



Government of **Western Australia**
Department of **Mines, Industry Regulation and Safety**

Petroleum safety and major hazard facility – guide

Records management including document control

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Guides

A guide is an explanatory document that provides more information on the requirements of legislation, details good practice and may explain means of compliance with standards prescribed in the legislation. The government, unions or employer groups may issue guidance material.

Compliance with guides is not mandatory. However, guides could have legal standing if it were demonstrated that the guide is the industry norm.

This Guide has an operations focus and is set out in the context of risk assessment and legislative requirements of all responsible persons. Consequently, each operation needs to understand its limitations and skills base.

The Guide is based on current experience and is not claimed to be complete.

Who should use this Guide?

You should use this Guide if you are responsible for the development and maintenance of the safety management system including records management and document control.

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1 Introduction

This document has been developed to provide assistance and guidance to licensees and operators to meet the Western Australian Petroleum safety and major hazard facility legislation administered by the Department of Mines, Industry Regulation and Safety (the Department).

The legislation covered by this Guide is listed in Appendix 1.

1.1 Scope and objective of this Guide

This Guide has been developed to provide licensees and operators with assistance for effective records management and document control.

For the purpose of this Guide, the term “safety case” is used to cover all of the safety documents referred to in the respective regulations.

The objective is to provide clarity to both industry and Department personnel on areas of the legislation which may be ambiguous or open to interpretation.

The following appendices are included:

Appendix 1 Legislative provisions

Appendix 2 References and acknowledgements

Appendix 3 Glossary of terms

Appendix 4 Further information

1.2 Definitions and abbreviations

Definitions and abbreviations are included in Appendix 3 Glossary of terms.

1.3 Use of standards

The following standards may be useful to licensees and operators when developing procedures and processes on records management and document control.

- AS ISO 15489.1 *Information and documentation – Records management – Part 1: Concepts and principles*
- AS/NZS 2885.3 *Pipelines – Gas and liquid petroleum – Part 3: Operation and maintenance*
- AS/NZS ISO 9001 *Quality management systems – Requirements*
- AS/NZS ISO 45001 *Occupational health and safety management systems – Requirements with guidance for use*

Licensees and operators should reference the current versions of these publications to support the requirements of the safety case and how records management and document control are managed within their organisation.

2 What is a record?

Records management processes and procedures should clearly define what records are to be retained.

A record may be in either paper or electronic format and comprise such areas as:

- maintenance records
- design studies for operations, engineering and maintenance
- design and construction records
- engineering change requests
- all testing, test plans and reports
- commissioning records
- all configuration, specification data, drawings and location maps
- supplier acceptance letters
- signed contracts
- training and competency records
- safety case or other required safety documentation
- all risk studies, including hazard and operability (HAZOP) and hazard identification (HAZID) reports
- installed software lists
- minutes of meetings
- emails
- accident and incident reports and actions arising from those reports
- any safety alerts issued or received.

Trade publications and advertising material are not normally classed as records and retained for an extended period of time.

3 Maintaining records for safety cases

Requirements are that licensees and operators must include a description in the safety case of how records and documents required by the safety case in force for a facility are kept and maintained.

A safety case in force for a facility should be kept for five years after the date of acceptance of the document by the Minister (or in the case of a major hazard facility, acceptance by the Chief Officer).

Written audit reports for a safety case for a facility should be kept for a period of five years after the date of receipt by a licensee or operator for the operation.

The safety case should contain a description of the process and procedures in place for records management and document control, including the document number and title of the procedure.

4 Records management

The key purpose of records management is to preserve and retain:

- historical information required for the safe operation and maintenance of a facility over the life of that facility
- objective evidence of the management system effectiveness and compliance
- records of decision making and approvals.

Processes and procedures should be established for the identification, collection, storage and disposal of records pertinent to the facility management system and to achieving the key purposes. These processes and procedures are then documented within a records management plan for the relevant facilities, and cover both electronic and print records.

As a minimum, the records management plan should address each of the following:

- the records to be retained – in order to identify this requirement effectively the organisation must have a process in place to define what is and what is not a record
- the retention period for each type of record
- storage and preservation methods for the records
- record update and maintenance procedures.

Records should be obtained and maintained that are necessary to:

- safely operate and maintain a facility
- demonstrate compliance with any Australian or international standards required for the design and safe operation of the facility
- identify decisions made and actions taken by the licensee or operator; for example, minutes of meetings, risk reports, validation reports, and any external documentation relevant to design, maintenance or decommissioning and abandonment of a facility
- confirm the fitness for purpose of the facility at any stage of the facility's operating life.

Licensees and operators should refer to the various standards covering their respective operations which may give an indication of the types of records that need to be generated and retained.

