for reporting purposes. Many of these quality control processes are documented along with associated timelines for completion as part of a Quality Management System (“QMS”) process. New controls are still being formally rolled out and some had not been fully performed or evidence of the quarterly review performed did not exist. This resulted in a lighter review of certain data sets than originally planned. It was confirmed by management that these data sets are checked at the end of the year through the PSRM Departments annual quality control review.

Should quarterly reviews not be completed or performed in a timely manner, there is a risk that a data set at a point in time needed to identify trends or inform decision making may not be accurate. Furthermore, there is a risk that if data sets are not adequately reviewed throughout the year, the level of effort required to ensure all data is accurate and the review of any unusual results may impede efficiency and effectiveness of PSRM and operations staff.

**Recommendation:**

Quarterly reviews over datasets informing PSR reporting should be fully completed in a timely manner to help ensure data (at that point in time) is as accurate as possible and to reduce the level of effort required to review data at the end of the reporting year.

Formal signoffs capturing the quarterly review of safety data by Statutory Directors for their respective program areas should be documented to formally capture any insights they may have and to identify any concerns over the data itself.

**Observation #5: Possible inconsistent interpretation and reporting of near miss occurrences.**

Data Attributes		
Q	A	C
✓	✓	✓

TSSA guidelines request the reporting of near misses, however, organizations are not mandated to provide this information. In addition, it sometimes can be difficult to discern whether a situation can be defined as a near miss from incident reports provided by the Spills Action Centre (“SAC”) via the Ministry of the Environment, Conservation and Parks. For reporting purposes in the PSR near miss occurrences are grouped with incidents and are used to help drive the Risk of Injury and Fatality calculation.

While near miss occurrence data helps with the early identification of possible trending risk areas and can help inform public safety issues, possible inconsistent reporting, and interpretation of such occurrences, coupled with the grouping of near miss occurrences with incidents, can lead to reported data in the PSR portraying an inaccurate representation of the state of safety within the province.

This risk is further amplified as near miss data is one component of information which is used to drive the calculation of the RIF which is reported in the PSR. Although it should be noted that the new method of calculating the RIF is less sensitive to the near misses than that which was previously being utilized.

Improved tracking of near misses would provide the TSSA with an opportunity to better identify safety trends and provide training in areas where near misses are increasing or clustering.

**Recommendation:**

There is an opportunity for the TSSA to revisit the approach used for utilizing and reporting near miss occurrence data to help drive consistency in reporting. Possible considerations include:

- Separating this measure from incidents for reporting purposes.
- Reviewing the inclusion of near miss data in key safety performance metrics such as the RIF calculation.
- Adopting a consistent definition of near misses for all program areas which should be reflected in reporting requirements shared with the SAC.

To enhance completeness and quality of reporting on near misses, TSSA management should consider practices from other jurisdictions such as obtaining reports on near misses from regulated businesses through existing Joint Health & Safety Committees. These details may be more informative and complete than current information received through the SAC and help to better inform root-cause analysis.

**Observation #6: Possible delayed reporting of injuries and fatalities requiring investigations.**

Data Attributes		
Q	A	C
✓		

In cases where there is an injury or fatality which requires an investigation, it may be several months before the root cause analysis to identify the cause of the injury or fatality is completed. These occurrences are reported in the PSR based on the date of their occurrence once a resolution has been reached. Therefore, previously reported incident data may be restated to reflect updates on incidents which occurred in a prior year(s).

To date, supplementary information related to such restatements has not been included in the PSR to help the reader understand any changes to the RIF and OIB calculations for restated/current results.

**Recommendation:**

There is an opportunity for the TSSA to enhance transparency of PSR disclosures by including additional information on incidents under investigation each year, including the incident date and indicating data can be subject to change in the future. In addition, when data and trends for prior periods are restated, a supplementary disclosure should be provided outlining the changes to the re-stated data for transparency purposes.

**Observation #7: Incident reporting can vary in quality and timeliness across all program areas.**

Data Attributes		
Q	A	C
✓	✓	

The TSSA has a Service Level Agreement (“SLA”) in place with the Spills Action Centre (“SAC”) operated by the Ministry of the Environment Conservation and Parks. The agreement outlines the terms of telecommunications and response coordination support to be provided in reporting incidents to TSSA. It was observed that there are no key performance indicators within the agreement to help measure the performance of the SAC.

There is a risk that without adequate measures in place to assess the quality and timeliness of incidents reported, TSSA’s ability to respond and report on incidents may be impaired.

**Recommendation:**

While annual training is conducted for SAC staff to reinforce the quality standards required relating to incident response and reporting, there is an opportunity to perform this training on a bi-annual basis to ensure quality standards are clearly understood and any changes made to coordination response procedures can be communicated.

As a new SLA agreement with the SAC is currently being discussed, the TSSA should take this opportunity to incorporate key performance indicators into the agreement to better monitor and measure the services provided by the SAC. To help inform what key performance indicators should be included, there is an opportunity for the TSSA to closely monitor the performance of the SAC over the next short period of time to assess its effectiveness in meeting TSSA’s needs and which indicators should be reported on a regular basis.

## Appendix A: Details of FY20 Recommendations and Status Update

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My report on the review of the FY20 PSR included three recommendations for which TSSA management developed an action plan. The following provides details of the recommendations and the status of management's action plan.

### Recommendation #1: Audience Definition

It is recommended that steps be taken in FY21 to clearly identify the primary reader for the PSR and actively solicit their feedback to confirm the objectives of the PSR and audience needs are being met.

