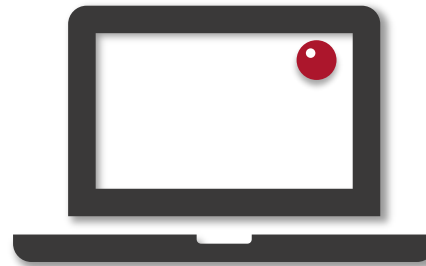


Housekeeping



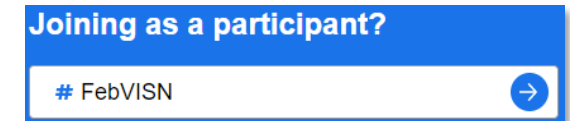
Cameras and mics are muted.
If your Teams is running slow, try
disconnecting from your VPN.



The session is being recorded and a
copy (including slides) will be made
available following the session.



Go to slido.com



Join the Q&A using #FebVISN or
using the chat feature in MS Teams.

OFFICIAL



**Office of the Victorian
Information Commissioner**

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

Victorian Information Security Network (VISN)
February 2022

OFFICIAL

OFFICIAL

Acknowledgement

We acknowledge the Wurundjeri people of the Kulin Nation as the Traditional Owners of the land from which we are presenting today.

Many of you will be joining from the traditional lands of other traditional owners. We pay our respects to their Elders, past and present, and Aboriginal Elders of other communities who may be with us today.

OVIC

OFFICIAL

Commissioner’s Welcome



Sven Bluemmel
Information Commissioner

OFFICIAL

Standard 3 – Information Security Risk Management

An organisation utilises its risk management framework to undertake a Security Risk Profile Assessment to manage information security risks.

VPDSS Standard 3 Element Assessment

Entity Risk	Subscore	Proposed
E3.010		
E3.020		
E3.030		
E3.040		
E3.050		

Standard 2 – Information Security Value

An organisation identifies and assesses the security value of public sector information.

VPDSS Standard 2 Element Assessment

Entity Risk	Subscore	Proposed
E2.0		
E2.0		
E2.0		
E2.0		
E2.0		
E2.0		
E2.0		
E2.0		
E2.0		
E2.0		

Standard 1 – Information Security Management Framework

An organisation establishes, implements and maintains an information security management framework relevant to its size, resources and risk posture.

VPDSS Standard 1 Element Assessment

VPDSS Standard
E1.010 The organisation documents a contextualised information security strategy, policy, procedures covering all information security drivers.
E1.020 The organisation's information security management framework is based on legislative and regulatory drivers.
E1.030 The organisation's information security management framework is based on legislative and regulatory drivers.
E1.040 Executive management defines information security competencies and authorities.
E1.050 Executive management nominates an information security champion to this point of contact.
E1.060 Executive management owns, endorses and sponsors information security program(s) including the implementation of the information security management framework.
E1.070 The organisation identifies information security performance objectives against these.
E1.080 Executive management commits to providing sufficient resources to the information security program.
E1.090 The organisation sufficiently communicates its information security framework and ensures it is accessible.

Freedom of Information | Privacy | Data Protection

OFFICIAL

OVIC
Office of the Victorian
Information Commissioner

Protective Data
Security Plan (PDSP)

Information Security

Victorian Protective Data Security Standards
Reporting information security capability and implementation progress

Single-Organisation Reporting Form

Version 3.1

This form is intended to be completed electronically.
Different software may preview form fields differently.

The 2022 PDSP form was developed using Acrobat 2020 (20.004.30008).
For best results when completing this form, please use a compatible
version of Adobe Acrobat Reader or Adobe Acrobat Pro.

