



## Record Control Procedure

### AZSPU-HSSE-DOC-00041-2

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<b>Scope:</b>	AzSPU Operational PUs	<b>Document Administrator:</b>	AzSPU HSSE MS Document Co-ordinator
<b>Issue Date:</b>	December 26, 2005	<b>Issuing Dept:</b>	AzSPU HSSE
<b>Revision Date:</b>	May, 1, 2010	<b>Control Tier:</b>	2- AzSPU
<b>Next Review Date:</b>	30 July, 2010		

## 1.0 Purpose/Scope

The purpose of this document is to describe the Azerbaijan Strategic Performance Unit (AzSPU) Health, Safety, Security, Environment (HSSE) Record Control Procedure, which applies to all AzSPU Operational Performance Units (PUs) engaged in the drilling, production, and/or transportation of oil and gas.

This procedure provides guidance to ensure that required HSSE records critical to the functioning of the management system (including but not limited to permits, inspection reports, hazardous waste manifests, training attendance manifests, monitoring and calibration logs, audit reports and correspondence with regulatory agencies) are managed in a controlled fashion to ensure that:

- Records are properly filed and readily accessible to a) the workforce to which they apply, b) regulatory authorities as requested, and c) other interested parties who have a right to access said records.
- Records are retained according to specified BP retention periods, see Appendix 1.
- Records are destroyed when the applicable retention period is reached.

Revision of this procedure and the operational controls detailed therein will be in accordance with AzSPU HSSE Document Management Procedure ([AzSPU-HSSE-DOC-00025-2](#)).

## 2.0 Definitions

Refer to AzSPU HSSE Definitions document [AzSPU-HSSE-DOC-00021-2](#) for definitions common to the management system.

**Record** – A document stating results achieved, or providing evidence of activities performed.

## 3.0 Specific Requirements

Only requirements specific to this procedure are listed here. For requirements applicable to all procedures refer to the AzSPU HSSE Procedures General Requirements document ([AzSPU-HSSE-DOC-00037-2](#)).

- OMS Sub-element 4.3 - Information Management & Document Control
- ISO 14001:2004 – 4.5.4 Control of Records.
- OHSAS 18001:1999 – 4.5.3 Records and Records Management

## 4.0 Key Responsibilities

**AzSPU HSE & Compliance Team** – Accountable and responsible for coordinating, developing and maintaining, in conjunction with the Legal Department, the HSSE&S Record Retention Schedule provided in Appendix 1. Responsible for conducting periodic assessment of records to ensure that records retention policies are being followed.

**Record Control Personnel / AzSPU HSSE Document Co-ordinator (for records in dK)**

Responsible for:

- Generation of a Records List for their Department / PU / Asset.
- Records storage.
- Periodic review of the Records List and provision of a list of records for destruction to the Record Owner (in line with the Record Retention Schedule).
- Destruction of the record, in line with this procedure, following approval from Record Owner.

**Record Owner**

Responsible for:

- Providing record for upload to Record Control Personnel / AzSPU HSSE Document Co-ordinator and confirming record ownership and the record destruction date (based on information in the Record Retention Schedule).
- Providing record destruction approval, extension of retention period, or a “hold” on a document to Record Control Personnel / AzSPU HSSE Document Co-ordinator when record destruction date has been reached.

**Employees** – BP employees are responsible for compliance with this procedure with respect to BP records, consistent with AzSPU requirements.

## **5.0 Procedure**

### **5.1 Identification of Records**

Records are identified at AzSPU level (or below) and are maintained based on legal, regulatory and business requirements.

For records stored in **dK**, a Records List can be generated using the search functions available.

For records that are not stored in **dK**, a Records List is maintained at AzSPU / PU / Asset level by a designated individual (Record Control Personnel) that identifies, as a minimum, the:

- Record description.
- Storage location.
- Assigned owner of the record.

### **5.2 Records Filing and Accessibility**

Records shall be legible, identifiable and traceable to the activity, product, or service involved. Records are stored in identified secure locations and maintained in such a way that they are readily retrievable and protected against damage, deterioration, or loss. AzSPU Departments / PUs and / or Assets designate record storage areas for their operations, as appropriate.

