PRIME Path 2 (OHS Certification)
Employer Self-Audit Guidelines

WorkplaceNL

Health | Safety | Compensation

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1.0 Introduction

1.1 An Overview of PRIME

PRIME is WorkplaceNL's employer incentive program. Through PRIME, employers can lower their assessment rates by meeting the PRIME requirements and managing claim costs through return to work (RTW) programs. Employers can receive a five per cent refund for meeting the practice requirements, and those who have effective return to work programs may receive an additional refund, charge or neither a refund nor charge depending on claims costs.

There are two Employer Categories:

- Path 1: Employers that have less than 20 workers at each worksite, regardless of the amount of assessments paid **OR** pay less than $10,000 in average assessments. Practice incentive requirements for Path 1 are outlined in Policy PR-14 PRIME Practice Incentive for Path 1 (OHS Education).

- Path 2: Employers that pay $10,000 or more in average assessments **AND** have 20 or more workers at any one worksite. Practice incentive requirements for Path 2 are outlined in Policy PR-15 PRIME Practice Incentive for Path 2 Employers (OHS Certification) and Procedure 507.00 – PRIME Path 2 Employers (OHS Certification) Criteria.

Note: Employers in a Construction NIC code must be certified by the NLCSA to avail of PRIME refunds.

1.2 The PRIME Auditing Process

OHS Certification audits will be conducted on a three-year cycle. This will include WorkplaceNL audits and employer self-audits. WorkplaceNL audits will include interviews, documentation review, and observational tours to confirm that all PRIME requirements have been met. Employer self-audits will include a documentation review.

A minimum audit score per program element (65%) and minimum overall audit score (80%) are required for an employer to be eligible for their PRIME refunds.

Generally, WorkplaceNL conducts the initial audit to verify the PRIME requirements. Following the initial audit, the employer conducts self-audits in years two and three. Self-audits must be submitted to WorkplaceNL for review and verification by an auditor. Employers will receive a notification of audit at least 2 weeks prior to the audit date.

Where a WorkplaceNL or self-audit cannot confirm that the PRIME requirements have been met, the employer will be notified in writing of the specific requirements that have not been met. If, after a designated period of time, the employer has not been able to provide information to validate the PRIME requirements, it may affect qualifying for the current year's PRIME refunds.

1.3 Purpose of the Employer Self-audit Guidelines

The purpose of this document is to provide guidance to those performing employer self- audits (referred to as 'auditor' going forward) to provide guidance and ensure consistency and standardization for WorkplaceNL's OHS Certification audit program.

1.4 Auditor's Code of Ethics

An auditor must always maintain a high level of professional conduct. To ensure that quality evaluations are consistently performed, auditors shall:

- Comply with all applicable legislation.
- Maintain sound independent judgment and act with due care and competence whilst completing duties.
- Behave in such a manner that good faith, honesty, and integrity will not be questioned and avoid conflicts of interest.
- Ensure that all information is accurately interpreted, communicated, and relevant to the employer's operations.
- Ensure that information obtained through the audit process is treated as confidential.
- Be honest, accurate, consistent, and complete in evaluations of provided data obtained through the auditing process.
- Avoid any misrepresentations or omissions relevant to the scope of the audit.
- Ensure that written details are clear, concise, reflective of the audit findings, relevant to the employer's operations, and add value to improving the employer's OHS program.
- Ensure evaluations are based on objective findings and not affected by personal biases.

1.5 Auditor Training

WorkplaceNL has developed a recorded training session that provides instruction on how to complete an audit in the Certainty Software. This training is accessible via www.workpalcenl.ca. Contact safety@workplacenl.ca for more details.

2.0 Performing the Audit

The employer self-audit uses documentation review to collect and verify audit information.

2.1 Documentation Review

Documentation review is the process of reviewing the OHS program as well as any related safety records. The auditor is looking for written proof, or a historical record, that describes activities in place. Safety records are typically checked for completeness such as dates, frequency, agenda items, signature, senior management initials or signature, etc.

Each element of the audit tool will detail what requirements need to be met, along with what documents will need to be reviewed to confirm the requirements have been met. The auditor will review documentation from the 12 months preceding the audit to determine that requirements have been met. Verify documentation with at least two samples unless otherwise specified in the audit tool. The auditor may use their discretion to review less samples. For example, if an employer only worked from heights once in the last 12 months, then only one sample can be reviewed. Comments for the specific question in the audit tool must indicate, by providing details, if discretion was used.

