

**Class B Cemetery Trust**

**2022 Protective Data Security Plan (PDSP) | Version 1.1**

**Cemetery Trust Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_­­­­­­­­­\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

|  |  |
| --- | --- |
| Warning with solid fill | **Please note*** Please refer to 2022 Protective Data Security Plan (**PDSP**) Instructional Document for help filling out this plan.
* You will need to provide a copy of this form to OVIC by **31 August 2022**. Please ensure you **maintain a copy** of this form for your own records.
* This document has been marked as **OFFICIAL** by OVIC. If you feel your Cemetery Trust’s PDSP requires a higher marking, please contact us.
* Should you require assistance in completing this form, please call **03 8684 1616** or email**security@ovic.vic.gov.au**
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# Document Details

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| --- | --- | --- |
| **Version** | **Publish date** | **Amendments in this version** |
| 1.0 | July 2020 | Initial version for Cemetery Trusts |
| 1.1 | January 2022 | 2022 Class B Cemetery Trust PDSP form has been released with amendments including: * Refined explanations of the requirements and Recommended Supporting Activities
* Added fields, including ‘Rationale’, ‘Proposed Completion Date’
* Updated Attestation
* Adjusted formatting to landscape
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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** |  |

# PART B – Self assessment against the requirements

|  |  |  |  |
| --- | --- | --- | --- |
| **Requirement** | **Explanation** | **Recommended Supporting Activity** | **Current Response (tick)** |
| **1** | The cemetery trust **records how it securely manages** its information | Documentation informs all cemetery trust members (current and future) on the expectations around securely managing trust information. | Pen with solid fill*Trust members discuss and write down their approach to* securely *managing their cemetery trust information.* *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.*  |[ ]  Not commenced *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Planned *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Partial *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Implemented |
|  |  |  |  |[ ]  Not Applicable *(rationale required below)*  |
|  |  |  |  | *You must provide a rationale for the selection of* ***Not Applicable*** *here:* |
| **Proposed Completion date for this Requirement** | [ ]  2022/2023 | [ ]  2023/2024 | [ ]  2024/2025 | [ ]  2025/2026 | [ ]  2026+ |
| **Requirement** | **Explanation** | **Recommended Supporting Activity** | **Current Response (tick)** |
| **2** | The cemetery trust **identifies and records** the **different types** of information it manages | Cemetery trusts manage different kinds of information, such as:* right of interment and interment registers;
* meeting agendas and minutes;
* correspondence;
* financial statements, invoices, and receipts;
* policies and procedures;
* instruments of delegation;
* employee contracts;
* maps

Sometimes these are kept in paper or electronic form.Understanding and documenting the different types of information that trust members manage instils community confidence. | Pen with solid fill*Trust members discuss the various cemetery trust information types managed by the trust.* *Members create a summarised record of these information types (in hard copy or electronic form). This summary is sometimes referred to as an Information Asset Register.**OVIC has developed an Information Asset Register template for Class B Cemetery Trusts. To request a copy, please contact OVIC at* *security@ovic.vic.gov.au* *or* ***03 8684 1616*** |[ ]  Not commenced *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Planned *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Partial *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Implemented |
|  |  |  |  |[ ]  Not Applicable *(rationale required below)*  |
|  |  |  |  | *You must provide a rationale for the selection of* ***Not Applicable*** *here:* |
| **Proposed Completion date for this Requirement** | [ ]  2022/2023 | [ ]  2023/2024 | [ ]  2024/2025 | [ ]  2025/2026 | [ ]  2026+ |
| **Requirement** | **Explanation** | **Recommended Supporting Activity** | **Current Response (tick)** |
| **3** | The cemetery trust **identifies and records sensitive** information it manages | Understanding the confidentiality of the cemetery trust information enables and instils confidence in the community that trust information is secured appropriately.For instance, some information types may have more sensitive components to them, e.g. interment records may have components that the trust is able to disclose to members of the public, but there are other components of these same interment records that need to remain confidential – i.e. details of next of kin, addresses, cause of death, credit card details etc. | Pen with solid fill*Trust members review their Information Asset Register and identify those specific information types that are considered confidential or sensitive (i.e. not for public distribution) and mark these accordingly.**When reviewing your information assets, consider what would happen if:* *an unauthorised person accessed this material, or* *it was disclosed to someone who wasn’t supposed to see or hear it?”* *OVIC has developed an Information Asset Register template for Class B Cemetery Trusts. To request a copy, please contact OVIC at* *security@ovic.vic.gov.au* *or* ***03 8684 1616*** |[ ]  Not commenced *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Planned *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Partial *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Implemented |
|  |  |  |  |[ ]  Not Applicable *(rationale required below)*  |
|  |  |  |  | *You must provide a rationale for the selection of* ***Not Applicable*** *here:* |
| **Proposed Completion date for this Requirement** | [ ]  2022/2023 | [ ]  2023/2024 | [ ]  2024/2025 | [ ]  2025/2026 | [ ]  2026+ |
| **Requirement** | **Explanation** | **Recommended Supporting Activity** | **Current Response (tick)** |
| **4** | The cemetery trust **identifies** **and** **records** information that needs to be **accurate** and **available** when used | Cemetery trusts must be mindful of the need to maintain the integrity (accuracy) and availability of the information they manage on behalf of the community. **e.g. Accuracy** If cemetery records are incomplete, inaccurate or tampered with and the cemetery trust couldn't advise who was interred in a particular plot, this may call into question the accuracy of the other information managed by the cemetery trust.**e.g. Availability** If the trust member who has custody of the particular records was no longer able to provide access or the information was damaged or lost, this may call into question the ability of the cemetery trust to provide access to information when required. | Pen with solid fill*Trust members review their Information Asset Register and identify those specific information types that are required to be accurate and available when called upon and mark these accordingly.**When reviewing your information assets, consider what would happen if:* * *the information were adjusted, modified, or changed without being authorised?” How can I make sure it will be accurate?” e.g. limiting access, cross checking records (integrity)*
* *the information was unavailable when it needs to be? How can I make sure it will be available? (availability)*