4.1 Design, construction and commissioning

Records should be retained and kept current during the design and construction stage of a facility. For example, the following should be retained for a new pipeline:

- all risk assessments conducted during the design, construction and commissioning phase, such as
 - HAZOP and HAZID studies
 - AS 2885 safety management studies
 - any other qualitative or quantitative studies conducted
- design basis, including design calculations, verification and validation
- project specification and safety data sheets
- traceability of all materials and components, including all test results and inspection reports
- all tests results and inspection reports to verify the integrity of the facility
- maximum allowable operating pressure (MAOP)
- fracture control plans and isolation plans
- all drawings, as built, and alignment relating to facilities and pipelines
- charts and maps showing location of cathodic protected pipelines, cathodic protection equipment and structures affected by or affecting the cathodic protection system

- cathodic protection potential readings, cathodic protection unit outputs and interference current readings
- condition of the internal and external surfaces
- operation procedures that form part of the design
- a list of the authorities that have granted easement rights or other operating permits and landholders through whose land a pipeline passes, including contact history and title information
- a list of other easements (especially easements in gross for other pipelines, power lines and communications cables) through which a pipeline passes, the contact details of the interest holder and other relevant information
- records of facility or pipeline sections or components identified as potentially high risk in an emergency
- commissioning records
- quality assurance records and traceability
- safety and environment records
- approvals and correspondence with regulatory authorities.

4.2 Operations and maintenance

A records management plan should cover the ongoing operations and maintenance of a facility. The plan should detail the records to be obtained and retained, and their storage methods and procedures to maintain currency of the records until abandonment or removal of a facility or pipeline.

Records to be included in the plan are:

- records acquired under the design, construction and commissioning phase of the facility or pipeline
- historical safety management system plans and procedures including previous versions of the safety case
- any change to operating conditions, engineering investigations and any work carried out in connection with any changes to operating conditions
- any modifications to the maps, charts, plans, drawings and procedures required to allow the procedures to be properly administered (e.g. exposure to the public, changes in design and operating conditions)
- details of any corrosion, dents or other anomalies
- details of the cathodic protection system as required to be recorded by AS 2832 – Cathodic protection of metals
- details of any leaks, ruptures or other loss of containment events
- routine inspections, and inspections and testing carried out when cutting a pipeline or making hot taps
- repairs and maintenance work to facilities and pipelines
- details of inspections of internal and external pipeline condition
- details of any coating inspections and repairs
- correspondence with statutory and regulatory authorities
- safety management study reviews and any other risk assessment reports associated with the facility or pipeline
- incidents and subsequent corrective and preventive actions generated and completed
- operation and maintenance personnel competency details and training records
- MAOP review documents

- location class review documents
- reports of landholder and third-party liaison and the information given
- records of emergency response exercises, the actions arising and the completion of those actions.

The licensee or operator should prepare and retain for a minimum of 10 years records of:

- necessary operational data
- pipeline surveillance patrol reports.

4.3 Abandonment and decommissioning

The records retention schedule should document the archiving and disposal of records associated with an abandoned and decommissioned facility or pipeline, and the period of time that operating and abandonment records are to be retained.

Records of changes to operating conditions, all engineering assessments and work carried out in connection with any change in the operating conditions should be maintained until the abandonment, decommissioning or removal process is complete.

4.4 Retention of records

A detailed records retention schedule should be developed that identifies the types of records and the period for which they are to be retained by the organisation.

For example, the regulatory requirement is:

- that a safety case in force for a facility operation is kept for five years after the date of acceptance of the document by the Minister
- that a written audit report for a safety case for a facility operation is kept for a period of five years after the date of receipt by the licensee or operator
- that a copy of each report given to the Minister under the legislation in Appendix 1 is kept for five years after the date the report was given to the Minister.

The organisation should have a procedure in place for defining what is and what is not considered to be a record (Section 0).

4.5 Archiving of records

Archiving records can be done either through the organisation's IT system, by the removal and offsite storage of hard copy documents or a combination of both.

When archiving through the IT system, a process should be established for the periodic secure backup of records to be stored off site and not overwritten for the agreed period of time noted in the retention schedule.

Hard copy records that are no longer required should be logged in the organisation's archive register, placed in appropriate storage boxes and stored, most often offsite. This may be done through companies that provide this service.

The archive register should list the title and date of the document being archived, the retention period and the estimated date on which the records may be destroyed. The register should have provision for details of withdrawal of any documents, the date of withdrawal, by whom and the date on which it is returned to archives. This process should be auditable to ensure documents are not withdrawn and subsequently lost.

4.5.1 Destruction of records

Destruction of any records should be authorised by the responsible supervisor or manager and a record of this authorisation kept on file. The following should be considered prior to the destruction of old records:

- How are the records to be destroyed? Do they need secure disposal methods?
- Do any of the records relate to any possible litigation action that is underway and should not be destroyed?
- Is the destruction in line with the records retention schedule?

Once this is clarified, destruction may take place either by the organisation themselves or the company responsible for their information management process. A destruction certificate listing all the records destroyed should be generated and the archive register updated to record this information.

5 Document control

Document control is a key element of the safety management system. Licensees and operators should have a process and procedure to ensure that only current documentation is available to all members of the workforce. This applies to drawings of facilities and pipelines.

All controlled documents should have a unique identifying number which can be assigned through an online document control system, or by a numbering system developed by the organisation.

