

# **Path 2 Employers (OHS Certification)**

## **Employer Self-Audit Guidelines**

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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 Audit Tool Tutorial**

WorkplaceNL has developed a recorded tutorial session that provides instruction on how to complete an audit in the Certainty Software. This training is accessible via [www.workpalcenl.ca](http://www.workpalcenl.ca). Contact [safety@workplacenl.ca](mailto: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

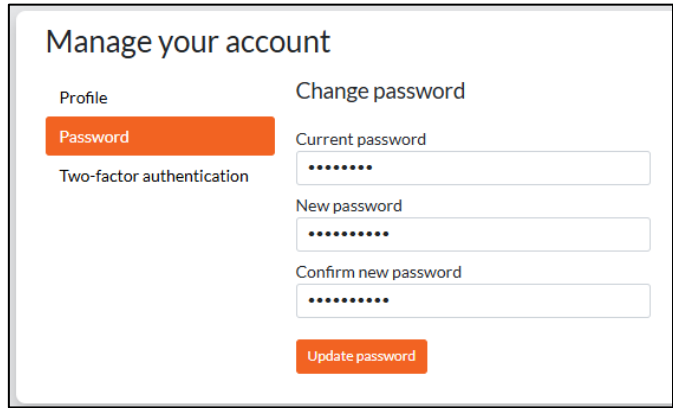
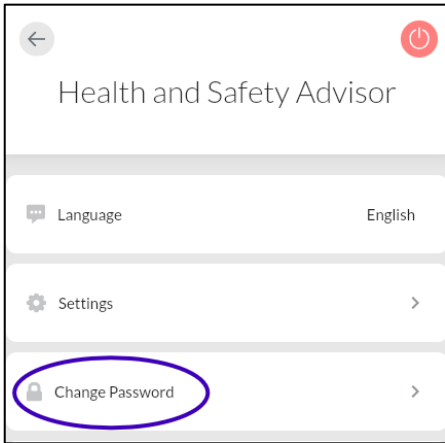
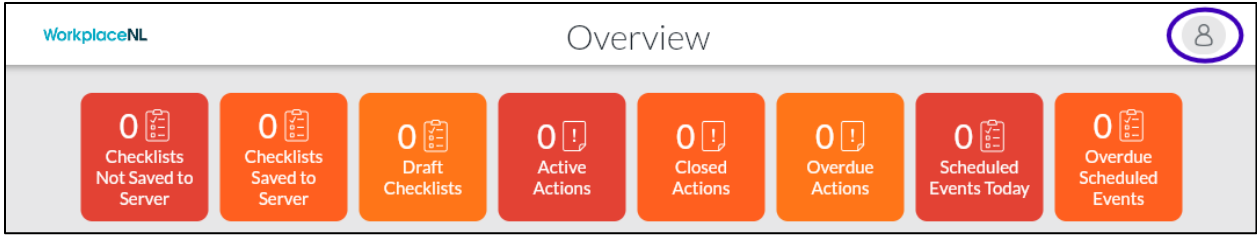
Certainty's auditor access, referred to as mobi, can be accessed via an internet browser (<https://workplaceni.certaintysoftware.mobi/>) or the mobile app available in the Microsoft Store, the App Store, or the Google Play.



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

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.