The auditor will verify training records with a representative sample and provide their rationale for the sample size in the comment section. A representative sample is a subset of a larger group that accurately reflects the characteristics of the larger group.

In addition to completing the audit questions, the auditor will need to upload copies of the following:
- OHS policy
- hazard assessments
- incident investigations
- workplace inspections
- safe work practices and procedures

- emergency evacuation drill records

- RTW policy

- evaluation records for the RTW element

- fall protection plans

- workplace violence risk assessments

- documentation to verify that psychological health and safety (PHS) hazards have been identified

- OHS statistical summary

- OHS committee meeting minutes (if federally regulated)

2.2 Using the Audit Tool

2.4.1 Account and Login

Certainty's auditor access, referred to as mobi, can be accessed via an internet browser (https://workplacenl.certaintysoftware.mobi/) or the mobile app available in the Microsoft Store, the App Store, or the Google Play.

You will be asked for an activation code when you first download the Certainty app. **The activation code is:** workplacenl

When your account is created, you will receive a welcome email with your username and temporary password. When you log in for the first time, you will use your temporary password.

You **MUST** change your password; however, the system will not prompt you to do so. To change your password, first click on the person icon in the top right corner of the screen. Then choose 'Change Password' and follow the instructions. Passwords require at least 12 characters with at least one capital letter, one small letter, and one special character.
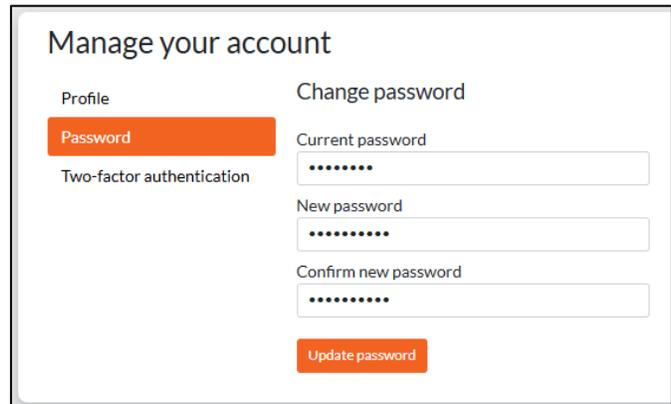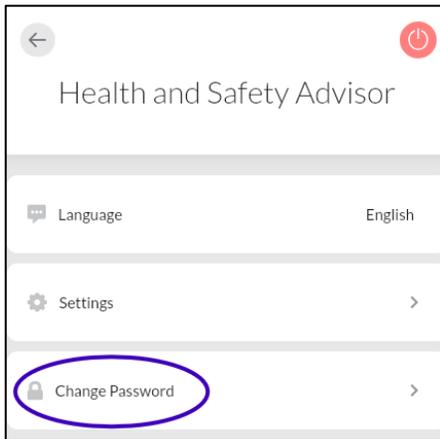
2.4.2 Being Scheduled for an Employer Self-Audit

You will receive an email notification from Certainty Software when scheduled for your audit, and a WorkplaceNL Advisor will also contact you directly to confirm. You will be given **four weeks** to complete the self-audit, which includes responding to the questions and uploading the required documentation.
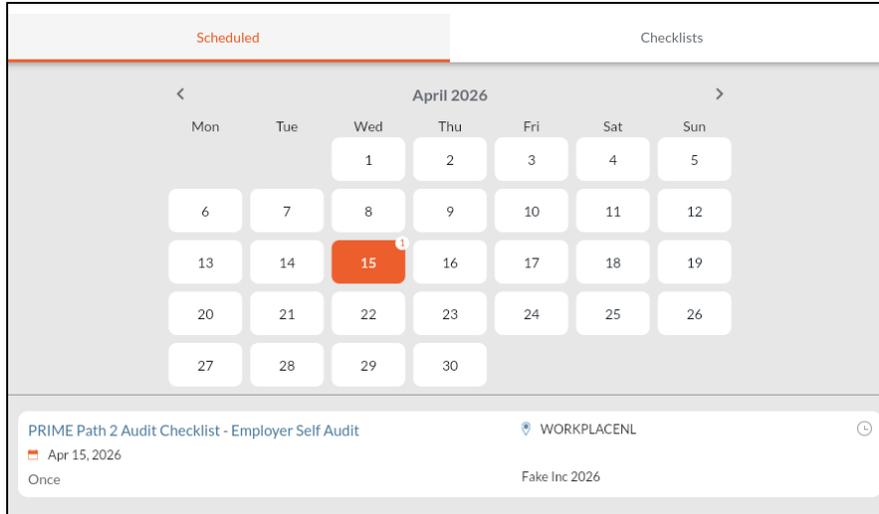
### 2.4.3 Completing an Employer Self-audit

Selecting the audit

From the main dashboard, click the 'Checklists' button on the bottom of the screen.

