

Review
of the
Public Safety Report
2023 Edition

By Angela Byrne
TSSA Safety and Risk Officer

Technical Standards and Safety Authority

For the Period ending April 30, 2023

Contents

Executive Summary.....	3
Introduction	5
Opinion.....	5
Status Update for FY22 Management Action Plan	8
FY23 PSR Observations and Recommendations	8
Appendix A: Summary of Work Performed	12
Appendix B: Details of FY21 and FY22 Recommendations and Status Update	14

Executive Summary

The annual Public Safety Report (“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 Technical Standards and Safety Authority (“TSSA”) regulates, estimates the level of risk Ontarians are exposed to through TSSA-regulated technologies, devices, equipment, and certified trades people. As TSSA continues its transformation to a Modern Outcome-Based Regulator it becomes increasingly important that information in the PSR is based on high quality, accurate and clear data on the state of safety in Ontario.

The purpose of this report is to express an opinion on the quality, accuracy, and clarity of the select data disclosures in the fiscal year 2023 (“FY23”) edition of the Public Safety Report and provide observations and recommendations to continue to strengthen the reliability of the state of safety in the sectors that TSSA regulates.

In conjunction with MNP LLP, I have undertaken an independent review to assess the accuracy and completeness, quality, and clarity of TSSA’s reported disclosure of the Compliance Rate in the FY23 edition of the PSR, covering the reporting period of May 1, 2022, to April 30, 2023. The safety program areas in scope included Fuels Safety, Boilers and Pressure Vessels, and Operating Engineers. Elevating and Amusement Devices safety programs were out of scope for this review as the core input checklist informing the Compliance Rate disclosure was not fully implemented for FY23. The engagement was limited to key processes and controls related to disclosures for the Compliance Rate.

The conclusions derived from the results of our work should not be extended to other disclosures in the PSR in whole or in part.

Management’s Responsibility

TSSA management is responsible for the design and operating effectiveness of controls related to the accuracy and completeness, quality, and clarity of PSR disclosures.

Safety and Risk Officer Responsibility

My responsibility under this engagement was to express a conclusion on whether the identified disclosures complied in all significant respects with relevant criteria.

Under my direction, MNP LLP completed a CSAE¹ 3001 limited assurance engagement to assess the accuracy and completeness of ‘in scope’ data disclosures reported in the PSR. I completed an assessment of the same ‘in scope’ data disclosure for attributes of quality and clarity. My work was conducted with reference to the Performance Reporting Principles For the British Columbia Public Sector² (“Reporting Principles”).

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

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

¹ Canadian Standards on Assurance Engagements (“CSAE”), as issued by the Chartered Professional Accountants (CPA) Canada

² 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

Conclusion

In my opinion, considering the limited procedures performed and the evidence collected on the 'in scope' data disclosure, 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.

Several observations were noted during the review which have been reported to TSSA management for consideration to further strengthen controls related to the quality, clarity, and accuracy of future disclosures in the PSR Report. These matters were discussed with TSSA management within the context of the review of the PSR and informed overall conclusions related to the reliability of the disclosures. Details of the key observations, recommendations and TSSA's management response 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 key sectors: 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 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.

The mission of the SRO is to provide TSSA Board of Directors with an independent review of the public safety responsibilities assigned to 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 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 of the fiscal year 2023 (“FY23”) edition of the PSR are provided in this report. My 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 data and contents in the PSR in measuring safety outcomes and communicating them to the public. As such, the observations and recommendations expressed 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 following sections provide an opinion on the quality, accuracy, and clarity of data in the FY23 PSR and provide 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

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 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 LLP³ to develop a robust approach to assessing 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

³ 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.

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.

The engagement was restricted to assessing the design and operating controls over selected processes and criteria and focused on disclosures related to the Compliance Rate during the period of May 1, 2022, to April 30, 2023. The review considered the application of inspection checklists and how data is entered in the checklist and tracked for analysis. The safety program areas in scope included Fuels Safety, Boilers and Pressure Vessels, and Operating Engineers. Elevating and Amusement Devices were considered out of scope as the core input checklist is currently being implemented.

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

Conclusion on Accuracy and Completeness of the Compliance Rate Disclosure

MNP LLP completed a CSAE⁴ 3001 limited assurance engagement to assess the accuracy and completeness of the Compliance Rate disclosure reported in the PSR across the in-scope safety program areas. 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.

MNP LLP considered the criteria as noted in Appendix A. TSSA management is responsible for overseeing and reporting the public safety information included within the PSR and agreed to the selected review criteria.