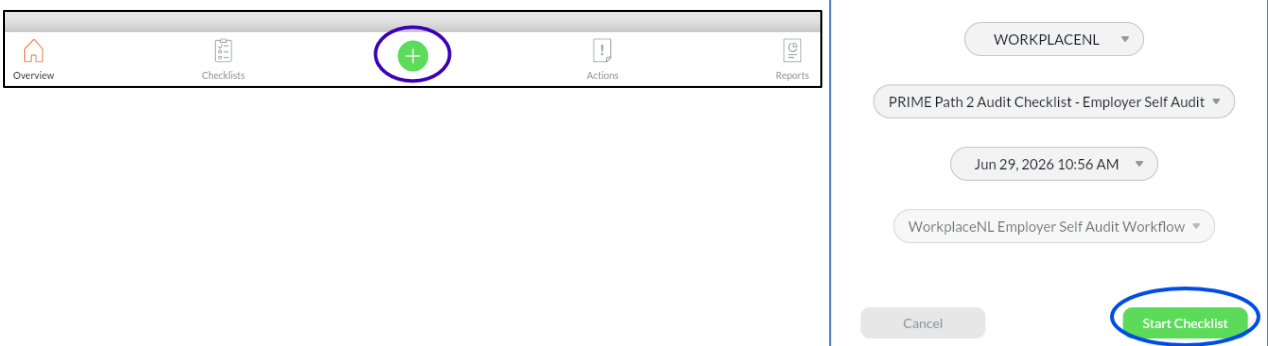
**2.4.2 Being Scheduled for an Employer Self-Audit**

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**

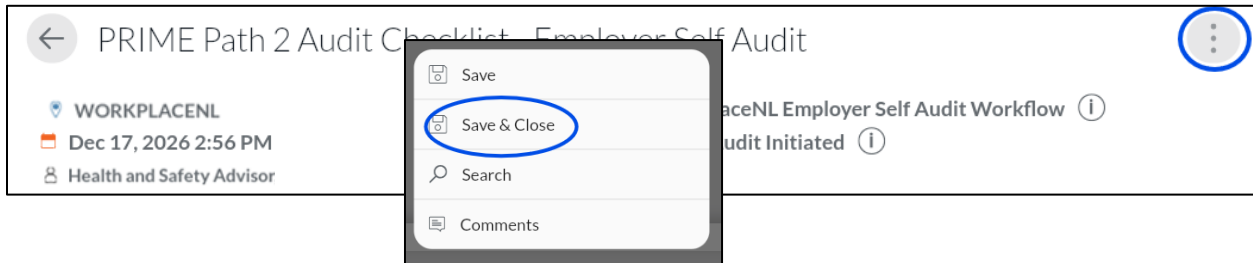
**Selecting the audit**

From the main dashboard, click the green plus (+) button on the bottom of the screen, then click the 'Start Checklist' button.

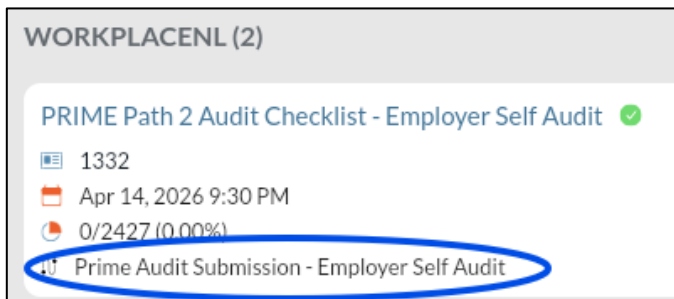


### Loading the worksite data

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



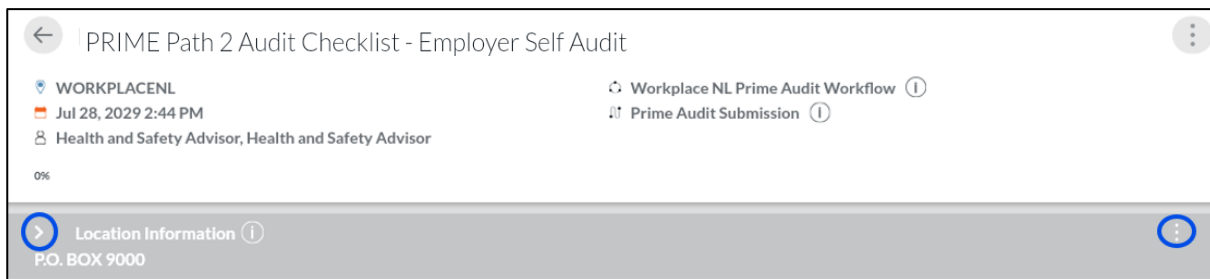
The workflow step you see before saving and closing will be "Prime Audit Initiated". By clicking 'save & close', the checklist will move to the next workflow step "Prime Audit Submission – Employer Self Audit" and the tool will automatically retrieve the worksite information from WorkplaceNL's database. This 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

