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# Information Governance Policy

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## 1. Purpose

This policy forms the backbone of the WA Country Health Service (WACHS) information management framework and outlines the minimum requirements for managing information throughout its life cycle, from creation or collection, to storage, access, use, disclosure, and disposal.

This policy must be read in conjunction with the WA Health [Information Management](#) and [Digital Health](#) policy frameworks.

## 2. Policy

This policy mandates the WACHS information governance structure and mechanisms for compliance with the WA Health [Information Management Framework](#) while incorporating adaptations to suit the needs of country health.

### 2.1 Information governance

WACHS information governance is managed in accordance with the following key WA Health information governance policies:

- MP 0152/21 [Information Management Governance Policy](#)
- MP 0190/25 [Aboriginal Data Governance Policy](#).

In accordance with the above policies, the WACHS information governance structure encompasses a model of roles and responsibilities, information assets, information registers, policies and procedures, and a coordination and advisory function undertaken by the WACHS Information Governance Office (IGO).

This structure may be amended from time to time to align with legislative, WA Government, and WA Health policy framework changes.

#### 2.1.1 Information governance model and responsibilities

The WACHS model meets the minimum requirements of the WA Health information governance policies and incorporates adaptations which reflect the organisational structure and geographical spread. These adaptations are described in [Appendix A: WACHS Information Governance Model](#) and captured in the information asset register.

Information created, collected, received, or otherwise used to perform WACHS clinical or business functions, must be managed as part of an information asset. WACHS information assets are defined by the criteria outlined in the WA Health [Aboriginal Data Governance Model](#) and [Information Management Governance Model](#).

At minimum, each WACHS information asset must have a Steward, a Sponsor, and a Custodian appointed. Other roles and responsibilities may be assigned depending on the size, complexity and criticality of the asset. Roles are assigned on recommendation from

the WACHS IGO and approved by the Steward, apart from the Administrator role, which can be approved by the Custodian.

## 2.2 Information registers

WA Health maintains a register of information assets used within WA Health.

WACHS must comply with obligations set out in the WA Government [Information Classification Policy](#) and the [Privacy and Responsible Information Sharing Act 2024 \(PRIS Act\)](#).

To meet these obligations, WACHS IGO maintains register/s to record information assets, breaches, and sharing agreements.

The use of information registers is mandatory to the extent prescribed in the relevant procedures for staff involved in information governance activities. Information registers are to be maintained and coordinated by the WACHS IGO.

## 2.3 Information privacy

WACHS maintains an obligation to protect the privacy of personal information under the MP0194/26 [Privacy and Responsible Information Sharing \(PRIS\) Policy](#) and related legislation, including the 11 [Information Privacy Principles \(IPPs\)](#) contained in the [PRIS Act](#).



WACHS staff are required to comply with the IPPs when collecting, accessing, using, disclosing, holding, securing or disposing of personal information. As per the Office of the

Information Commissioner Western Australia (OIC), certain IPPs must be considered at different parts of the lifecycle. The below IPPs are to be integrated across all stages:

- [IPP 4: Information security](#)
- [IPP 5: Openness and Transparency](#)
- [IPP 7: Unique Identifiers](#)

Under the Privacy Standards (s4, WA Health [PRIS Standards](#)) and [IPP 5: Openness and Transparency](#), WACHS is required to establish and maintain the following local policies, procedures, and/or processes:

- Privacy Management Plan
- Privacy Statement
- Collection Notices

Under the [PRIS Act](#), the WACHS Privacy Officer is responsible for promoting WACHS' compliance with Part 2 of the [PRIS Act](#) - Privacy. WACHS IGO provides an advisory function to Custodians and Sponsors on requirements under the MP 0194/26 [Privacy and Responsible Information Sharing \(PRIS\) Policy](#), including tools and resources to conduct privacy impact assessments (PIAs) when undertaking a major new function or activity that involves the handling of personal information and is likely to have a significant impact on the privacy of individuals.

## 2.4 Information security

WACHS maintains information security under the MP 0067/17 [Information Security Policy](#) and compliance with [IPP 4: Information Security](#).

WACHS IGO refers information security governance issues under the WA Health [Digital Health Policy Framework](#) to relevant WACHS teams including Cyber Security and Information & Communications Technology (ICT), and vice versa, to support compliance with the WA Health [Information Management Framework](#).

WACHS Cyber Security and IGO teams provide consultation on the creation and management of information assets, establishing clear rules for the classification, use, storage, and disposal of information, and enabling consistent and effective protection beyond technical controls.

### 2.4.1 Information breaches

WACHS manages and responds to breaches of information security in accordance with the MP 0135/20 [Information Breach Policy](#) with adaptations to suit a dispersed and remote workforce.

Suspected and actual information breaches must be reported to the WACHS IGO using the means prescribed in the WA Health [Information Breach Response Standard](#). WACHS IGO assesses the breaches, makes relevant notifications, undertakes relevant reporting and maintains the relevant register.

An information breach involving information systems or technology (s. 4.1, [Information Breach Response Standard](#)), **must be notified to WACHS ICT Helpdesk immediately on 1800 794 748.**

## 2.5 Information classification

WACHS has adopted the mandatory information classification categories specified in the [WA Government Information Classification Policy](#) and MP 0146/20 [Information Classification Policy](#). WACHS is required to establish and maintain local policies and procedures ensuring the minimum requirements of these policies are operationalised locally within the [Information Classification and Handling Policy](#).

WACHS information assets must be classified OFFICIAL, OFFICIAL Sensitive, Commonwealth Security Classified, or Official: Sensitive Cabinet, depending on the information they hold.

OFFICIAL Sensitive is the default classification for sensitive personal information as defined in the [PRIS Act](#). Assets containing OFFICIAL Sensitive information must be designated OFFICIAL Sensitive.

WACHS IGO provides consultation on conducting an information classification assessment and applying classifications, as appropriate. WACHS IGO captures the information classification of each asset in the information asset register.

