



Office of the Victorian
Information Commissioner

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Class B Cemetery Trusts

2022 Protective Data Security Plan (PDSP) How-to Guide

Version 1.0

If you need help in completing the Protective Data Security Plan please call
(03) 8684 1616 or email security@ovic.vic.gov.au

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DOCUMENT DETAILS

| Version | Publish date | Amendments in this version |
|---------|--------------|-------------------------------------|
| 1.0 | January 2022 | Initial version for cemetery trusts |

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BACKGROUND

The Office of the Victorian Information Commissioner (**OVIC**) has developed the Victorian Protective Data Security Standards (**the Standards**) as required under the *Privacy and Data Protection Act 2014* (**PDP Act**).

The Standards prescribe requirements designed to **protect information** across the Victorian public sector, including Class B Cemetery Trusts.

Class B Cemetery Trusts manage various types of **important information** such as:

- applications for **right of interment**;
- applications for **interment authorisation**;
- applications for **approval to inter cremated human remains**;
- applications to **establish or alter a memorial or place of interment**;
- **right of interment and interment registers**; and
- trust **records**, such as **correspondence, financial statements, policies and procedures**.

During OVIC's discussions with trust members, it was clear there is a passion to **protect paper and electronic information (and where required, sensitive verbal discussions)**.

OVIC appreciates that Class B Cemetery Trust members and employees (most of whom are volunteers) spend countless hours ensuring trust records are **accurate and complete**.

This dedication by trust members helps build community **confidence** in the **accuracy and availability** of this information when it's most needed.

As a Class B Cemetery Trust member, have you considered:

- what you can do to **protect trust records** in the event of a fire or flood?
- what would happen if a cemetery trust member retires or passes? How is the knowledge that has built up over the years **transferred** to the next member?
- **what would have helped you** when you became a trust member? Documenting some of those practices could assist in the **ongoing management and future handover** of the cemetery trust.

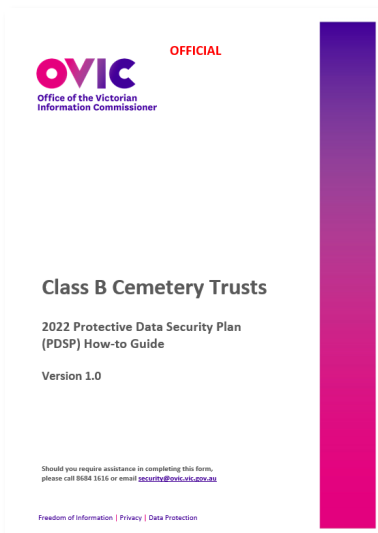
Strong information management practices can support **good financial record keeping** and help cemetery trust members manage their time and efforts relative to any risks.

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ABOUT THIS DOCUMENT AND THE CLASS B PDSP FORM

There are two key documents you will require:



Class B Cemetery Trust 2022 Protective Data Security Plan (PDSP) How-to Guide (this document)

This provides you with instructions and guidance on how to complete the PDSP form (document 2).



Class B Cemetery Trust 2022 Protective Data Security Plan (PDSP) form



This must be completed and a copy returned to OVIC by 31 August 2022.

The requirements set out in the PDSP form recommend good information security management practices to ensure the protection of cemetery trust records.

The PDSP form has been created to meet the specific needs of Class B Cemetery Trusts. By completing the 2022 PDSP and submitting it to OVIC, you will have satisfied your PDSP reporting obligation to OVIC for 2022.

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INSTRUCTIONS FOR COMPLETING THE PDSP FORM

The PDSP form is made up of four parts:

| 2022 Protective Data Security Plan for Class B Cemetery Trusts | | |
|--|--|--|
| PART A | Contact information | This part records basic information that will assist OVIC in identifying the key contacts for your Class B Cemetery Trust. |
| PART B | Self-assessment against the requirements | This part provides us with information on how your cemetery trust is tracking against the requirements and provides some suggested activities to help you address these requirements. OVIC has specified 14 core requirements (aligned to the Standards ¹) that will assist you in managing Class B Cemetery Trust information in a consistent and secure way. |
| PART C | Attestation | The Attestation must be signed by the person authorised to submit a copy of the PDSP to OVIC. |
| PART D | Reporting on behalf of multiple Class B Cemetery Trusts | If you wish to report on behalf of yourself and other cemetery trusts in a consolidated submission, simply add the names and contact details of the other cemetery trusts in this section. OVIC will use the responses you have provided for each of the requirements as a reflection of the other listed cemetery trusts status. |

Instructions for completing each part can be found in the following sections.

