



Department of **Energy, Mines,
Industry Regulation and Safety**



GUIDE

Records management including document control

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Reference

WorkSafe Western Australia, 2024, Records management including document control: Guide. Department of Energy, Mines, Industry Regulation and Safety, Western Australia, 15 pp.

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Foreword

Western Australia's work health and safety (WHS) legislation came into force in March, 2022. This resulted in the amendment of the various petroleum Acts and the repeal of the associated regulations so that all onshore and offshore petroleum, pipeline and geothermal energy operations are now subject to the requirements of the:

- *Work Health and Safety Act 2020* (the WHS Act)
- Work Health and Safety (Petroleum and Geothermal Energy Operations) Regulations 2022 (WHS PAGEO Regulations).

A key responsibility for the WorkSafe Group (WorkSafe) of the Department of Energy, Mines, Industry Regulation and Safety continues to be the ongoing risk management and safety requirements for the onshore and offshore petroleum, pipeline and geothermal energy operations. To support these requirements the guides previously developed have been updated to provide support and assist operators to meet their commitments under the WHS Act and WHS PAGEO Regulations.

Application

This Guide is a non-statutory document provided by WorkSafe to assist persons subject to duties under the WHS Act and requirements to conduct audits of the safety management system as prescribed by the WHS PAGEO Regulations.

It has been developed to provide advice and guidance to operators to meet the WHS Act and the WHS PAGEO Regulations requirements administered by the WorkSafe.

Who should use this Guide?

You should use this Guide if you are:

- the operator of onshore or offshore petroleum, pipeline or geothermal energy operations under the WHS Act
- responsible for the development and maintenance of a safety case and the safety management system including records management and document control under the WHS PAGEO Regulations.

WHS legislation

Under the WHS Act, the WorkSafe Commissioner is responsible for performing the functions and exercising the powers of the regulator. Each safety document must be submitted for acceptance by the regulator.

WorkSafe assists the regulator in the administration of the WHS Act and the WHS PAGEO Regulations, including the provision of inspectors and other staff to oversee compliance with the legislation.

For facilities outside the Western Australian waters, the WHS Act does not apply and guidance should be sought from National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA). If a vessel does not fall under the definition of “facility” in the Act, operators should contact the Australian Maritime Safety Authority and Department of Transport.

No petroleum or geothermal operations can be conducted on any onshore or offshore petroleum, pipeline or geothermal energy operations unless the facility has an operator registered in accordance with the requirements of WHS PAGEO Regulations.

The WHS PAGEO Regulations provided for transitional provisions in relation to facility operators and safety cases in place or submitted before the commencement of the WHS legislation.

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1 Introduction

WHS PAGEO Regulations r. 31

Maintaining records for safety cases

WHS PAGEO Regulations r. 50

Arrangement for records

WHS PAGEO Regulations r. 97

Diving operations record

This Guide provides operators with assistance for effective records management and document control. There are specific requirements for record keeping in the Work Health and Safety (Petroleum and Geothermal Energy Operations) Regulations 2022 (WHS PAGEO Regulations), particularly in regard to records related to the safety case, diving operations, hazardous chemicals and dangerous goods.

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

The objective of this Guide is to provide clarity on areas of the legislation which may be ambiguous or open to interpretation.

2 What is a record?

A record may be in either paper or electronic format and comprise documents such 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
- diving operations and diver log books.

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

WHS PAGEO Regulations r. 31

Maintaining records for safety case

WHS PAGEO Regulations r. 50

Arrangements for records

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. The safety case must include arrangements for making a record of the safety case in force, each revision of the safety case and each written audit report for the safety case.

It must also include arrangements for making those documents and records available to persons who need to be aware of the contents and for securely storing those documents and records.

A safety case in force for a facility should be kept for five years after the date of acceptance of the document by the regulator.

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 an operator for the facility.