## 2.6 Information collection and quality

Collection or creation of information by WACHS is carried out in compliance with the following key WA Health information quality policies:

- MP 0178/23 [Information Quality Policy](#)
- MP 0164/21 [Patient Activity Data](#)
- MP 0157/21 [Establishment and Workforce Data Policy](#).

WACHS is also required to establish information quality procedures to comply with the WA Health [Information Management Governance Model](#).

WACHS is required to have local procedures in place to ensure compliance with the above policies, and to accurately report and comply with the mandatory business rules, data specifications and data dictionaries.

WACHS information assets used for the collection of personal information, must be established and maintained with reference to:

- [IPP 1: Collection](#)
- [IPP 3: Information Quality](#)
- [IPP 8: Anonymity](#)

WACHS IGO provides advice on governance requirements regarding mandatory policies, Information Quality Summaries and Quality Improvement Plans, and works in cooperation with stakeholders as required to support Custodians and Sponsors to manage information quality requirements.

### 2.6.1 Information assets in data warehouse

Information assets established and maintained in the WACHS Data Warehouse are a subset of information assets that, in addition to information asset governance, are subject to additional requirements regarding development, technical specifications, assurance, administration and ownership.

WACHS Data & Analytics Service (DAS) provides an advisory function regarding the requirements under the MP 0184/24 [Data Linkage Policy](#).

WACHS IGO is to liaise with and/or refer to WACHS DAS regarding establishment and maintenance of information assets within the WACHS Data Warehouse.

## 2.7 Information access, use and disclosure

WACHS enables access to, uses, and discloses information in accordance with the MP0015/16 [Information Access, Use & Disclosure Policy](#).

Access, use and disclosure of WACHS information must be managed with reference to:

- [IPP 2: Use and Disclosure](#)
- [IPP 6: Access and Correction](#)
- [IPP 9: Disclosures outside Australia](#)
- [IPP 10: Automated Decision Making](#).

Disclosure of information held in WACHS information assets is undertaken under a range of legislation, including but not limited to those described in [Appendix B: Legislation Requiring or Enabling Release of Information](#).

The WACHS officers who are assigned information governance responsibilities, or are otherwise tasked with enabling access to, use or disclosure of information, must do so in accordance with the MP 0006/16 [Risk Management Policy](#) and related Risk Assessment Tables.

### 2.7.1 Information Sharing

Under the [PRIS Act](#), the WACHS Information Sharing Officer is responsible for promoting WACHS' compliance with Part 3 of the Act – Responsible Information Sharing.

Where information is received, held or disclosed by WACHS subject to an information sharing agreement, WACHS IGO is to record the details of the agreement in the WACHS information sharing register.

## 2.8 Information storage, retention and disposal

WACHS manages storage, retention and disposal of information in accordance with MP 0144/20 [Information Retention and Disposal Policy](#) and MP 01458/20 [Information Storage Policy](#).

Storage, retention and disposal of WACHS information must be managed with reference to:

- [IPP 3: Information Quality](#)
- [IPP 6: Access and Correction](#)
- [IPP 11: De-identified information](#).

Further stipulations regarding corporate and healthcare record retention and disposal requirements are made in the [Corporate Recordkeeping Compliance Policy](#) and [Health Record Management Policy](#) respectively.

Upon decommissioning, all information assets are subject to ongoing security and access, retention, and disposal controls. WACHS IGO documents information asset decommissioning in the information asset register.

### 3. Roles and Responsibilities

**WACHS Chief Executive (CE)** is responsible for:

- ensuring the designation of a Privacy Officer and an Information Sharing Officer under the [PRIS Act](#)
- undertaking the role of, or nominating, the Steward for WACHS information assets
- leading compliance and setting the culture of information governance
- escalating risks and issues pertaining to information governance to the WACHS Board and/or Department of Health (System Manager)
- periodically reviewing the role and performance of the WACHS Steward.

**WACHS Manager Informatics** is responsible for:

- promoting and monitoring the implementation of the WACHS Information Governance Model
- coordinating pertinent reporting activities to WACHS Board and Executive, and the System Manager.

**WACHS Information Governance Office (IGO)** is responsible for:

- maintaining information registers
- coordinating the process of managing WACHS information assets, including establishment, assigning information governance roles, information breaches and other activities, as required
- providing advice in relation to the WA Health and WACHS information governance models.
- liaising with the System Manager and other external stakeholders regarding system-wide registers, reporting and other matters as necessary
- developing, maintaining and delivering education in relation to information governance matters
- evaluating implementation of this policy every three years, or more frequently as directed by WACHS Executive or otherwise required.

**Staff with information governance responsibilities** are responsible for:

- undertaking these responsibilities in accordance with the WACHS Information Governance Model.

**Staff who seek to establish, maintain, or decommission an information asset** are responsible for:

- complying with this policy and the relevant procedures
- advising the WACHS IGO of any changes pertaining to the asset/s.

**Line Managers** are responsible for:

- ensuring staff are aware of this policy and the relevant procedures
- supporting staff in reporting suspected and actual information breaches
- participating in information breach assessments and implement lessons learned as required.

**All staff** are responsible for:

- ensuring that the appropriate information classification label is applied upon handling the information that they produce, collate or receive, including for legacy or pre-existing information assets
- ensuring information breaches are reported immediately (refer to [section 2.4.1](#)) and, where possible, by the person who identified the breach
- participating in information management education as appropriate to their role.

**All staff** are required to comply with the directions in WACHS policies and procedures as per their roles and responsibilities. Guidelines are the recommended course of action for WACHS and staff are expected to use this information to guide practice. If staff are unsure which policies procedures and guidelines apply to their role or scope of practice, and/or are unsure of the application of directions they are to consult their manager in the first instance.

#### 4. Monitoring and Evaluation

The WACHS Informatics Manager monitors the implementation of this policy through two-yearly information management maturity assessments, standard reporting, risk assessments and advice from the business.

WACHS IGO evaluates the effectiveness of this policy through standard reporting and monitoring of the information registers.

This policy is to be reviewed bi-annually or in response to significant changes in legislation, technology, or WACHS operations.

#### 5. References

Department of the Premier and Cabinet (WA). [Data and information sharing](#) [Internet]. Perth (WA): Government of Western Australia; 2026.

