

Review of the Public Safety Report

2025 Edition

By Deepak Jaswal
Safety and Risk Officer

Technical Standards and Safety Authority

For the period ending April 30, 2025

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Executive Summary

The purpose of this report is to express an opinion on the quality, accuracy, and clarity of select data disclosures in the fiscal year (FY25) edition of the Public Safety Report (PSR) and provide observations and recommendations to continue to strengthen the accuracy and reliability of reported data.

In conjunction with MNP LLP (MNP), I have undertaken an independent review to assess the accuracy, quality, and clarity of incident data in the PSR. This review was limited to assessing the design and operating effectiveness of key controls for select processes pertaining to incident data during the period of May 1, 2024, to April 30, 2025. All TSSA safety programs were in scope for the purposes of this review.

Management's Responsibility

TSSA management is responsible for the design and operating effectiveness of controls related to the accuracy, quality, and clarity of incident data.

Safety and Risk Officer Responsibility

My responsibility under this engagement was to express a conclusion on whether the design and operational effectiveness of processes used for the capture, processing, dissemination, and reporting of incident data across TSSA safety programs complied in all significant respects with relevant criteria. Under my direction, MNP supported in the assessment of the accuracy, reliability, and completeness of incident data.

I completed an assessment of the reporting quality and clarity of incident data. My work was conducted with reference to the Performance Reporting Principles for the British Columbia Public Sector¹ (Reporting Principles).

In our review procedures, instances of fraud or error are considered significant if, individually or in aggregate, they could reasonably be expected to influence the decisions of users of this report.

I believe the evidence we obtained was sufficient and appropriate to provide a basis for my opinion on the areas reviewed.

Conclusion

In my opinion, considering the procedures performed and evidence collected on the in-scope processes and procedures, nothing has come to my attention that causes me to believe that the underlying subject matter does not conform in all significant respects, to the applicable criteria.

A number of observations were noted during the review which have been reported to TSSA management and have informed overall conclusions related to the accuracy and reliability of

¹ 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

reported incident data. Details on key observations, recommendations and TSSA's management responses are provided in the body of this report.

Introduction

Mandated by the Government of Ontario, the Technical Standards and Safety Authority (TSSA) is Ontario's public safety regulator in the following regulated industries (also referred to as program areas): Fuels Safety; Elevating Devices, Amusement Devices and Ski Lifts; Boilers and 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 Public and Business Service Delivery (MPBSD) 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 MPBSD and TSSA clarifies the roles, duties, and responsibilities of each party in relation to the administration of the Act. The Chief Safety and Risk Officer (SRO) position is established through this Act and is further outlined in the MOU. The creation of this position was aimed at enhancing technical safety in the province.

The mission of the SRO is to provide the TSSA Board of Directors with an independent review of the public safety responsibilities assigned to TSSA pursuant to the Act. The SRO will perform analysis and provide recommendations pertaining to safety activities and advocate for leading practices. SRO duties include a review of TSSA's Annual Public Safety Report (PSR) for the purpose of assessing the quality, accuracy and clarity of the data presented in 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 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 performance.

The results of my review for the fiscal year 2025 (FY25) edition of the PSR are provided in this report. This report is intended for the sole purpose of assisting TSSA Board of Directors and management in taking steps to continually strengthen the value of the data and contents in the PSR in measuring safety outcomes and communicating them to the public. As such, the observations and recommendations expressed are not 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 following sections provide an opinion on the quality, accuracy, and clarity of incident data in the FY25 PSR and provide observations and recommendations to continue to strengthen the reliability and integrity of incident data inside the PSR.

Opinion

As the PSR provides key safety information estimating the level of risk exposure to Ontarians, it is critical that the report presents a reliable picture of the state of safety to assure readers that regulated sectors do not present an unacceptable risk of harm.

In undertaking the review of the PSR, I worked alongside MNP LLP² (MNP) to develop a comprehensive approach to assessing the quality, accuracy, and clarity of reported incident data. I directed MNP in determining an appropriate scope and approach in reviewing processes and controls ensuring the accuracy and completeness of incident data. In addition, I independently reviewed specific processes and controls related to the quality and clarity of incident data disclosed in the PSR.

The review was restricted to assessing the design and operating controls over reported incident data during the period of May 1, 2024, to April 30, 2025. All TSSA safety programs were in scope.

Refer to Appendix A, Summary of Work Performed, for additional details.

Conclusion on the Accuracy and Completeness of Incident Data

Both MNP and I completed a review to understand the design and operating effectiveness of processes used for the capture, processing, dissemination, and reporting of incident data across TSSA regulated industries. This area has been subject to recent changes, particularly in the way incidents are defined, classified, handled and reported. This review is also intended to help inform TSSA management on how and if changes have led to better quality, clarity and accuracy around incident management and reporting. In executing this review, MNP and I complied with independence and other ethical requirements required by the Institute of Internal Auditors, CPA Canada, and CPA Ontario.

