

#### **Policy Frameworks**

MP 0145/20

Effective from: 4 December 2020

# Information Storage Policy

#### 1. Purpose

The purpose of the *Information Storage Policy* is to facilitate storage of information practices across the WA health system which are consistent/compliant with relevant applicable legislative and policy requirements.

This Policy applies to all information generated, collected, accessed, used, managed, stored and disclosed by all WA health system entities including, but not limited to, information collected under the *State Records Act 2000*, *Health Services Act 2016*, *Health (Miscellaneous Provisions) Act 1911*, *Mental Health Act 2014*, *Private Hospital and Health Services Act 1927*, *Public Health Act 2016*, *Public Sector Management Act 1994*.

This Policy is a mandatory requirement under the *Information Management Policy Framework* pursuant to section 26(2)(k) of the *Health Services Act 2016*.

This Policy is a mandatory requirement for the Department of Health pursuant to section 29 of the *Public Sector Management Act 1994*.

This Policy supersedes Operational Directive 0559/14 *Information Storage and Disposal Policy*.

## 2. Applicability

This Policy is applicable to all WA health system entities, as defined in this Policy.

To the extent that the requirements contained within this Policy are applicable to the services purchased from contracted health entities, WA health system entities are responsible for ensuring these requirements are accurately reflected in the relevant contract and managed accordingly.

## 3. Policy requirements

All information collected by the WA health system needs to be managed and stored according to its classification and business requirements. Suitable storage conditions will ensure that information is managed, protected and accessible across the WA health system.

WA health system entities must:

- ensure that Health Service Providers develop local policies/procedures/processes related to information storage.
- ensure all employees within the WA health system, including contractors, subcontractors and agency personnel familiarise themselves with the relevant

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legislation, policies, guidelines, standards and procedures pertaining to the storage of information. The extent of these responsibilities will vary according to individual roles.

- ensure physical and technical security controls for physical, electronic and biological information systems guarantee the integrity of the information.
- ensure Staff Member compliance with the Record Keeping Awareness Training.

#### 3.1. Physical Records storage

WA health system entities must:

- ensure storage conditions for physical records are designed to protect the information not only from unauthorised access and theft, but from damage caused by vermin, fire, water, mould and natural disasters
- ensure physical records that have been transferred to a secondary storage facility
  are made available for retrieval if requested. Complete documentation of all records
  sent off-site, including barcoding records and storage boxes, will enable records to
  be easily located when required
- assure that the secondary storage facility is accountable for maintaining the required storage conditions in accordance with the applicable information storage contract and relevant WA health system policies, guidelines and procedures.
- ensure that physical records storage processes are carried out according to the State Records Office Standard 6: Outsourcing and State Records Commission Standard 7: State Archives Retained by Government Organizations and associated Archival Storage Specification.

### 3.2. Digital records storage

WA health system entities must:

- ensure storage conditions of digital records provide adequate protection while also allowing for easy accessibility of the record
- ensure information is not stored on external cloud services without agreements for the management of the information in accordance with WA health system policies and legislative requirements such as the *Freedom of Information Act 1992* and State Records Act 2000.
- ensure that record digitisation processes are carried out according to the State Records Office of Western Australia Standard 8 Managing Digital Information and the Digitization Specification Guidelines requirements.

## 3.3. Biological record storage

WA health system entities must:

• ensure storage conditions of Biological record provide adequate protection while also allowing for easy accessibility of the biological records.

## 4. Compliance monitoring

WA health systems entities are responsible for complying with this Policy.

The System Manager, through the Purchasing and System Performance Division, Department of Health, may carry out compliance audits to ascertain the level of WA health

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systems entities' compliance with this Policy and may provide updates to Information Stewards, Chief Executives of WA health system entities, the Director General and other relevant persons regarding the findings of compliance monitoring activities.

The Department of Health (Information and Performance Governance Unit), is responsible for monitoring and reporting Department of Health compliance with this Policy to Executive.

#### 5. Related documents

The following documents are mandatory pursuant to this Policy:

N/A

#### 6. Supporting information

The following information is not mandatory but informs and/or supports the implementation of this Policy:

• Information Storage Policy Resource Compendium

#### 7. Definitions

The following definition(s) are relevant to this Policy.

Term	Definition		
	Biological records are specimens taken from a patient. Examples are:		
Biological records	cell and tissues samples		
	blood samples		
	genetic samples.		
	Cloud services are defined as the delivery of on-demand data management services, including software		
Cloud services	applications, storage and processing power, typically via		
Cloud Services	the public internet. There are three main types of cloud		
	services available for purchase 'as a service'.		
Digital record	Digital records are records that are either born digital or have been digitised from a physical format. Examples are:  • Born digital records such as photographs, videos, audios, information contained within databases  • Patient records that have been scanned into a digital format such as the various medical information contained in the paper-based record.  Refers to the creation of digital images from paper		
Digitisation	documents by such means as scanning.		
Information	The terms 'information' generally refers to data that has been processed in such a way as to be meaningful to the person who receives it. Information can be personal or non-personal in nature.		
Physical Record	Physical records are records that can be touched and take up physical space, for example:  • Paper based records including:		

	<ul> <li>Medical records</li> <li>HR hard copy files</li> <li>Hard copy corporate files</li> <li>Non-digital photographs, videotapes, films and audiotapes</li> <li>Microforms (microfilm and microfiche)</li> </ul>
WA health system entities	<ul> <li>Non-digital diagnostics information.</li> <li>All Health Service Providers as established by an order made under section 32(1)(b) of the Health Services Act 2016;</li> <li>The Department of Health as an administrative division of the State of Western Australia pursuant to section 35 of the Public Sector Management Act 1994.</li> <li>Note: Contracted health entities are not considered WA health system entities.</li> </ul>

# 8. Policy contact

Enquiries relating to this Policy may be directed to:

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#### 9. Document control

Version	Published date	Effective from	Review date	Effective to	Amendment (s)
MP 0145/20	4 December 2020	4 December 2020	December 2023	Current	Original version

# 10. Approval

Approval by	Nicole O'Keefe, Assistant Director General, Strategy and Governance Division, Department of Health
Approval date	21 November 2020

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