*OVIC has developed an Information Asset Register template for Class B Cemetery Trusts. To request a copy, please contact OVIC at* *security@ovic.vic.gov.au* *or* ***03 8684 1616*** |[ ]  Not commenced *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Planned *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Partial *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Implemented |
|  |  |  |  |[ ]  Not Applicable *(rationale required below)*  |
|  |  |  |  | *You must provide a rationale for the selection of* ***Not Applicable*** *here:* |
| **Proposed Completion date for this Requirement** | [ ]  2022/2023 | [ ]  2023/2024 | [ ]  2024/2025 | [ ]  2025/2026 | [ ]  2026+ |
| **Requirement** | **Explanation** | **Recommended Supporting Activity** | **Current Response (tick)** |
| **5** | The cemetery trust **documents any information security risks** relating to the management of its information | The cemetery trust understands the information security risks associated with the records they manage on behalf of the community. This enables the cemetery trust to prioritise its efforts and resources. | Pen with solid fill*Trust members may already have a record of risks in paper or electronic form as recommended in your Cemetery Trust Manual. This requirement requires trust members to simply update this record with any information security risks you may be aware of.* *For example, an information security risk that may be recorded could be:* *“The risk of documents being destroyed, caused by fire (no backups), resulting in lack of confidence by the local community in the cemetery trust”.* *One way to reduce the impact of this risk may be to create copies or a backup of this information and store these copies separately.*  |[ ]  Not commenced *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Planned *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Partial *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Implemented |
|  |  |  |  |[ ]  Not Applicable *(rationale required below)*  |
|  |  |  |  | *You must provide a rationale for the selection of* ***Not Applicable*** *here:* |
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| **Requirement** | **Explanation** | **Recommended Supporting Activity** | **Current Response (tick)** |
| **6** | The cemetery trust **validates who (people) and what (systems)** have **direct access** to its information | The cemetery trust ensures only the right people, and/or systems, are authorised to have direct access to cemetery trust information when and where required.The ‘right people’ may include certain roles within the cemetery, individuals from neighbouring cemetery trusts, or private organisations providing support or assistance.The ‘right systems’ may include an approved internal or external IT system that processes or stores trust information e.g. computer, server, email system. Cemetery trusts must ‘validate’ (confirm) the legitimacy of these people and systems before granting direct access to cemetery trust information. This includes external organisations and/or systems. The cemetery trust should clarify how the information will be used. | Pen with solid fill*Trust members discuss, verify and document who (people or organisations) and what (systems – if any) should be granted authorised access to cemetery trust information. For example, consider:** *which cemetery roles are authorised for direct access to certain information and which are restricted*
* *how your cemetery trust may validate direct access authorisation requests from third parties such as community members, private industry groups and/or systems and consider whether the access is legitimate and authorised?*
 |[ ]  Not commenced *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Planned *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Partial *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Implemented |
|  |  |  |  |[ ]  Not Applicable *(rationale required below)*  |
|  |  |  |  | *You must provide a rationale for the selection of* ***Not Applicable*** *here:* |
| **Proposed Completion date for this Requirement** | [ ]  2022/2023 | [ ]  2023/2024 | [ ]  2024/2025 | [ ]  2025/2026 | [ ]  2026+ |
| **Requirement** | **Explanation** | **Recommended Supporting Activity** | **Current Response (tick)** |
| **7** | The cemetery trust **documents the roles and responsibilities** for those managing cemetery trust information | The cemetery trust ensures everyone understands their role and responsibilities when managing information on behalf of the community. | Pen with solid fill*Trust members discuss and document the roles and responsibilities of personnel that manage cemetery trust information.* * *What roles are responsible for what types of information?*
* *Do trust members know what information they are allowed to disclose?*