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

In my opinion, considering the limited procedures performed and the evidence collected in assessing the accuracy and completeness of the Compliance Rate disclosure, 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 Quality and Clarity of the Compliance Rate Disclosure

With respect to my independent review of the quality and clarity and given there are no applicable auditing standards that provide specific assurance on data quality and clarity, my assessment was conducted with reference to the Performance Reporting Principles For the British Columbia Public Sector⁵ ("Reporting Principles"). The Reporting Principles are considered a good fit for the review of the data in the PSR as they provide guidance on reporting to the public on performance.

In consultation with Internal Audit and MNP, I selected principles from the Reporting Principles that appeared to be the most relevant in guiding the criteria and activities in examining the clarity and quality of data disclosures. Refer to Appendix A for details on the principles selected and the evaluation criteria.

In arriving at my conclusion as to the quality and clarity of the Compliance Rate disclosure I performed document reviews and met with key internal stakeholders. Where processes were formalized or controls existed, I reviewed their design and effectiveness in meeting the criteria. In executing the review, I complied with ethical requirements and standards as required by the Institute of Internal Auditors.

⁴ Canadian Standards on Assurance Engagements ("CSAE"), as issued by the Chartered Professional Accountants ("CPA") Canada

⁵ 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 my opinion, based on the results of the limited work that I completed in assessing the quality and clarity of the Compliance Rate disclosure, 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.

As the review was restricted to assessing controls over the Compliance Rate disclosure, the opinions cannot be extended to TSSA's entire internal control systems over the quality, accuracy, and clarity of disclosures in the PSR.

Status Update for FY21 and FY22 Management Action Plan

My report on the review of the FY22 PSR provided three recommendations for which TSSA management developed an action plan. Recommendations focused on action to further strengthen the quality, clarity, and accuracy of future disclosures in the PSR. In reviewing the FY23 PSR I followed up on the status of management's action plan.

During FY23 TSSA closed two of the three outstanding recommendations from FY21. The outstanding recommendation of assessing the value of the Risk of Injury or Fatality metric in reporting TSSA performance is expected to be completed in FY24. All three recommendations from the SRO review of the FY22 PSR were closed during the year.

Details of the recommendations and the status on management's action plan are provided in Appendix B: Details of FY21 and FY22 Recommendations and Status Update.

FY23 PSR Observations and Recommendations

The quality of data published in the PSR continues to improve. As the journey to a Modern Outcome-Based Regulator continues for TSSA the data disclosed in the PSR is more closely linked to the organization's strategy, objectives, and risk-based decisions. With increased use of the data to inform decisions and direct resources, processes and controls guiding data collection, usage and reporting are taking on new meaning in the organization.

For example, TSSA introduced inspection checklists and technology to enhance consistency in the inspection process and the data collected. The inspection outcomes are used to analyze data that not only influences resource allocations but also factors into the calculation of the Compliance Rate published in the PSR.

In the FY23 PSR, TSSA introduced a new compliance rate along with supplementary data to facilitate the interpretation of the disclosure. The change allows readers to easily spot trends in noncompliance of high-risk devices and draw more accurate conclusions about the state of safety in the program area.

Finally with the introduction of the brand strategy in support of the 2024-2028 Strategic Plan, it is evident that the PSR is now intended to have a tone and visual style consistent with other public reports. This positions the PSR as a significant part of external reporting.

As the journey to a Modern Outcome-Based Regulator continues, the PSR plays a critical role in demonstrating accountability by connecting results and TSSA's strategies and objectives. It will continue to evolve and develop to align with TSSA's transformation and there will always be areas for improvement to reflect the state of safety and inform the targeted audience.

In reviewing the FY23 PSR, I noted several opportunities to strengthen the quality, clarity, and accuracy of the disclosures in the PSR. My detailed observations and recommendations which, in my professional judgement, are of significance for management's consideration were shared with TSSA.

The key observations, recommendations, and management's response are provided below.

Observation #FY23-2: Value of the Compliance Rate

Data Attributes ⁶		
Q	A	C
✓		

The Auditor General, in its 2018 audit, noted the limitations of the Compliance Rate disclosure in assessing safety. TSSA has taken steps to increase its value by introducing a new compliance rate and interpreting “compliance” as inspections with no issued high-risk orders. They have also simplified and automated the calculation to allow it to be computed more quickly.

Currently the data informing the Compliance Rate has limited value in informing decisions at TSSA. As presented in the PSR, the Compliance Rate does not appear to be used by the target audiences to gauge industry safety or guide decisions. There is an opportunity to leverage the data informing the Compliance Rate more fully to inform decisions and action, and to strengthen its presentation in the PSR.

