



Information Classification and Handling Policy

1. Background

The purpose of this policy is to provide a consistent approach across WA Country Health Service (WACHS) for the classification of information assets, including providing the minimum requirements and responsibilities of WACHS employees.

This policy has been developed in accordance with the [WA Health Information Management Policy Framework](#) and the WACHS Recordkeeping Plan (RKP).

2. Policy Statement

Information and records management must comply with the WA Health Mandatory Policy [MP0146/20 Information Classification Policy](#). The classification of information assets with respect to sensitivity and risk ensures baseline security controls are in place for the protection of WA Health information assets.

2.1 Information Classification Categories

As per [MP0146/20 Information Classification Policy](#), there are three information classification categories to be used to classify information assets and records:

	Classification	Definition
1.	Unofficial	Information not related to official work duties.
2.	Official	Information created or processes in the WA health system as part of the business of Government. This includes records and information assets pertaining to Department of State, System Manager and Health Service Provider (HSP) functions.
3.	Official: Sensitive	Official information that could result in damage to individuals, organisations or government if released.

In addition to the above classifications, WACHS may receive or handle information designated as either 'Commonwealth Security Classified' or 'Cabinet Information' which must be handled appropriately;

- Commonwealth Security Classified information is to be classified and handled in accordance with the relevant provision(s) of applicable inter-jurisdiction agreement(s);
- Cabinet Information is to always be classified as 'Official: Sensitive' and handled in accordance with the [Government of Western Australia Cabinet Handbook](#).

When information is created, substantially altered or received, the originator or owner is responsible for conducting an information classification assessment and applying classification as appropriate.

There is no requirement to conduct a classification process on existing information or records until they are used. At this point, prior to sharing the information or record, the classification should be reviewed.

2.2 Electronic Document Record Management System (EDRMS)

WACHS has endorsed the use of HPE Records Manager (RM) as the Electronic Document Record Management System (EDRMS). RM terminology has been mapped to the approved terms below:

Classification	RM Terminology (mapping)
Unofficial	Not maintained in RM
Official	Protected (internal use)
Official: Sensitive	Confidential

Further to this, RM allows for additional security caveats to be applied to internal structures (folders) and documents. This is undertaken on request and should be undertaken using a risk approach based on the document(s) being restricted.

2.3 Corporate records

Corporate records include Official and Official: Sensitive information generated, managed or received by WACHS. They should be captured and managed in accordance with the [WACHS Records Management Policy](#).

WACHS acknowledges that it holds and manages datasets in applications and systems other than Records Manager for the purpose of conducting its business. Those datasets are to be classified in line with this policy by their respective custodians at the time of substantial changes or upgrades. New and future datasets are to be classified in line with this policy at the time of development or acquisition.

2.4 Healthcare Records

Healthcare Records (patient records) are all considered Official: Sensitive due to the confidential nature of information collected and maintained in health records. Healthcare Records are not primarily to be maintained in the EDRMS, rather all health information should be captured and maintained in accordance with the [WACHS Health Record Management Policy](#).

Healthcare Records that form part of a broader corporate record (e.g. Freedom of Information (FOI) requests and Clinical Incident (CI) reviews) or that require digital capture for a business workflow/process must be digitised and saved in the EDRMS as Official: Sensitive (Confidential) with appropriate security caveats.

2.5 Security

For the protection of Unofficial, Official, and Official: Sensitive information, WACHS is required to comply with the requirements of the [WA Government Digital Security Policy](#) and [MP 0067/17 Information Security Policy](#).

For the protection of Commonwealth Security Classified information, WACHS is required to comply with the provisions of the relevant inter-jurisdictional agreement(s) (see the Commonwealth's [Protective Security Policy Framework](#)).

2.6 Information Management Governance

WACHS provides a contemporary approach to the management of information held in all digital and non-digital formats including physical (paper) records. Information assets should be classified using a risk approach, with Stewards, Sponsors, Custodians and Administrators determining the risk to individuals, organisations and government that may be caused by inappropriate handling or release.

The [WA Health Five Safes Framework](#) allows information asset Stewards, Sponsors, Custodians and Administrators to identify risks and implement controls and risk mitigation strategies. The model also provides a means of aligning the degree of control required in a manner that is appropriate for the information. It ensures that information risk management is a consideration across the organisation when information sharing is occurring.



User Checklist	
Safe Purpose	<ul style="list-style-type: none"> • Is the purpose for which information is to be shared and used appropriate? • Is it for the public good and will it provide value? • Are there unreasonable risks or detriments if the sharing does not occur?
Safe People	<ul style="list-style-type: none"> • Is the organisation receiving the information an appropriate recipient? • Do their staff have the right level of skills and experience? • Will they restrict the information to the right people?
Safe Environment	<ul style="list-style-type: none"> • Is the environment in which the information will be stored, accessed and used appropriate? • Does it have the right level of security? • What is the likelihood of deliberate or accidental disclosure?
Safe Data	<ul style="list-style-type: none"> • Is the information to be shared appropriate for the proposed purpose? • If the data is to be de-identified, how will this occur?
Safe Outputs	<ul style="list-style-type: none"> • Is the proposed publication or disclosure of the information appropriate? What is the risk of identifying individuals?