From there you will see a calendar, shown under the 'Scheduled' tab. Navigate to the date your self-audit is scheduled for. When you click on the date, your audit checklist will appear in the list below.

Click on the checklist to access your self-audit, then click the green 'Start Checklist' button.
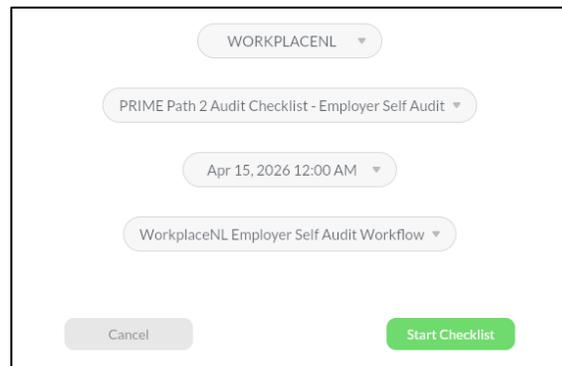

Loading the worksite data

Once you initiate the audit in Certainty, you will need to 'save & close' the audit to prompt the system to load the worksite data. Click the ellipsis in the top right corner, then select 'save & close'.

PRIME Path 2 Audit Checklist - Employer Self Audit

WORKPLACENL
Dec 17, 2026 2:56 PM
Health and Safety Advisor

WorkplaceNL Employer Self Audit Workflow (i)
Prime Audit Initiated (i)

Save
Save & Close
Search
Comments

The workflow step you see before saving and closing will be "Prime Audit Initiated". By clicking 'save & close', the checklist will move to the next workflow step "Prime Audit Submission – Employer Self Audit" and the tool will automatically retrieve the worksite information from iSeries. You should take this step before you go to the audit location, otherwise it may take up to 15 minutes to load the worksite data, depending on how much data needs to be transferred.
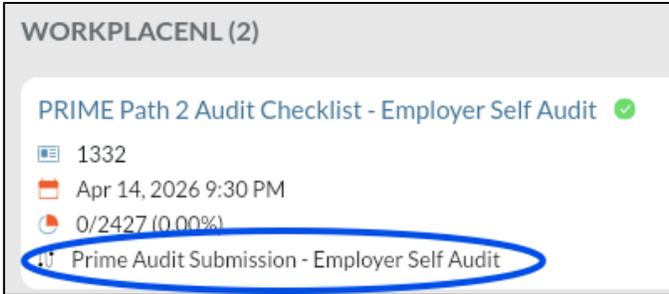
The audit is ready to be completed once it moves to the workflow step "PRIME Audit Submission – Employer Self Audit".

Worksite information should be reviewed and can be updated in the audit tool. This keeps the worksite information current. If you need to add a new worksite, click the 3 dots to the right of a worksite, then select 'Repeat Question Set'. To view each worksite, click the arrow to
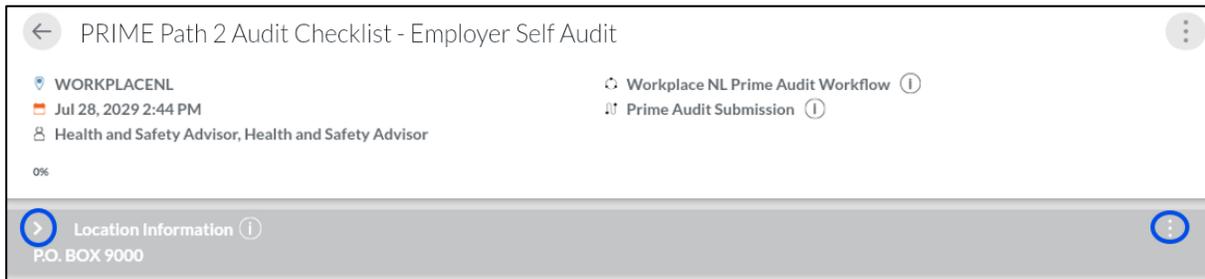

the left of a worksite.