Releasing safety metrics that do not inform decisions or influence action, contradicts the principles of a Modern Outcome-Based Regulator, and wastes valuable resources.

Recommendation:

Assess the value of the key data points related to compliance and inspection results to inform decisions and take steps to improve, replace or discontinue the published Compliance Rate.

TSSA Management Response:

TSSA has used the compliance data to inform the development of compliance standards and determine the frequency of periodic inspections. As part of our regulatory transformation, we will continue to use compliance data to allocate resources and identify high risk.

TSSA will start to regularly review the results of periodic inspections to better understand the patterns and trends being observed by inspectors, and correlations to regulatory decisions (e.g., Top high-risk issues by region; patterns of non-compliance by building or device types).

Observation #FY23-4: Strengthening the Link between Data and Decisions.

Data Attributes		
Q	A	C
✓		✓

To fully understand the meaning and significance of the performance information presented in the PSR, it is important to explain how TSSA’s strategies and objectives relate to results achieved. In previous PSR editions, the connection between data and objectives was not always clear.

In the FY23 PSR edition, this linkage has been enhanced by adding more details that align data disclosures and TSSA strategies and objectives as a Modern Outcome-Based Regulator. These links demonstrate how TSSA has been progressively developing and implementing initiatives in its transformation, and how it is using data to inform its direction.

⁶ Data attributes include “Q” for quality, “A” for accuracy and “C” for clarity.

With the release of TSSA’s 2024-2028 Strategic Plan and the corresponding brand strategy, a fresh opportunity emerges to leverage messaging in executing the renewed TSSA purpose.

By incorporating actions taken in response to data in the PSR, notably engagement, evidence, enforcement, and education, TSSA can enhance accountability and integrity.

Recommendation:

Take steps to strengthen the link between data disclosures and TSSA decisions in the content of the PSR.

TSSA Management Response:

As TSSA implements the data and analytics initiatives of the new 2024-2028 Strategic Plan there will be additional content in the PSR to illustrate how data is used to inform decisions. These enhancements to the content of the PSR will follow the timing of the Strategic Plan implementation.

Observation #FY23-6: Reducing Periodic Inspection Backlog.

Data Attributes		
Q	A	C
	✓	

The responsibility of monitoring and prioritizing inspections in the backlog is the responsibility of Statutory Directors, who are commended for performing higher than forecasted inspections in FY23 and reducing the backlog carried forward from the FY22.

Facilities or devices that have not been inspected for a prolonged period and that are backlogged may have a higher risk of being in noncompliance. Without the reduction or elimination of the backlog of periodic inspections, the ability of TSSA to have a clear picture of the safety posture of inspected devices is lessened. Therefore, TSSA may not be able to commit resources at optimal levels and towards high-risk areas.

It is acknowledged that TSSA is currently hiring additional inspectors to help reduce the periodic inspection backlog.

Recommendation:

It is recommended that Statutory Directors monitor inspection backlogs for the purpose of directing resources to the highest risk areas, with the assistance of the Strategic Analytics team.

Current and future inspectors should be cross trained in performing periodic inspections amongst the program areas to help further reduce the backlog of periodic inspections. TSSA should also explore employing other efficient methods of performing periodic inspections which are more closely aligned with Modern Outcome-Based Regulator principles.

TSSA Management Response:

TSSA’s approach to inspection scheduling takes into account the last date when the device was inspected, as well as the compliance history of the device to ensure that an appropriate frequency is maintained within a reasonable range of dates and resource demands. The past two fiscal years have created additional challenges that TSSA is addressing.

The cross-training of inspectors to perform periodic inspections in different program areas is a current practice across BPV, OE and FS inspectors because the knowledge, skills and certifications required are comparable and cross-training is more practical.

As part of the new 2024-2028 Strategic Plan, TSSA will explore new and innovative approaches to scheduling inspection frequency and conducting periodic inspections that is more data-driven and prioritizes safety outcomes.

Appendix A: Summary of Work Performed

MNP LLP completed a CSAE⁷ 3001 limited assurance engagement to assess the accuracy and completeness of the Compliance Rate disclosure in the PSR. 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. The 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.

MNP LLP considered the following criterion as agreed upon with TSSA management:

- Data disclosures are clearly defined.
- Defined methods exist for calculating and documenting data disclosures outputs.
- Documented guidance or procedures exist for data gathering, input and analysis for the data disclosures.
- Defined parameters are applied around data extraction from operating systems/data bases for the data disclosures.
- Assigned tasks and controls around quality assurance exist and are clearly documented for each of the disclosures.