*Personnel may include:** *volunteers;*
* *individual trust members;*
* *staff;*
* *third parties (sub-contractors).*
 |[ ]  Not commenced *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Planned *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Partial *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Implemented |
|  |  |  |  |[ ]  Not Applicable *(rationale required below)*  |
|  |  |  |  | *You must provide a rationale for the selection of* ***Not Applicable*** *here:* |
| **Proposed Completion date for this Requirement** | [ ]  2022/2023 | [ ]  2023/2024 | [ ]  2024/2025 | [ ]  2025/2026 | [ ]  2026+ |
| **Requirement** | **Explanation** | **Recommended Supporting Activity** | **Current Response (tick)** |
| **8** | The cemetery trust **manages any compromises** (incidents) to its information | Cemetery trusts that have a plan(s) in place to handle a situation or event that has adversely impacted/affected cemetery trust information (a compromise to its information), may be able to reduce the impact of an incident. Incidents or scenarios could include:* Sensitive information has been released to a public enquiry by mistake (e.g. giving out contact details)
* Theft, loss or damage of information
 | Pen with solid fill*Trust members discuss and document how they will deal with a variety of incidents.**It is important to think through different scenarios and have a plan in place to manage incidents that have the potential to affect the confidentiality, integrity and/or availability of cemetery trust information. For example, in the event of an incident:** *What steps would you need to take?*
* *Who would you notify of the incident? E.g., OVIC, DH, Victoria Police*
* *Who will manage the incident?*
* *Who can you turn to for help?*
* *Where is the incident management plan?*