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

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

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

WHS PAGEO Regulations r. 39

Adequacy of design, construction, installation, modification and maintenance

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 phases 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 workers' competency details and training records
- maximum allowable operating pressure (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 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 Diving records

WHS PAGEO Regulations r. 97
Diving operations record

The WHS PAGEO Regulations are very specific about the types of diving operation records must be collected and maintained by the diving supervisor and the manner in which these records are to be retained.

Diving operation records must be kept in a hard-covered form bound in such a way that its pages cannot easily be removed, or it is in a form that has multiple copies of each page and must be bound so that at least 1 copy of each page cannot easily be removed. The pages of the diving operation records must be sequentially numbered. This requirement also covers the divers' log books.

All diver operation and diver log books must be kept for a period of at least seven years after the date of the last entry in it.

4.5 Retention of records

WHS PAGEO Regulations r. 50
Arrangements for 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 regulator
- 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 operator
- that a copy of each report given to the regulator under the legislation is kept for five years after the date the report was given to the regulator.

The operator should have a procedure in place for defining what is and what is not considered to be a record.

4.6 Archiving records

Archiving records can be done either through the operator'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 third party 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.

4.6.1 Destruction of records

Destruction of any records should be authorised by the responsible supervisor or manager and a record of the 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 therefore 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. Operators should have a process and procedure to ensure that only current documentation, including drawings of facilities, plant, pipelines, etc. is available to all workers.

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.

Workers should be consulted and provided the opportunity to review and comment on new documentation that relates to their particular area of expertise 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 workers. A process should be in place to notify workers 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 workers, have it updated with any identified changes and checked, if necessary, then pass the new version to document control for release.

All workers 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 workers that a new version of a 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 Glossary

The following terms are defined for the purposes of this Guide.

Key terms	Meaning
Competent person	A person who has acquired through training, qualification or experience the knowledge and skills to carry out the task. The definition of 'competent person' in the Work Health and Safety (General) Regulations prescribes specific requirements for some types of work such as diving.
Custodian	A worker with the appropriate knowledge and expertise to develop documentation to accurately reflect the requirements of the procedure or process.
Document control	A worker or workers 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, etc.
Facility	<p>Geothermal energy facility – a place at which geothermal energy operations are carried out and includes any fixture, fitting, plant or structure at the place</p> <p>Petroleum facility – a place at which petroleum operations are carried out and includes any fixture, fitting, plant or structure at the place</p> <p>Mobile facility – includes an onshore drilling rig</p> <p>The term facility has been adopted throughout this document to cover offshore and onshore facilities and pipelines including aboveground structures associated with onshore pipelines.</p>
Geothermal energy operation	<p>Means an operation to:</p> <ul style="list-style-type: none"> • explore for geothermal energy resources • drill for geothermal energy resources • recover geothermal energy • or is any other kind of operation that is prescribed by the regulations to be a geothermal energy operation for the purpose of this definition <p>and carry on of such operations and the execution of such works as are necessary for that purpose.</p>
HAZID	Hazard identification study
HAZOP	Hazard and operability study
Inspector	WorkSafe Petroleum Safety inspector
MAOP	Maximum allowable operating pressure
Operator	A person who has, or will have, the day-to-day management and control of operations at a facility and is registered as the operator of the facility under r.22(3).