### **5.3 Records Retention**

The purpose of the Records Retention Schedule is to:

- provide a foundation for creation and maintenance of record management programs;
- maintain record retention periods associated to categories of records; and
- ensure consistency of retention, regardless of the organisation's structure.

The AzSPU HSSE&S Record Retention Schedule is provided in Appendix 1.

## 5.4 Records Destruction

Records are destroyed after the retention period has expired and approval is gained from the Record Owner. A list of records for destruction is periodically produced by the designated individual (Record Control Personnel) at AzSPU / PU / Asset level and by the AzSPU HSSE Document Controller (for records stored in **dK**) and sent to the Record Owner for destruction approval.

Record Owners may give destruction approval, extension of retention period, or a "hold". A "hold" on a record is a deferment of destruction pending litigation, government investigation, audit, or identified as not for destruction due to business reasons. Record Owners may seek additional advice from the Legal Department pertaining to certain records prior to destruction.

Records approved for destruction will be removed from the records management program and the Records List (or **dK**) updated to show that the record has been destroyed. Hard copies of records will be removed from binders / hanging files and shredded. Electronic records will be destroyed, or recycled, in line with the universally accepted standard at the time.

## 6.0 Key Documents/Tools/References

- AzSPU Legal Department Records Retention Schedule – will be incorporated into the BP Global Records Management Website <http://recordsinfo.bpweb.bp.com>

## Review / Revision Log

Revision Date	Authority	Custodian	Revision Details
December 26, 2005	Gunther Newcombe	Yuliy Zaytsev	Initial version.
December 19, 2006	Gunther Newcombe	Yuliy Zaytsev	Appendix 1: HSSE&S Record Retention Schedule added. Reference to dK added. Additional information on Records Destruction added.
March 05, 2008	Yuliy Zaytsev (AzSPU HSSE MS & Compliance Manager)	Rebecca Heath (AzSPU HSSE MS Senior Advisor)	Appendix 1: HSSE&S Record Retention Schedule updated in line with revised AzSPU Legal Department Records Retention Schedule, AzSPU Permit to Work Procedure and feedback from PUs / Assets. Confirmation received from BP Georgia Legal Team regarding applicability of stated retention

			periods to their operations. Clarification provided regarding format that HSSE&S records can be stored in.
July 15, 2008	Yuliy Zaytsev (AzSPU HSSE MS & Compliance Manager)	Rebecca Heath (AzSPU HSSE MS Senior Advisor)	Appendix 1: HSSE&S Record Retention Schedule updated to include: - Retention periods of ISSOW Task Risk Assessments. - Additional information on HSSE&S Incident Report storage. - Retention period for External Environmental Reports. - Retention periods for dangerous, explosive, hazardous or flammable substances transportation records.
January 19, 2009	Yuliy Zaytsev (AzSPU Safety & Compliance Manager)	Rebecca Heath (AzSPU HSSE MS Senior Advisor)	Responsibilities of Record Owner clarified.
April 15, 2009	Yuliy Zaytsev (AzSPU Safety & Compliance Manager)	Rebecca Heath (AzSPU HSSE MS Senior Advisor)	Reference to COSHH requirements added to Record Retention Schedule.
May 1, 2010	Yuliy Zaytsev (AzSPU Safety & Compliance Manager)	Rebecca Heath (AzSPU HSSE MS Senior Advisor)	Annual review conducted of procedure. Validity of document extended to end of July 2010 when further clarity will be available on AzSPU reorganization, roles / responsibilities, and location of records.

## Appendix 1: AzSPU HSSE&S Record Retention Schedule

Note: For the purposes of this schedule “record” means any form of recorded information including paper, electronic copy (on server, CD-Rom, etc), microfilm, microfiche, photograph, map, email, voice message or other recorded information, personal drafts and handwritten notes.

