



Command Centre Access and Disclosure of Call Recordings Procedure

1. Purpose

The purpose of this procedure is to facilitate lawful and appropriate access, use, disclosure and storage of WA Country Health Service (WACHS) Command Centre call recordings and complies with the requirements of the [Information Management Policy Framework](#).

All inbound and outbound calls to and from the Command Centre are recorded using endorsed WA Health telephony systems. Command Centre call recording is invaluable with assisting in the review and improvement of service delivery, policy development, service planning, training and education, evaluating health system performance and identifying emerging risks or issues.

2. Procedure



ATTENTION

All staff must be aware that call recordings and transcripts may contain voices or names of deceased persons.

2.1 Access to the WACHS Call Recording Environment

Access to the WACHS Command Centre Call Recording environment is restricted to the role of WACHS Authorised Account Users. No other individual, role or organisation is permitted access without the consent of the appropriate Data Custodian and/or Steward as per the WACHS [Command Centre Call Recording Access and Disclosure Matrix](#).

2.2 Request of Call Recordings

All requests for call recordings must be submitted using the [WA Health Information Request Form](#) and each request (regardless of outcome) must be recorded within the WACHS [Command Centres Information Request Register](#) (this link is only accessible to authorised staff). All request forms should be submitted to the WACHS Command Centre via email to wachs.cc@health.wa.gov.au.

Individuals requesting access to call recordings must consider if their application is appropriate and ensure all other information resources have been utilised prior to request. Due to the potential sensitive nature of information contained within call recordings, retrieval of these records is to be the final method of information gathering, if unable to be gathered by any other means.

Examples of appropriate use:

Example	Considerations
Safety and Quality audits, clinical investigations, and stakeholder feedback management.	Ensure all requests are discussed with the regional WACHS Patient Safety & Quality Manager and/or WACHS Program Manager Clinical Risk Management prior to their submission.
Medico-legal including Freedom of Information, court orders and coroner requests.	Ensure all requests are discussed with your regional WACHS Freedom of Information Coordinator prior to their submission.
Command Centre education and training activities including employee induction and development activities.	Ensure all requests are discussed with the Director of Operations Hub and/or Command Centre Medical Director prior to their submission.

It is the responsibility of the WACHS Command Centre Health Information Manager to coordinate the review of the request. All records related to a request must be saved into a yearly Records Manager (RM) folder under the Command Centre classification structure with accessibility restricted to the WACHS Authorised Account Users. All relevant parties involved in the call and/or managers are to be notified of the disclosure of recordings.

WACHS Internal Education and Training Activities

The request is to be reviewed by the WACHS Command Centre Medical Director and/or Director of Operations Hub and assessed if it is appropriate to release the information (recording and/or transcript) in accordance with applicable legislation and/or policies as outlined within the WACHS [Command Centre Call Recording Access and Disclosure Matrix](#).

It is the responsibility of the WACHS Command Centre Medical Director and/or Director of Operations Hub to assess if further review is required as per [External Recipients / Special Circumstances](#).

WACHS Internal Safety and Quality Activities

The request is to be reviewed by the Information Custodian (or delegate) and assessed if it is appropriate to release the information (recording and/or transcript) in accordance with applicable legislation and/or policies as outlined within the WACHS [Command Centre Call Recording Access and Disclosure Matrix](#).

This is to include a classification of the information being requested in accordance to the WA Health MP 0146/20 [Information Classification Policy](#) and WACHS [Command Centre Call Recording Access and Disclosure Matrix](#). It is the responsibility of the Information Custodian (or delegate) to assess if further review is required as per [External Recipients / Special Circumstances](#).

External Recipients / Special Circumstances

The request is to be reviewed by the Data Custodian and/or Steward, and assessed if it is appropriate to release the information (recording and/or transcript) in accordance with applicable legislation and/or policies as outlined within the WACHS [Command Centre Call Recording Access and Disclosure Matrix](#).

The recording(s) are also to be reviewed by a representative nominated by the Data Custodian and/or Steward, for example WACHS Public Relations Officer and/or Legal Services representative, depending upon the information contained within the recording.

2.3 Disclosure of Call Recordings

It is the responsibility of the WACHS Command Centre Health Information Manager to securely transfer approved call recording(s) request records to the authorised recipient(s) using the Kiteworks application as an encrypted email, with the ability to forward removed and password protection applied.

A receipt of goods is to be provided by email from Kiteworks to the sender indicating the legal transfer of information to the authorised recipient(s). The receipt of goods is to be saved as a record in the requests secured RM folder.

