



Government of **Western Australia**
Department of **Health**

Information Storage Policy Resource Compendium



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Owner:	Department of Health, Western Australia
Contact:	Information and System Performance Directorate
Approved by:	
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1. Purpose

The Information Storage Policy Resource Compendium is a supporting document in the Information Storage Policy. The purpose of the compendium is to provide context, background information and resources to assist stakeholders comply with the mandated requirements in the Information Storage Policy. The compendium is not mandatory unless the requirement is mandated in the policy.

2. Introduction

The Information Storage Policy ensures WA health system information is stored, classified, secured and accessible in a consistent and timely manner. This is achieved by outlining the relevant associated policies and procedures concerning storage.

The Information Storage Policy sits under the [Information Management Policy Framework](#). The key policy drivers for the Information Storage Policy are outlined in Figure 1. The legislative and policy framework as well as the State and National health agendas inform the Information Storage Policy.

Figure 1: Key Policy drivers



For an in depth overview of the key policy drivers that influence the Information Storage Policy and other Information Management Policies, see the [Information Access Use and Disclosure Information Policy Resource Compendium](#)¹.

3. Information Storage

The WA health system creates and collects a vast amount of information, much of which is confidential personal information. Information collected by the WA health system is an important resource used for the clinical care of patients, health service planning, monitoring, improvement and medical research. This information is vital to patient safety and wellbeing and must be managed with consideration for its confidentiality and sensitivity.

The WA health system is committed to ensuring that information which supports the provision of health care is readily available to authorised users, when and where it is needed. All information needs to be managed and stored according to its classification, business requirements. Suitable storage conditions will ensure that information is managed, protected and accessible across the WA health system.

For this policy, information can be in physical, digital or biological formats. It includes collections of patient information, corporate, financial and workforce information where one or more of the following conditions are met:

- the information is used to meet business, operational and legislative requirements
- the State of Western Australia has a strategic need for the information
- the data collection contains personal health information
- the data collection is used for reporting at a state level, national level or external to the health service where the data collection resides
- the data collection is used across multiple health services.

Please note WA health system information is to be classified in accordance with the [Information Classification Policy](#)²

The [Information Security Policy](#)³ documents safeguards for ICT equipment and information. The [Patient Information Retention and Disposal Schedule Policy](#)⁴ mandates retention and disposal requirements for information held within the WA health system.

3.1. Storage of Physical Records

Physical records are records that can be touched and take up physical space, for example:

- Paper based records including:
 - medical records
 - HR hard copy files
 - hard copy corporate files

- Non-digital photographs, videotapes, films and audiotapes
- Microforms (microfilm and microfiche)
- Non-digital diagnostics information.

Storage conditions for physical records must be designed to protect information not only from unauthorised access and theft, but from damage that can be caused by vermin, fire, water, mould and natural disasters.

Physical records that are considered to have a permanent or continuing value should be stored in conditions that satisfy the State Records Commission record keeping requirements for government organisations. The *Environmental and Safety and Protection Minimum Requirements for Paper Records* ([Appendix 1](#)) outlines the minimum storage requirements for paper records. For more information see the [State Records Commission Standard 7 - State Archives Retained by Government Organisations](#)⁵ and [archival storage specifications](#)⁶

Semi-active (required infrequently, for example, once a year) or inactive hard copy records may be stored in secondary storage facilities, either in-house or in a commercial facility approved under a Common Use Arrangement (CUA) established by the Office of Government Procurement (refer to [Department of Finance – Buyers Guide - Storage, Retrieval and Destruction for Paper and Electronic Records \(CUA 34504 & 123499\)](#)⁷). As the CUA is not mandatory for regional areas, the WA Country Health Service (WACHS) is able to enter into agreements with local offsite storage providers.

Outsourcing storage of physical records does not lessen the obligation to ensure records are secured, managed and made accessible. The secondary storage provider is responsible for maintaining the required storage conditions. For more information see [State Records Commission Standard 6 - Outsourcing](#)⁸.

3.2. Storage of Digital Information

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.
- Source records that have been scanned into a digital format and captured to an eDRM.
- Patient records that have been scanned into a digital format such as the various medical information contained in the paper-based record.

The record digitisation processes are carried out according to the State Records Office of Western Australia Standard 8 Managing Digital Information and the State Records Office of Western Australia Digitization Specification Guidelines requirements. Records should be stored in an approved eDRMS, business system with records management functions or physical records management system.

The [Information Security Policy](#)³ outlines the security controls required to be implemented, monitored and reviewed across the WA health system. The purpose of this Policy is to ensure:

- appropriate information security controls are in place to protect health information
- and systems from theft, fraud, malicious or accidental damage, and privacy or confidentiality breaches; and alignment with Australian Standards for Information Security.

3.2.1. Digitisation of records

The State Records Office of Western Australia outlines the requirements for records digitisation processes. The State Records Office [Standard 8 Managing Digital Information](#)⁹ provides guidance on requirements for storage of digital records. Also see State Records Office [Digitization Specification Guidelines](#)¹⁰.

