



Cloud Policy

1. Purpose

The purpose of the *Cloud Policy* is to provide the requirements for evaluating and selecting cloud services within the WA health system, to ensure the ongoing security and confidentiality of WA health system information. This Policy also provides a basis for staff members to assess risks in aligning operational requirements with cloud services.

This Policy:

- defines cloud services options available to the WA health system
- details mandatory requirements to adequately protect information when cloud services are utilised within the WA health system.

To ascertain the suitability of proposed cloud services, including any potential risks, cloud services have been categorised into three 'zones'.

Cloud Zone A: HealthNext (low risk)

- Contains components of private and public clouds and includes both Infrastructure as a Service (IaaS) and Platform as a Service (PaaS) environments.
- The HealthNext Cloud contracts have been established to ensure the ongoing security and redundancy of information availability.

Cloud Zone B: Third Party – Australian-hosted (medium risk)

- Australian hosted cloud services that sit outside of the HealthNext infrastructure.

Cloud Zone C: Third Party – Offshore-hosted (high risk)

- Cloud Zone C services are subject to the privacy and confidentiality laws within the country hosting the cloud service. These laws may be significantly different from those of Australia.

Staff members considering purchasing cloud services should obtain guidance from the Health Support Services Security and Risk Management Team via email infosec@health.wa.gov.au

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

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

2. Applicability

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

3. Policy requirements

All WA health system entities must have a clear understanding of the classification of information that will be stored and accessed to ensure the security controls offered by the cloud services are sufficient.

3.1 Cloud Zone A services

When seeking to purchase a Zone A cloud service, WA health system entities must:

- document a formal assessment against the specification of the Zone A cloud service within the *Cloud Service Requirements* to ensure that this is a suitable value for money and fit for purpose service. If suitable services can be arranged through the HealthNext Cloud, this service must be used
- ensure compliance with the [ICT Governance and Approvals Process](#) and the Procurement Policy Framework when purchasing cloud services.

3.2 Cloud Zone B and C services

Where a Zone A cloud service is considered unsuitable, WA health system entities are accountable for procuring a suitable Zone B or Zone C cloud service that will ensure information is appropriately stored and protected.

If the confidentiality of personal information cannot be adequately understood, managed or controlled under any proposed Zone B or Zone C cloud service, WA health system entities must not proceed with the arrangement.

When seeking to purchase Zone B or Zone C cloud services, WA health system entities must:

- complete a documented Risk Assessment to demonstrate that the offered service meets storage, security and redundancy requirements. Identified risks must be managed in accordance with [System Governance, Risk and Assurance Policy Framework](#)
- ensure compliance with the Cloud Service Requirements.
- ensure compliance with the [ICT Governance and Approvals Process \(WA Health Staff members only\)](#) and the requirements of the [Procurement Policy Framework](#) when purchasing cloud services
- clarify any legal issues regarding the contractual obligations of accepting any terms of use, including those within User Agreements, Terms of Service, Terms of Use, Contracts for Service, Service Agreements, or any other terms and conditions
- provide details of the cloud service to be purchased to the Health Support Services Security & Risk Management Team via email: infosec@health.wa.gov.au

4. Compliance monitoring

Health Service Providers are required to comply with this Policy through annual Cloud Service Audits.

Health Service Providers are required to provide to the System Manager the results of their annual Cloud Services Audit, the results of which will be subject to review for assurance purposes. In addition, all related local documentation including processes, procedures and/or protocols are to be provided by Health Service providers to the System Manager upon request.

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

5. Related documents

The following documents are mandatory pursuant to this Policy:

- [Cloud Service Requirements](#)

6. Supporting information

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

- [Western Australian Government Cloud Policy Supplementary Guide and Toolkit](#)
- [Western Australian Government Data Offshoring Position and Guidance Fact Sheet](#)

7. Definitions

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

Term	Definition
Cloud services	Cloud services are defined as the delivery of on-demand data management services, including software applications, storage and processing power, typically via the public internet. There are three main types of cloud services available for purchase 'as a service':
HealthNext	HealthNext is a major reform program led by Health Support Services to transform the WA Health system's ICT infrastructure into a contemporary, scalable and cost-effective hybrid-cloud environment to better support the delivery of healthcare services.
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. The terms 'data' and 'information' are often used interchangeably and should be taken to mean both data and information in this Policy.
Personal information	Has the meaning given in the <i>Freedom of Information Act 1992</i> in the Glossary clause 1: Information or an opinion, whether true or not, and whether recorded in a material form or not, about an individual, whether living or dead —

	<p>a) whose identity is apparent or can reasonably be ascertained from the information or opinion; or</p> <p>b) who can be identified by reference to an identification number or other identifying particular such as a fingerprint, retina print or body sample.</p>
Staff member	<p>For the purposes of this Policy, a staff member means:</p> <ul style="list-style-type: none"> • A staff member pursuant to section 6 of the <i>Health Services Act 2016</i> is: <ul style="list-style-type: none"> ○ an employee in the health service provider ○ a person engaged under a contract for services by the health service provider. • An employee pursuant to section 3(1) of the <i>Public Sector Management Act 1994</i> is a person employed in the Public Sector by or under an employing authority, which, for the purposes of this Policy is the Department of Health.
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 <i>Health Services Act 2016</i>; <u>and</u> • The Department of Health as an administrative division of the State of Western Australia pursuant to section 35 of the <i>Public Sector Management Act 1994</i>. <p>Note: Contracted health entities are not considered WA health system entities.</p>

8. Policy contact

Enquiries relating to this Policy may be directed to:

Title: Assistant Director General
Directorate: Purchasing and System Performance
Email: RoyalSt.PSPInfoManagement@health.wa.gov.au

9. Document control

Version	Published date	Effective from	Review date	Effective to	Amendment (s)
MP0140/20	27 July 2020	27 July 2020	27 July 2023	Current	Original version

10. Approval

Approval by	Nicole O'Keefe, Assistant Director General, Strategy and Governance Division Department of Health
Approval date	24 July 2020

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