



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

Information Management Governance Model

Version 2.0

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1. Introduction

This document outlines the Information Management Governance Model for information held within the WA health system. The WA health system is expanding and transforming rapidly in the digital strategy space. To align, the existing WA health system Information Management Governance Model was reviewed, and it was determined that changes were required. This ensures that the information contained within new and existing systems, in addition to the governance mechanisms overseeing them, can expand appropriately.

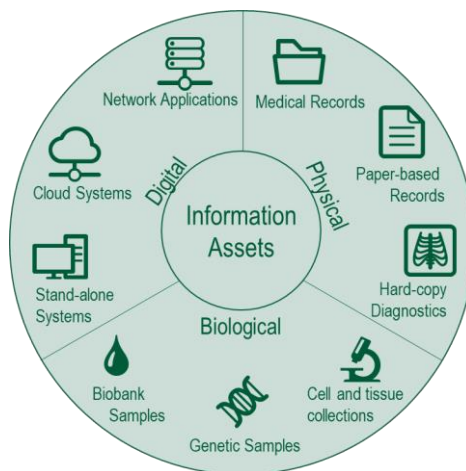
Whilst the digital transformation progresses, the WA health system still maintains and produces information in other non-digital formats such as physical (medical records, imaging information) and biological information (blood and tissue samples). The Information Management Governance Model applies to all information collected by the WA health system regardless of format.

Information produced by the WA health system must be held in health information management systems¹. The information contained within these systems are valuable assets and assist the WA health system to undertake Department of State, System Manager and Health Service Provider functions. The information enables the WA health system to deliver safe, high quality care and supports better health outcomes to the people of Western Australia.

2. Information Assets

An Information Asset is 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. This includes, but is not limited to, collections of digital, physical and biological information.

Figure 1: Examples of types and formats of information held within Information Assets



An Information Asset must include one or more of the following conditions:

- is used to meet business, operational and/or legislative requirements
- the State of WA has a strategic need for the information
- contains clinical and/or personal information
- is used for reporting at a state level, national level, or external to the health service provider where the Information Asset resides
- is used across multiple health service providers.

The size of the Information Asset is not a determining factor.

¹ Health information management systems has the meaning defined in Section 214(1) of the Health Services Act 2016 as systems for the collection, receipt, storage and disclosure of, and access to, health information.

Information Assets must be:

Fit for purpose

Information Assets must be designed to maximise their usefulness to service multiple needs, both internal and external to the health system, in a timely manner. It should not, wherever possible, generate a body of information which duplicates information already available within another Information Asset.

Governed

The information management governance structure must be in place to ensure that the Information Asset is managed appropriately, and that the information captured by the Information Asset is used appropriately.

Efficient and Effective

Costs relates to the resources used in supplying, collecting, processing, governing, storing and using the information within Information Assets. The selection of a suitable system must reflect the choice of the least costly option that fits the decision-making needs of the WA health system. All Information Assets must comply with the [MP 0001/16 Information Communications Technology \(ICT\) Governance Policy](#) to ensure that the above issues are addressed.

Accessible

Information Assets must be structured to facilitate information sharing. All parties accessing and using information from the Information Asset must comply with [MP 0015/16 Information Access, Use and Disclosure Policy](#) to ensure information is lawfully and appropriately accessed, used and disclosed.

Transparent

Information held within an Information Asset must be clearly defined to promote consistency and comparability of information. Accordingly, metadata documentation (e.g. data dictionaries, reference manuals) must be developed to describe the content, format and structure of the collection, and the relationships between elements, to assist with interpretability. Where relevant, definitions must be consistent with local, national and international definitions.

Consistent

Ensuring information is comparable, reliable and consistent over time, facilitates accurate analysis of the information and allows the identification of trends or inconsistencies to inform strategic decision making. Measures must be taken to ensure information is captured from source accurately and consistently. As such, information captured by the Information Asset must comply with the [MP 0057/17 Data Quality Policy](#).

Ethical

Only the minimum amount of personal information should be collected in order to fulfil the purpose of the Information Asset. Where relevant, patient confidentiality must be maintained, and in accordance with the [Confidentiality Fact Sheet](#).

Secure

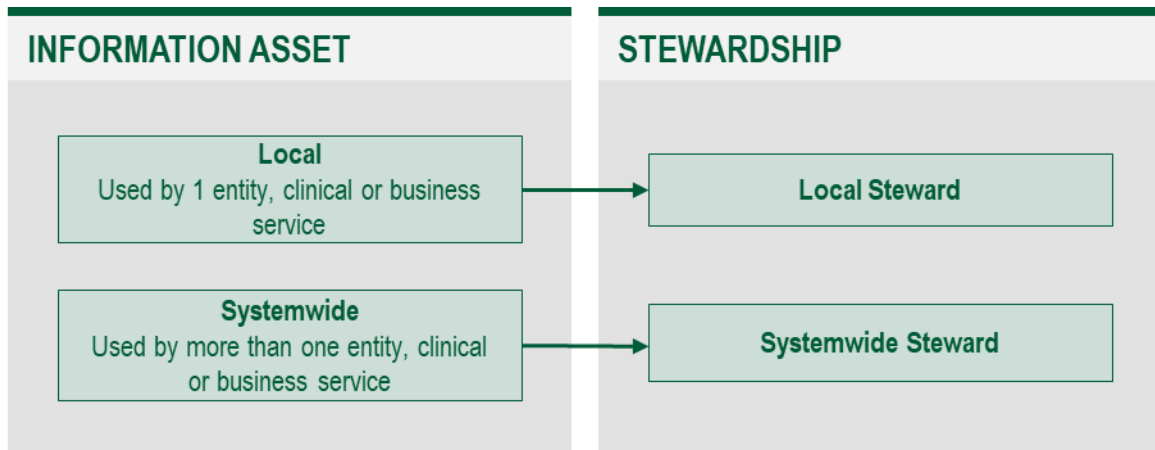
Information captured by the Information Asset must be classified correctly, as outlined in the [MP 0146/20 Information Classification Policy](#). This is to ensure that the information can be appropriately controlled based on the sensitivities and risks associated with the collected information.