5.1 Development of new documentation

The custodian of all new safety management system documentation should be familiar with the task or equipment for which the new documentation is required, and have the level of expertise to ensure that the document meets all the safety case requirements (e.g. regulations, hazard control measures).

Where documentation relates to a high level of technical expertise being required, then a review process should be in place using a person of similar or higher level expertise to the custodian to check and review the contents of the document before it is approved for release.

Members of the workforce should be consulted and provided the opportunity to review and comment on new documentation that relates to their facility or operation.

All new documentation should have a nominated periodic review frequency. Depending on the risk level of the tasks being performed, this frequency may be anywhere between six months and five years. For example, documentation covering high risk tasks may be reviewed annually, whereas tasks that are non-critical and not subject to frequent changes, may be reviewed every three to four years.

Once a new document has been developed and approved for release, it should be published, preferably in a portable document format (PDF), through the appropriate portal so that it is available to all members of the workforce. A process should be in place to notify the workforce of new documents that have been published and are available for use.

All controlled documents should have:

- details of the custodian, either by a defined position or by name
- a revision history of the document showing the version, date and summary of the change as well as the author, reviewer and approver of the document
- the date on which the document was approved for release and the next review date
- a disclaimer to the effect that the document is uncontrolled when printed. This is often included in the footer of the document.

5.2 Periodic review and changes of controlled documents

Document control should have a periodic review process in place for all controlled documents based on the timeframe established at the time the document was developed.

Reminders of periodic review should be sent to the relevant custodian at least a month prior to the review date of the current version of the document. This will allow the custodian time to schedule the review of the document in conjunction with relevant members of the workforce, have it updated with any identified changes and checked if necessary, then pass the new version to document control for release to the workforce.

All members of the workforce should have the authority to identify and request changes to controlled documents. This should be done by requesting the editable format version of the document, adding the proposed changes and completing a document change request that forms part of the document control process. The completed document change request together with the updated document should then be passed to the document custodian for review and if applicable, approval of the changes which creates a new controlled document.

Document control should have a process in place to:

- remove and archive any superseded documents
- notify the workforce that a new version of the document has been published.

5.3 Retention of superseded documentation

The retention of superseded documentation and drawings should be included in the organisation's record retention schedule to ensure that historical information is readily available if required.

Superseded controlled documentation and drawings should be clearly identified as superseded and filed away from the current versions to prevent the mistaken use of out of date information.

Appendix 1 Legislative provisions

Petroleum (Submerged Lands) (Management of Safety of Offshore Facilities) Regulations 2007

- r. 14 Maintaining records for safety cases
- r. 34 Arrangements for records

Petroleum (Submerged Lands) (Pipelines) Regulations 2007

- r. 31 Arrangements for records, storage of documents

Petroleum (Submerged Lands) (Diving Safety) Regulations 2007

- r. 33 Diving operations records
- r. 34 Divers' log books

Petroleum and Geothermal Energy Resources (Management of Safety) Regulations 2010

- r. 9 Maintaining records for safety management system
- r. 26 Arrangements for records

Petroleum Pipelines (Management of Safety of Pipeline Operations) Regulations 2010

- r. 9 Maintaining records for safety management system
- r. 26 Arrangements for records

Dangerous Goods Safety (Major Hazard Facilities) Regulations 2007

- r. 24(2)(b) Safety management system, operator of major hazard facility to prepare

Appendix 2 References and acknowledgements

Development of this Guide has used:

- AS ISO 15489.1 *Information and documentation – Records management Part 1: Concepts and principles*
- AS/NZS 2885.3 *Pipelines – Gas and liquid petroleum – Part 3: Operation and maintenance*
- AS/NZS ISO 9001 *Quality management systems – Requirements*
- AS/NZS ISO 45001 *Occupational health and safety management systems – Requirements with guidance for use*

Appendix 3 Glossary

Custodian. A member of the workforce with the appropriate knowledge and expertise to develop documentation to accurately reflect the requirements of the procedure or process.

Department. The Department of Mines, Industry Regulation and Safety.

Document control. A member or members of the workforce responsible for administering the document control process and managing all controlled documents.

Documentation. All controlled procedures, work instructions, documented processes, drawings for the facility and operations.

HAZID. Hazard identification study.

HAZOP. Hazard and operability study.

MAOP. Maximum allowable operating pressure.

PDF. Portable document format.

Portal. An area on the organisation's intranet where all controlled documents and drawings can be easily accessed by members of the workforce.

Retention period. The period of time agreed by the officers of an organisation to retain records relating to the facility and operations.

Appendix 4 Further information

Other guides available:

- *ALARP demonstration*
- *Audits, review and continual improvement*
- *Bridging documents and simultaneous operations (SIMOPS)*
- *Diving safety management system*
- *Emergency planning*
- *Hazard identification*
- *Major accident events, control measures and performance standards*
- *Involvement of members of the workforce*
- *Management of change*
- *Offshore facility safety case*
- *Pipeline management plan*
- *Pipeline operation safety case*
- *Reporting of accidents, incidents and dangerous occurrences*
- *Risk assessment and management including operational risk assessment*
- *Safety management system*