You have **two options for completing** the PDSP form:



Option 1 - Hard copy (printed) with a pen: You will need to photocopy or scan a copy of your completed form and post or email this copy back to OVIC. **Keep a copy (either original or copy) of your form for your records/ reference.**



Option 2- Soft copy (on the computer): You will need to type responses into the fields and click the appropriate box to mark with an 'X'. If you have selected a box by mistake, you can clear it by simply clicking it again. You can request a soft copy of this form by emailing security@ovic.vic.gov.au

¹ To access the Standards visit OVIC's website - <https://ovic.vic.gov.au/data-protection/standards/>

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Part A: Contact information

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PART A - Contact information

| Name of Chairperson | | Name of person authorised by the Chairperson to submit a copy of this PDSP | | Nominated point of contact (if different from the Chairperson) | |
|---------------------|-------------|--|--|--|--|
| Full name | | Full name | | Full name | |
| Title | Chairperson | Title | | Title | |
| Phone number | | Phone number | | Phone number | |
| Email address | | Email address | | Email address | |
| Postal address | | Postal address | | Postal address | |

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Section Description

This part records basic information that will assist OVIC in identifying the key contacts for your Class B Cemetery Trust.

How to complete this section:

1. **Write the contact information** of your cemetery trust's Chairperson.
2. **Write the contact information** of the person who is authorised by the Chairperson to submit the PDSP on the Chairperson's behalf (this might be the Secretary). If this is the same person, simply note this.
3. **Write the contact information of the main point of contact** for your cemetery trust. This person may be contacted by OVIC if there are any questions relating to your cemetery trust and the address to where any postal material will be sent. This may be the Chairperson or Secretary, or an additional point of contact. If it's the same person, simply note that.

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Part B: Self-assessment against the 14 requirements

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PART B – Self assessment against the requirements

| Requirement | Explanation | Recommended Supporting Activity | Current Response (tick) |
|--|--|---|---|
| 1 The cemetery trust records how they manage their information | Documentation informs all Cemetery Trust members (current and future) on the expectations around managing trust information. |  <i>Trust members discuss and document/write down their approach to managing their Cemetery Trust information.</i> <i>This could be recorded in the form of a simple statement, or, for more complex Trusts, it may be recorded in one or more documents.</i> | <input type="checkbox"/> Not commenced (completion date required) <input type="checkbox"/> Planned (completion date required) <input type="checkbox"/> Partial (completion date required) <input type="checkbox"/> Implemented (completion date required) <input type="checkbox"/> Not Applicable (rationale required) You must provide a rationale for the selection of Not Applicable here: |
| Proposed Completion date for this Requirement | <input type="checkbox"/> 2022/2023 <input type="checkbox"/> 2023/2024 <input type="checkbox"/> 2024/2025 <input type="checkbox"/> 2025/2026 <input type="checkbox"/> 2026+ | | |

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Section Description

This part provides OVIC with information on how your cemetery trust is tracking against the requirements and provides some suggested activities to help you address these requirements.

OVIC has specified **14 core requirements** (aligned to the Standards) that will assist you in managing Class B Cemetery Trust information in a consistent and secure way.

Each requirement has:

- a **number**;
- an **explanation**;
- a **recommended supporting activity** to assist in implementing this requirement; and
- a **response**.

The recommended supporting activities are included as a guide to help you meet the requirements.

The ‘Current Response’ column is mandatory for each of the 14 requirements.

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How to complete this section:

1. **Read the description** of each requirement carefully.
2. **Think about** how the recommended supporting activity could help the cemetery trust meet the related requirement. If you are unsure or need assistance, please contact OVIC.
3. **Consider** whether your cemetery trust is undertaking/has undertaken the activity or a similar activity and **tick the appropriate response for each of the 14 requirements.**
4. If you've ticked '**Not Applicable**' for any of the requirements, you must **include a rationale** in the box provided.
5. If you've ticked '**Not commenced**', '**Planned**', or '**Partial**', you must nominate a date for **proposed completion** of this requirement by ticking the appropriate box.

The responses should be read in the following manner:

| Your response | What this means |
|---|--|
| Not Commenced | Our cemetery trust acknowledges this requirement is applicable, however no work has been commenced or planned at this stage. |
| Planned | Our cemetery trust is in the process of planning our work to meet this requirement. |
| Partial | Work is underway by our cemetery trust to meet this requirement. |
| Implemented | The requirement is fully implemented and our cemetery trust is actively managing supporting activities. |
| Not Applicable | We do not believe this requirement is applicable to our cemetery trust and will document why. |
| <input type="checkbox"/> Rationale | If you ticked ' Not Applicable ' you will need to provide a written rationale for this selection in the box provided. |

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PLEASE NOTE

OVIC does not expect that every requirement of the standards will be fully implemented, but to fulfil your obligations under the *Privacy and Data Protection Act 2014* you do need to provide a response outlining your current status.