In evaluating the data quality and clarity in the PSR, in consultation with Internal Audit and MNP LLP, it was necessary to agree on the meaning of the terms "quality" and "clarity" with respect to data. I referenced the definition of "quality" as provided by the International Organization for Standardization ("ISO") and specifically ISO 8000 – 2:2020⁸. The ISO definition describes quality of data using five attributes:

- Accuracy
- Completeness
- Reliability
- Relevance
- Timeliness

For the term "clarity" I relied on the following OECD⁹ (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."¹⁰

⁷ Canadian Standards on Assurance Engagements ("CSAE"), as issued by the Chartered Professional Accountants ("CPA") Canada

⁸ <https://www.iso.org/obp/ui/#iso:std:iso:8000:-2:ed-4:v1:en>

⁹ <https://stats.oecd.org/glossary/detail.asp?ID=5119#:~:text=Clarity%20refers%20to%20the%20data's,is%20provided%20by%20National%20Statistical>

¹⁰ Ibid

To guide the evaluation criteria and review activities, I referenced the Performance Reporting Principles for the British Columbia Public Sector¹¹ (“Reporting Principles”) and selected three principles that appeared to be the most relevant.

- Reporting Principle 2:¹² 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 6:¹³ 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 7:¹⁴ 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.

In referencing the principles above, I considered the following criteria that were agreed upon with TSSA management in assessing the quality and clarity of the selected data disclosures:

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

¹¹ 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.

¹² Ibid

¹³ Ibid

¹⁴ Ibid

Appendix B: Details of FY21 and FY22 Recommendations and Status Update

The following section provides details of the recommendations and the status of management's action plan.

Update on FY21 Recommendations

Recommendation #FY21 - 2: Risk of Injury or Fatality ("RIF") metric

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. 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.

TSSA Response and Action

TSSA agrees that a review of risk metrics can be beneficial to both TSSA and the readers of the report.

Action: In FY22, TSSA will undertake an initiative to revise the risk metrics, including a review of the RIF and an assessment of the value and clarity of providing aggregate measures.

Status - Open

TSSA began a review of the RIF metric in FY22 assessing the validity of the metric and scanning what other regulators and jurisdictions were doing. It was intended that the 2024-2028 Strategic Plan, released in FY23, would introduce new organizational safety metrics, including a review of the RIF. However, for other priorities to move forward, assessing and deciding on the value of the RIF has been deferred. The RIF will continue to be included in the balanced scorecard and a decision regarding its presentation in the PSR will be decided later in FY24.

Recommendation #FY21 - 5: Strengthening Near Miss Occurrences

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 Spills Action Centre ("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.

TSSA Response and Action

TSSA agrees on the need to harmonize and strengthen the collection of incidents and near miss data.

Action: TSSA will review the quality of incident reporting and look to implement a uniform definition and seek ways to enhance data collection. Any changes will be aligned with the reporting requirements in the regulation. As part of the review of the RIF, TSSA will assess the inclusion of different occurrence types.

Status – Closed

In FY22, TSSA finalized an Advisory for Boilers, Pressure Vessels, and Operating Engineers (“BPV OE”) on the incident reporting definitions and process. Guidance on reporting incidents was published on the website and progress continues in addressing incident data quality. To better understand the impact of near miss occurrence data on the RIF, TSSA conducted a RIF calculation with and without the near miss occurrence data and concluded there was no significant impact on the RIF results. Currently each program area has distinct requirements for incident reporting that reflect their respective regulations.

As definitions for incident reporting are embedded in regulations, TSSA worked on harmonizing internal processes during FY23 that are driving consistency in incident data collection.

Recommendation #FY21 - 7: Strengthening Quality and Timeliness of Incident Reporting

While annual training is conducted for Spills Action Centre 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 Service Level Agreement (“SLA”) agreement with the SAC is currently being discussed, 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 (“KPIs”) should be included, there is an opportunity for 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.

Updated Recommendation for FY22:

TSSA should continue to follow up with the SAC regarding the execution of the new agreement and consider adjusting the term of the contract to compensate for the delay in signing. Staying current on capacity or structural changes at the SAC may allow for the introduction of KPIs in the future.

To further improve the efficiency of training delivery, it is recommended that TSSA consider implementing e-learning modules to supplement bi-annual training.

TSSA Response and Action

TSSA agrees that its partnership with the SAC is critical for the quality standards of occurrence data used for public disclosures.

Action: In FY22 a new SLA was negotiated between TSSA and SAC and training provided to SAC staff. In FY23, TSSA will continue to monitor the quality and completeness of incident reports submitted by SAC and will continue to track any issues with reports to properly assess the impact of those issues on the quality and accuracy of public disclosures.