Allocation of Information Assets

The WA health system has two collections of Information Assets. Information Assets are determined by the number of legal entities who use the Information Asset and the Steward is assigned accordingly. The definitions of each collection of Information Asset are as follows:

- **Local** - Information Assets used by a single legal entity, clinical or non-clinical service.
- **Systemwide** – Information Assets used by more than one legal entity, clinical or non-clinical service. This provides functionality/capability to enable clinical or non-clinical service across all relevant legal entities where that service is provided.

Figure 2: Information held within the WA health system



Establishing new Information Assets

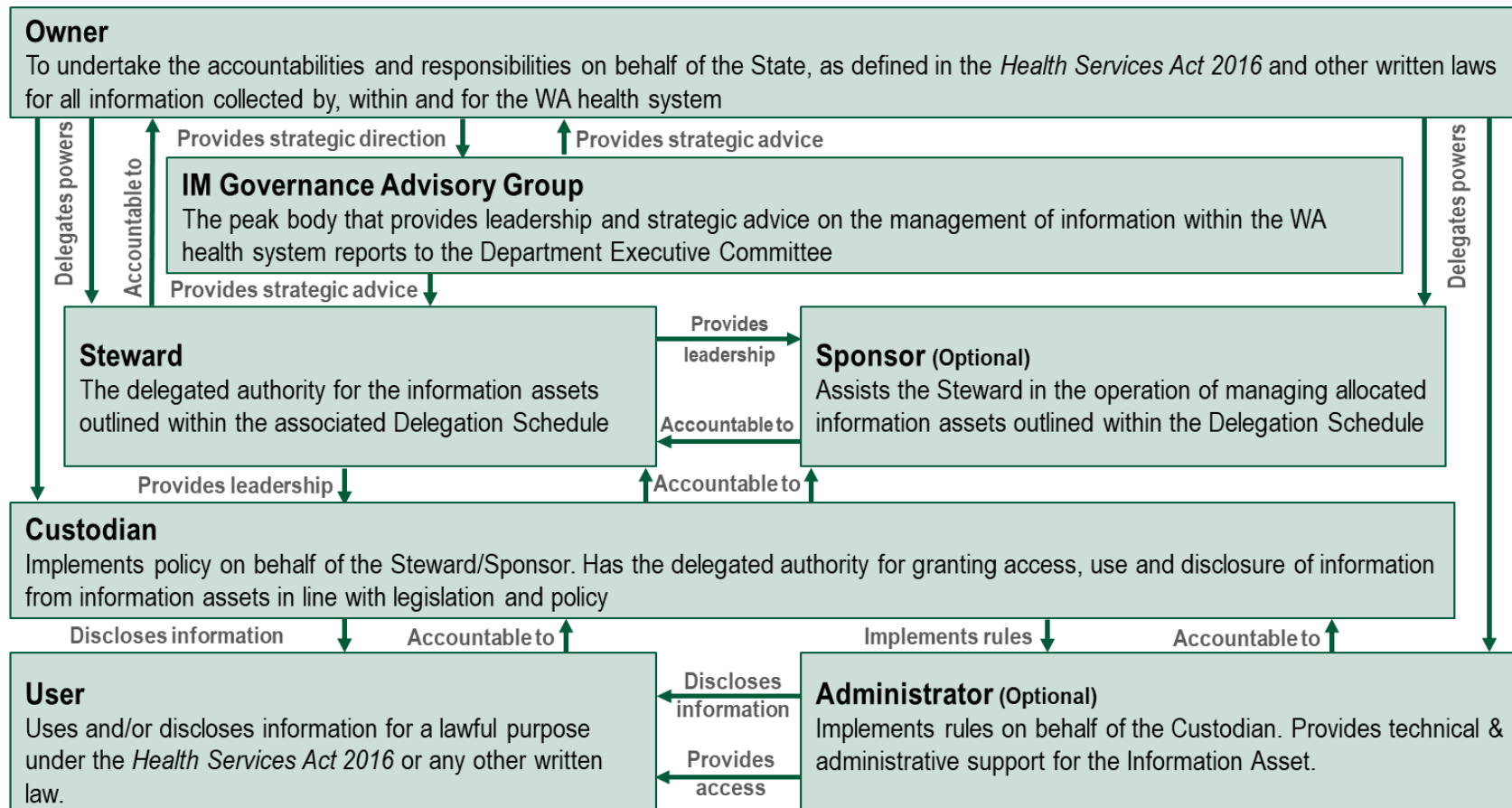
In establishing a new Information Asset, information management governance practices and processes must be developed.