In developing this conclusion, MNP and I performed document reviews, data analysis, key stakeholder interviews, and reviewed supporting evidence to determine whether appropriate controls existed and were applied to ensure the accuracy and completeness of reported incident data.

In my opinion, considering the procedures performed and the evidence collected in assessing the accuracy and completeness of incident data, nothing 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 the Quality and Clarity of Incident Data

With respect to my independent review of data quality and clarity, my assessment was conducted with reference to the Performance Reporting Principles for the British Columbia Public Sector (Reporting Principles). In arriving at my conclusion as to the quality and clarity of incident data disclosed, MNP and I performed document reviews and stakeholder interviews. Where processes were formalized or controls existed, MNP and I reviewed their design and effectiveness in meeting

² MNP LLP is a leading Canadian accounting, tax and business consulting firm and is currently engaged by TSSA to provide assurance and advisory services.

the criteria. In executing the review, MNP and I complied with ethical requirements and standards as required by the Institute of Internal Auditors, CPA Canada, and CPA Ontario.

In my opinion, based on the results of the work completed in assessing the quality and clarity of incident data, nothing has come to my attention that causes me to believe that the underlying subject matter does not conform in all significant respects, to the applicable criteria.

Note: As the review was restricted to assessing controls over incident data, these opinions cannot be extended to TSSA's entire internal control systems over the quality, accuracy, and clarity of data reported in the PSR.

PSR FY25 Reporting Enhancements

The integrity of the data published in the FY25 PSR has continued to improve. TSSA's proactive responses to the 2018 Auditor General's report and SRO recommendations from previous years have significantly enhanced the quality, clarity, and accuracy of reported incident data found in the report.

Additionally, TSSA's continuous strengthening of internal processes and controls guiding data collection, usage and reporting are making a difference in the accuracy, completeness, and clarity of reported data. Over the last few years, substantial efforts have been made to carefully examine the data and metrics presented in the PSR. This has led to clearer definitions, refinements in calculations and the simpler presentation of data allowing for readers to easily interpret and focus on safety issues.

Furthermore, TSSA has made a noteworthy effort to incorporate high standards for data quality and accuracy into everyday tasks, and to promote collaboration between stakeholders involved in the reporting process, from program areas who help drive the collection and documentation of data, to Strategic Analytics, who review, analyse and present this data within the PSR.

FY25 PSR Observations and Recommendations

Four opportunities to further strengthen the reporting of incident data were noted and are documented below. Detailed observations and recommendations were directly shared for consideration with TSSA management.

Observation #1: Application of Harmonized Dispatch Criteria

TSSA has implemented a new incident response process which uses a set of harmonized dispatch criteria to determine the speed and type of response required, depending on the circumstances of an incident. The creation of this set of criteria has been a joint effort between TSSA's program areas and a newly formed investigations team. The objective of this criterion is to establish a consistent and risk-based approach to incident response, which meets TSSA's mandated duties.

The review identified several instances where incidents were initially recorded at a certain severity by TSSA employees and upon internal review were later classified at a different severity i.e. higher or lower.

Recommendation:

While TSSA does not currently report on the severity of incidents in the PSR, it should be noted that the accuracy of incident data and TSSA's associated response support the overall reporting process and the quality of the PSR report. Information recorded about the incident, including the incident severity as outlined in TSSA's harmonized dispatch criteria, help to inform PSR case studies and internal root cause investigations.

It is recommended that TSSA's investigations team and program areas, continue to become more familiar with the new harmonized dispatch criteria through internal trainings and education opportunities to help drive consistency in the application of the new criteria.

TSSA Management Response:

Management has confirmed that all inspectors, supervisors, and incident desk advisors will continue to receive ongoing training, education, and support to further drive consistency in the application of the new criteria.

Observation #2: Quality Control Processes Within TSSA Program Areas

Program areas currently do not utilize standalone quality control processes to review incident data for quality, accuracy, or clarity. Instead, they rely on training, standard operating procedures/work instructions and the use of mandatory fields in CRM to ensure that required data is captured. While these measures are all appropriate and required, they are not designed to identify issues with data once it has been entered into the CRM system.

It was also noted that Strategic Analytics provides support to program areas in quarterly meetings to review open incidents and potential issues with incident data. While these efforts are effective for flagging select types of data issues (i.e., duplicates), they rely on specific indicators, as set by Strategic Analytics. Program areas do not currently have a standalone process to help identify and correct issues with incident data outside of this process.

Recommendation:

TSSA can improve on the quality of its incident data by targeting standalone quality control reviews by program supervisors, with the assistance of Strategic Analytics to help ensure incident data is complete, clear, and accurate.

These reviews can focus on factors that may increase the likelihood of errors, including:

- Data entered by an inspector that is new to a program area.
- Incidents occurring in unusual circumstances.
- Incidents occurring after hours.
- Incident data entered into a mandatory field which requires judgement (e.g., incident severity).