Freedom of Information | Privacy | Data Protection

OFFICIAL

SUBMISSION, NEXT STEPS, AND USEFUL LINKS

PART C OF THE PDSP FORM

PART B OF THE PDSP FORM

PART A OF THE PDSP FORM

FREQUENTLY ASKED QUESTIONS

OVIC
Office of the Victorian
Information Commissioner

INFORMATION FOR
AGENCIES and BODIES
1300 00 6842 | ovic.vic.gov.au

How-to: A guide to completing the
2022 Protective Data Security Plan (PDSP)

Freedom of Information | Privacy | Data Protection

Commissioner's Welcome

VICTORIAN PUBLIC SECTOR STAKEHOLDERS



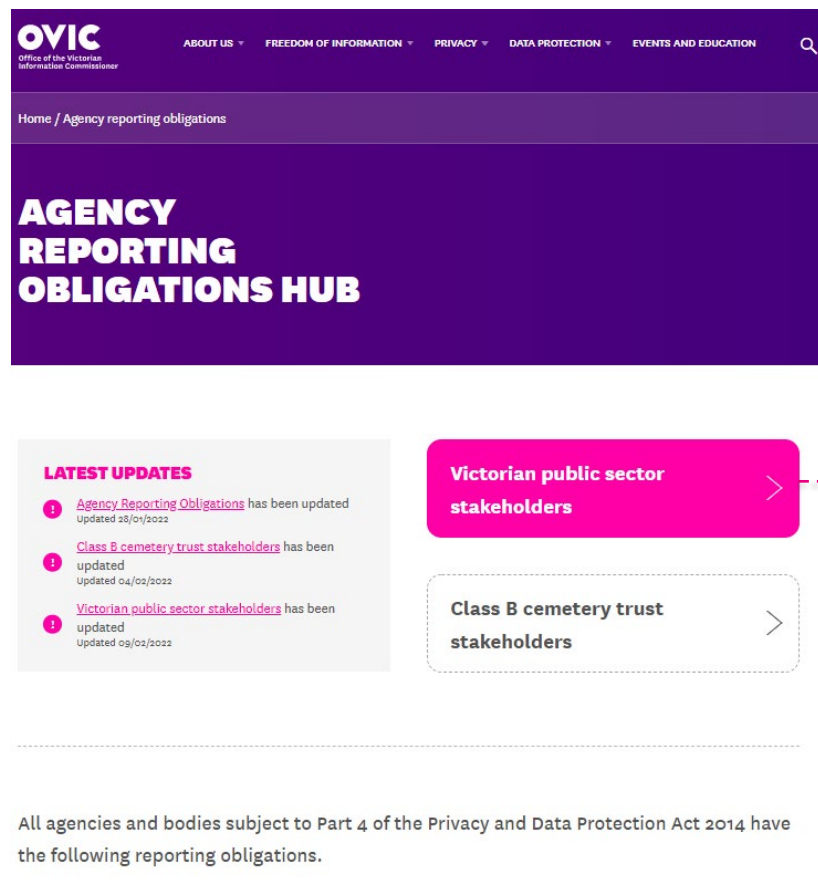
Following positive feedback from stakeholders in 2020 and 2021, we understood the importance of engaging executives and highlighting the upcoming reporting deadline.

This video seeks to clarify public sector body Head's accountability for the PDSP submission and ensure appropriate attention is given to resourcing in support of information security efforts across the organisation.

Access the video by visiting the OVIC website:

<https://ovic.vic.gov.au/agency-reporting-obligations-hub/vps-stakeholders/>

Commissioner's Welcome



We've refreshed our website to include an **Agency Reporting Obligations Hub**.

Here VPS stakeholders will find everything they need for this year's reporting cycle.