3.2.2. Cloud Computing

Cloud computing is a term used to describe a method of storing information on a server located externally, made accessible via the internet. For more information refer to the [Cloud Policy](#)¹¹.

3.3. Storage of Biological Records

Biological records are specimens taken from a patient. Examples are:

- cell and tissues samples
- blood samples
- genetic samples

Biological record storage requirements are outlined in the [Therapeutic Goods Administration: Biological standards](#)¹².

4. Glossary

Term	Meaning
Biological	Biological records are specimens taken from a patient. Examples are: <ul style="list-style-type: none"> • cell and tissues samples • blood samples • genetic samples.
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.
Data	The term ‘data’ generally refers to unprocessed numbers, facts or statistics, while the term ‘information’ refers to data that has been processed in such a way as to be meaningful to the person who receives it. The terms ‘data’ and ‘information’ are often used interchangeably and should be taken to mean both data and information.
Data Collection	A systematic gathering or organised collection of data, in any format, including manual entry into an application system, questionnaires, interviews, observation, existing records and electronic devices. This includes, but is not limited to, information stored in enterprise systems, local systems and data warehouses.
Digital record	Digital records are records that are either born digital or have been digitised from a physical format. Examples are: <ul style="list-style-type: none"> • 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. • source records that have been scanned into a digital format and captured to an Electronic Document and Records Management System (eDRMS).
Digitisation	Refers to the creation of digital images from paper documents by such means as scanning.
Digitised record	Include records produced by digitisation. Digitised record and scanned health record are synonymous in this document.

Term	Meaning
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.
Personal information	Has the meaning given in the Freedom of Information Act 1992 in the Glossary clause 1: Means information or an opinion, whether true or not, and whether recorded in a material form or not, about an individual, whether living or dead — (a) whose identity is apparent or can reasonably be ascertained from the information or opinion; or (b) who can be identified by reference to an identification number or other identifying particular such as a fingerprint, retina print or body sample.
Physical Record	Physical records are records that can be touched and take up physical space, for example: <ul style="list-style-type: none"> • paper based records including: <ul style="list-style-type: none"> • medical records • HR hard copy files • Hard copy corporate files • Non-digital photographs, videotapes, films and audiotapes • Microforms (microfilm and microfiche) • Non-digital diagnostics information.
WA health system	Pursuant to section 19(1) of the Health Services Act 2016, the WA health system means the Department of Health, Health Service Providers and to the extent Contracted Health Entities provide health services to the State, the Contacted Health Entities.
WA health system entities	<ul style="list-style-type: none"> • All Health Service Providers as established by an order made under section 32(1)(b) of the Health Services Act 2016; • 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. <p>Note: Contracted health entities are not considered WA health system entities.</p>

5. References

- 1 Western Australian Government. (2014). *Information Access, Use and Disclosure Policy Resource Compendium*. Department of Health, Perth. Available from: <https://ww2.health.wa.gov.au/About-us/Policy-frameworks/Information-Management/Mandatory-requirements/Access-Use-and-Disclosure/Information-Access-Use-and-Disclosure-Policy> (accessed 9 July 2020).
- 2 Western Australian Government. (2014). *Information Classification Policy*. Department of Health, Perth. Available from: <https://ww2.health.wa.gov.au/About-us/Policy-frameworks/Information-Management/Mandatory-requirements/Access-Use-and-Disclosure/Information-Classification-Policy> (accessed 9 July 2020).
- 3 Western Australian Government. (2019). *Information Security Policy*. Department of Health, Perth. Available from: <https://ww2.health.wa.gov.au/About-us/Policy-frameworks/Information-and-Communications-Technology/Mandatory-requirements/Information-Security-Policy>(accessed 9 July 2020).
- 4 Western Australian Government. (2014). *Patient Information Retention and Disposal Schedule Policy*. Western Australian Government, Perth. Available from: <https://ww2.health.wa.gov.au/About-us/Policy-frameworks/Information-Management/Mandatory-requirements/Storage-and-Disposal/Patient-Information-Retention-and-Disposal-Schedule-Policy> (accessed 9 July 2020).
- 5 Western Australian Government. (2016). *State Records Commission Standard 8 Managing Digital Information*. State Records Commission. Western Australian Government, Perth. Available from: https://www.sro.wa.gov.au/sites/default/files/src_standard_7_-_june_2016.pdf (accessed 7th October 2020).
- 6 Western Australian Government. (2016). *State Records Office Guideline Archival Storage specifications*. Western Australian Government, Perth. Available from: https://www.sro.wa.gov.au/sites/default/files/archival_storage_specification_-_june_2016.pdf (accessed 7th October 2020).
- 7 Western Australian Government. (2015). *Department of Finance – Storage, Retrieval and Destruction for Paper and Electronic Records (CUA 34504&123499)*. Western Australian Government, Perth. Available from: <https://www.wa.gov.au/government/cuas/storage-retrieval-destruction-and-digitisation-of-paper-and-electronic-records-cuarec2015> (accessed 9 July 2020).