For each worksite, you are able to update address information, number of workers, regulation type, and change the worksite from active to inactive, if necessary.

Proceeding with the audit questions

There are a few ways to navigate the audit. You can progress to the next page/element by clicking 'continue' or the right facing arrow at the bottom of the screen. You can also click on the dropdown arrow to select a page/element to jump to, if you want to complete the audit in a different order than each element is presented.
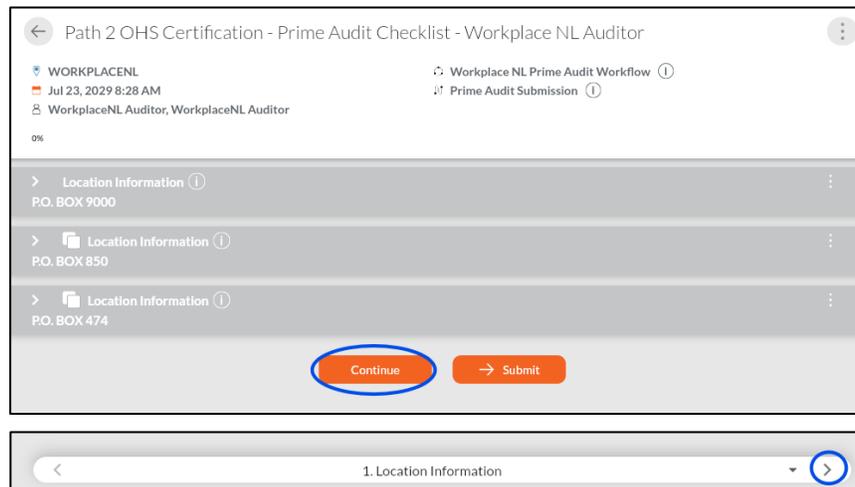
IMPORTANT: You MUST save your progress before navigating to the next page. The tool does not automatically save; thus, you will lose your progress if you close out of the checklist without saving.

Once all questions are completed, click the 'Submit' button to move the audit to the next workflow step (PRIME Audit Review – Employer Self-Audit). All questions are mandatory, and you will get an error message if you miss any. If an error message occurs, complete any unanswered questions.

Sending the audit for review

The 'Shared Access' section should be automatically populated with your WorkplaceNL Advisor. Click 'Move to Next Step and Close'.
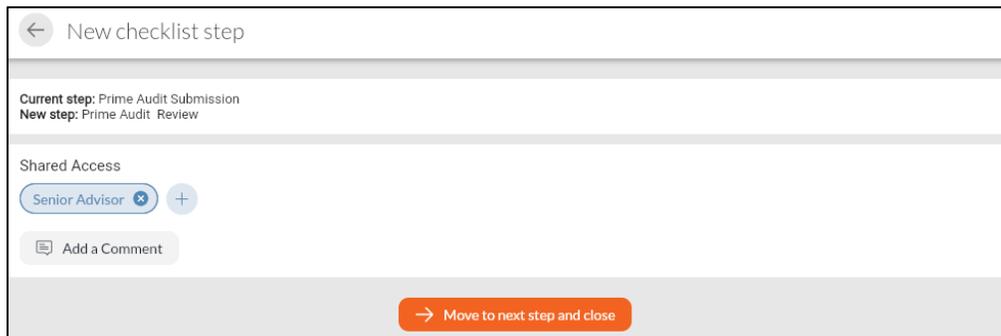
The WorkplaceNL Advisor will review the audit within **two weeks** of receiving the submission from the auditor.

2.4.5 Reviewing an Employer Self-Audit

Once you submit your completed self-audit checklist and the required documents are uploaded, a WorkplaceNL Health and Safety Advisor will review the submission to determine if the practice incentive requirements have been met.

If the requirements are not met, your WorkplaceNL Advisor will add commentary to the answers provided by the auditor, as appropriate, to explain what was not acceptable and why.

The WorkplaceNL Advisor will then prepare a report that will include the audit score, any comments the advisor makes, and any corrective actions.

2.4.6 Working Offline

You may have to complete audits at worksites that do not have access to internet. Audits can be completed while offline; however, they will have to be initiated and moved to the submission workflow step while connected to the internet. The audit must be loaded on the device to be used while connected to the internet. The tool will save the answers, but the audit cannot be submitted until you reconnect to the internet.

2.4.7 Support

If you are experiencing issues with the tool, contact your WorkplaceNL Advisor, or email safety@workplacenl.ca.

