

Review  
of the  
Public Safety Report  
*2024 Edition*

By Angela Byrne  
TSSA Safety and Risk Officer

Technical Standards and Safety Authority

*For the Period ending April 30, 2024*

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## Executive Summary

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The purpose of this report is to express an opinion on the quality, accuracy, and clarity of select data disclosures in the fiscal year (FY24) edition of the Public Safety Report (PSR) and provide observations and recommendations to continue to strengthen the reliability of the reported data.

In conjunction with MNP LLP (MNP), I have undertaken an independent review to assess the accuracy, quality, and clarity of select PSR disclosures. The review was restricted to assessing the design and operating controls over selected processes during the period of May 1, 2023, to April 30, 2024. All TSSA safety programs were in scope.

### **Management's Responsibility**

TSSA management is responsible for the design and operating effectiveness of controls related to the accuracy, 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 completed a review to assess the accuracy and completeness of select data disclosures. The review was limited to assessing any changes in control design for select disclosures, as informed by the previous two years' assessments. The in-scope disclosures included compliance rates for periodic inspections, injuries/near misses, risk of injury and fatality and observed injury burden.

I completed an assessment of the inspection results, high-risk inventory and the high-risk issues disclosures for quality and clarity. My work was conducted with reference to the Performance Reporting Principles For the British Columbia Public Sector<sup>1</sup> (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.

### **Conclusion**

In my opinion, considering the limited procedures performed and evidence collected on the in-scope disclosures, 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 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.

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<sup>1</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

## 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; 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 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 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 of the fiscal year 2024 (FY24) edition of the PSR are provided in this report. My 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 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 FY24 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

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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 LLP<sup>2</sup> (MNP) 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 in determining an appropriate scope and approach in reviewing the processes and controls ensuring the accuracy and completeness of select safety related data. In addition, I independently reviewed specific processes and controls related to the quality and clarity of selected data disclosed in the report.

The review was restricted to assessing the design and operating controls over selected processes during the period of May 1, 2023, to April 30, 2024. All TSSA safety programs were in scope.

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

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

MNP completed a review of the processes and controls to assess the accuracy and completeness of select data disclosures. The review was limited to assessing any changes in design for select disclosures, as informed by the previous two years' assessments. The data disclosures were limited to compliance rates for periodic inspections, injuries/near misses, risk of injury and fatality and observed injury burden. In executing its review, MNP complied with independence and other ethical requirements required by the Institute of Internal Auditors, CPA Canada and CPA Ontario.

In developing its conclusion, MNP performed document reviews, met with key internal stakeholders, and reviewed selected evidence 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 data disclosures, 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 Select Disclosures

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<sup>3</sup> (Reporting Principles). In arriving at my conclusion as to the quality and clarity of the inspection results, high-risk inventory and the high-risk issues disclosed, 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, CPA Canada and CPA Ontario.

In my opinion, based on the results of the limited work that I completed in assessing the quality and clarity of selected disclosures, 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.

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

<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

As the review was restricted to assessing controls over selected data disclosures, 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 FY23 Management Action Plan

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During FY24, TSSA closed the outstanding recommendation from FY21 along with the three recommendations from the SRO review of the FY23 PSR.

Details of the recommendations and the status on management's action plan are provided in Appendix B: Details of FY21 and FY23 Recommendations and Status Update.

## FY24 PSR Observations and Recommendations

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The integrity of the data published in the FY24 PSR has continued to improve. As noted last year, the FY23 PSR held very little resemblance to the version reviewed by the Auditor General in 2018. The latest report offers a sharper, more focused view of public safety in Ontario. It emphasizes the pivotal role of TSSA in safeguarding Ontarians as demonstrated by incidents, inspection results, observed injury burden and the risk of injury or fatality.

With a streamlined presentation, the FY24 PSR is concise and supported by clear graphs and charts that make it easy to digest. TSSA's proactive responses to the 2018 Auditor General's report and the SRO recommendations from previous years have significantly enhanced the quality, clarity, and accuracy of the data disclosures in the report.

TSSA's continuous strengthening of the processes and controls guiding data collection, usage and reporting are making a difference in the accuracy and completeness of data. A key influence is TSSA's increasing use of data to inform decisions and direct resources, directly bolstering the integrity of the PSR disclosures. Over the last few years, efforts have been made to carefully examine the metrics presented in the PSR and how they are influencing TSSA decisions. This has led to more precise definitions, refinements in calculations, and PSR presentations that clarified the impact on safety. For example, simplified presentations of high-risk issues and compliance rate, allow readers to focus on the most significant safety concerns, while the use of visual aids enhances comprehension. Overall, the progress is an accumulated effort to bring to life the data presented to the public and actively use it to inform TSSA internal decisions.

