

## Attestation and reporting options

### Victorian Protective Data Security Framework

#### Summary

This fact sheet provides information to public sector agencies and bodies about options for submitting a Protective Data Security Plan (PDSP) and providing an attestation to the Office of the Victorian Information Commissioner (OVIC).

#### Introduction

There are two options for a Victorian public sector agency or body (**organisation**) to submit their PDSP and provide an attestation to OVIC.

These options have been designed to reflect the unique operating arrangements that exist across Victorian government portfolio entities, sectors and industries. This includes governance structures that often exist between larger lead agencies and smaller organisations that fall within the lead agency's portfolio of responsibilities, and the provision of shared resources (including information technology and corporate functions). It also provides an opportunity for collaboration across organisations that perform a similar function.

#### Options

##### 1. Single organisation model

An organisation can submit a PDSP and provide an attestation on its own behalf (**single organisation model**).

##### 2. Multiple organisation model

An organisation can submit a consolidated PDSP and provide an attestation on its own behalf, **and** for and on behalf of, one or more public sector agencies or bodies. This may be based upon a portfolio model where agencies or bodies fall within the portfolio of responsibilities of a department or where organisations of a similar form or function

choose to consolidate their efforts (**multiple organisation model**).

***OVIC does not mandate the use of any particular approach, with the selection of either reporting option residing with each organisation.***

To demonstrate a multiple organisation model, working examples are included below for additional guidance.

#### Example 1: Department of Education and Training (DET)

As a department, DET has an obligation to submit a PDSP and provide an attestation to OVIC. As a lead agency, DET has responsibility for over 1500 school councils, each of which has obligations under Part 4 of the *Privacy and Data Protection Act 2014*.

If DET chose to use the multiple organisation model, and report on behalf of itself **and** school councils, DET would need to:

- undertake a detailed Security Risk Profile Assessment
- complete a VPDSF self-assessment (referencing the VPDSF elements)
- develop a detailed PDSP
- review the PDSP at least every two years (or sooner if there is significant organisational change)
- use the 'Multiple organisations Protective Data Security Plan' (and accompanying attestation) template to prepare an attestation and high-level PDSP to submit to OVIC for and on behalf of DET **and** school councils.

However, school council presidents, who are public sector body Heads under the *Public*

*Administration Act 2004*, remain **accountable** for any accompanying obligations set out under Part 4 of the *Privacy and Data Protection Act 2014*.

\* N.B. DET's reporting options include, but are not limited to, the example noted above, which is provided for the purpose of an example rather than a direction.

## Further information

Further information and assistance is available at [www.ovic.vic.gov.au](http://www.ovic.vic.gov.au) and 1300 00 6842.

email: [security@ovic.vic.gov.au](mailto:security@ovic.vic.gov.au)

April 2018

## Example 2: Shared resources

*This scenario only works where all the elements are common across the multiple organisations.*

Agency B resides on the same premises and utilises the same resources e.g. ICT environment and human resources services provided by Department A.

Under the multiple organisation model, on behalf of itself **and** Agency B, Department A would need to:

- undertake a detailed Security Risk Profile Assessment
- complete a VPDSF self-assessment (referencing the VPDSF elements)
- develop a detailed PDSP
- review the PDSP at least every two years (or sooner if there is significant organisational change)
- use the 'Multiple organisation Protective Data Security Plan' (and accompanying attestation) template to prepare an attestation and high-level PDSP to submit to OVIC for and on behalf of Department A **and** Agency B.

Please note: Shared service providers that deliver common resources such as ICT infrastructure, facilities management to Victorian government organisations, must offer a level of assurance to customers regarding their implementation of the VPDS, to enable organisations to complete their reports.