The [Information Communication Technology \(ICT\) Governance](#) process was developed to ensure that the right ICT systems are in place within the WA health system. Whilst progressing through the ICT Governance process, the Appendix 1: Information Asset Checklist for information management governance matters must also commence.

3. Information Management Governance Model

The WA health system has recognised the need for a contemporary Information Management Governance structure to ensure that the Department of Health and Health Service Providers information is secured, protected and regarded a high-value asset whilst still being able to share information for the benefit of patients, staff, researchers and the public. The contemporary Information Management Governance Model is outlined in Figure 3. This model maintains Stewards and Custodians and introduces the IM Governance Advisory Group, Sponsors and Administrators. The Owner and User are also integrated into the model.

Figure 3: WA health system Information Management Governance Model



3.1 Information Management Governance Focus Areas

The Information Management Governance Focus Areas are a set of overarching attributes that enables a linkage of compliance between the Information Management Governance Model to the maturity of WA health system's management of information.

The focus areas are applied to the responsibilities of the Information Management Governance Model roles within each entity and are used to assess the compliance to the level of maturity. For further details on the WA health system entity's maturity assessment, refer to section 4: Compliance and Assurance.

The below table outlines the focus area and associated description.

Focus area	Description
Leadership commitment	<ul style="list-style-type: none"> Communication and model leadership commitment to Information Management Governance
Culture of engagement	<ul style="list-style-type: none"> Employee perceptions and behaviour demonstrates a broad commitment to Information Management Governance across the WA health system
Accountability	<ul style="list-style-type: none"> Roles and responsibilities for managing Information Management Governance are clearly defined and appropriately assigned
Guiding behaviour	<ul style="list-style-type: none"> Policies and procedures guide employees regarding Information Management Governance
Workforce knowledge	<ul style="list-style-type: none"> Capability is managed such that employees have the skills and knowledge to maintain and mature Information Management Governance
Risk management	<ul style="list-style-type: none"> The risks to Information Assets are identified, assessed and managed
Physical and technical controls	<ul style="list-style-type: none"> Physical/technical controls to detect and protect against any information breaches are in place
Continual improvement	<ul style="list-style-type: none"> Corporate monitoring and reporting activities to help inform improvements in Information Management Governance

3.2 Roles and Responsibilities

Appendix 2: Roles and Responsibilities Matrix lists the roles and responsibilities for each focus area.

Owner

The Owner's role is to undertake responsibilities on behalf of the State, as defined in the *Health Services Act 2016* and other written laws, for all information collected by, within and for the WA health system.

The Owner is accountable to the Minister of Health, the State of Western Australia or as prescribed within written laws.

As per the *Health Services Act 2016*, the State of Western Australia is the statutory owner of all assets within the WA health system, including Information Assets. The Director General of the Department of Health is granted authority to collect, use and disclose information on behalf of the State. Therefore, for the purposes of this document, the Director General is the Owner of all information collected under the *Health Services Act 2016*.

For other written laws, the Director General may not be the delegated Owner. For example, the Chief Health Officer is the delegated Owner of information collected under the *Public Health Act 2016*. The relevant legislation under which the information is collected determines the delegated owner, not the governance model.

The Owner is responsible for:

Focus area	Owner responsibilities
Leadership commitment	<ul style="list-style-type: none"> Ensure the WA health system's Information Assets and all information contained within are developed and managed on behalf of the State
Culture of engagement	<ul style="list-style-type: none"> Provide strategic direction of information management governance to the Information Management Governance Advisory Group Support information sharing that promotes the access, use and disclosure of information when it is permitted or required by law
Accountability	<ul style="list-style-type: none"> Authorise the delegation of information management functions and powers to Stewards, Sponsors, Custodians and Administrators via relevant Instruments of Delegation
Guiding behaviour	<ul style="list-style-type: none"> Approve policies within the relevant Policy Frameworks to ensure the management of information including the way in which information is collected, used and disclosed
Workforce knowledge	<ul style="list-style-type: none"> Maintain a skilled workforce capable of making appropriate decisions around information management
Risk management	<ul style="list-style-type: none"> Provide a consistent approach to risk management
Physical and technical controls	<ul style="list-style-type: none"> Support physical and technical initiatives to ensure the security and privacy of the WA health system's information
Continual improvement	<ul style="list-style-type: none"> Support information management initiatives to ensure continual improvement to information produced by the WA health system

Information Management (IM) Governance Advisory Group

The IM Governance Advisory Group is the peak body for information management governance. Its role is to:

- provide strategic advice on the management of information within the WA health system which includes, but is not limited to, clinical and non-clinical information
- provide leadership and advice on information management governance models and architecture
- review and monitor compliance on the management of Information Assets
- develop strategies and provide advice to improve information management capabilities including optimising information sharing, and education and awareness
- provide advice on state and national information management issues
- give advice on information management risks and mitigation strategies
- provide additional strategic information management advice for ICT initiatives that are key information management enablers
- provide executive sponsorship for information management working or advisory groups.

The IM Governance Advisory Group reports to the Department Executive Committee and is accountable to the Systemwide Steward. The IM Governance Advisory Group comprises nominated Executive representatives from all health system entities.