The quality and clarity of the PSR data disclosures has also improved significantly. TSSA sought feedback from its target audience and in response introduced clearer language and visual elements.

Adding to the clarity of data disclosures are the steps TSSA has taken to explain how strategies and objectives relate to results achieved. Readers need this context to fully understand the meaning and significance of the performance information presented in the PSR. The FY23 PSR edition greatly enhanced this linkage and the FY24 version continued this path with a sharpened focus on TSSA's public safety role. This was most apparent in the case studies that highlighted TSSA's incident analysis supported by selected data and trends to demonstrate safety impacts. TSSA actions that referenced engagement, evidence, enforcement and education, underscored its purpose in all that it does. Finally, the quotes from inspectors in the case studies brought to life the impact of high-risk issues on day-to-day safety in the various sectors.

No longer is the production of the PSR a separate and distinct activity residing outside of daily operations. It is now clearly a reflection of how TSSA conducts operations, demonstrating its accountability and commitment to safety.

As the journey to a modern outcome-based regulator continues, the PSR will continue to evolve. In reviewing the FY24 version, I noted several opportunities to further strengthen the quality, clarity, and accuracy of the disclosures.

It is worth mentioning that the progression I have seen since 2019 is even evident in this year’s observations and recommendations. For example, the recommendations regarding root cause analysis would not have been possible several years ago when TSSA was more focused on strengthening the accuracy and completeness of the data collected.

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 #FY24-2: Compliance Standards Methodology

Data Attributes <sup>4</sup>		
Q	A	C
✓	✓	✓

The Compliance Standards methodology is an evidence based and data-driven approach that is aligned with the principles of a modern outcome-based regulator. It is a dynamic process that continues to evolve to reflect the specific needs of the safety program under review.

Applying a rigorous approach to identify and assess the highest safety risks, directly informs inspection results, the high-risk inventory and the high-risk issues disclosed in the PSR. This in turn enhances the quality of these metrics and provides a more accurate profile of the state of public safety.

A key component in the approach are the Risk Assessment workshops that leverage both qualitative and quantitative data. Facilitated sessions validate quantitative data with subject matter experts (SMEs). The selection of facilitators and SMEs relies on availability and individual preferences, introducing the potential for bias to skew results. Quantitative data is limited to the availability and quality of data recorded by TSSA.

In applying a rigorous, comprehensive approach, the workshops consume significant time and resources. Despite this challenge, it is worth noting the high level of engagement and commitment of the participants interviewed for this review.

Although Compliance Standards methodology goals and benefits have been defined, implementation is still in the early stages, and it is too early to determine if benefits are being realized.

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<sup>4</sup> Data attributes include “Q” for quality, “A” for accuracy and “C” for clarity.

**Recommendation:**

To ensure the Compliance Standards methodology continues to produce the intended benefits of reducing harm, improving public safety and efficiency of TSSA resources, the following action is recommended:

- Continue to strive for opportunities to minimize the risks to the quality of data informing Compliance Standards, including the use of external data sources to validate results.
- Continue to review the methodology for opportunities to reduce time and resources required to review and implement the Compliance Standards.
- Consider how results will be measured and used to inform TSSA action.

**TSSA Management Response:**

TSSA will continue to review and assess the methodology to develop compliance standards. TSSA has implemented a Management of Change process as part of its Rule Making Framework that specifies a process for tracking and triaging feedback and prioritizing changes. The results of the compliance standards analysis are used to develop standard orders, assign a risk score and time to comply. The analysis generated from the usage of standard orders is used to inform education and compliance support activities.

**Observation #FY24-5: Training for Root Cause Analysis**

Data Attributes		
Q	A	C
✓	✓	

TSSA's root cause analysis (RCA) training program, which began earlier in the year, has completed the planned training sessions. The training aims to equip TSSA staff with the necessary skills to accurately identify and address the underlying causes of incidents, thereby improving overall safety and compliance.

While the initial training sessions have been completed, ongoing sessions are planned to maintain proficiency in incident investigation and resolution. A continuous improvement feedback loop has been established to gather input to enhance the training program and limited resources have been noted as a challenge, along with the need to clearly define and communicate roles and responsibilities.

**Recommendation:**

TSSA should focus on the following steps to ensure the ongoing effectiveness of the RCA training:

- Regular refresher courses and practical workshops should be scheduled to maintain RCA proficiency across all program areas.
- Consider rotating staff to assist with training delivery where necessary, to address resource constraints.
- Clearly define roles and responsibilities for the RCA training and process.

**TSSA Management Response:**

TSSA has instituted a dedicated Incident desk and Manager function, reporting to a Director in the Legal and OBR teams. Their primary focus is to implement and operationalize TSSA's Harmonized Incident Policy and facilitate and coordinate a consistent and harmonized response to incident and near-miss



reporting. TSSA is also clarifying and streamlining the roles and responsibilities around training for employees. Working with the training team, a schedule will be followed to ensure there are refresher courses and clear roles and responsibilities to maintain RCA proficiency across programs and functions as appropriate. All inspection staff have been retrained in RCA in 2024.