Office of the Information Commissioner (WA). [Privacy in Western Australia](#) [Internet]. Perth (WA). Government of Western Australia; 2026.

United Nations. [Universal Declaration of Human Rights](#) [Internet]. New York. United Nations; 1948.

Government of Western Australia. [WA Government Cyber Security Policy](#) [Internet]. Perth (WA): Government of Western Australia; 2025.

Western Australia Department of Health. [WA Health System Privacy Statement](#) [Internet]. Perth (WA). Government of Western Australia; 2026.

## 6. Definitions

Term	Definition
<b>Aboriginal data</b>	Defined by the <a href="#">Maiam nayri Wingara Indigenous Data Sovereignty Collective</a> as any information or knowledge, in any format or medium, which is about and may affect Aboriginal people both collectively and individually.
<b>Aboriginal data governance</b>	Defined by the <a href="#">Maiam nayri Wingara Indigenous Data Sovereignty Collective</a> as the right of Aboriginal people to autonomously decide what, how, and why Aboriginal data are collected, accessed, and used. It ensures that data on or about Aboriginal people reflects their priorities, values, cultures, worldviews, and diversity.
<b>Administrator</b>	Implements rules on behalf of the Custodian and provides technical and administrative support for the information asset.
<b>Contracted health entity</b>	Defined in the <a href="#">Health Services Act 2016</a> as a non-government entity that provides health services under a contract or other agreement entered into with the Department CEO on behalf of the State, a health service provider or the Minister.
<b>Custodian</b>	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.
<b>Data</b>	The term 'data' generally refers to unprocessed information, 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. In this policy the terms 'data' and 'information' are often used interchangeably and are to be taken to mean both data and information.
<b>Data linkage</b>	The action of combining two or more datasets including, but not limited to, utilising data linkage keys.
<b>Information</b>	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. The terms 'data' and 'information' are often used interchangeably and are to be taken to mean both data and information in this policy.
<b>Information asset</b>	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.
<b>Information breach</b>	An incident in which personal or confidential information, or non-personal information that could be sensitive or commercial is compromised. The information may be subject to unauthorised access, use or disclosure, or is lost, damaged or destroyed.

<b>Information Commissioner</b>	The role oversees and promotes understanding of the IPPs and matters relating to Part 2 of the <a href="#">PRIS Act</a> .
<b>Information management governance</b>	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.
<b>Information Management Governance Advisory Group (IMGAG)</b>	The peak body for information management governance within the WA health system. This body provides strategic advice on the management of information within the WA health system which includes, but is not limited to, clinical and non-clinical information.
<b>Information management maturity assessment</b>	Information management maturity assessment is part of the compliance component of the WA Health Information Management Governance Policy. This assessment obtains an understanding of the status of the WA health system entities, in terms of information management governance.
<b>Information Privacy Principles (IPPs)</b>	Guiding principles prescribed in the <a href="#">PRIS Act</a> that govern the collection, use, disclosure and security of personal information across the WA public sector.
<b>IPP entity</b>	Defined in the <a href="#">PRIS Act</a> as a Minister, Parliamentary Secretary, public entity, or contracted service provider.
<b>Information quality</b>	Refers to the extent that information is suitable for its intended use (i.e. fit for purpose) and is evaluated in terms of five standards: relevancy, accuracy and reliability, timeliness, coherence and comparability, and accessibility and clarity.
<b>Information sharing</b>	The term 'information sharing' generally refers to the exchange of knowledge, information or insights between individuals and/or organisations.
<b>Information Sharing Officer</b>	As per the Chief Data Officer, an Information Sharing Officer is appointed by the principal officer of a public entity and is responsible for: <ul style="list-style-type: none"> <li>• Promoting implementation of the responsible information sharing framework.</li> <li>• Coordinating engagement with the Chief Data Officer for any notifications relating to information sharing agreements or information holdings requests.</li> <li>• Assisting with: <ul style="list-style-type: none"> <li>○ information sharing requests</li> <li>○ the management of the information sharing agreements</li> <li>○ conducting relevant assessments, including responsible sharing principles, Aboriginal information assessments and privacy impact assessments.</li> </ul> </li> </ul>
<b>Information use</b>	A person 'uses' information if they utilise, handle, collect or communicate information within the WA health system or employ information for a purpose.

<b>Notifiable information breach</b>	As defined in the <a href="#">PRIS Act</a> as a type of information breach relating to personal information held by an IPP entity that is likely to result in serious harm to any individual to whom the information relates. The breach may relate to unauthorised access or disclosure that has either occurred or is likely to occur.
<b>Owner</b>	This role undertakes responsibilities on behalf of the State, as defined in the <a href="#">Health Services Act 2016</a> and other written laws, for all information collected by, within and for the WA health system. For example, the Director General of the Department of Health is owner under the <a href="#">Health Services Act 2016</a> , while the Chief Health Officer is the owner under the <a href="#">Public Health Act 2016</a> .
<b>Personal information</b>	As defined in the <a href="#">PRIS Act</a> as information or an opinion that relates to an individual whose identity is apparent or can reasonably be ascertained from the information or opinion.
<b>Privacy</b>	Privacy is recognised as a fundamental human right under the <a href="#">Universal Declaration of Human Rights</a> , and includes an individual’s ability to control who can access or use their personal information.
<b>Privacy Officer</b>	As per the Office of the Information Commissioner WA (OIC), a Privacy Officer is appointed by the principal officer of an IPP entity and is responsible for: <ul style="list-style-type: none"> <li>• Promoting compliance with the IPPs and PRIS privacy provisions.</li> <li>• Ensuring privacy impact assessments are conducted when required.</li> <li>• Coordinating: <ul style="list-style-type: none"> <li>○ the preparation of the information breach policy and maintaining the register of notifiable information breaches.</li> <li>○ responses to privacy complaints.</li> <li>○ IPP entity dealings with the OIC including enquiries, privacy complaints and investigations, conciliation, monitoring or assessments conducted by the Information Commissioner.</li> </ul> </li> </ul>
<b>Privacy management plan</b>	A strategic planning document that outlines how an organisation manages personal information to ensure compliance with privacy laws and regulations.
<b>Sponsor</b>	Assists the Steward in the operation of managing allocated information assets outlined in the relevant delegation schedule
<b>Steward</b>	The delegated authority for the information assets outlined within the associated delegation schedule.
<b>WA Health Aboriginal Data Governance Committee (WAHADGC)</b>	The peak body for the governance of Aboriginal data held within the WA health system. It provides strategic leadership and direction on the governance and management of Aboriginal data held within the WA health system.