If the recording(s) cannot be transferred via Kiteworks, they must be delivered on an encrypted and password protected USB to the recipient in person.

2.4 Storage of Call Recordings and Request Documentation

All WACHS corporate records must be stored in the approved recordkeeping system in alignment to the WACHS [Corporate Recordkeeping Compliance Policy](#) and WACHS [Health Record Management Policy](#). As per [Section 2.2](#) copies of the recording(s) must be saved into a yearly RM folder under the Command Centre classification structure with accessibility restricted to the WACHS Authorised Account Users.

Authorised recipients of the call recording(s) are also responsible for the secure storage of the recordings physically, technically and virtually in alignment to MP 0067/17 [Information Security Policy](#).

2.5 Disposal of Call Recordings

Disposal, destruction or deletion of call recordings must be undertaken in alignment to their classification's retention period. Authorised users and recipients should refer to MP 0144/20 [Information Retention and Disposal Schedule Policy](#) and WACHS [Corporate Records Management Procedure](#).

3. Roles and Responsibilities

The **Chief Executive** is the Data Steward and is responsible for:

- ensuring that an organisational system for the capture and management of records is maintained and compliant with legislative requirements and best practice standards

- has an authorising role for call recordings requested and required for Safety and Quality, Clinical Incident reviews external to WACHS (inclusive of requests pertaining to legal or court order purposes) and all other special circumstances for external recipients. This may be in collaboration/ advice of the WACHS Public Relations and/or Legal Services team as required.

The **WACHS Executive** have a duty to ensure that WACHS maintains proper and accurate records.

The **Executive Directors and Line Managers** of WACHS staff are to ensure that when reviewing safety and quality concerns related to patient transfers, all regional resources and documentation are to be utilised before requesting Command Centre assistance for the retrieval of call recordings.

The **WACHS Chief Operating Officer** is the Information Custodian for call recordings requested and required for Clinical Incident review (internal to WACHS).

The **WACHS Command Centre Director** are to ensure that:

- services are provided according to the needs of the organisation and/or local clinicians
- call recordings requested and required for education and training purposes only (internal to WACHS) and as delegated by the Data Custodian and/or Steward.

The **WACHS Command Centre Health Information Manager** is to ensure:

- all requests are documented within the Command Centre Information Request Register and submitted using the appropriate WA Health Information Release form
- that requests for information are suitable prior to submission for approval to access
- call recordings are requested, stored, and utilised in line with this policy
- call recordings are securely transferred to recipients at all times.

The **WACHS Authorised Account Users** are:

- to ensure that the information for which they are responsible, regardless of its location, is classified in line with this policy
- responsible for accessing and collation of the required call recordings within a designated timeframe
- responsible for ensuring access to the Kiteworks application
- WACHS Customer account holder of the WACHS Call Recording environment with full access to smart search for retrieving call recordings
- to ensure all retrieved call recordings are captured in Records Manager and maintained in line with this procedure.

The **WACHS Authorised Account Users** (Request Administrators) are:

- WACHS Chief Operating Officer
- WACHS Command Centre Director
- WACHS Command Centre Medical Director
- WACHS Operations Hub Director
- WACHS Command Centre Health Information Manager

All Staff are required to adhere to all legislative and policy obligations relevant to their day-to-day work as a WACHS employee. In accordance with this requirement, WACHS staff must:

- complete Confidentiality and Recordkeeping Awareness Training

- possess a good understanding of legislative and policy obligations and subsequent compliance requirements as they relate to recordkeeping and their position
- observe and comply with procedures used for compliance with recordkeeping
- provide timely and adequate information to enable effective assessment and treatment of patients
- maintain records of all patients referred to the WACHS Command Centre in alignment to existing WACHS Freedom of Information and Release of Information policies.

All staff are required to work within policies and guidelines to make sure that WACHS is a safe, equitable and positive place to be.

4. Monitoring and Evaluation

4.1 Monitoring

Monitoring of compliance with this procedure is the responsibility of the Command Centre Health Information Manager, Command Centre Director and Chief Operating Officer. Compliance is monitored through monthly reporting and annual audits.

Audits are to contain whether the process is generating the expected outcomes and is aligned with any statutory or regulatory compliance obligations. Reports are to contain information inclusive of the number of requests by requesting area, reason for request, outcome of the request and the reason for all rejected requests.