#### Rationale

As the quality and value of a report can only be determined by the intended readers it is critical to ensure a primary audience is identified and that their feedback is sought. When that clarity is missing it will continue to be a challenge to deliver a report in an appropriate format with the correct level of information. There is a risk that the needs of the audience are not satisfied and the quality and value of the report in the eyes of the reader are diminished.

#### TSSA Response and Action

TSSA acknowledges that the State of Public Safety Report is produced with multiple audiences in mind and that having a clear main audience would help improve the focus.

**Action:** By FY21 Q4, TSSA will determine the main audience for the State of Public Safety Report. Once the audience is defined, in FY22 a plan will be developed to focus the report to that audience for the FY23 edition of the report.

#### Status - Open

During FY21 management identified two primary audiences for the Public Safety Report, as follows:

- Government of Ontario (through MGCS), and
- Authorization Holders (regulated parties).

The ability to focus the content to regulated entities was evident in the language and content in the Case Studies and Director's messages in the FY21 edition of the PSR. Plans are underway to formally solicit feedback from the audiences during FY22 and use the information to continue to strengthen the PSR.

### Recommendation #2: Strengthening of Data Analysis and Interpretation

It is recommended that collaboration between PSRM, the Statutory Directors and their teams and Communication staff continues to be strengthened as it will be instrumental in enriching the quality of interpretation, conclusions, and presentation of data in the PSR.

As a first step it is recommended that the teams review the process for FY20, identify what worked, and implement action to strengthen collaboration for FY21. Formalizing the process by clarifying roles and the timing of activities may be helpful. To build familiarity and strengthen the interpretation of the data it is recommended that the collaboration process include regular review of key metrics throughout the year. This will also help to alleviate some of the year end pressure associated with producing the report.

### Rationale

The preparation of the PSR draws upon various skills and expertise in TSSA. Statutory Directors require an understanding of the analysis and conclusions provided by PSRM to effectively align data points and safety indicators with observations and feedback from the field. PSRM needs feedback from the Statutory Directors to direct further analysis or interpretation of data and validate their conclusions. Finally, the Communication team plays an important role in pulling together a cohesive document that balances a consolidated picture of the state of safety with individual highlights in program areas. Only an effective joint effort between the teams will increase the certainty of delivering a quality PSR report.

### TSSA Response and Action

TSSA agrees that the collaboration between the different functions has improved the quality of interpretations and will continue with this practice moving forward. As part of its continuous improvement practice, TSSA will continue to improve the process to ensure there is a strong interpretation of the data to inform the report's conclusions.

**Action:** The Strategic Analytics team will automate the analysis of key safety performance indicators – particularly those that rely on qualitative data that is more resource intensive to process.

### Status - Closed

During FY21 management implemented automated reports on key safety indicators (High Risk Inventory, Risk of Injury and Fatality, Observed Injury Burden, natural language processing for incidents) to increase the efficiency in analyzing data and expanding access to results. The reports were launched in Spring 2021 and will continue to be enhanced and refined. The change will allow Statutory Directors and others to easily access data. In addition, the Strategic Analytics team holds informal discussions with the program areas to better understand the data and interpret the results. An important consideration under discussion for FY21 PSR reporting has been isolating the impact of COVID on changes in data from previous years.

In the development of the FY21 PSR report the PSRM, Statutory Directors and Communication teams recognize the benefit of collaborating and discussions were initiated earlier in the year. Plans are underway to formalize the working relationship in FY22.

### **Recommendation #3: PSR Format and Presentation**

As TSSA responds to the suggested improvements from the Peer Review, it is recommended that improvements to case studies and messages from Statutory Directors be considered. Choosing case studies that can be linked directly to incidents or trends in data would assist the reader in linking TSSA activities with safety data. Clearly stating conclusions and TSSA actions will provide confidence in TSSA's ability to respond. Enhancing the Statutory Director's message as to the activities that TSSA is taking to respond to the data will help the reader to begin to grasp the value of TSSA activities and how they are improving safety. These improvements may be instrumental in addressing the Peer Review recommendations on answering readers' questions as to "why" and "so what?".

### Rationale

Enhancing the case studies and messages from Statutory Directors will add to the quality of the PSR as readers will be able to easily link trends in data to TSSA activities in improving public safety.

### TSSA Response and Action

Since TSSA introduced case studies in the PSR, it has improved the way they are presented. TSSA agrees that once the main audience for the report is identified, case studies can be strengthened to address the needs of that audience with the goal of helping the reader grasp the value of TSSA activities and how it is improving safety.

**Action:** TSSA will continue to improve the case studies. The automation of incident data analysis will help identify potential case studies early on and work with the program areas to parse out the details.

The Strategic Analytics team will work closely with the Communications and Stakeholder Relations team and the Statutory Directors to identify ways that the key messages of the PSR relate back to the strategic initiatives that TSSA is undertaking to address areas of high risk.

### Status - Closed

The Strategic Analytics team, in collaboration with Statutory Directors monitored the data for FY21 to identify potential key messages and case studies that would strengthen the context for the data and assist the reader in understanding trends and their significance.

The benefit of this process was evident in language and format that improved the quality and clarity of the FY21 edition. Case studies and Statutory Directors messages were strengthened to better allow the reader to link back to the data presented, provided a stronger conclusion and a direct link to TSSA activities in improving safety.