Department	Record Type	Description	Owner	Office of Record	Retention Time	Reference	Uploaded to:
HSSE&S	Permits	PSAs, HGAs, IGAs, ESIAs, Technical Notes, ESIA Addendums and other publicly disclosed documents, e.g. Management and Monitoring Plans, Waste Management Plans, Public Consultation and Disclosure Plans, Community Liaison Programmes, ESAPs, SLIPs, Resettlement Action Plans, Environmental Assurance Reports, Environmental Risk Assessments, CDAP Reports. Regulatory approval letters.	AzSPU Safety & Compliance Systems Manager	HSE&TD	Termination plus 6 years (period should be measured from contract / agreement termination)	English law	dK
HSSE&S	Accreditation certificates	Records documenting the attainment and maintenance of accreditation under established management schemes.	AzSPU Safety & Compliance Systems Manager	HSE&TD	Termination of accreditation plus 1 year	NA	dK
HSSE&S	Training Records	Attendance Records	AzSPU HSE L&OD Team Leader	HSE&TD	5 years as a minimum	NA	VTA
HSSE&S	Training Documents	Training Materials (slides, presentations, handouts)	PU / Asset / Facility Training Manager	PU / Asset / Facility	3 years as a minimum	*	
HSSE&S	Audit Reports	Internal and External AzSPU Audit Reports	Audit Owner	HSE&TD	Completion of audit plus 5 years	NA	dK (Actions also in Traction)
HSSE&S	Audit Supporting Information	AzSPU Audit / Inspection Checklists	AzSPU Safety & Compliance Systems Manager	HSE&TD	3 years as a minimum	*	dK
HSSE&S	Audit Reports	PU / Asset Audit Reports	Audit Owner	PU / Asset	Completion of audit plus 5 years	NA	(Actions in Traction)
HSSE&S	Audit Supporting Information	PU / Asset Audit / Inspection Checklists	PU / Asset Env / H&S Manager	PU / Asset	3 years as a minimum	*	
HSSE&S	Task Risk Assessments (paper based PTW system)	Level 1 Task Risk Assessments Top page of permit only	Assets / Facilities	Site	1 year as a minimum	Based on BP Operations practices	
HSSE&S	Task Risk Assessments (paper based PTW system)	Level 2 Task Risk Assessments	Assets / Facilities	Site	5 years as a minimum	Azerbaijan law	
HSSE&S	Task Risk Assessments (ISSOW)	Level 1 and 2 Task Risk Assessment Operational Risk Assessment Stand alone Risk Assessment	Assets / Facilities	Site	5 years as a minimum	Azerbaijan law	Sentinel Pro database

Department	Record Type	Description	Owner	Office of Record	Retention Time	Reference	Uploaded to:
HSSE&S	Task Risk Assessments (ISSOW)	Worksite declaration of work party	Assets / Facilities	Site	1 month from completion	Based on BP Operations practices	Sentinel Pro database
HSSE&S	Annual Management Reviews	Slide packs, meeting minutes, actions, etc	AzSPU Safety & Compliance Systems Manager	HSE&TD	3 years as a minimum	*	dK
HSSE&S	External correspondence	Correspondence with Regulatory Agencies. Records of external enquiries from public, NGOs, non-regulatory agencies, etc.	AzSPU Environment Manager	HSE &TD	Current year plus 5 years	Azerbaijan law	AzSPU Environment Team Shared Drive
HSSE&S	Incident Reports	Minor incidents – severity level F-H. Scanned incident investigation records to be attached to Traction IR (witness statements, police statements, maps, risk assessments, etc). An exception to this is medical records which are treated as confidential information.	PU / Asset / Facility Safety Manager	Site	Current year plus 45 years	Azerbaijan law	Tr@ction
HSSE&S	Incident Reports	Major incidents – fatalities, workplace injuries and illness, security breaches, spills & leaks, vehicle accidents, near misses (G+ severity), process safety incidents and plant / integrity incidents.	PU / Asset / Facility Safety Manager	Site	Current year plus 45 years	Azerbaijan law	Tr@ction (plus original of Major Investigation Report to be kept at site and copies in SPU files and in Corporate HSE files)
Environment	External Environmental Reporting	Environmental reports submitted to MENR and other statutory bodies	PU / Asset Env Manager	PU / Asset and AzSPU Env Team	6 years after relevant PSA, HGA, IGA expired	NA	dK
Environment	External Inspection Records	MENR Acts (Reports on External Inspections)	AzSPU Environment Manager	HSE&TD	Current year plus 5 years	Azerbaijan law	dK
Environment	Internal Inspection Records	Asset / Facility Inspection Reports	Asset / Facility Env Manager	Site	3 years as a minimum	*	
Environment	Waste Records	Waste Transfer Notes / Waste Consignment Notes / Manifests. Hazardous Waste Shipment Forms. Waste Analysis Records. Facility waste records (tracking logs, inspections).	Asset / Facility Waste Manager	Site	3 years as a minimum	* and English law (hazardous waste)	
Environment	Dangerous, Explosive, Hazardous or Flammable Substances Transportation	Records related to the transportation of dangerous, explosive, hazardous or flammable substances. Includes shipping manifests.	PU / Asset Env Manager	PU / Asset	Indefinitely	BP UK Retention Period	
Environment	Environmental Monitoring Records	Emissions monitoring, sewage discharge monitoring, drainage monitoring, drilling discharges, etc	Asset / Facility Env Manager	Site	6 years after relevant PSA, HGA, IGA expired	NA (linked to permit retention period)	