TSSA Management Response:

As noted, TSSA has implemented several mechanisms to review the accuracy, completeness, and accuracy of incident data, to better understand how and why data quality issues arise, and to

implement remedies accordingly. Management acknowledges that there may be situations where the risk of error is more likely to present itself: in those cases, Management will ensure that additional controls are in place.

Observation #3: Upcoming Changes to Incident Reporting Process

Currently, most incidents reported to TSSA are provided by the Spills Action Centre (SAC), a call center that is a part of the Ministry of the Environment, Conservation and Parks. The SAC and TSSA have a longstanding relationship, documented by an agreement which outlines the process by which incidents are to be reported to TSSA. Over the past few years, TSSA has adjusted its incident response process to ensure that reports coming from SAC are appropriately triaged and documented.

However, the SAC has provided notification to TSSA that it will no longer be accepting incident reports as of November 2025. This introduces some uncertainty into the incident notification process which helps initiate incident response activities, investigation and reporting processes that inform the PSR. It was noted that TSSA are currently actively exploring options to ensure that Ontarians are not impacted by this change and it is anticipated that an alternate incident reporting process will be established prior to November 2025.

Recommendation:

Given the receipt of timely and accurate information forms the foundation of effective safety activities, TSSA should consider alternatives to the SAC for incident notification and reporting while considering cost, effort, timeliness, and effectiveness. Below are three viable options to consider:

- Receiving reports directly from the public via phone, email and/or through its customer portal.
- Receiving reports through an alternative, public-sector reporting centre.
- Outsourcing incident notification and reporting to a third-party.

TSSA Management Response:

TSSA is currently in the process of evaluating options for a replacement to the SAC. TSSA has gained assurance from SAC that there will be flexibility on the transition date to enable TSSA the time to put a new process in place and to ensure an orderly transition to the new service provider.

Observation #4: Categorization of Safety Impact Measurement Outcomes

TSSA collects various information about incidents in its CRM system, including measures for Safety Impact Measurement (SIM), SIM lifecycle and SIM root cause. When reviewing the options available to inspectors for selection, it was noted that there was a potential lack of clarity around the most applicable option that could be selected for each of these fields. TSSA's current standard operating procedures do not outline the distinction between options, which can lead to inconsistent selections for these measures across incidents.

Recommendation:

While TSSA does not directly report on SIM measurements in the PSR, it is recommended that TSSA review these options to support the clarity and accuracy of data capture for these safety measures

should they wish to report on this data in the future. TSSA should also update current standard operating procedures to clarify selection options to support consistency in the way information is interpreted, selected, and documented.

TSSA Management Response:

As TSSA's approach to data-driven decisions and risk-based analytics evolves, the changes will require adjustments to how data was previously tracked and selected. TSSA will consider simplifying the framework for SIM categories in the context of its data and analytics framework and will assess the timing of changes in the context of other strategic priorities and IT enhancements.

Appendix A: Summary of Work Performed

The purpose of the SRO's review of the PSR is to conduct an independent assessment on the quality, accuracy, and clarity of data within the report. Upon independent assessment and consultations with key stakeholders, incident data was chosen as the dataset for a targeted review.

The scope of work for FY25 included all TSSA's safety programs (Fuels, Boilers, Pressure Vessels and Operating Engineers, and Elevating Devices, Amusement Devices and Ski Lifts) for the reporting period of May 1, 2024, to April 30, 2025.

To support the SRO's review of the accuracy and clarity of incident data, MNP LLP (MNP) were engaged. For the FY25 review, the engagement was limited to:

- Understanding the design of processes used for the capture, processing, dissemination, and reporting of incident data across TSSA Regulated Industries.
- Evaluating the operating effectiveness of processes used to capture, assess, and report on incident data within the PSR across TSSA Regulated Industries.

The following areas were reviewed in addition to the selection of a sample of incidents to confirm the operational effectiveness of incident related processes:

- Definition and categorization of an incident.
- Management and handling of incidents once TSSA is notified of an incident.
- The review of dispatch criteria used by TSSA for responding to incidents.
- Documentation of incident data and entry of this data into systems.
- Quality controls to review incident data across regulated areas.
- Extraction of data from systems and data manipulation for reporting purposes.
- PSR reporting quality controls around incident data.

The SRO's approach for assessing the design and operating effectiveness of incident reporting processes was focused on meeting various cross departmental and program stakeholders involved in supporting incident data and reviewing internal policies, guidelines and supporting criteria. The review examined the process of incident documentation, analysis, and reporting, including the sampling of twenty incidents to determine the effective use of dispatch criteria. The review examined the process of data extraction and analysis for reporting, including walkthroughs of the systems used to store, compile, and analyse data. The review also examined evidence of quality controls to ensure that incident data is complete.

Finally, the review referenced the Performance Reporting Principles for the British Columbia Public Sector for guidance on delivering quality information to the public to help assess the clarity of incident data being presented in the PSR.