- 8 Western Australian Government. (2016). State Records Office Guideline Archival Storage specifications. Western Australian Government, Perth. Available from: [State Records Commission Standard 6 - Outsourcing](#) (accessed 7th October 2020).
- 9 Western Australian Government. (2016). *State Records Commission Standard 8 Managing Digital Information*. State Records Commission. Western Australian Government, Perth. Available from: www.sro.wa.gov.au/sites/default/files/src_standard_8_-_june_2016.pdf (accessed 9 July 2020).
- 10 Western Australian Government. (2016). *Digitization Specification*. State Records Commission. Western Australian Government, Perth. Available from: http://www.sro.wa.gov.au/sites/default/files/digitization_specification_2018_amendment_2.pdf (accessed 9 July 2020).
- 11 Western Australian Government. (2020). *Cloud Policy*. Western Australian Government, Perth. Available from: <https://ww2.health.wa.gov.au/About-us/Policy-frameworks/Information-and-Communications-Technology/Mandatory-requirements/Cloud-Policy> (accessed 29 July 2020).
- 12 Therapeutic Goods Administration. (2020). *Biological standards*. Australian Government: ACT. Available from: <https://www.tga.gov.au/biological-standards> (accessed 7th October 2020).

Appendix 1: Environmental and Safety and Protection Minimum Requirements for Paper Records

Environmental and Safety and Protection Minimum Requirements for Paper Records		
Environmental conditions	Temp/Relative Humidity	<ul style="list-style-type: none"> The storage of records in air-conditioned premises where the temperature and relative humidity are maintained within recommended ranges (refer to State Records Commission, Standard 7: State Archives retained by Government Organisation) or the various media is the ideal. However if air-conditioning is not available or practical, then priority should be given to maintaining a consistent temperature and humidity over time through ventilation, insulation, location of storage and building design.
	Internal Environment	<ul style="list-style-type: none"> Dust and dirt controls. Limiting the impact and/or remedy such as a cleaning cycle. <ul style="list-style-type: none"> Pest/vermin control program. Continuous power supply. Occupational health and safety considerations. Records should be stored in conditions that are clean and secure, with low risk of damage from fire, water, dampness, mould, insects and rodents. They should also be kept away from direct sunlight and other sources of light and heat. The storage area should be well ventilated.
	Lighting	<ul style="list-style-type: none"> Minimise the entry of natural light, ultra-violet light and heat.
Safety and protection	Fire and Disaster Management	<ul style="list-style-type: none"> Alarm and fire protection system. Smoke detectors. Disaster management programmes should be established and maintained. Risk management exercises include examination of records storage areas. Fire prevention and suppression measures include heat/smoke detection, fire alarms and extinguishing systems. Current disaster recovery plans are in place which covers each records storage location. Staff are assigned responsibilities in the records disaster management process and are trained to meet them.
	Security	<ul style="list-style-type: none"> Records with a higher degree of sensitivity or confidentiality, such as those relating to personal privacy, commercial and personal interests, personal and national security, should be identified and access to these records controlled by – <ul style="list-style-type: none"> levels of secure storage consistent with the levels of sensitivity accountable procedures controlling personnel access to the storage areas. Determine access status of records and requirements of control. Control access to storage areas. Unauthorised entry prevention and detection systems.
	Housing and Shelving	<ul style="list-style-type: none"> Buildings chosen for records storage are weatherproof, have good drainage and areas are intruder resistant and access controlled. Storage areas are maintained and monitored, including monitoring of temperature and humidity variation and mould, dust and pest infestation. Shelving/cabinets/racks should be appropriate for each format of record. Consideration should be given to the horizontal storage of large format records. Shelving, cabinets and racks should support the weight of each container or item and hold them separately to reduce the risk

		<ul style="list-style-type: none"> • of damage that could arise from access to nearby items or collapse of stacked items. • Shelving should be clean and meet occupational health and safety requirements. Shelving arrangements are compatible with the sprinkler system design (if installed).
	Containers and Handling	<ul style="list-style-type: none"> • Packaging and containers are designed to fit the records, strong enough to withstand handling, pressure and weight of records they contain and of quality and composition commensurate with the value and use. • Handling techniques include transfer containers or satchels with security seals. • Item containers are clean, in good condition and appropriate to the format of records they hold.
	Retrieval of Records	<ul style="list-style-type: none"> • The ability to respond immediately to unpredictable demands for either records or their content. • Effective descriptive and location controls that enable accurate identification of the records requested and their whereabouts in storage. • The design and resourcing of the storage operation, including the type and configuration of shelving, equipment, staffing and the efficiency of retrieval, delivery procedures and control systems should be considered. • Consider the location of the storage facility, particularly if physical delivery of the record is necessary.

Note: This table has been sourced from information in the [‘National Archives of Australia Standard for the storage of archival records \(excluding digital records\)’](#), National Archives of Australia 2014.



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