The IM Governance Advisory Group's responsibilities are:

Focus area	Information Management Governance Advisory Group responsibilities
Leadership commitment	<ul style="list-style-type: none"> • Manage the overall establishment, implementation, maintenance, and continually improve the model that governs information held within the WA health system
Culture of engagement	<ul style="list-style-type: none"> • Support the advancement of information management strategies and practices • Support information sharing that promotes the access, use and disclosure of information when it is permitted or required by law
Accountability	<ul style="list-style-type: none"> • Direction and structure of the Information Management Advisory Group is outlined within the Terms of Reference
Guiding behaviour	<ul style="list-style-type: none"> • Endorse and direct strategies for the access, use and disclosure of information from Information Assets
Workforce knowledge	<ul style="list-style-type: none"> • Support, endorse and direct information management communication and education programs
Risk management	<ul style="list-style-type: none"> • Identify and mitigate risks associated with all decisions made • Address risks and issues escalated by the Stewards • Provide strategic advice on the information management governance compliance and assurance for Information Assets
Physical and technical controls	<ul style="list-style-type: none"> • Support the advancement of physical and technical control strategies and practices
Continual improvement	<ul style="list-style-type: none"> • Support the advancement of continual improvement strategies and practices • Support Business User Groups in improving Information Assets

Steward

The Steward's role is to:

- implement the strategic direction of information management governance that has been recommended by the IM Governance Advisory Group and/or approved by the Owner
- manage the Information Assets under their control to ensure compliance in line with legislation, policies and standards.

There are three types of Stewards:

- **Systemwide Steward** - One Systemwide Steward who is responsible for all systemwide Information Assets.
- **Local Stewards** -
 - Health Service Provider - One Local Steward per Health Service Provider who is responsible for all local Information Assets within the entity.
 - Department of Health – One Local Steward who is responsible for all local Information Assets within the Division.

Stewards are accountable to the Owner.

Stewards are delegated the authority for Information Assets by the Owner, and this responsibility must be outlined within the relevant Instruments of Delegation.

The Steward's responsibilities are:

Focus area	Steward responsibilities
Leadership commitment	<ul style="list-style-type: none"> • Implement and support the Information Management Governance Model • Support and provide leadership to the management of Information Assets
Culture of engagement	<ul style="list-style-type: none"> • Provide support to the Sponsor(s) and Custodians on the management of information management practices • Support information sharing that promotes the access, use and disclosure of information when it is permitted or required by law
Accountability	<ul style="list-style-type: none"> • 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
Guiding behaviour	<ul style="list-style-type: none"> • Ensure policies under the relevant Policy Frameworks are supported and implemented
Workforce knowledge	<ul style="list-style-type: none"> • Support the participation to the information management communications and education programs
Risk management	<ul style="list-style-type: none"> • Review and manage all risks and issues that arise • Escalate to the Information Management Governance Advisory Group as required
Physical and technical controls	<ul style="list-style-type: none"> • Ensure physical and technical controls are reviewed, maintained and improved
Continual improvement	<ul style="list-style-type: none"> • Ensure continual improvement to the Information Assets such as quality of information, security, metadata and record management

Assignment of a Steward

The criteria to assign a Steward is:

- Stewardship is allocated to a position, not a person. This enables any occupant whether, substantive or acting, to exercise the functions and powers outlined within the relevant Instruments of Delegation.
- The Systemwide Steward will be assigned by the Director General, who will advise the IM Governance Advisory Group.
- Local Steward within the Health Service Provider must hold the position of Chief Executive (Tier 1B) or Executive Director (Tier 2B).
 - The Chief Executive will nominate one Steward for the whole Health Service Provider by completing the Assignment of Local HSP Steward form and sending to the RoyalSt.PSPInfoManagement@health.wa.gov.au.
- Department of Health Local Stewards must hold the position of Assistant Director General (Tier 2A).
 - The Director General will assign the Local Steward(s), who will advise the Information Management Governance Advisory Group.

Sponsor

The Sponsor role is to execute leadership over allocated Information Assets functions on behalf of the Steward. The Sponsor is allocated functions to assist the Steward in the operation of managing Information Assets.

There are three types of Sponsors:

- **Systemwide Sponsor** – One or more Systemwide Sponsor(s) who are accountable to the Systemwide Steward
- **Local Sponsor(s)** - One or more Local Sponsor(s) who are accountable to the respective Local Steward.

The functions held by a Sponsor must be outlined within the relevant Instruments of Delegation and approved by the Owner.

The Sponsor's responsibilities are:

Focus area	Sponsor responsibilities
Leadership commitment	<ul style="list-style-type: none"> • Provide support and leadership to the Custodians of allocated Information Assets in the day-to-day management
Culture of engagement	<ul style="list-style-type: none"> • Support the Steward in implementing policies, processes and procedures • Support the Custodians on the management of information management practices including access, use and disclosure issues • Support information sharing that promotes the access, use and disclosure of information when it is permitted or required by law
Accountability	<ul style="list-style-type: none"> • 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
Guiding behaviour	<ul style="list-style-type: none"> • Support the Steward in the implementation of relevant policies within the Policy Frameworks
Workforce knowledge	<ul style="list-style-type: none"> • Support the Steward in organising participation in information management communications and education programs
Risk management	<ul style="list-style-type: none"> • Review and manage all risks and issues that arise • Escalate to the Steward as required
Physical and technical controls	<ul style="list-style-type: none"> • Support the Custodian in reviewing and maintaining physical and technical controls to the Information Asset
Continual improvement	<ul style="list-style-type: none"> • Support the Custodian in reviewing and maintaining quality improvements including quality processes, security, metadata and record management

