



Retention and Disposal of COVID-19 Information

Information Management Advice
for State Organisations

Revised January 2024



Retention and Disposal of COVID-19 Information

This document provides State Records Office (SRO) guidance on the retention and disposal of information collected by WA government organisations in response to the COVID-19 pandemic.

What is COVID-19 information?

COVID-19 information is any data, fact, identifier, knowledge, or evidence created, acquired, collected, and recorded as part of managing and reporting during the COVID-19 pandemic State of Emergency in Western Australia.

Why are retention and disposal processes for COVID-19 information essential to do now?

Some COVID-19 information will contain personal information such as names, addresses, phone numbers, and health and vaccination status. This kind of information should only be retained for as long as lawfully required.

Other COVID-19 information that has enduring value may have been created and kept by dedicated COVID-19 working groups or units that will soon or already be dissolved or disbanded now that the public health emergency has ended. Identifying and retaining that information must be done as soon as possible so these records are managed appropriately as State archives

STEP 1: IDENTIFY COVID-19 INFORMATION

Ensure your organisation has a comprehensive understanding of information created, acquired, collected, and recorded specifically for managing the COVID-19 pandemic State of Emergency in Western Australia, particularly information that must be managed to protect privacy.

The main categories of information are described in Step 2 below.

STEP 2: IDENTIFY INFORMATION THAT MUST BE MANAGED TO PROTECT PRIVACY (ASSESSED / REDACTED / DESTROYED)

The table below outlines the main categories of COVID-19-related information, and the applicable disposal authority.

Category	Disposal Authority
Check-in data captured on paper, ledger, or another format. Does not include data collected specifically via the SafeWA app.	<u>Protection of Information (Entry Registration Information Relating to COVID-19 and Other Infectious Diseases) Act 2021</u> Destroy 28 days after collection.

<p>COVID-19 health declarations.</p>	<p>Local Government: 2023-005 General Retention and Disposal Authority for Local Government Information Section 92.1</p> <p>State Government: 2023-004 General Retention and Disposal Authority for State Government Information Section 74.1</p>
<p>COVID-19 vaccination status records. – government employees and visitors.</p> <p>Information may be recorded in paper documents, in digital forms or documents or held as data in databases.</p> <p>Information may be in held in a personnel file for employees and/or in other systems e.g., Ascender.</p>	<p>Local Government: 2023-005 General Retention and Disposal Authority for Local Government Information Section 92.1</p> <p>State Government: 2023-004 General Retention and Disposal Authority for State Government Information Section 74.1</p> <p>Remove from personnel file and/or other systems and destroy or minimise retention of personal information where no longer required to provide evidence of vaccination status.</p> <p>Redact Individual Health Identifiers* from any information that must be retained.</p>
<p>Statistical or summary information.</p> <p>Aggregated data and information (dataset).</p>	<p>Local Government: 2023-005 General Retention and Disposal Authority for Local Government Information Section 100 as applicable</p> <p>State Government: 2023-004 General Retention and Disposal Authority for State Government Information Section 82 as applicable</p> <p>Retain if significant - see Attachment 1 for guidance on assessing significance.</p> <p>Otherwise destroy according to an approved disposal authority.</p>

*An Individual Healthcare Identifier (IHI) is a unique 16-digit number the My Health Record system uses to identify an individual. These may be found on an individual’s vaccination certificate and other health records. For further information about protection and handling of

IHIs see: <https://www.oaic.gov.au/privacy/guidance-and-advice/privacy-guidance-regarding-individual-healthcare-identifiers-ihis-on-covid-19-digital-vaccination-certificates>

STEP 3: PREPARE DISPOSAL AUTHORISATION/S FOR APPROVAL

Disposal of State records must be authorised by the lead officer of the organisation (CEO or equivalent) or their approved delegate.

The SRO's Records Management Advice on [Destruction of Temporary Records](#) outlines the specific information that should be included in a disposal authorisation.

Sample documentation for recording the disposal of records no longer required is provided in **Attachment 2**.

Note: When preparing a Disposal Authorisation list of COVID-19 Vaccination Status records, it is not necessary to include individual names of all individuals. A broad description such as: '*Vaccination status records- Employees - 2022*', '*Vaccination status records – Visitors – 2022*' is satisfactory.

It is not necessary to provide any of this disposal documentation to the SRO unless requested.

Agencies must retain records-of disposal authorisation/s for COVID-19 information.

STEP 4: DESTROY RECORDS APPROPRIATELY

Authorisation of the disposal of records of information must be appropriately documented – see published advice at [Destruction of Temporary Records](#).

Organisations must ensure, as far as possible, that destruction methods render information unrecoverable.

Hard copy records may be destroyed by shredding or pulping. Burning or burying records are not acceptable destruction methods.