4.2 Evaluation

The WACHS Command Centre Health Information Manager is responsible for ensuring evaluation is completed annually or sooner if required. Information obtained from monthly and annual audits is to be included in the procedure's evaluation. In addition, Policy and subject matter experts are to be asked to provide an opinion of compliance to legislation, regulation, recommendations, strategies, or framework obligations.

5. Compliance

This procedure is a mandatory requirement for the recording and disclosure of recordings under the MP 0015/16 [Information Access, Use and Disclosure Policy](#), to ensure lawful and appropriate access, use and disclosure of information contained within call recordings.

Failure to comply with this procedure may constitute a breach of the WA Health Code of Conduct (Code). The Code is part of the [Integrity Policy Framework](#) issued pursuant to Section 26 of the [Health Services Act 2016](#) and is binding on all WACHS staff which for this purpose includes trainees, students, volunteers, researchers, contractors for service (including all visiting health professionals and agency staff) and persons delivering training or education within WACHS.

WACHS staff are reminded that compliance with all policies and procedures is mandatory.

6. References

WACHS [Recordkeeping Plan \(RKP\)](#)

7. Definitions

Term	Definition
Call Recording	Recorded audio information from the WACHS Command Centre telephony devices stored as secure digital audio files in the WACHS approved Call Recording environment.
Confidentiality	Obligation imposed on persons by common law, statute and /or equity which requires that information of a certain character (e.g., personal, or otherwise sensitive information) be treated in confidence by those to whom it is made known or becomes known.
External recipients	All non-WA Health requestors which includes services contracted by WA Health to deliver services.
Information Classification	Business-level process whereby the sensitivity of a piece of information (or collection of information) is evaluated such that the sensitivity is to be clear to those who access it subsequently.
Kiteworks	Secure file hosting and transfer application used by WA Health.
Record	Recorded information (regardless of form or medium) created, received and maintained by the organisation in pursuance of its legal obligations or in the transaction of business.
Recordkeeping	The systematic organisation and control of recorded information in any format from the time it is created to its final disposition.
Records Management	A systematic approach to the creation, maintenance, use and disposition of records.
Sensitive Information	Information that might result in an adverse impact(s) on an individual, the WA health system, the government and/or other third parties.

8. Document summary

Coverage	WACHS Command Centre
Audience	Staff who coordinate or request call recording records or information.
Records Management	Non-Clinical: Corporate Recordkeeping Compliance Policy Clinical: Health Record Management Policy
Related Legislation	<ul style="list-style-type: none"> • Health Services Act 2016 (WA) • Freedom of Information Act 1992 (WA) • State Records Act 2000 (WA)
Related Mandatory Policies / Frameworks	<ul style="list-style-type: none"> • MP 0015/16 Information Access, Use and Disclosure Policy • MP 0067/17 Information Security Policy • MP 0124/19 Code of Conduct Policy • MP 0144/20 Information Retention and Disposal Policy • MP 0146/20 Information Classification Policy • Information Management Policy Framework • Protective Security Policy Framework
Related WACHS Policy Documents	<ul style="list-style-type: none"> • Corporate Records Management Procedure • Recordkeeping Plan (RKP)
Other Related Documents	<ul style="list-style-type: none"> • Australian Institute of Health and Welfare Five Safes Framework • Australian Standards - 15489.1: 2017 - Records Management • State Records Commission Standards • WA Government Digital Cyber Security Policy
Related Forms	<ul style="list-style-type: none"> • WA Health Information Request Form • WA Health Information Disclosure Form
Related Training Packages	<p>The following packages are accessible from MyLearning:</p> <ul style="list-style-type: none"> • Confidentiality (IMCON EL2) • Freedom of Information and Release of Information (FROI EL2) • Recordkeeping Awareness Training (RAT)
Aboriginal Health Impact Statement Declaration (ISD)	ISD Record ID: 2666
National Safety and Quality Health Service (NSQHS) Standards	1.16, 1.18
Aged Care Quality Standards	8.3c(i)
Chief Psychiatrist's Standards for Clinical Care	Nil

9. Document Control

Version	Effective Date	Current from	Summary of changes
1.00	23 April 2024	23 April 2024	New Procedure.
1.01	27 June 2024	23 April 2024	Minor amendment to Section 2 – Examples of appropriate use, paragraph updated to include: <ul style="list-style-type: none"> ‘All relevant parties involved in the call and/or managers are to be notified of the disclosure of recordings.’

10. Approval

Policy Owner	Chief Operating Officer
Co-approver	Executive Director Business Services
Contact	Command Centre Health Information Manager
Business Unit	Command Centre
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