Assignment of a Sponsor

The criteria to assign a Sponsor is:

- Sponsorship is allocated to a position, not a person. This enables any occupant whether, substantive or acting, to exercise the functions and powers outlined within the relevant Instruments of Delegation.
- The allocation of Sponsor(s) is at the discretion of the Steward or Chief Executive. If Sponsor(s) are allocated, they must be assigned to a senior position.
- One or more Sponsor(s) can be endorsed by the Steward. This enables flexibility to align Information Assets to management structures or operational service delivery such as clinical and non-clinical functions. For example, a Sponsor for Medicine Management Information Assets within a Health Service Provider can be the Chief Pharmacist.

Assignment of Sponsor requires completion of the Recommendation of Sponsorship Form for arrangements relating to:

- new or additional Sponsors
- change in Sponsor position
- change in Sponsor position occupant.

Endorsement by the applicable Steward must be obtained. The endorsed Sponsor arrangements will be outlined within the WA health system Information Register and where applicable, the relevant Instruments of Delegation once approved by the Owner.

The process for the assignment of Sponsorship is outlined below.

Systemwide Sponsor

1. A completed Recommendation of Sponsor form sent to Information and Performance Governance via RoyalSt.PSPInfoManagement@health.wa.gov.au
2. Information and Performance Governance, within the Department of Health will obtain endorsement from the Systemwide Steward

Local Sponsor

1. A completed Recommendation of Sponsor form is sent to the Local Steward for endorsement.
2. The endorsed Recommendation of Sponsor form must then be sent to Information and Performance Governance within the Department of Health via RoyalSt.PSPInfoManagement@health.wa.gov.au.

For other written laws, the process for assigning a Sponsor still applies but the approval may be from a different Owner. For example, Sponsor changes to Information Assets under the *Public Health Act 2016* will require approval from the Chief Health Officer. The approved Recommendation of Sponsor form must then be sent to Information and Performance Governance within the Department of Health via RoyalSt.PSPInfoManagement@health.wa.gov.au for inclusion in the WA health system's Information Register.

Custodian

The Custodian role is:

- to manage day-to-day operations of the Information Asset, and implement policy on behalf of the Steward and Sponsor
- to grant access to, use and disclosure information from Information Assets in line with legislation, policy as per delegated authority and in accordance with Steward and Sponsor requirements.
- to maintain appropriate metadata documentation that is fit-for-purpose
- plan and project manage changes to the information asset.

The Custodian is accountable to the Sponsor (where instituted), otherwise the relevant Steward. The functions held by the Custodian must be outlined within the relevant Instruments of Delegation and approved by the Owner.

The Custodian responsibilities are:

Focus area	Custodian responsibilities
Leadership commitment	<ul style="list-style-type: none"> • Manage the Information Asset in line with policy and relevant legislation and other written laws
Culture of engagement	<ul style="list-style-type: none"> • Support information sharing that promotes the access, use and disclosure of information when it is permitted or required by law • Provide advice on the proper use and interpretation of the information to authorised users
Accountability	<ul style="list-style-type: none"> • Ensure the Custodian and Information Asset details are current and accurate within the associated Instruments of Delegation and the WA health system Information Register
Guiding behaviour	<ul style="list-style-type: none"> • Supports and implements the relevant policies, processes and procedures
Workforce knowledge	<ul style="list-style-type: none"> • Participation in all information management communication and education programs
Risk management	<ul style="list-style-type: none"> • Maintain a work plan for the asset highlighting risk and mitigation strategies • Highlight risks and associated mitigation strategies to the Steward or the Sponsor if deemed operationally required by the Steward • Escalate risks associated with access, use and disclosure of information to the Steward or the Sponsor if deemed operationally required by the Steward • Report and manage information breaches in a timely manner as outlined within relevant policies
Physical and technical controls	<ul style="list-style-type: none"> • Control the access to the Information Asset including regular reviews of users • Ensure the safe transmission of information to authorised users • Maintain the security of the Information Asset to ensure privacy and confidentiality of information contained within

Focus area	Custodian responsibilities cont.
Continual improvement	<ul style="list-style-type: none"> • 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 • Maintain documentation of metadata, data dictionary and any technical documentation required by policies, legislation or other written laws • Ensure the record management (retention, storage and disposal) of information is in accordance with policies, legislation and other written laws • May participate within Business User Groups

Assignment of a Custodian

The criteria to assign a Custodian is:

- Custodianship is allocated to a position (minimum requirement of PSA/HSU Level 5 or equivalent), not a person. This enables any occupant whether, substantive or acting, to exercise the functions and powers outlined within the relevant Instruments of Delegation.
- The Custodian must have the knowledge and understanding of the Information Asset(s) to fulfil the delegated responsibilities and the capacity to implement policies and processes and procedures.
- If the Custodian position is not occupied, the Sponsor or Steward will be responsible for the Information Asset(s) until a Custodian has been endorsed and approved.
- 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.

Assignment of Custodian requires completion of the Recommendation of Custodianship Form for arrangements relating to:

- new or additional Custodians
- change in Custodian position
- change in Custodian position occupant.