<b>WA health system</b>	The WA health system is comprised of: <ul style="list-style-type: none"> <li>(i) the Department;</li> <li>(ii) Health Service Providers (NMHS, SMHS, CAHS, WACHS, EMHS, PathWest, Quadriplegic Centre and HSS); and</li> <li>(iii) contracted health entities, to the extent they provide health services to the State.</li> </ul>
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## 7. Document Summary

<b>Coverage</b>	WACHS
<b>Audience</b>	All Staff
<b>Records Management</b>	Non Clinical: <a href="#">Corporate Recordkeeping Compliance Policy</a> Clinical: <a href="#">Health Record Management Policy</a>
<b>Related Legislation</b>	<ul style="list-style-type: none"> <li>• <a href="#">Copyright Act 1968</a> (Cth)</li> <li>• <a href="#">Freedom of Information Act 1992</a> (WA)</li> <li>• <a href="#">Freedom of Information Regulations 1993</a> (WA)</li> <li>• <a href="#">Health (Miscellaneous Provisions) Act 1911</a> (WA)</li> <li>• <a href="#">Health Services (Information) Regulations 2017</a> (WA)</li> <li>• <a href="#">Health Services Act 2016</a> (WA)</li> <li>• <a href="#">Information Commissioner Act 2024</a> (WA)</li> <li>• <a href="#">Mental Health Act 2014</a> (WA)</li> <li>• <a href="#">Privacy Act 1988</a> (Cth)</li> <li>• <a href="#">Privacy and Other Legislation Amendment Act 2024</a> (Cth)</li> <li>• <a href="#">Privacy and Responsible Information Sharing Act 2024</a> (WA)</li> <li>• <a href="#">Private Hospital and Health Services Act 1927</a> (WA)</li> <li>• <a href="#">Public Health Act 2016</a> (WA)</li> <li>• <a href="#">Public Health Regulations 2017</a> (WA)</li> <li>• <a href="#">Public Sector Management Act 1994</a> (WA)</li> <li>• <a href="#">State Records Act 2000</a> (WA)</li> </ul>
<b>Related Mandatory Policies / Frameworks</b>	<ul style="list-style-type: none"> <li>• MP 0190/25 <a href="#">Aboriginal Data Governance Policy</a></li> <li>• MP 0184/24 <a href="#">Data Linkage Policy</a></li> <li>• MP 0157/21 <a href="#">Establishment and Workforce Data Policy</a></li> <li>• MP 0015/16 <a href="#">Information Access, Use &amp; Disclosure Policy</a></li> <li>• MP 0135/20 <a href="#">Information Breach Policy</a></li> <li>• MP 0146/20 <a href="#">Information Classification Policy</a></li> <li>• MP 0152/21 <a href="#">Information Management Governance Policy</a></li> <li>• MP 0178/23 <a href="#">Information Quality Policy</a></li> <li>• MP 0144/20 <a href="#">Information Retention and Disposal Policy</a></li> <li>• MP 0067/17 <a href="#">Information Security Policy</a></li> <li>• MP 0145/20 <a href="#">Information Storage Policy</a></li> <li>• MP 0164/21 <a href="#">Patient Activity Data</a></li> </ul>

	<ul style="list-style-type: none"> <li>• MP 0194/26 <a href="#">Privacy and Responsible Information Sharing Policy</a></li> <li>• MP 0006/16 <a href="#">Risk Management Policy</a></li> <li>• WA Health <a href="#">Information Management Framework</a></li> <li>• WA Health <a href="#">Digital Health Framework</a></li> </ul>
<b>Related WACHS Policy Documents</b>	<ul style="list-style-type: none"> <li>• <a href="#">Information Classification and Handling Policy</a></li> </ul>
<b>Related Training</b>	<p>Available from <a href="#">MyLearning</a>:</p> <ul style="list-style-type: none"> <li>• <a href="#">Information Management eLearning Series</a></li> <li>• <a href="#">Essential Cyber Security Training (ECST) 2026</a></li> <li>• <a href="#">Freedom of Information and Release of Information (FROI EL2) 2022</a></li> <li>• <a href="#">Guide to completing the Information Quality Summary Form</a></li> <li>• <a href="#">Health Information Management Orientation Package (HIMO EL1) 2022</a></li> <li>• <a href="#">Using AI Tools within WA Health</a></li> </ul>
<b>Aboriginal Health Impact Statement Declaration (ISD)</b>	ISD Record ID: 5969
<b><a href="#">National Safety and Quality Health Service (NSQHS) Standards</a></b>	1.16
<b><a href="#">Aged Care Quality Standards</a></b>	Nil
<b><a href="#">Chief Psychiatrist's Standards for Clinical Care</a></b>	Nil
<b>Other Standards (please specify and include link)</b>	<ul style="list-style-type: none"> <li>• Australian Government, Department of Health and Aged Care: Therapeutic Goods Administration: Biological standards</li> <li>• Australian Standard 2828.1 Paper based health records</li> <li>• Australian Standard 2828.2 Digitised (scanned) health record system requirements</li> <li>• International Standard 15489-1 15489-2 Records Management</li> <li>• AS/ISO 27002: 2015, Information Technology – Security techniques – Code of practice for information security management</li> <li>• AS/ISO 27799: 2011, Information security management in health using ISO/IEC 27002</li> <li>• <a href="#">State Records Commission Standard 6: Outsourcing</a></li> <li>• <a href="#">State Records Commission Standard 7: State Archives Retained by Government Organizations</a></li> <li>• <a href="#">State Records Commission Standard 8 Managing Digital Information</a></li> </ul>