Digital records should be destroyed using the destruction functionality in the business information system. Organisations should be aware that if the “delete” function is used to remove information from certain business information systems without further actions by system administrators the information may still be recoverable. It is recommended that records and information managers work with ICT staff to ensure digital records are rendered unrecoverable where required.

Consideration should also be given to information and data stored in backups and email archives i.e., copies of records.

STEP 5: MANAGE INFORMATION THAT MUST BE RETAINED

Certain records are valuable as long-term evidence of decision making and the actions of government. In some cases, these will need to be retained permanently as State archives.

Category	Retention and Disposal Authority
<p>Records documenting decisions made to accommodate short-term changes required to manage COVID-19 in the organisation.</p> <p>Decisions could be part of activities such as procurement, cleaning schedules, technology needs for staff to work from home, and planning for office fit-outs and modifications. Information may be recorded in email, purchase orders, etc.</p>	<p>Dispose of in accordance with General Disposal Authorities:</p> <p>Local Government: 2023-005 General Retention and Disposal Authority for Local Government Information</p> <p>State Government: 2023-004 General Retention and Disposal Authority for State Government Information</p> <p>Other government organisations may also need to refer to Sector Disposal Authorities and/or Disposal Authority approved under a Record Keeping Plan</p>
<p>Lists and certificates of records destroyed with authorisation. For example: Signed and approved Disposal Authorisation.</p>	<p>Local Government: 2023-005 General Retention and Disposal Authority for Local Government Information</p> <p>Section 96.7</p> <p>State Government: 2023-004 General Retention and Disposal Authority for State Government Information</p> <p>Section 78.7</p>
<p>State Archives</p> <p>Records documenting decisions related to strategy, policy and plans required to manage COVID-19 within or across government organisations. Decisions could be part of strategic activities such as organisation-wide policies, committees, taskforces, working groups and other bodies records.</p>	<p>Local Government: 2023-005 General Retention and Disposal Authority for Local Government Information</p> <p>State Government: 2023-004 General Retention and Disposal Authority for State Government Information</p> <p>Other government organisations may also need to refer to Sector Disposal Authorities and/or Disposal Authority approved under a Record Keeping Plan</p>

FURTHER INFORMATION

If you have further enquiries or have identified COVID-19 information not covered in this Advice, contact the SRO at sro@sro.wa.gov.au .

ACTIVE DATE: January 2024

REVIEW DATE: January 2026

ATTACHMENT 1 – Definition of “Significant” Information

Records may be considered “significant” if the activity:

- Substantially affects the obligations, responsibilities or liabilities of the State or the organisation
- Substantially affects the whole-of-sector function
- Substantially affects the development of legislation, regulations or organisation policy
- Substantially affects the agency's business, structure or policy
- Substantially affects the implementation or development of legislation or government policy
- Sets a legal or substantive precedent
- Generates / involves substantial community or public interest, debate or controversy
- Involves / affects property (land, infrastructure, structures, buildings or items considered to have cultural, Aboriginal, environmental or heritage significance)
- Concerns / affects the long-term environmental impact on State or local government land, waters or air
- Led, or substantially contributed to, a major investigation or formal inquiry
- Involves innovative, unique or precedent-setting practices, techniques or methods

Source:

General Retention and Disposal Authority for Local Government Records

General Retention and Disposal Authority for State Government Information



ATTACHMENT 2 – Disposal Authorisation Example

The following is an example of a disposal authorisation form. This may be modified depending on the organisation’s internal authorisation/approval processes.

Information in [square brackets] is for instructional purposes and should be removed from organisation documents.

Disposal Authorisation					
REVIEW					
I have reviewed the records and disposal actions as listed below and <u>recommend</u> these records for disposal.					
Name / Position: _____ Signature: _____ Date: _____					
<i>[add other names as required]</i>					
AUTHORISATION					
I have reviewed the records and disposal actions as listed below and <u>authorise</u> these records for disposal.					
Name / Position <i>[CEO or Delegate]</i> : _____ Signature: _____ Date: _____					
Record/File Number (if applicable)	Title / Description	Date Range	Disposal Authority (including category number)	Destruction Due Date	Other information if required <i>[e.g., record location]</i>
<i>[add as required]</i>	COVID-19 vaccination status records - <i>[number]</i> staff members	1 Jan 2022 – 31 Dec 2022	2021-010 2.2 End of Public Health State of Emergency	4 Nov 2022	
	COVID-19 vaccination status records - <i>[number]</i> visitors	1 Jan 2022 – 31 Dec 2022	2021-010 2.3 End of Public Health State of Emergency	4 Nov 2022	

EXAMPLE ONLY



	Check in forms - visitors	1 Jul – 31 Jul 2022	<i>Protection of Information (Entry Registration Information Relating to COVID-19 and Other Infectious Diseases) Act 2021</i>	28 Aug 2022	
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