Endorsement by the applicable Steward must be obtained. The endorsed Custodian arrangements will be outlined within the WA health system Information Register and where applicable, the relevant Instruments of Delegation once approved by the Owner.

The process for the assignment of Custodianship is outlined below.

Systemwide Custodian

1. A completed Recommendation of Custodianship form sent to Information and Performance Governance within the Department of Health via RoyalSt.PSPInfoManagement@health.wa.gov.au
2. Information and Performance Governance will obtain endorsement from the Systemwide Steward

Local Custodian

1. A completed Recommendation of Custodianship form is sent to the Local Steward for endorsement.
2. The endorsed Recommendation of Custodianship form must then be sent to Information and Performance Governance within the Department of Health via RoyalSt.PSPInfoManagement@health.wa.gov.au.

For other written laws, the process for assigning a Custodian still applies but the approval may be from a different Owner. For example, Custodianship changes to Information Assets under the *Public Health Act 2016* will require approval from the Chief Health Officer. The approved Recommendation of Custodianship form must then be sent to Information and Performance Governance within the Department of Health via RoyalSt.PSPInfoManagement@health.wa.gov.au for inclusion in the WA health system's Information Register.

Administrator

An Administrator provides technical and administrative support for the Information Asset. Limited delegated functions can be allocated by the Owner upon recommendation of the Steward and outlined within the applicable Instrument of Delegation.

The Administrator role is:

- to implement rules on behalf of the Custodian
- to provide technical and administrative support for the Information Asset.

The Administrator responsibilities are:

Focus area	Administrator responsibilities
Leadership commitment	<ul style="list-style-type: none"> • Provide support and technical expertise to Custodians in managing allocated Information Assets
Culture of engagement	<ul style="list-style-type: none"> • Support the Custodian in implementing technical directions to allocated Information Assets
Accountability	<ul style="list-style-type: none"> • Ensure Administrator details are current within the associated Instruments of Delegation and the WA health system Information Register
Guiding behaviour	<ul style="list-style-type: none"> • Assists the Custodian in the technical implementation of the relevant policies, processes and procedures
Workforce knowledge	<ul style="list-style-type: none"> • Participation in all information management communication and education programs
Risk management	<ul style="list-style-type: none"> • Highlight risks to and within the Information Asset and associated mitigation strategies to the Custodian • Report and manage information breaches in a timely manner as outlined within policies
Physical and technical controls	<ul style="list-style-type: none"> • Ensure all physical and technical controls have been applied to the Information Asset
Continual improvement	<ul style="list-style-type: none"> • Assist the Custodian in implementing quality, security, metadata and record management improvements • May participate within Business User Groups

Assignment of an Administrator

The criteria to assign an Administrator is:

- Administrator is allocated to a position, not the person. This enables any occupant, whether substantive or acting, to exercise the functions and powers outlined within the relevant Instruments of Delegation.
- The allocation of Administrator(s) is at the discretion of the Steward. If Administrator(s) are allocated, they must be assigned to a position that has the required technical knowledge.
- Depending on the size, function and requirements of the Information Asset, the Administrator role may be undertaken by the Custodian.
- 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.
- The Administrator must have the technical knowledge to perform the functions allocated by the Custodian.

Assignment of Administrator requires completion of the Recommendation of Administrator Form for arrangements relating to a:

- new or additional Administrator
- change in Administrator position
- change in Administrator position occupant.

Systemwide Administrator

1. A completed Recommendation of Administrator form sent to Information and Performance Governance within the Department of Health via RoyalSt.PSPInfoManagement@health.wa.gov.au
2. Information and Performance Governance within the Department of Health will obtain endorsement from the Systemwide Steward

Local Administrator

1. A completed Recommendation of Administrator form is sent to the Local Steward for endorsement.
2. The endorsed Recommendation of Administrator form must then be sent to Information and Performance Governance within the Department of Health via RoyalSt.PSPInfoManagement@health.wa.gov.au.

For other written laws, the process for assigning an Administrator still applies but the approval may be from a different Owner. For example, Administrator changes to Information Assets under the *Public Health Act 2016* will require approval from the Chief Health Officer. The approved Recommendation of Administrator form must then be sent to Information and Performance Governance within the Department of Health via RoyalSt.PSPInfoManagement@health.wa.gov.au for inclusion in the WA health system's Information Register.

User

A User is an individual or group that has been provided with access to the Information Asset(s) and/or information either contained within or disclosed from the Information Asset.

The User role is to appropriately and lawfully access, use or disclose information contained in the Information Asset as authorised by the Custodian, Sponsor or Steward.

The User responsibilities are:

Focus area	User responsibilities
Leadership commitment	<ul style="list-style-type: none"> Maintains compliance to the approved usage of information provided by the Custodian
Culture of engagement	<ul style="list-style-type: none"> Comply to the access, use and disclosure agreements, process or procedures outlined by the Custodian
Accountability	
Guiding behaviour	<ul style="list-style-type: none"> WA health system staff members – comply to the relevant policies within the Policy Frameworks, local policies, processes and procedures Non-WA health system users - abide by the access, use and disclosure agreements, process or procedures outlined by the Custodian
Workforce knowledge	<ul style="list-style-type: none"> WA health system staff members – participation in all information management communication and education programs Non-WA health system users – abide by the access, use and disclosure agreements, process or procedures outlined by the Custodian
Risk management	<ul style="list-style-type: none"> Report any suspected breach of information within a timely manner
Physical and technical controls	<ul style="list-style-type: none"> Ensure all physical and technical controls are being utilised such as passwords, multi factor authentication and separation of duties
Continual improvement	<ul style="list-style-type: none"> Report information quality, functionality or security concerns to the Custodian

3. Compliance and Assurance

To measure compliance against Information Management Governance policy, a maturity model and assessment tool will be used.