Key terms	Meaning
Performance standard	A standard established by the operator defining the performance required for a safety critical element typically defining the functionality, availability, reliability, survivability and interdependency of the safety critical element.
Person conducting a business or undertaking (PCBU)	A PCBU is an umbrella concept capturing all types of working arrangements or relationships. A PCBU includes a company, unincorporated body or association and sole trader or self-employed person. Individuals who are in a partnership that is conducting a business will individually and collectively be a PCBU. A reference to a PCBU includes reference to the operator of a facility.
Petroleum operation	Means an activity that is carried out in an area in respect of which a petroleum title is in force, or that is carried out in an adjacent area, for the purpose of any of the following: <ul style="list-style-type: none"> • exploring for petroleum • drilling or servicing a well for petroleum • extracting or recovering petroleum • injecting petroleum into a natural underground reservoir • processing petroleum • handling or storing petroleum • the piped conveyance or offloading of petroleum.
Portal	An area on the organisation's intranet where all controlled documents and drawings can be easily accessed by workers.
Regulator	The WorkSafe Commissioner is the regulator under the <i>Work Health and Safety Act 2020</i> .
Retention period	The period of time agreed by the officers of an organisation to retain records relating to the facility and operations.
Safety case	Documented provisions related to the health and safety of people at or in the vicinity of a facility, including identification of hazards and assessment of risks; control measures to eliminate or manage hazards and risks; monitoring, audit review and continual improvement
Safety critical element	Any item of equipment, system, process, procedure or other control measure the failure of which can contribute to an MAE.
SFAIRP	So far as is reasonably practicable
SMS	Safety management system
Validation	A statement in writing by an independent person in respect of the design, construction and installation of a facility, that complies with r. 67.
WHS Act	<i>Work Health and Safety Act 2020</i>
WHS PAGEO Regulations	Work Health and Safety (Petroleum and Geothermal Energy Operations) Regulations 2022
Worker	Any person who carries out work for a person conducting a business or undertaking, including work as an employee, contractor or subcontractor (or their employee), self-employed person, outworker, apprentice or trainee, work experience student, employee of a labour hire company placed with a 'host employer' or a volunteer

Appendix 2 Further information

Petroleum safety guidance

Interpretive guidelines

- *Development and submission of a diving safety management system*
- *Development and submission of a safety case*
- *Development and submission of an onshore facility safety case – drilling operations*

Guides

- *Audits, review and continual improvement*
- *Bridging documents and simultaneous operations (SIMOPS)*
- *Dangerous goods and hazardous chemicals in petroleum, pipeline and geothermal energy operations*
- *Decommissioning and management of ageing assets*
- *Demonstration of risk reduction so far as is reasonably practicable (SFAIRP)*
- *Diving start-up notices*
- *Emergency response planning*
- *Facility design case*
- *Hazard identification*
- *Health and safety leading and lagging performance indicators*
- *Human factors fundamentals for petroleum and major hazard facility operators*
- *Human factors self-assessment guide and tool for safety management systems at petroleum and major hazard facility operations*
- *Identification of major accident events, control measures and performance standards*
- *Inspections – Land-based drilling rigs*
- *Involvement of workers*
- *Management of change*
- *Nomination of an operator*
- *Records management including document control*
- *Risk assessment and management including operational risk assessment*
- *Validation requirements*

Australian and international standards

- AS ISO 15489.1 *Information and documentation – Records management Part 1: Concepts and principles*
- AS/NZS 2885.1 *Pipelines – Gas and liquid petroleum – Part 1: Design and construction, Section 13.1 – Records*
- AS/NZS 2885.3 *Pipelines – Gas and liquid petroleum – Part 3: Operation and maintenance, Section 12 – Records Management*
- AS/NZS ISO 9001 *Quality management systems – Requirements*
- AS/NZS ISO 45001 *Occupational health and safety management systems – Requirements with guidance for use*

Codes of practice

- Mentally healthy workplaces for fly-in fly-out workers in the construction and resources sector
- Psychosocial hazards in the workplace
- Workplace behaviour

See the WorkSafe website for approved codes of practice on a range of related topics such as *Managing the risks of hazardous chemicals in the workplace*, *Confined spaces*, *Managing the risk of falls at workplaces*, *Managing risk of plant* and *Managing the work environment and facilities*.

Other resources

- Overview of Western Australia's Work Health and Safety Act 2020 – Guide
- Discriminatory, coercive and misleading conduct – Interpretive guideline
- How to determine what is reasonably practicable to meet a health and safety duty – Interpretive guideline
- Incident notification – Interpretive guideline
- The health and safety duty of an officer – Interpretive guideline
- The meaning of 'person conducting a business or undertaking' (PCBU) – Interpretive guideline



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