### Observation #FY24-7: Clarity in Distinguishing between Level 1 and Level 2 Root Cause Analysis Investigations

Data Attributes		
Q	A	C
	✓	

Interviews with TSSA staff have highlighted that while the existing policy guidance provides clear criteria for distinguishing between Level 1 and Level 2 root cause analysis (RCA) investigations, there are challenges in applying these guidelines consistently. The complexity of certain incidents can make it difficult for inspectors to categorize incidents accurately, leading to variations in how incidents are escalated and managed.

Although the framework itself is generally considered clear by experienced inspectors, less experienced staff or those unfamiliar with the RCA methodology may struggle to apply the criteria consistently. In situations where incidents are particularly complex or subjective, inspectors seek assistance from the Strategic Analytics team to ensure appropriate classification and response.

There is potential value in developing support tools, such as a rubric or decision tree, to assist inspectors in making more consistent and accurate decisions regarding incident categorization.

#### Recommendation:

As noted in the observation above, TSSA should continue providing ongoing training focused on the RCA methodology, with particular emphasis on understanding the distinctions between Level 1 and Level 2 incidents. It is also recommended that TSSA develop additional support tools to assist inspectors in evaluating incident complexity and determining the appropriate level of RCA investigation.

#### TSSA Management Response:

Level 1 RCA analysis refers to incidents where the determination of root cause can be done based on the information provided in the incident report and/or inspection (if one is required). Level 2 RCA refers to incidents that require an in-depth root cause analysis (IDRCA). IDRCA are facilitated by risk advisors trained in the methodology and who coordinate a series of meetings to review available evidence needed to determine the root cause. A report is published and shared with the Incident and Program teams. The findings from the IDRCA are used to inform education and compliance support efforts and to identify ways to prevent similar incidents from happening again. The criteria to determine if an incident requires a IDRCA is published and communicated to people leaders, and includes: if the incident includes a new or emerging risk; if the cause of the incident is complicated and difficult to determine; if the incident involves a fatality or serious injury; if the incident is high-profile; if the incident is investigated for potential legal recourse. TSSA will review the feedback received by the SRO and consider ways to continue to make these criteria accessible. In addition, TSSA is identifying opportunities to simplify the process for inspectors.

## Observation #FY24-11: Challenges with CRM System Functionality and Data Entry

Data Attributes		
Q	A	C
	✓	

Interviews indicate several challenges with the functionality and data entry process of the customer relationship management (CRM) system. These issues include the need for additional mandatory fields, clearer definitions for incident types, and the ability to link incidents to specific inventory items.

The limitations of the CRM system can result in significant administrative burdens for inspectors, who may spend considerable time navigating the system and entering data. This detracts from their primary role of conducting inspections and ensuring compliance. Addressing these functionality issues and simplifying the data entry process could enhance the efficiency and accuracy of the CRM system, thereby improving the quality of safety data and metrics.

Many of these issues have been ongoing as part of the phased CRM implementation. It is acknowledged that TSSA is actively working to resolve issues, with weekly director meetings to establish priorities. Information Technology is working on a 6-week cycle to implement CRM improvements, based on priorities provided by directors.

### **Recommendation:**

TSSA should continue to prioritize and implement CRM improvements based on user feedback, ensuring that identified issues, such as the need for mandatory fields and clearer incident type definitions, are addressed effectively.

### **TSSA Management Response:**

TSSA's new enterprise IT solution is relatively new, with the final phase going live in April 2024. Since the launch of the final phase of the new system, TSSA's focus has been on stabilization and sustainment. As with any new technology solution, TSSA has put in place a mechanism to identify, prioritize and implement improvement and break-fixes in a structured process. For example, issues that impact the use of the system are tracked through a ticketing system and actioned based on prioritization by Directors. In addition, a separate tracker is used to identify potential enhancements to the system. TSSA will continue to track feedback and prioritize the need for break-fix work with opportunities for enhancement as part of its sustainment plans.

## Appendix A: Summary of Work Performed

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The purpose of the SRO's review of the PSR is to conduct an independent assessment on the quality, accuracy, and clarity of selected data disclosures within the report.

The scope of work for FY24 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, 2023, to April 30, 2024.

To support the SRO's review of the accuracy of selected disclosures, TSSA engaged MNP LLP (MNP). Unlike previous years, where the auditing standard CSAE 3001<sup>5</sup> was executed by MNP to assess the accuracy and completeness of selected data disclosures, the current approach acknowledges significant control improvements by TSSA, rendering the CSAE 3001 auditing standard less beneficial.