## 8. Document Control

Version	Published date	Current from	Summary of changes
1.00	30 June 2026	30 June 2026	New policy

## 9. Approval

<b>Policy Owner</b>	Executive Director Business Services
<b>Co-approver</b>	Nil
<b>Contact</b>	Director Data & Digital Innovation
<b>Business Unit</b>	Data and Digital Innovation
<b>EDRMS #</b>	ED-WA-26-297390
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**This document can be made available in alternative formats on request.**



## Appendix A: WACHS Information Governance Model

Role	WACHS Position	Eligibility for Appointment	Key Responsibilities
<b>WACHS Steward</b>	Chief Executive <i>or</i> Executive Director	<p>WACHS Steward must hold the position of Chief Executive or Executive Director.</p> <p>The Chief Executive is to nominate <b>one Steward for the whole of WACHS</b> (may self-nominate).</p> <p>Stewardship is allocated to a position, not a person.</p>	<p><b>Accountability &amp; Leadership</b></p> <ul style="list-style-type: none"> <li>Delegated authority for WACHS local information assets, accountable to the Owner (as per relevant legislation).</li> <li>Ensure information asset compliance in line with legislation, policies and standards.</li> <li>Attend and advise the Information Management Governance Advisory Group (IMGAG) on behalf of WACHS.</li> <li>Implementation of the strategic direction of information management governance that has been recommended by IMGAG and/or approved by the Owner.</li> <li>Support the WA Aboriginal Health and Wellbeing Framework 2015- 2030 and the initiatives arising from it, to improve the health and wellbeing of Aboriginal people in WA.</li> <li>Support the WA health system's compliance with the Aboriginal Data Governance Principles.</li> <li>Support and provide leadership to the governance of Aboriginal data.</li> <li>Where Aboriginal data is used and concerns are raised, IMGAG must be guided by the WAHADGC or any other relevant Aboriginal group.</li> <li>Endorse and direct Aboriginal data governance processes and procedures.</li> <li>Implement and support the Information Management Governance Model.</li> <li>Support and provide leadership to the management of information assets.</li> <li>Implement and support the Information Breach Policy.</li> <li>Provide strategic guidance and executive level support where an information breach occurs involving an information asset under their stewardship.</li> <li>Ensure policies under the relevant Policy Frameworks are supported and implemented.</li> <li>Assign functions to the Sponsor(s), Custodians and Administrators, and ensure these functions are detailed within the associated Instrument of Delegation and the WA health system Information Register.</li> <li>Signatory for WACHS Sponsor and Custodian nomination forms.</li> </ul> <p><b>Education &amp; Engagement</b></p> <ul style="list-style-type: none"> <li>Provide support to the Sponsor(s) and Custodian(s) on the management of information management practices.</li> <li>Support information sharing that promotes the access, use and disclosure of information when permitted or required by law.</li> </ul>

Role	WACHS Position	Eligibility for Appointment	Key Responsibilities
			<ul style="list-style-type: none"> <li>• Support the advancement of strategies and practices which utilise Aboriginal data to benefit the health and wellbeing of Aboriginal people.</li> <li>• Seek guidance from the WAHADGC in the management of Aboriginal data.</li> <li>• Support participation in the information management communications and education programs.</li> <li>• Support and endorse participation in Aboriginal Data Governance Training and awareness initiatives.</li> <li>• Support participation in information breach communications and education programs.</li> </ul> <p><b>Security &amp; Risk Management</b></p> <ul style="list-style-type: none"> <li>• Ensure physical and technical controls are reviewed, maintained, and improved.</li> <li>• Review information management risks and issues that arise, including those that arise from management of an information asset or due to an information breach.</li> <li>• Review and escalate Aboriginal data governance issues to the WAHADGC as required.</li> <li>• Escalate risks, issues, and information breaches to IMGAG and WACHS Executive as required.</li> </ul> <p><b>Continual Improvement</b></p> <ul style="list-style-type: none"> <li>• Ensure continual improvement to information assets, e.g., information quality, security, metadata and record management.</li> <li>• Ensure the currency of the delegated information asset/s is reviewed in the Information Register on a regular basis.</li> <li>• Support the advancement of continual improvement strategies and practices in relation to Aboriginal data.</li> <li>• Support Business User Groups in managing and improving Aboriginal data.</li> </ul>

Role	WACHS Position	Eligibility for Appointment	Key Responsibilities
<p><b>WACHS Sponsor</b></p>	<p>A senior position of responsibility reporting directly to a WACHS Executive Director, COO or CE.</p> <p>There must be one Sponsor per information asset.</p>	<p>In alignment with DoH interpretation of the <i>Instrument of Delegation: Collection and Disclosure of Health Information</i>, the Sponsor is intended to be a senior position of responsibility reporting to an “Executive Director, COO or CE”.</p> <p>Sponsorship must be assigned to a position, not a person.</p> <p><b>Allocation of more than one Sponsor</b> enables flexibility to align information assets to management structures or operational service delivery such as clinical and non-clinical functions, e.g., the general Sponsor for Medication Management information assets might be the Chief Pharmacist, but for an Oncology-specific Medication Management asset, the Program Manager – Cancer Services may also be a Sponsor.</p>	<p><b>Accountability &amp; Leadership</b></p> <ul style="list-style-type: none"> <li>• Leadership over allocated information asset functions on behalf of the Steward, accountable to the Steward.</li> <li>• Assist the Steward by implementing the strategic direction of information management governance within areas under their purview.</li> <li>• Support the Steward in implementing policies, procedures, and processes under the Information Management Framework.</li> <li>• Support the WA Aboriginal Health and Wellbeing Framework 2015- 2030 and the initiatives arising from it, to improve the health and wellbeing of Aboriginal people in WA.</li> <li>• Support the WA health system's compliance with the Aboriginal Data Governance Principles.</li> <li>• Provide support and leadership to the Custodians in the management of Aboriginal data.</li> <li>• Where Aboriginal data is used and concerns are raised, Sponsors must be guided by the WAHADGC or any other relevant Aboriginal group.</li> <li>• Support the Steward and Custodian in the implementation of Aboriginal data governance processes and procedures that comply with legislative requirements.</li> <li>• Assist the Steward by ensuring information assets under their control are compliant with legislation, policies, and standards.</li> <li>• Provide support and leadership to the Custodians of allocated information assets in the day-to-day management.</li> <li>• Ensure functions are appropriately assigned to the Custodians and Administrators and are detailed within the associated Instrument of Delegation and the WA health system Information Register.</li> <li>• If the Custodian position is not appointed, the Sponsor is to be responsible for the information asset/s until a Custodian has been endorsed and approved.</li> </ul> <p><b>Education &amp; Engagement</b></p> <ul style="list-style-type: none"> <li>• Support the Custodians on the management of information management practices including access, use and disclosure issues.</li> <li>• Support the Custodians on the management of information management practices including access, use and disclosure issues resulting from information breaches.</li> <li>• Support the Steward in implementing Aboriginal data strategies and practices.</li> <li>• Support the Custodians on the management of Aboriginal data, including access, use and disclosure issues.</li> </ul>