Compliance will take the form of a WA health system entity self-assessment via the Information Management Assessment Tool every two years. The Information Management Assessment Tool will assist Health Service Providers assess their information management governance maturity.

The self-assessment can be taken on a more frequent basis to support the development and ongoing management of information management governance processes.

WA health system maturity assessment process

The WA health system maturity assessment is a key element of the Information Management Assessment Tool.

- Health Service Providers and each Department of Health Division are required to complete the assessment using the Information Management Assessment Tool. The completed assessment requires the relevant Chief Executive or Assistant Director General approval and must be submitted within the System Manager required timeframes to Information and Performance Governance within the Department of Health via RoyalSt.PSPInfoManagement@health.wa.gov.au.
- Each assessment will be reviewed by Information and Performance Governance:
 - All queries and issues will be in collaboration with the WA health system entity
 - Evidence may be requested to support the assessment
 - Comparison to previous years will be performed
- An overall report on the maturity of the WA health system entities will be tabled with the IM Governance Advisory Group
- Action plans may be requested on the discretion of the IM Governance Advisory Group.

The below table outlines the five levels of maturity for WA health system entities.

Maturity	Description
Level 1 - Undeveloped	Few or no systems are in place. A single role carries key responsibilities and there is no monitoring of controls or systems improvement activities.
Level 2 - Developing	Systems are largely ad hoc. Key responsibilities are scattered across various roles and there is minimal monitoring of controls. Systems improvement activities are random.
Level 3 - Defined	There are examples of formal compliance. Particular roles are specified as carrying key responsibilities (but may not in practice) and monitoring of controls is generally responsive in nature to inform systems improvement.
Level 4 - Managed	Systems are formally compliant. Particular roles formally carry key responsibilities and there is some regular tracking of controls to inform systems improvement.
Level 5 - Embedded	Systems to manage integrity risks are strategic and joined-up. All roles carry key responsibilities and there is ongoing monitoring of the effectiveness of controls by the executive/board that informs any systems improvement.

Appendix 1: Information Asset Checklist

Information Management Governance requirements	Responsibility	Completed
The disclosure of information between Information Assets (including feeder systems) must have Custodian(s) involvement and Steward(s) approval	Stewards/Custodians	
<p>Information Assets outside of the WA health system that connect into WA health system's Information Assets, for example, Universities, private hospitals, National or International registries must have each of the following:</p> <ul style="list-style-type: none"> • Data transfer and/or legal agreements established • Steward(s) approval • Ethics approval may be required for research related Information Asset(s) 	Stewards/Custodians	
<p>Determine which collection does the Information Asset belong to:</p> <ul style="list-style-type: none"> • Local • Systemwide 	Owner/Stewards/Custodians	
<p>Assign the appropriate positions to the below information management governance roles:</p> <ul style="list-style-type: none"> • Steward • Sponsor • Custodian • Administrator <p>Complete the appropriate Recommendation Forms [hyperlink] and send to RoyalSt.PSPInfoManagement@health.wa.gov.au</p>	Owner/Stewards	
A process to obtain patient consent must be established if patients are directly uploading their health information into the Information Asset. Ethics approval may also be required.	Stewards/Custodians	
Information must be hosted or stored within the WA health system's HealthNext (Zone A). If in Australia (Zone B) or overseas (Zone C), Steward approval must be obtained and all requirements as per MP 0140/20 Cloud Policy	Stewards/Custodians	
Classify the information within the new Information Asset(s) as per the MP 0146/20 Information Classification Policy	Custodians	

Information Management Governance requirements	Responsibility	Completed
<p>Policies within the Information Management Framework must be understood and implemented by the Custodian(s)</p> <p>The information management governance documentation that is required for the new Information Asset are:</p> <ul style="list-style-type: none"> • The below governance requirements can be within one document with forms, models and/or agreements as appendices: <ul style="list-style-type: none"> ○ Access and disclosure models ○ Disclosure register ○ Information request form and release contract ○ Information access and agreement forms ○ Obligations of users ○ Audit and assurance checklists ○ Information security model ○ Research process including Ethics approval • Data quality assessment and statements to be developed and maintained as per MP 0057/17 Data Quality Policy • Metadata practices such as data dictionary to be developed and maintained. 	Custodians	

