



Mines Safety Bulletin No. 120

Subject: Preventing loss of classified plant records

Date: 02 June 2015

Background

Regulation 6.25 of the Mines Safety and Inspection Regulations 1995 requires duty holders to maintain records of the inspection, testing, commissioning or alteration of certain types of plant, particularly registered classified plant.

Duty holders may also be requested by an Inspector of Mines to provide other documentary evidence of compliance with any Part 6 regulations.

Although it is not specified that such records must be stored in hard copy form, there is an expectation that they are readily accessible on site to be available:

- to any employee or safety and health representative in accordance with regulation 6.25(3)
- for transfer on sale of the plant, as required by regulation 6.25(4)
- for inspection or seizure of copies by any visiting Inspector of Mines, pursuant to section 21 of the *Mines Safety and Inspection Act 1994*.

For itinerant classified plant that is not owned by or permanently located on the mine site, sufficient records should be readily available on site (or with the plant) to provide evidence of compliance.

Replacing paper-based filing systems with electronic record storage and management systems, including “cloud-based” systems where information is stored on servers owned and controlled by others, has resulted in issues for some duty holders.

The failure of a national asset integrity services company in 2014 resulted in clients losing access to their cloud-based classified plant management system. In some cases, the electronic records stored on the service provider's cloud server were not backed up with hard copies or other electronic storage controlled by the client mine site. Consequently, essential classified plant records became unavailable when the service provider went into receivership.

Summary of hazard

As part of any safe system of work, complete and accurate classified plant records are required to ensure that the equipment is safe to operate.

Permanent or temporary loss of access to such records may directly or indirectly increase the risk of personnel being exposed to a hazard. Such information is necessary to enable the plant's servicing and operating history to be monitored.

Contributory factors

Typical reasons for loss of classified plant records include:

- lack of secure records management system
- failure of document control and filing procedures due to lack of training, inadequate systems or poor supervision
- confusion associated with sale or transfer of the business entity, change of business ownership, or corporate restructure
- changes to records management systems, information technology systems, or computer system upgrades
- confusion due to frequent changes of personnel or unclear responsibilities of personnel
- documentation not transferred upon sale or relocation of the equipment. This is common for equipment obtained through used equipment dealers
- fire or water damage and failure to maintain duplicates in a secure location
- accidental deletion and failure to maintain back-up copies.

Actions required

When designing a records management system for classified plant records, duty holders should consider how they will manage the risks of potential data loss.

Regardless of the storage and retrieval methods used for classified plant records, the following actions will assist duty holders to maintain records as required under legislation.

- For paper-based records kept on site, keep duplicate copies in a secure fire-proof, weatherproof, vermin proof facility, or back up records electronically on a secure server.
- For records stored on a local hard drive or server controlled by the duty holder, ensure the hard drive or server is backed up daily and the back-up drive is kept at a secure location.
- For records stored on cloud servers not owned or controlled by the duty holder, ensure a back-up system is available, either hard copy or electronic, to protect the duty holder from permanent loss of the service.

Further information

Visit www.dmp.wa.gov.au/ResourcesSafety for information on occupational safety and health in the resources sector.

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