Role	WACHS Position	Eligibility for Appointment	Key Responsibilities
			<ul style="list-style-type: none"> <li>• Support information sharing that promotes the access, use and disclosure of information when permitted or required by law, including in the resolution of information breaches.</li> <li>• Support the Steward in organising Aboriginal Data Governance Training and awareness initiatives.</li> <li>• Support the Steward in organising participation in information management communications and education programs.</li> </ul> <p><b>Security &amp; Risk Management</b></p> <ul style="list-style-type: none"> <li>• Support the Custodian in reviewing and maintaining physical and technical controls to the information asset.</li> <li>• Review and manage all risks and issues that arise, including those arising out of an information breach.</li> <li>• Review and manage Aboriginal data governance risks and issues that arise.</li> <li>• Escalate risks, issues and information breaches to the Steward as required.</li> </ul> <p><b>Continual Improvement</b></p> <ul style="list-style-type: none"> <li>• Support the Custodian to facilitate improvements in Aboriginal data.</li> <li>• Support the Custodian in reviewing and maintaining quality improvements including quality processes, security, metadata and record management.</li> <li>• Review the currency of the delegated information asset/s within the Information Register on a regular basis.</li> </ul>

Role	WACHS Position	Eligibility for Appointment	Key Responsibilities
<p><b>WACHS Custodian</b></p>	<p>Minimum <b>HSU G5</b> or equivalent.</p>	<p>The Custodian <b>must have the knowledge and understanding of the information asset/s</b> to fulfil the delegated responsibilities and <b>the capacity to implement policies and processes and procedures.</b></p> <p>Custodianship is allocated to a position, not a person.</p> <p>WACHS Custodians must be endorsed by the WACHS Steward.</p> <p>All WACHS information assets must have a Custodian. All Systemwide assets must, at a minimum, have a Custodian at each Health Service Provider where the asset is employed. All Custodians are to contribute to decisions and are collectively responsible to the applicable Steward.</p>	<p><b>Accountability &amp; Leadership</b></p> <ul style="list-style-type: none"> <li>• WACHS Custodian can be assigned to a systemwide or local information asset.</li> <li>• For local information assets, the Custodian is accountable to the relevant WACHS Primary Sponsor or, in the absence of a Sponsor, the WACHS Steward.</li> <li>• For systemwide information assets, the Custodian contributes to systemwide decisions for the relevant asset and is accountable to the applicable systemwide Steward.</li> <li>• Manage day-to-day operations of the information asset, in line with policy, relevant legislation and other written laws, and in accordance with Sponsor/Steward requirements.</li> <li>• Implements and operationalises Information Management Framework policies relevant to the information asset on behalf of the Steward.</li> <li>• Support the WA Aboriginal Health and Wellbeing Framework 2015- 2030 and the initiatives arising from it, to improve the health and wellbeing of Aboriginal people in WA.</li> <li>• Support the WA health system’s compliance with the Aboriginal Data Governance Principles.</li> <li>• Acknowledge that historically, Aboriginal data has, at times, been collected, used and disclosed in a way that has negatively impacted the health and well-being of Aboriginal people, and is to commit to use Aboriginal data to benefit Aboriginal people.</li> <li>• Manage information assets in line with MP 0190/25 Aboriginal Data Governance Policy.</li> <li>• Where Aboriginal data is used and concerns are raised, Custodians must be guided by the WAHADGC or any other relevant Aboriginal group.</li> <li>• Implement Aboriginal data governance processes and procedures that comply with legislative requirements.</li> <li>• Ensure the record management (retention, storage and disposal) of information is in accordance with policies, legislation and other written laws.</li> <li>• Maintain the quality of the data within the information asset including accuracy, completeness, relevance, timeliness, reliability, integrity and consistency to the business needs of the WA health system.</li> <li>• Ensure information quality issues are documented and information is corrected in accordance with any policy and legislative requirements.</li> <li>• Maintain documentation of metadata, data dictionary and any technical documentation required by policies, legislation, or other written laws.</li> <li>• Plan and project manage changes to the information asset.</li> <li>• May participate in Business User Groups.</li> </ul>

