

15 April 2019

### Proposed reforms to the Victorian Protective Data Security Framework and 2019 reporting obligations

I am writing to inform you of a forthcoming reporting requirement for your agency in relation to the Victorian Protective Data Security Framework (**Framework**) and to ask you to note some prospective changes to the Framework following the conclusion of that reporting period.

#### Successful completion of the first reporting cycle

In August 2018, the first cycle of reporting to my office under the Framework concluded. I am pleased to report that of the more than 3,000 organisations covered by the Framework, my office received high-level Protective Data Security Plans (**PDSPs**) and attestations for all but 15.

I thank you for your contribution toward improving Victoria's information security.

#### Independent review of the Framework

The Office of the Victorian Information Commissioner (**OVIC**) is committed to continually improving the Framework to ensure that it remains fit for purpose. Since the first cycle concluded, my team has reviewed a broad sample set of the submitted high-level Protective Data Security Plans. OVIC also commissioned an independent review (**Review**) of the Framework to assess its effectiveness. The Review was conducted by PriceWaterhouseCoopers and involved consultation with selected agencies and an analysis of feedback received from OVIC stakeholders.

Findings from the Review included:

- the Framework had an overwhelming positive impact for Victorian government organisations and Victorian government as a whole;
- the attestation process contributed substantially to executive awareness of information security; and
- the Framework could be improved by simplifying the Victorian Protective Data Security Standards (**Standards**) and supporting materials.

Based on the feedback, OVIC will revise the Framework in the second half of 2019. This update aims to make the Framework simpler, clearer and more user friendly.

#### 2019 reporting obligations to OVIC

While my office works on review of the Framework, your agency's protective data security obligations under the Framework remain unchanged. This includes reporting obligations under Standard 12.

Unless your agency has been through substantial change, for example through a Machinery of Government change, you will **not** need to complete a new PDSP this year. However, the Standards require you to report your agency's adherence to the PDSP that it submitted last year. Your 2019 attestation reaffirms your ongoing commitment to the Standards, the security activities and work programs you reported to my office as part of the first reporting period. By doing this, you will have met your obligations under Standard 12.

This reporting, together with the attestation, is due by **Friday 30 August 2019**.

If your agency has experienced substantial change, I encourage you to contact my office at the earliest opportunity to discuss how you may meet your obligations.

I am pleased to enclose a copy of the 2019 attestation templates. Organisations are required to:

- select the appropriate template as per their 2018 submission (unless there has been a significant change to their reporting structure) and
- submit their 2019 attestation to my office by **30 August 2019**.

### Next Steps

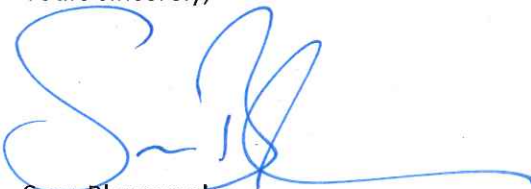
It is my intention that any changes to the Framework will be introduced in September 2019 – that is, after end of the 2019 reporting period.

As changes to the Framework and its supporting resources are updated, my office will consult with stakeholders across the varying topic areas such as the Standards, the Assurance model and Collections. A program of communications and change management to support this is in development. In the meantime, I encourage you contact my team with your feedback about how to improve the Framework and the Standards.

### Further information

For information about the Framework, the Standards and the 2019 reporting obligations, please contact the Information Security Unit on [security@ovic.vic.gov.au](mailto:security@ovic.vic.gov.au) or Anthony Corso, Assistant Commissioner, Information Security on (03) 8684 1658.

Yours sincerely,



Sven Bluemmel  
**Information Commissioner**