You must provide a response for all 14 requirements.

If you are unsure, give your best assessment, or contact OVIC for assistance.

Your cemetery trust may have reported a particular response for the 14 requirements in 2020. Depending on your operating environment, you may wish to adjust your 2020 responses to a lower implementation status in 2022. **This is perfectly fine;** your responses should reflect your *current* status.

By providing this to OVIC, we can develop appropriate resources and guidance material to help trust members protect information in a way that makes sense to you and is practical.

You will note some of the requirements in this form require processes to be documented, **however you do not need to provide OVIC with copies of these documents at this time.** Simply keep a copy for your reference.

OVIC understands that each Class B Cemetery Trust has its own unique way of operating. We encourage you to consider this when developing your local documentation. We know that some Class B Cemetery Trusts may have more documentation than others to support operational activities.

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Part C: Attestation

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PART C – Attestation

The attestation can be signed by the Chairperson or their authorised representative.

The Chairperson has authorised this PDSP *(check box once the Chairperson has authorised)*

This attestation is submitted to the Information Commissioner in accordance with s 8D(2)(b) of the *Privacy and Data Protection Act 2014*. I am authorised to make this attestation to the Office of the Victorian Information Commissioner.

I, verify that

(Full Name) (Name of cemetery trust)

has implemented the requirements or is in the process of implementing the requirements (as indicated), as required by the Standards, which are issued in accordance with s 86(1) of the *Privacy and Data Protection Act 2014* as part of the Victorian Protective Data Security Framework.

Signature

Print name More than one Cemetery Trust is captured by this attestation:

Position *(check box if applicable and complete Part D of this form)*

Date

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Section Description

The Attestation must be signed by the person authorised to submit a copy of the PDSP to OVIC.

How to complete this section:

1. **Ensure the Chairperson has reviewed and authorised** the form.
2. **Tick the box** to signify that the Chairperson has reviewed and authorised the form.
3. **Complete the sections** including the name and role of the signatory, the name of your cemetery trust, and the date.
4. **Sign** the document.
5. If you are completing this form on behalf of yours and another cemetery trust, tick the box marked **“More than one cemetery trust is captured by this attestation”** and **proceed to Part D**.
6. If this form only captures your cemetery trust, you can leave Part D blank.

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Part D: Reporting on behalf of multiple cemetery trusts

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PART D – Reporting on behalf of multiple cemetery trusts

The cemetery trusts listed in this section have implemented the requirements or are in the process of implementing the requirements as outlined in Part B (add more rows if required).

| Name of Cemetery Trust | Name of Cemetery Trust Chairperson | Phone Number or Email Address | The Cemetery Trust is aware of your including them on this form |
|------------------------|------------------------------------|-------------------------------|---|
| | | | <input type="checkbox"/> (check box) |
| | | | <input type="checkbox"/> (check box) |
| | | | <input type="checkbox"/> (check box) |
| | | | <input type="checkbox"/> (check box) |
| | | | <input type="checkbox"/> (check box) |

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Section Description

If you wish to report on behalf of yourself and other cemetery trusts in a consolidated submission, simply add the names of the other cemetery trusts in this section.

By doing so, OVIC will use the responses you have provided for each of the requirements as a reflection of the other cemetery trusts status.

How to complete this section:

1. **List the name** of each cemetery trust, the **relevant Chairperson** and their **contact details**.
2. **Tick the box** to indicate that each cemetery trust’s Chairperson is aware that they are being reported on behalf of you.

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SUBMITTING THE PDSP FORM TO OVIC

Once you have completed all parts of the PDSP form, you need to supply a copy to OVIC. This can be done via email or post.



Email a copy of your form to OVIC's Information Security Unit at security@ovic.vic.gov.au



Mail a copy of your form using the following details:

Attention: Information Security Unit, OVIC
PO Box 24274
Melbourne Victoria 3001

It is good practice to keep a record and copies of any forms (including the PDSP) that you submit to OVIC.

I NEED HELP COMPLETING THE PDSP FORM

We understand that some of the requirements described in this document may be new, unfamiliar, or confusing, and we are here to assist you in complying with the law.

Please contact us to discuss any material you don't know how to address.



Phone us on (03) 8684 1616



Email us at security@ovic.vic.gov.au

The feedback we get back from you and other trust members, will assist us in building a network of likeminded people that care about Class B Cemetery Trust information and are able to share their knowledge and experiences to assist others.

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