2.5 Not Meeting Question Requirements

For every audit question answered with a 'No', a comment outlining the rationale is mandatory. These comments must clearly explain why the requirement was not met.

3.0 Post Audit

3.1 Audit Report

3.1.1 Prelim vs Final Audit Report

If an audit achieves a passing score, your WorkplaceNL Advisor will provide you with a Final Audit Report and inform you of the results.

If an audit receives a failing score, your WorkplaceNL Advisor will provide you a Preliminary Audit Report and inform you of the results. You will be given **four weeks** to complete any outstanding items and provide supporting documentation to your WorkplaceNL Advisor. After you submit this documentation, or the four weeks elapse, your WorkplaceNL Advisor will provide you with a Final Audit Report and inform you of the results. Final Audit Reports will also be available in connect.

3.1.2 Comments in the audit tool

Comments are encouraged for all questions in the audit tool and are mandatory for each question with a 'no' or 'NA' response. The comments should speak directly to the criteria and why they were or were not met, or why they were not applicable. The reader should be able to

read the comment and understand the justification for a given score. Comments must be written in complete sentences and checked for errors and omissions.

If an entire element is marked as 'NA' (i.e., PPE or occupational health), document why in the executive summary test box in the audit tool, as there is no way to add notes for the element. Otherwise, the executive summary section will be completed by your WorkplaceNL Advisor.

3.1.3 Scoring

Questions are scored based on the 'yes' or 'no' answer and there is no option for partial points. The scoring was considered when the audit was designed, and questions are often broken down into smaller items and points to allow for scoring to reflect the partial completion of a specific question. For example, Question 1.1 is worth 35 points, and is broken down into seven smaller questions, worth three, five or 15 points each.

You must receive 80% overall AND 65% in each element to pass the audit. Auditors can view the score by reviewing the checklist summary or the audit report. The checklist summary automatically opens when a checklist is closed or submitted. The audit report can be generated by clicking on the down arrow next to the specific audit.

3.1.4 Corrective Actions

If a question results in a 'no' answer, your WorkplaceNL Advisor will issue corrective action(s). You will be given **four weeks** to correct any action(s) before the audit is finalized.

Corrective actions will be summarized at the end of the audit report, this is what corrective actions will look like in the audit report:

Actions			
# 644	Develop an incident reporting and investigation procedure that outlines the responsibilities of		
Description			
Question	3.1.1 Procedure(s) that outline the responsibilities of the employer, supervisors, workers, OHS committee, WHS representative or designate, contractors and visitors regarding incident reporting and investigation.	Answer	No
Due Date	30 Sep 2025	Completion Date	
Site	WORKPLACENL	Status	**Active**
Priority	High	Type	

3.2 Appeals

All validation results from the submission of annual employer's statements and PRIME audits can be appealed within 30 days. The first appeal goes through WorkplaceNL's Internal Review Division, while the second appeal is reviewed externally by the Workplace Health, Safety and Compensation Review Division (WHSCRD). The process to file an appeal is outlined in Procedure 72.00 – New Information, of WorkplaceNL's Client Services Procedure Manual.

3.3 PRIME Refund

You are required to submit your Annual Employer Statements (AES) by the end of February each year. This includes the Employer Payroll Statement, OHS Statement, and Contractor Statement (if applicable). The payroll statement will include a question where you can indicate if you wish to participate in WorkplaceNL's OHS Certification program.

If you do not submit your AES by the last day of February, your PRIME refund will be automatically forfeited. A late reporting charge will also be applied to your account.

To qualify for a PRIME rebate, Path 2 employers will need to:

- Implement the 15-element OHS program
- Indicate that they wish to participate in the PRIME audit when submitting their AES
- Participate in the PRIME audit (either WorkplaceNL or employer self audit, depending on cycle) and
- Receive 65% on each individual program element and 80% on the overall audit.

Audits are conducted within the current assessment year. For example, if an employer applies to participate in February 2026, their audit will take place during 2026. If the audit is successful and the employer's AES is completed in full within the required timelines, they will receive their 2026 refund in February 2027.

Construction employers must be Certificate of Recognition (COR) certified by the Newfoundland and Labrador Construction Safety Association (NLCSA) to qualify for PRIME refunds and are not required to participate in the Path 2 Employers (OHS Certification) audit process.

Non-construction employers who have an acceptable safety certification (for example, CORTM, ISO, etc.) will qualify for PRIME refunds and are not required to participate in the audit process as outlined for Path 2 Employers (OHS Certification).