3. Definitions

Administrator	Implements rules on behalf of the Custodian and provides technical and administrative support for the information asset.
Cabinet Information	Confidential cabinet documents, discussions and decisions as governed by the <i>Government of Western Australia Cabinet Handbook</i> .
Commonwealth Security Classified	Information classification for information either originating from, or shared with, the Australian Government under an applicable inter-jurisdictional agreement.
Custodian	Implements policy on behalf of the steward and has the delegation authority for granting access, use and disclosure of information from Information assets in line with legislation and policy.
Electronic Document Record Management System (EDRMS)	An automated system used to manage the creation, use, management and disposal of physical and electronically created documents and records for the purpose of; <ul style="list-style-type: none"> • supporting creation, revision and management of records • managing the retention and disposal of records • improving an organisation’s workflow • providing evidence of business activities.
Health Information	Section 213 of the <i>Health Services Act 2016</i> , (a) information, or an opinion, that is also personal information about: <ol style="list-style-type: none"> i. the health (at any time) of an individual; or ii. a disability (at any time) of an individual; or iii. an individual’s expressed wishes about the future provision of health services to the individual; or iv. a health service provided, or to be provided, to an individual; or v. other personal information collected to provide, or in providing, a health service.
Information	The term ‘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.
Information Asset	A collection of information that is recognised as having value for the purpose of enabling the WA health system to perform its clinical and business functions, which include supporting processes, information flows, reporting and analytics.

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Always source the current version from [WACHS HealthPoint Policies](#).

Information Classification	Business-level process whereby the sensitivity of a piece of information (or collection of information) is evaluated such that the sensitivity will be clear to those who access it subsequently.
Information Management Governance	A holistic approach to managing the WA health system's information by implementing processes, roles, controls and metrics that treat information as a valuable business asset.
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.
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.
Sponsor	Assists the Steward in the operation of managing allocate Information Assets outlined in the relevant delegation schedule.
State Records	Any form of information created, received or maintained by a government agency or parliamentary department in the course of conducting its business activities.
Steward	The delegated authority for the information assets outlined within the associated delegation schedule.

4. Roles and Responsibilities

WACHS Board governs the Health Service Provider constituted under section 71 of the *Health Services Act 2016*. The functions of the Board are set out in section 34 of the *Health Services Act 2016*. The WACHS Board is responsible for governing the organisations records management.

WACHS Executive are to ensure an organisational system for the capture and management of records is maintained and that WACHS is compliant with the legislative requirements and best practice standards.

Information Stewards and Custodians are to ensure that the information for which they are responsible, regardless of its location, is classified in line with this policy.

Managers are responsible for ensuring staff create and keep records as an integral part of their work in accordance with this policy and the WACHS Recordkeeping Plan.

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 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.

5. Compliance

This policy is a mandatory requirement under the [Health Services Act 2016](#) (WA). Failure to comply with this policy 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](#) (WA) 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 is mandatory.

6. Records Management

All WACHS corporate records must be stored in the approved Electronic Documents and Records Management System as outlined in the WACHS [Records Management Policy](#).

7. Evaluation

Evaluation of this policy is to be carried out by the Informatics Manager. The following means or tools may include, but not limited to:

- Participation rates for records management training measured against current staffing levels;
- Regular compliance auditing/reporting on the EDRMS to ensure appropriate records are kept and confirm to classification and retention and disposal requirements.
- Reporting in the WACHS Annual Report
- A complete review of the WACHS Recordkeeping Plan (RKP) every five years.

8. Standards

[National Safety and Quality Health Service Standards – 1](#)

9. Legislation

[Health Services Act 2016](#) (WA)
[State Records Act 2000](#) (WA)
[Public Sector Management Act 1994](#) (WA)
[Freedom of Information Act 1992](#) (WA)

[Criminal Code Act 1913 \(WA\)](#)
[Electronic Transactions Act 2011 \(WA\)](#)
[Evidence Act 1906 \(WA\)](#)
[Financial Management Act 2006 \(WA\)](#)

10. References

[WA Information Classification Policy](#)
[State Records Commission of WA Principles and Standards](#)
[WACHS Authorisation Schedule \(Intranet Link\)](#)
[WA Health Information Access, Use and Disclosure Policy Resource Compendium](#)
[Government of Western Australia Cabinet Handbook](#)
[WA Government Digital Security Policy](#)
[Commonwealth Protective Security Policy Framework](#)

11. Related Policy Documents

[Health Record Management Policy](#)
[Records Management Policy](#)

12. Related WA Health System Mandatory Policies

[MP 0146/20 Information Classification Policy](#)
[MP 0015/16 Information Access, Use and Disclosure Policy](#)
[MP 0067/17 Information Security Policy.](#)
[MP 0152/21 Information Management Governance Policy](#)

13. Policy Framework

[Information Management Policy Framework](#)

This document can be made available in alternative formats on request for a person with a disability

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