Role	WACHS Position	Eligibility for Appointment	Key Responsibilities
			<p><b>Education &amp; Engagement</b></p> <ul style="list-style-type: none"> <li>• Support information sharing that promotes the access, use and disclosure of information when it is permitted or required by law.</li> <li>• Implement strategies and practices in line with the WA Aboriginal Health and Wellbeing Framework 2015-2030, to utilise Aboriginal data to benefit the health and wellbeing of Aboriginal people.</li> <li>• Provide advice on the appropriate use of Aboriginal data to authorised users.</li> <li>• Consult and liaise with the WAHADGC or any other relevant Aboriginal group where required.</li> <li>• Provide advice on the proper use and interpretation of the information to authorised users.</li> <li>• Support WACHS Information Governance to ensure information assets and breaches are managed as required.</li> <li>• Provide support to assessor/s assigned under the <i>WACHS Information Breach Response Procedure</i>.</li> <li>• Advise primary and secondary users of any strengths and limitations of the information so they can make an informed decision about whether the information is 'fit for purpose'</li> <li>• Support and participate in Aboriginal Data Governance Training and awareness initiatives.</li> <li>• Participate in all information management communication and education programs.</li> </ul> <p><b>Security &amp; Risk Management</b></p> <ul style="list-style-type: none"> <li>• Oversight of breaches related to the information asset to ensure risk and mitigation strategies are reviewed and updated.</li> <li>• Control access to the information asset including regular reviews of users.</li> <li>• Ensure the safe transmission of information to authorised users.</li> <li>• Ensure information breaches are reported and managed in a timely manner as outlined within relevant policies.</li> <li>• Maintain the security of the information asset to ensure privacy and confidentiality of information.</li> <li>• Maintain a work plan for the asset highlighting risk and mitigation strategies.</li> <li>• Identify risks associated with access, use and/or disclosure of Aboriginal data.</li> <li>• Escalate risks associated with access, use and/or disclosure of Aboriginal data to the Steward, or Sponsor if deemed operationally required by the Steward.</li> <li>• Escalate risks associated with access, use and disclosure of information, including information breaches, to the Steward or Sponsor if deemed operationally required.</li> </ul>

Role	WACHS Position	Eligibility for Appointment	Key Responsibilities
			<ul style="list-style-type: none"> <li>• Highlight mitigation strategies to the Steward or Sponsor if deemed operationally required.</li> <li><b>Continual improvement</b></li> <li>• Facilitate initiatives to improve the governance of Aboriginal data.</li> <li>• Evaluate the quality of the information for its intended use.</li> <li>• Identify and implement strategies for information quality improvement.</li> <li>• Inform information quality statements that accompany a data submission or for reporting purposes.</li> <li>• Complete or nominate staff to complete the <i>Information Quality Summary</i> for each information asset to capture information quality standards within 3 months of the establishment of the asset.</li> <li>• Ensure an <i>Information Quality Improvement Plan</i> is documented no later than 3 months after completing the <i>Information Quality Summary</i>.</li> <li>• Responsible for consulting with relevant staff to ensure quality improvement efforts are documented and implemented in accordance with the mandated <i>Quality Improvement Plan Form</i>.</li> <li>• Must have actions, or nominate actions for staff, towards meeting the objectives of the <i>Quality Improvement Plan Form</i>, lessons learnt, changes to timeframes and priorities in place to improve information quality for at least the coming year.</li> <li>• Make the findings of the <i>Information Quality Summary Form</i> available to the Steward and/or the System Manager on request.</li> <li>• Make the findings of the <i>Quality Improvement Plan Form</i> available to the Steward and/or the System Manager on request.</li> <li>• Ensure fit-for-purpose metadata documentation is created and maintained.</li> <li>• Ensure the Custodian and information asset details are current and accurate within the associated Instruments of Delegation and the WA health system Information Register.</li> <li>• Advise the Steward and/or the System Manager of information quality and improvement issues on request or as deemed appropriate by the Custodian.</li> </ul>

Role	WACHS Position	Eligibility for Appointment	Key Responsibilities
<p><b>WACHS Administrator</b></p>	<p><i>Not Applicable</i></p>	<p>The allocation of Administrator(s) is at the discretion of the Steward. If Administrator(s) are allocated, they must be assigned to <b>a position that has the required technical knowledge</b> to perform the functions allocated by the Custodian.</p> <p>Administrator is allocated to a position, not the person.</p> <p>Depending on the size, function and requirements of the information asset, the Administrator role may be undertaken by the Custodian.</p> <p>Health Service Support can perform the Administrator role for information assets in addition to any position-specific requirements otherwise not prescribed for within Information Management Governance Policy.</p>	<p><b>Accountability &amp; Leadership</b></p> <ul style="list-style-type: none"> <li>• Implement rules on behalf of the Custodian.</li> <li>• Provide technical and administrative support for the information asset.</li> <li>• Provide support and technical expertise to Custodians in managing allocated assets.</li> <li>• Assists the Custodian in the technical implementation of the relevant policies, processes, and procedures.</li> <li>• Support the WA Aboriginal Health and Wellbeing Framework 2015- 2030 and the initiatives arising from it, to improve the health and wellbeing of Aboriginal people in WA.</li> <li>• Support the WA health system's compliance with the Aboriginal Data Governance Principles.</li> <li>• Where Aboriginal data is used and concerns are raised, Administrators must be guided by the WAHADGC or any other relevant Aboriginal group.</li> <li>• Support the Custodian to implement Aboriginal data governance processes and procedures that comply with legislative requirements.</li> <li>• May participate within Business User Groups.</li> </ul> <p><b>Education &amp; Engagement</b></p> <ul style="list-style-type: none"> <li>• Support the Custodians in the management of Aboriginal data.</li> <li>• Support the Custodian in implementing technical directions to allocated information assets.</li> <li>• Support and participate in Aboriginal Data Governance Training and awareness initiatives.</li> <li>• Participate in all information management communication and education programs.</li> </ul> <p><b>Security &amp; Risk Management</b></p> <ul style="list-style-type: none"> <li>• Ensure all physical and technical controls have been applied to the information asset.</li> <li>• Highlight risks to and within the information asset and associated mitigation strategies to the Custodian.</li> <li>• Assist the Custodian to identify risks in Aboriginal data.</li> <li>• Report and manage information breaches in a timely manner as outlined within policies.</li> </ul> <p><b>Continual Improvement</b></p> <ul style="list-style-type: none"> <li>• Assist the Custodian to improve the governance of Aboriginal data.</li> <li>• Assist the Custodian in implementing quality, security, metadata and record management improvements.</li> <li>• Ensure Administrator details are current within the associated Instruments of Delegation and the WA health system Information Register.</li> </ul>

## Appendix B: Legislation Requiring or Enabling Release of Information

This chart is provided for **information purposes only** and **must not be relied on as decision-making tool or authority to release information outside of WACHS**. If you are considering the disclosure of information, please contact the WACHS Release of Information or Legal team for further advice.