Status - Closed

In negotiating the new SLA, the SAC did not agree to performance indicators and the agreement was signed in FY23.

In FY22 TSSA revised the training package and delivered training to SAC staff in May 2022 and designated individuals in each program area to monitor the quality and timeliness of data. Training has continued and TSSA has a standing monthly meeting with SAC to discuss any data quality issues.

In FY23, TSSA created a new position, Director of Investigations with accountability for incidents and investigations. In this role, the team identifies gaps in data quality and implements action to close the gaps. In FY24, TSSA is implementing and tracking metrics that measure the consistency of data in meeting data standards.

Update on FY22 Recommendations

Recommendation #FY22- 1: Enhancing Quality Control Activities.

It was noted that not all program areas perform the same quality control activities. In one program area ride-along performed by Supervisors with Inspectors as part of a Quality or Inspection audit are not executed based on a set frequency. They are performed at the discretion of the Supervisor based on the plan each Supervisor has created and each region has a different structure for the plan.

There is a risk that quality related issues, inefficiencies or errors are not being identified and remediated due to inconsistencies amongst program areas.

There is an opportunity for all program areas to implement additional quality control activities such as trend analysis on incident related errors and Supervisor ride-along. Furthermore, Supervisor ride-along should be performed based on a set frequency or each time there is a serious incident (i.e., fatality, incident involving high risk inventory) to ensure they are performed consistently throughout the program area.

TSSA Response and Action

TSSA agrees that the quality of incident data is critical to overall accuracy of reporting and public disclosures. TSSA will review existing quality control activities and assess opportunities to strengthen them in other program areas.

Status - Closed

With the final release of the new IT system OASIS, TSSA is reviewing its quality control activities. One of the key pillars of the Strategic Plan is "Ease of Doing Business" which includes the goal to document processes and work instructions, cross-training, streamline, simplify, digitize processes to ensure that client and employees work together seamlessly.

In FY23, TSSA began defining business rules and definitions for incident data as part of the Data Governance Program Framework. In addition, the newly appointed Director of Investigations is tracking data quality issues and implementing action to close gaps. Leveraging CRM and providing staff training will strengthen root cause analysis, identify emerging safety issues, and link the data to risk-based decisions.

Recommendation #FY22 - 2: Connecting Action and Data.

Public performance reporting, such as the Public Safety Report, ideally should suggest a logical flow of events from vision, mission, strategies, through to action and results. Clearly making this connection for the targeted audiences promotes transparency and accountability. The PSR is beginning to identify key initiatives that are having, or expected to have, an impact on data disclosed in the report. It was noted that it was not always clear how the initiative is, or will, impact the data and move TSSA closer to its safety goals.

As initiatives continue to deliver results, it is recommended that wherever possible the PSR highlights the impact on data and trends that demonstrate the initiative is targeting risks and reducing harm.

TSSA Response and Action

TSSA will continue to highlight how Outcome-Based Regulator activities are contributing to overall public safety results by linking the outcome of initiatives to public safety data trends.

Status - Closed

The FY23 PSR edition enhanced the linkage between TSSA strategic initiatives and public safety results. As a result, target audiences are beginning to see how TSSA initiatives are targeting risks and reducing harm.

Recommendation #FY22 - 3: Strengthening Audience Engagement.

Considerable progress has been made in enhancing the format and readability of the Public Safety Report. As Advisory Councils members are a key partner in shifting safety behaviour their understanding of the data and safety results is necessary to fully engage them in discussions on current and future initiatives. Making the PSR as easy as possible to access and understand will strengthen this engagement.

TSSA should explore options to provide the Public Safety Report in digital interactive content supported by a variety of message media to enhance interaction with the PSR. Strengthening the communication and visualization of the value of content and data in the PSR will support meaningful consultation and engagement with its intended audience.

TSSA Management Response:

TSSA agrees with this observation and will explore ways to improve and enhance interaction between the intended audience and the PSR key data and insights in order to make the content more engaging.

Status - Closed

The communications team has significantly increased and improved the way it shares and disseminates the key findings and learning of the Public Safety Report with key audiences like industry.

For example: In FY22, the bi-weekly Safety Dispatch newsletter contains key data from the PSR; there is a social media campaign focused on safety related themes around key milestones and public events; and presenting key learnings more regularly with staff.

During FY23, significant efforts were invested in promoting the Public Safety Report to the public. Analytics were implemented to track activity related to general social media posts, including those related to PSR, as well as identifying downloads of the PSR. This analysis serves as a benchmark from which to measure further social media interactions and provides a solid foundation to inform future engagement as the PSR continues to evolve in tandem with TSSA's transformation to a Modern Outcome-Based Regulator.