For the FY24 review, the MNP engagement was limited to assessing any changes in design for select data disclosures, as informed by the previous two years' assessments. The data disclosures were limited to compliance rates for periodic inspections, injuries/near misses, risk of injury and fatality and observed injury burden.

The MNP work performed was limited to:

- Reviewing changes to TSSA's relevant processes and controls for information collection, analysis, reporting and quality assurance,
- Interviewing key safety program and public safety risk management personnel, and
- Assessing the design effectiveness of changes to key controls related to the reporting of select safety data, considering the accuracy and completeness of the reported data for the reporting period.

The SRO's approach for assessing quality and clarity of data disclosures focused on the Compliance Standards methodology to inform inspection results, high-risk inventory, and the high-risk issues.

The review examined the Risk Assessment processes of the Compliance Standards methodology, and the activities related to Risk Assessment Workshops, Establishing Thresholds, Industry Validation and Management of Change. Processes related to operationalizing the Compliance Standard policy, still undergoing refinement, were excluded from the review.

The review examined evidence of the Compliance Standards methodology to ensure that processes were executed as documented and identified opportunities to increase effectiveness in maximizing safety benefits and driving resource efficiency. The review approach referenced the Performance Reporting Principles For the British Columbia Public Sector<sup>6</sup> for guidance on delivering reliable information to the public.

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<sup>5</sup> Canadian Standards on Assurance Engagements (CSAE), as issued by the Chartered Professional Accountants (CPA) Canada

<sup>6</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.

## Appendix B: Details of FY21 and FY23 Recommendations and Status Update

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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 - Closed**

TSSA began a review of the RIF metric in FY22. It assessed the validity of the metric and scanned what other regulators and jurisdictions were doing. TSSA decided to defer any decision on its use pending the release of the 2024-2028 Strategic Plan and the introduction of new organizational safety metrics. During FY24, TSSA completed a more thorough assessment of the RIF, including a review of the methodology assessing the integrity and rigour of calculations. The review noted that the RIF is a measure of overall potential risk based on incident data that can be compared year over year. In FY24, TSSA decided to continue using it as an aggregate measure. Internally it is being leveraged along with complementary metrics to inform decision-making and this is reflected in the FY24 PSR as it is presented as one component of the overall safety profile.

### **Update on FY23 Recommendations**

#### **Recommendation #FY23-2: Value of the Compliance Rate**

The Auditor General, in its 2018 audit, noted the limitations of the Compliance Rate disclosure in assessing safety. In response, TSSA has taken steps to increase its value by introducing a new compliance rate and simplifying the calculation. There is an opportunity to leverage the data informing the Compliance Rate 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.

It is recommended that TSSA 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 Response and Action*

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).

*Status – Closed*

During FY24, TSSA used the compliance data as a key predictive feature in establishing inspection frequencies as well as analyzing inspection results to identify key high-risk issues. The revised rate is now accessed internally to inform compliance standards, along with being monitored on a regular basis for opportunities for improvement and patterns in risk. The FY24 PSR presentation of the Compliance Rate has been improved with easy to interpret graphs that focuses the readers attention on the most important safety issues.

**Recommendation #FY23-4: Strengthening the Link between Data and Decisions**

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. The FY23 PSR edition enhanced this linkage and the release of TSSA’s 2024-2028 Strategic Plan and the corresponding brand strategy, presented a fresh opportunity for continued improvement. By incorporating actions taken in response to data in the PSR, notably engagement, evidence, enforcement, and education, TSSA can enhance accountability and integrity and demonstrate how it is using data to inform its direction.

It is recommended that TSSA take steps to strengthen the link between data disclosures and TSSA decisions in the content of the PSR.

*TSSA Response and Action*

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.

*Status – Closed*

Throughout FY24, TSSA continued to have regular meetings and discussions on how to use data to inform decisions and action. The output of these regular meetings was apparent in the FY24 PSR edition. There was a sharpened focus on TSSA’s public safety role, and this was most apparent in the case studies. Each example highlighted TSSA’s incident analysis supported by selected data and trends to demonstrate safety impacts. This was followed by TSSA actions that referenced engagement, evidence, enforcement and education; reflecting TSSA’s purpose in all that it does.

### Recommendation #FY23-6: Reducing Periodic Inspection Backlog

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. TSSA also implemented steps to hire additional inspectors. Facilities or devices that have not been inspected for a prolonged period 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 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 Response and Action

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.

#### Status - Closed

Throughout FY24, TSSA took several risk-based steps to reduce the periodic inspection backlog including Workforce Planning that prioritizes overdue inspections while maximizing resources. In addition, risk-based analytics have revised inspection frequencies in Elevating Devices and are in progress for Operating Engineers and Propane. Finally, cross-training of inspectors has been implemented in some areas. Results for FY24 found backlogs had diminished to close to, or below, targets.