Department	Record Type	Description	Owner	Office of Record	Retention Time	Reference	Uploaded to:
Environment	Ecological Monitoring Records	Integrated Ecological Monitoring Program Reports	AzSPU Environment Manager	HSE & TD	6 years after relevant PSA, HGA, IGA expired	NA (linked to permit retention period)	Ecological monitoring database
Environment	Calibration Logs		Asset / Facility Env Manager	Site	3 years as a minimum	*	
Health	Maintenance Reports	Potable water maintenance systems and logs.	Asset / Facility Maintenance Manager	Site	3 years as a minimum	*	
Health	Health Assessments	Pre-employment, pre-posting, travel, periodic, business travel, health exposure assessments (noise, hazardous substances, etc), post illness health assessments, etc	AzSPU Health Manager	Medical provider ISOS clinic	Current year plus 75 years (this period should be measured from the date of the relevant document)	Azerbaijan law	Clinic system
Health	Medical Certificates and Test Results	Scanned versions of pre-employment medical certificates, offshore medical certificates, etc. Hard copies of drug and alcohol test results and medical summary reports.	AzSPU Health Manager	HSE & TD and medical provider ISOS clinic	Current year plus 75 years (this period should be measured from the date of the relevant document)	Azerbaijan law	Clinic system
Health	Inspections / Testing	Inspection reports, potable water testing results, food testing results, etc.	AzSPU Health Manager	HSE & TD	3 years as a minimum	*	
Health	Inspections / Testing	Weekly inspections of local exhaust ventilation systems and PPE and annual maintenance, examination and testing of this equipment.	AzSPU Health Manager	HSE & TD	5 years as a minimum	COSHH	
Safety	STOPs	Safety Training Observation Programme	AzSPU Safety & Compliance Systems Manager	HSE&TD	3 years as a minimum	*	Web based STOP system
Safety	SOCs	Safety Observations and Conversations	AzSPU Safety & Compliance Systems Manager	HSE&TD	3 years as a minimum	*	Tr@ction
Safety		AzSPU Dashboards	AzSPU Safety & Compliance Systems Manager	HSE&TD	3 years as a minimum	*	
Security		Security incident database, internal investigation database	Azerbaijan Security Manager	Azerbaijan Security Org	3 years as a minimum. However, if transferred to employee personal files current year plus 75 years.	Azerbaijan law	
Security		Visitors registration log book	Azerbaijan Security Manager	Azerbaijan Security Org	3 years as a minimum	*	

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Department	Record Type	Description	Owner	Office of Record	Retention Time	Reference	Uploaded to:
Security		Badge request forms, lost badges log, property passes, staff search lists, material transfer dockets.	Azerbaijan Security Manager	Azerbaijan Security Org	3 years as a minimum	*	
Security		Weekly schedules, guard service working schedules, patrolling log book, shift handover logbooks, car registration log books, vehicle inspection checklists, vehicle maintenance sheets.	Azerbaijan Security Manager	Azerbaijan Security Org	3 years as a minimum	*	

\* In accordance with the "list describing the terms of storage of documents drawn up as a result of the activities of executive authorities, administrations, enterprises and organisations" approved by the National Archive Department of the Azerbaijan Republic (Certificate No: 3104, 9<sup>th</sup> December 2004 on the State Registration of Regulatory Legal Act) all organisations should keep their documents (excluding those related to personal or finance) for **3 years**. Therefore 3 years has been set as a minimum retention period for these records.