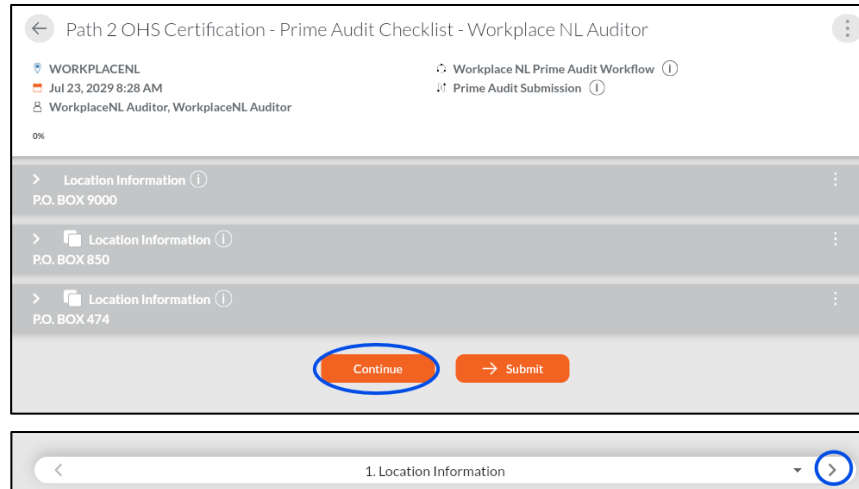
keeps the worksite information current. If you need to add a new worksite, click the 3 dots to the right of a worksite, then select 'Repeat Question Set'. To view each worksite, click the arrow to the left of a worksite.



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.

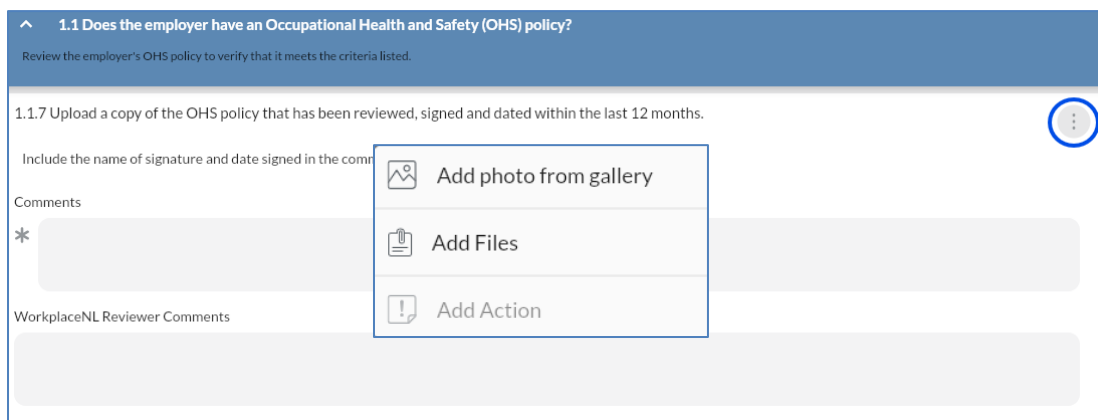
## Proceeding with the audit questions

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.