*If you are unsure if you have a privacy or information security incident, please contact OVIC at* *security@ovic.vic.gov.au* *or phone* ***03 8684 1616*** |[ ]  Not commenced *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Planned *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Partial *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Implemented |
|  |  |  |  |[ ]  Not Applicable *(rationale required below)*  |
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| **Proposed Completion date for this Requirement** | [ ]  2022/2023 | [ ]  2023/2024 | [ ]  2024/2025 | [ ]  2025/2026 | [ ]  2026+ |
| **Requirement** | **Explanation** | **Recommended Supporting Activity** | **Current Response (tick)** |
| **9** | The cemetery trust **documents** how it intends to protect its information in the **event of a disaster** | The cemetery trust ensures it can securely manage its information if things do not go to plan or is impacted by things beyond its control. | Pen with solid fill*Trust members discuss and document how the cemetery trust will continue in the event an incident turns into a disaster. Discussion around the protection of cemetery trust information stored as hard copy documents or in electronic form on computers may be relevant.* *For example:* * *have the trust members considered creating copies or backups of their cemetery trust information?*
* *where are these copies stored? Could they be stored away from the office/home environment?*
* *would these copies be available following an accident or disaster?*
 |[ ]  Not commenced *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Planned *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Partial *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Implemented |
|  |  |  |  |[ ]  Not Applicable *(rationale required below)*  |
|  |  |  |  | *You must provide a rationale for the selection of* ***Not Applicable*** *here:* |
| **Proposed Completion date for this Requirement** | [ ]  2022/2023 | [ ]  2023/2024 | [ ]  2024/2025 | [ ]  2025/2026 | [ ]  2026+ |
| **Requirement** | **Explanation** | **Recommended Supporting Activity** | **Current Response (tick)** |
| **10** | The cemetery trust **documents** **how** **non-cemetery trust members access** **and/or use** its information in a secure way | The cemetery trust ensures non-cemetery trust members understand what is required of them when accessing or using its information. | Pen with solid fill*Trust members discuss and document:** *Who is authorised to access the cemetery trust information? (e.g., DH, Victoria Police, Local Council, members of the public)*
* *How is the information provided?*
* *What protections are required when sharing this information?*
 |[ ]  Not commenced *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Planned *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Partial *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Implemented |
|  |  |  |  |[ ]  Not Applicable *(rationale required below)*  |
|  |  |  |  | *You must provide a rationale for the selection of* ***Not Applicable*** *here:* |
| **Proposed Completion date for this Requirement** | [ ]  2022/2023 | [ ]  2023/2024 | [ ]  2024/2025 | [ ]  2025/2026 | [ ]  2026+ |
| **Requirement** | **Explanation** | **Recommended Supporting Activity** | **Current Response (tick)** |
| **11** | The cemetery trust **notifies OVIC** of any compromises **(incidents)** to its information | The cemetery trust ensures OVIC is aware of any issues impacting on the security of its information. | Pen with solid fill*Trust members discuss, and document how they notify OVIC of any incidents that compromise cemetery trust information.* *For example, if the right of interment and interment registers have been destroyed a notification should be made to OVIC.* |[ ]  Not commenced *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Planned *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Partial *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Implemented |
|  |  |  |  |[ ]  Not Applicable *(rationale required below)*  |
|  |  |  |  | *You must provide a rationale for the selection of* ***Not Applicable*** *here:* |
| **Proposed Completion date for this Requirement** | [ ]  2022/2023 | [ ]  2023/2024 | [ ]  2024/2025 | [ ]  2025/2026 | [ ]  2026+ |
| **Requirement** | **Explanation** | **Recommended Supporting Activity** | **Current Response (tick)** |
| **12** | The cemetery trust **members are checked** prior to, and throughout their appointment | The cemetery trust ensures that its members are eligible and suitable to manage trust information.Cemetery trusts are responsible for conducting interviews and referee checks prior to endorsing applications for appointment. In addition to this, the Department of Health (**DH**) is responsible for undertaking probity checks of applicants endorsed by the trust.Cemetery trusts should ensure members remain eligible and suitable to manage trust information on an ongoing basis. This is particularly relevant for lifetime members as they are not required to go through the application process every 5 years. | Pen with solid fill*Trust members discuss and document the requirements for validating the eligibility and suitability of individuals prior to, and during, their appointment.**The cemetery trust will notify DH if it believes a member has become unsuitable to continue as a trust member.* |[ ]  Not commenced *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Planned *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Partial *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Implemented |
|  |  |  |  |[ ]  Not Applicable *(rationale required below)*  |
|  |  |  |  | *You must provide a rationale for the selection of* ***Not Applicable*** *here:* |
| **Proposed Completion date for this Requirement** | [ ]  2022/2023 | [ ]  2023/2024 | [ ]  2024/2025 | [ ]  2025/2026 | [ ]  2026+ |
| **Requirement** | **Explanation** | **Recommended Supporting Activity** | **Current Response (tick)** |
| **13** | The cemetery trust **securely maintains computer systems** that process and/or store its information | The cemetery trust ensures its computer systems (if used) that process and/or store its information are secure. | Pen with solid fill*Trust members discuss and document the requirements for ensuring any computer systems or cloud-based systems storing/processing cemetery trust information are secure.* *This could include having updated software and strong passwords on computers/laptops and other electronic devices.* *Only select “not applicable” if you are not using a computer for cemetery trust business.* |[ ]  Not commenced *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Planned *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Partial *(select a proposed completion date below)* |
|  |  |  |  |[ ]  Implemented |
|  |  |  |  |[ ]  Not Applicable *(rationale required below)*  |
|  |  |  |  | *You must provide a rationale for the selection of* ***Not Applicable*** *here:* |
| **Proposed Completion date for this Requirement** | [ ]  2022/2023 | [ ]  2023/2024 | [ ]  2024/2025 | [ ]  2025/2026 | [ ]  2026+ |
| **Requirement** | **Explanation** | **Recommended Supporting Activity** | **Current Response (tick or check box)** |
| **14** | The cemetery trust **securely maintains its facilities, equipment and services** that help securely manage its information and systems | The cemetery trust ensures its hardcopy and softcopy information is physically protected. | Pen with solid fill*Trust members discuss and document the requirements for ensuring their physical facilities that store their information are secured. Physical measures may include:** *facilities – e.g., locks on doors, alarms;*
* *equipment – e.g., types of containers that are used to store information, such as locked cabinets; safes; protective containers or boxes (to avoid water or insect damage)*
* *services – e.g., security guard, monitoring companies where applicable.*
 |[ ]  Not commenced *(completion date required)* |
|  |  |  |  |[ ]  Planned *(completion date required)* |
|  |  |  |  |[ ]  Partial *(completion date required)* |
|  |  |  |  |[ ]  Implemented  |
|  |  |  |  |[ ]  Not Applicable *(rationale required)*  |
|  |  |  |  | *You must provide a rationale for the selection of* ***Not Applicable*** *here:* |
| **Proposed Completion Date for this Requirement** | [ ]  2022/2023 | [ ]  2023/2024 | [ ]  2024/2025 | [ ]  2025/2026 | [ ]  2026+ |

# PART C – Attestation

*The attestation can be signed by the Chairperson or their authorised representative as specified in Part A of this form.*

*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** |  | More than one Cemetery Trust is captured by this attestation:[ ]  *(check box if applicable and complete* ***Part D of this form)*** |
| **Print name** |  |
| **Position** |  |
| **Date** |  |

# 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 |
|  |  |  | [ ]  *(check box)* |
|  |  |  | [ ]  *(check box)* |
|  |  |  | [ ]  *(check box)* |
|  |  |  | [ ]  *(check box)* |
|  |  |  | [ ]  *(check box)* |