The below chart provides a **non-exhaustive** list of legislation that may be used to **request or require** information from a WA health entity. Legislation may make the release of information compulsory, or it may provide a legal avenue to allow release of information. Where legislation compels disclosure, it may or may not provide a statutory time frame.

Current and updated legislation can be accessed via [WA Legislation](#) and the [Federal Register of Legislation](#).

Agency / Body	Legislation	Examples of context
Aged Care Quality and Safety Commission	Aged Care Act 2024 (Cth)	Investigation of complaints, assessment of compliance, or exercise of regulatory functions over approved aged care providers.
Assessor for Criminal Injuries Compensation	Criminal Injuries Compensation Act 2003 (WA)	Determining eligibility for victims of criminal offences.
Auditor General for Western Australia	Auditor General Act 2006 (WA)	Conducting performance audits or reviews of health service efficiency, effectiveness, or governance.
Australian Health Practitioner Regulation Agency (AHPRA) and National Boards	Health Practitioner Regulation National Law (WA)	Investigating notifications, complaints, or concerns about practitioner conduct, competence, or fitness to practise.
Australian Maritime Safety Authority	Marine Safety (Domestic Commercial Vessel) National Law (WA)	Investigating marine safety incidents or accidents involving injury.
Australian Transport Safety Bureau	Transport Safety Investigation Act 2003 (Cth)	Conducting safety investigations into aviation, rail, or marine transport accidents involving injury.
Catastrophic Injuries Support Scheme	Motor Vehicle (Catastrophic Injuries) Act 2016 (WA)	Assessing eligibility and care needs for people with catastrophic motor vehicle injuries.
Civil aviation liability proceedings (via courts)	Civil Aviation (Carriers' Liability) Act 1961 (WA)	Civil litigation concerning liability for injuries sustained during air travel.
Coroners Court of WA	Coroners Act 1996 (WA)	Coronial investigations into deaths or serious incidents.
Corruption and Crime Commission of WA	Corruption, Crime and Misconduct Act 2003 (WA)	Investigations into serious misconduct, corruption, or systemic failures within public sector entities.
Courts of WA and Federal Courts of Australia	Relevant Court Acts and Rules	Judicial proceedings requiring clinical or administrative evidence.

Department of Communities (WA)	Children and Community Services Act 2004 (WA)	Child protection, safety assessments, and welfare decision-making involving children.
Department of Mines, Industry Regulation and Safety (Energy / Gas Safety Inspectors)	Electricity Industry Act 2004 (WA); Energy Coordination Act 1994 (WA); Energy Coordination (Inspectors and Infringement Notices) Regulations 1995 (WA); Gas Standards Act 1972 (WA)	Investigations into gas or electrical safety incidents resulting in injury.
Freedom of Information applicants	Freedom of Information Act 1992 and Regulations 1993 (WA)	Access applications for documents held by WA Health, including patient records (subject to exemptions).
Health and Disability Services Complaints Office (HaDSCO)	Health and Disability Services (Complaints) Act 1995 (WA)	Complaint investigations into health, disability, or mental health services.
Human tissue regulatory framework	Human Tissue and Transplant Act 1982 (WA)	Regulation and oversight of organ and tissue donation, transplantation, and consent processes.
Insurance Commission of WA	Insurance Commission of WA Act 1986 (WA)	Assessment and management of injury claims under statutory insurance schemes.
Insurance Commission of WA (Compulsory Third Party scheme)	Motor Vehicle (Third Party Insurance) Act 1943 (WA)	Injury assessments and claims management for motor vehicle accident victims.
Medicines and Poisons Regulatory Authority	Medicines and Poisons Act 2014 (WA)	Monitoring prescribing, supply, and administration of medicines.
Mental Health WA	Mental Health Act 2014 (WA)	Statutory reviews, inquiries, and oversight of mental health treatment and detention.
Minister for Health / Director General of Health (WA)	Health Services Act 2016 (WA)	System governance, service planning, performance monitoring, and statewide health system management.
National Disability Insurance Scheme (NDIS) Quality and Safeguards Commission	National Disability Insurance Scheme Act 2013 (Cth)	Investigation of reportable incidents, complaints, and provider compliance affecting NDIS participants.
National Redress Scheme Operator	National Redress Scheme for Institutional Child Sexual Abuse Act 2018 (Cth)	Assessment of redress applications by survivors of institutional child sexual abuse.
Ombudsman WA	Parliamentary Commissioner Act 1971 (WA)	Investigation of complaints about administrative actions and systemic issues in public authorities.
Professional Services Review	Health Insurance Act 1973 (Cth)	Investigations into inappropriate or non-compliant Medicare billing and service provision.
WA Health	Public Health Act 2016 (WA)	Management of public health risks, emergencies, and enforcement of public health measures. Surveillance, notification, and control of notifiable infectious diseases.
Radiological Council of WA	Radiation Safety Act 1975 (WA)	Oversight and investigation of radiation safety incidents and compliance with radiological standards.

Registrar of Births, Deaths and Marriages (WA)	Births, Deaths and Marriages Registration Act 1998 (WA)	Registration and correction of births and deaths based on clinical certification and supporting information.
Services Australia (Centrelink)	Social Security (Administration) Act 1999 (Cth); Human Services Act 1997 (Cth)	Determining eligibility for social security payments, disability support, and related benefits.
State Administrative Tribunal (SAT) of WA and Administrative Review Tribunal (ART)	State Administrative Tribunal Act 2004 (WA); Administrative Review Tribunal Act 2024 (Cth)	Review of administrative decisions involving health practitioners, guardianship, mental health orders, or health-related matters.
My Health Record (System Operator)	My Health Records Act 2012 (Cth)	Oversight, audit, and investigation of access to and use of My Health Record.
WA Police Force (via court)	Criminal Investigation Act 2006 (WA)	Criminal investigations and prosecutions requiring medical evidence.
WorkCover WA	Workers Compensation and Injury Management Act 1981 (WA)	Assessment and management of workers' compensation claims for workplace injuries.
WorkSafe WA (Inspectors)	Work Health and Safety Act 2020 (WA)	Investigation of workplace incidents, injuries, and safety breaches.