Appendix 2: Roles and Responsibilities Matrix

	Owner	Information Management Governance Advisory Group	Steward	Sponsor (Optional)	Custodian	Administrator (Optional)	User
Leadership commitment	Ensure the WA health system's Information Assets and all information contained within are developed and managed on behalf of the State.	Manage the overall establishment, implementation, maintenance, and continually improve the model that governs information held within the WA health system.	Implement and support the Information Management Governance Model. Support and provide leadership to the management of Information Assets.	Provide support and leadership to the Custodians of allocated Information Assets in the day-to-day management.	Manage the Information Asset in line with policy and relevant legislation and other written laws.	Provide support and technical expertise to Custodians in managing allocated Information Assets.	Maintains compliance to the approved usage of information provided by the Custodian.
Culture of engagement	Provide strategic direction of information management governance to the Information Management Governance Advisory Group. Support information sharing that promotes the access, use and disclosure of information when it is permitted or required by law.	Support the advancement of information management strategies and practices. Support information sharing that promotes the access, use and disclosure of information when it is permitted or required by law.	Provide support to the Sponsor(s) and Custodians on the management of information management practices. Support information sharing that promotes the access, use and disclosure of information when it is permitted or required by law.	Support the Steward in implementing policies, processes and procedures. Support the Custodians on the management of information management practices including access, use and disclosure issues. Support information sharing that promotes the access, use and disclosure of information when it is permitted or required by law.	Support information sharing that promotes the access, use and disclosure of information when it is permitted or required by law. Provide advice on the proper use and interpretation of the information to authorised users.	Support the Custodian in implementing technical directions to allocated Information Assets.	Comply to the access, use and disclosure agreements, process or procedures outlined by the Custodian.
Accountability	Authorise the delegation of information management functions and powers to Stewards, Sponsors, Custodians and Administrators via relevant Instruments of Delegation.	Direction and structure of the Information Management Advisory Group is outlined within the Terms of Reference.	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.	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.	Ensure the Custodian and Information Asset details are current and accurate within the associated Instruments of Delegation and the WA health system Information Register.	Ensure Administrator details are current within the associated Instruments of Delegation and the WA health system Information Register.	Comply to the access, use and disclosure agreements, process or procedures outlined by the Custodian.
Guiding behaviour	Approve policies within the relevant Policy Frameworks to ensure the management of information including the way in which information is collected, used and disclosed.	Endorse and direct strategies for the access, use and disclosure of information from Information Assets.	Ensure policies under the relevant Policy Frameworks are supported and implemented.	Support the Steward in the implementation of relevant policies within the Policy Frameworks.	Supports and implements the relevant policies, processes and procedures.	Assists the Custodian in the technical implementation of the relevant policies, processes and procedures.	WA health system staff members – comply to the relevant policies within the Policy Frameworks, local policies, processes and procedures. Non-WA health system users - abide by the access, use and disclosure agreements, process or procedures outlined by the Custodian.
Workforce knowledge	Maintain a skilled workforce capable of making appropriate decisions around information management.	Support, endorse and direct information management communication and education programs.	Support the participation to the information management communications and education programs.	Support the Steward in organising participation in information management communications and education programs.	Participation in all information management communication and education programs.	Participation in all information management communication and education programs.	WA health system staff members – participation in all information management communication and education programs. Non-WA health system users – abide by the access, use and disclosure agreements, process or procedures outlined by the Custodian.

	Owner	Information Management Governance Advisory Group	Steward	Sponsor (Optional)	Custodian	Administrator (Optional)	User
Risk management	Provide a consistent approach to risk management.	Identify and mitigate risks associated with all decisions made. Address risks and issues escalated by the Stewards. Provide strategic advice on the information management governance compliance and audits for Information Assets.	Review and manage all risks and issues that arise. Escalate to the Information Management Governance Advisory Group as required.	Review and manage all risks and issues that arise. Escalate to the Steward as required.	Maintain a work plan for the asset highlighting risk and mitigation strategies. Highlight risks and associated mitigation strategies to the Steward or the Sponsor if deemed operationally required by the Steward. Escalate risks associated with access, use and disclosure of information to the Steward or the Sponsor if deemed operationally required by the Steward. Report and manage information breaches in a timely manner as outlined within relevant policies.	Highlight risks to and within the Information Asset and associated mitigation strategies to the Custodian. Report and manage information breaches in a timely manner as outlined within policies.	Report any suspected breach of information within a timely manner.
Physical and technical controls	Support physical and technical initiatives to ensure the security and privacy of the WA health system's information.	Support the advancement of physical and technical control strategies and practices.	Ensure physical and technical controls are reviewed, maintained and improved.	Support the Custodian in reviewing and maintaining physical and technical controls to the Information Asset.	Control the access to the Information Asset including regular reviews of users. Ensure the safe transmission of information to authorised users. Maintain the security of the Information Asset to ensure privacy and confidentiality of information contained within.	Ensure all physical and technical controls have been applied to the Information Asset.	Ensure all physical and technical controls are being utilised such as passwords, multi factor authentication and separation of duties.
Continual improvement	Support information management initiatives to ensure continual improvement to information produced by the WA health system.	Support the advancement of continual improvement strategies and practices. Support Business User Groups in improving Information Assets.	Ensure continual improvement to the Information Assets such as quality of information, security, metadata and record management.	Support the Custodian in reviewing and maintaining quality improvements including quality processes, security, metadata and record management.	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. Maintain documentation of metadata, data dictionary and any technical documentation required by policies, legislation or other written laws. Ensure the record management (retention, storage and disposal) of information is in accordance with policies, legislation and other written laws. May participate within Business User Groups.	Assist the Custodian in implementing quality, security, metadata and record management improvements. May participate within Business User Groups.	Report information quality, functionality or security concerns to the Custodian.

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