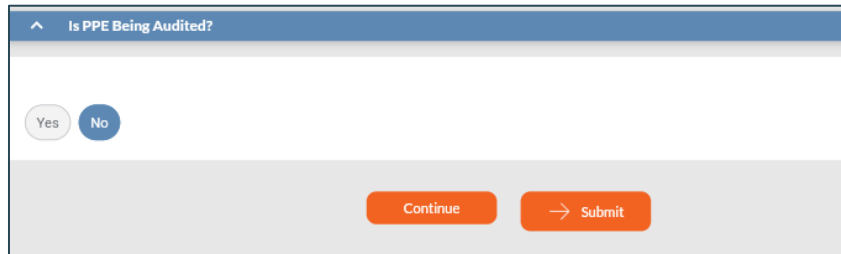


**IMPORTANT:** You MUST save your progress before navigating to the next page. The tool does not automatically save; thus, you will lose your progress if you close out of the checklist without saving.

Some questions require you to upload a document. This can be done by hovering over the ellipse on the right side of the question and selecting 'Add Files'. Only upload the requested documents.



Some questions may not apply to your firm, these questions can be marked as NA. If you mark a question as NA, you are required to put in a comment indicating why it is NA. There are 2 elements that can be marked NA, PPE or occupational health. If these elements do not apply to your firm, mark them as NO and document why in the comment box.

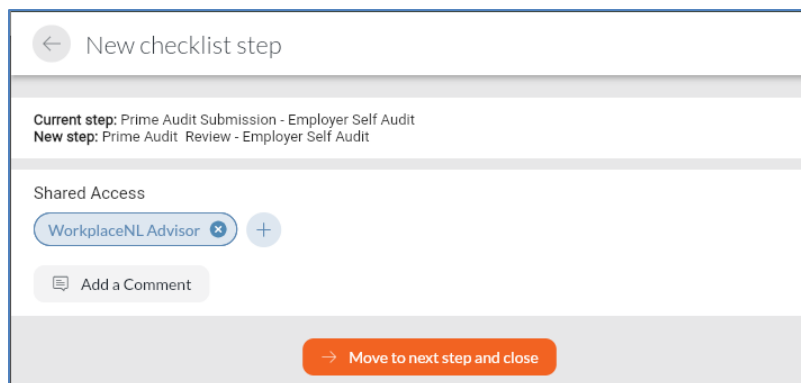
A screenshot of a web form titled "Is PPE Being Audited?". At the top left, there is a back arrow icon. Below the title, there are two radio buttons: "Yes" (unselected) and "No" (selected). At the bottom of the form, there are two orange buttons: "Continue" and "Submit" (with a right-pointing arrow).

For every audit question answered with a 'No', a comment is mandatory. These comments must clearly explain why the requirement was not met. Comments can also include your plan to address the requirement. Although the tool allows you to do so, **DO NOT** create corrective actions, this information can be included in the comment box. You will not have access to the tool after your audit.

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'.

A screenshot of a "New checklist step" screen. At the top left, there is a back arrow icon. Below the title, there is a section for "Current step: Prime Audit Submission - Employer Self Audit" and "New step: Prime Audit Review - Employer Self Audit". Below this is a "Shared Access" section with a button for "WorkplaceNL Advisor" (with a close icon) and a plus sign. There is also a button for "Add a Comment". At the bottom, there is a large orange button with a right-pointing arrow and the text "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](mailto:safety@workplacenl.ca).

### **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.


Path 2 OHS Certification - Prime Audit Checklist - Workplace NL Auditor 

 1232

 Jul 29, 2029 2:54 PM

 0/2855 (0.00%)

 Prime Audit Submission



WorkplaceNL		Path 2 OHS Certification - Prime Audit Checklist - Workplace NL Auditor	
Checklist #:	1232		
Site:	WORKPLACENL		
Audit Date:	29 July 2029 10:24 ((UTC-08:00) Pacific Time (US & Canada))		
User:	WorkplaceNL Auditor		
Total Score:	2449/2505 (97.76%)		

		for closing out issues, dates, etc.).	
Element 1 – Leadership Commitment		94/150	(62.67%)
1.1 Does the employer have an Occupational Health and Safety (OHS) policy?		0/25	

### 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	<b>Active</b>
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).