OFFICIAL

Legislative Obligations

OVIC

OFFICIAL

Part 4 of the PDP Act

Privacy and Data Protection Act 2014
No. 60 of 2014
Part 4—Protective data security

Part 4—Protective data security

Division 1—Application of Part

84 Application of Part

- (1) Subject to subsection (2), this Part applies to—
- (a) a public sector agency; and
 - (b) a body that is a special body, within the meaning of section 6 of the **Public Administration Act 2004**; and
 - (c) a body declared under subsection (3) to be a body to which this Part applies.
- (2) This Part does not apply to the following—
- (a) a Council;
 - (b) a university within the meaning of the **Education and Training Reform Act 2006**;
 - (c) a body to which, or to the governing body of which, the government of another jurisdiction, or a person appointed or body established under the law of another jurisdiction, has the right to appoint a member, irrespective of how that right arises;
 - (d) a public hospital within the meaning of the **Health Services Act 1988**;
 - (e) a public health service within the meaning of the **Health Services Act 1988**;
 - (f) a multi-purpose service within the meaning of the **Health Services Act 1988**;
 - (g) an ambulance service, within the meaning of the **Ambulance Services Act 1986**.
- (3) The Governor in Council, by Order published in the Government Gazette, may declare a body to be a body to which this Part applies.

Authorised by the Chief Parliamentary Counsel
104

Security Risk Profile Assessment (SRPA)

Section 89(1)(a) The public sector body Head must ensure that a security risk profile assessment is undertaken for the agency or body

Section 89(2) A security risk profile assessment of an agency or body **must include an assessment of any contracted service provider** of the agency or body to the extent that the provider collects, holds, uses, manages, discloses or transfers public sector data for the agency or body.

Protective Data Security Plan (PDSP)

Section 89(4) A public sector body Head must ensure that the protective data security plan prepared under this section is reviewed--

(a) if there is a **significant change** in the operating environment or the security risks relevant to the agency or body; or

(b) otherwise, **every 2 years**.

Section 89(5) A public sector body Head for the agency or body must ensure that a copy of the protective data security plan is given to the Information Commissioner.

OFFICIAL

An approach to 2022 reporting

OVIC

OFFICIAL

Single Organisation Sample Approach



Engage

ENGAGE

UNDERTAKE

DEVELOP

SUBMIT

When engaging executive teams, organisations need to consider what approach will work best for their business.

- 1 NOMINATE AN EXECUTIVE SPONSOR**
An important first step includes the nomination of an Executive Sponsor who will champion the significance of information security throughout the business.
- 2 ESTABLISH A WORKING GROUP TO COORDINATE EFFORTS**
A working group may help coordinate efforts in implementing the VPDSS and should include representation from all areas of the business.
- 3 CONFIRM YOUR ORGANISATION'S INFORMATION SECURITY LEAD**
Your information security lead acts as a central point of contact for OVIC, helping deliver important information security messages and updates relating to the Framework and Standards.

Review PDSP and Internal Security Program

ENGAGE

UNDERTAKE

DEVELOP

SUBMIT

Review your previous PDSP and internal security program

OFFICIAL

Introduction to the Protective Data Security Plan

What is a Protective Data Security Plan (PDSP)?

A Protective Data Security Plan (PDSP) serves several purposes. It is designed to:

- help you assess your organisation's information security capability;
- summarise your privacy standards (SPSs);
- provide assurance if your organisation is making a claim.

Why do I need a PDSP?

The PDSP is a useful document that activities are in place. It provides information to stakeholders, providing a clear overview of the standards.

It is also a requirement under the Privacy Act 1988.

When do I have to update my PDSP?

PDSPs are required to be updated if a PDSP is the basis of a claim.

If your organisation has to be required to update a PDSP, you should update it.

What should I capture?

PDSPs submitted to OVIC should capture:

- the organisation's information security standards;
- the organisation's information security capabilities;
- the organisation's information security implementation progress.

Freedom of Information | Privacy | Data Protection

OFFICIAL

OVIC
Office of the Victorian Information Commissioner

Protective Data Security Plan (PDSP)

Information Security

Victorian Protective Data Security Standards

Reporting information security capability and implementation progress
Single-Organisation Reporting Form

Version 2.2 March 2020

This form is intended to be completed electronically. Different software may preview form fields differently. For best results, please use the latest version of Adobe Acrobat Reader or Adobe Acrobat Pro.

Freedom of Information | Privacy | Data Protection

OFFICIAL

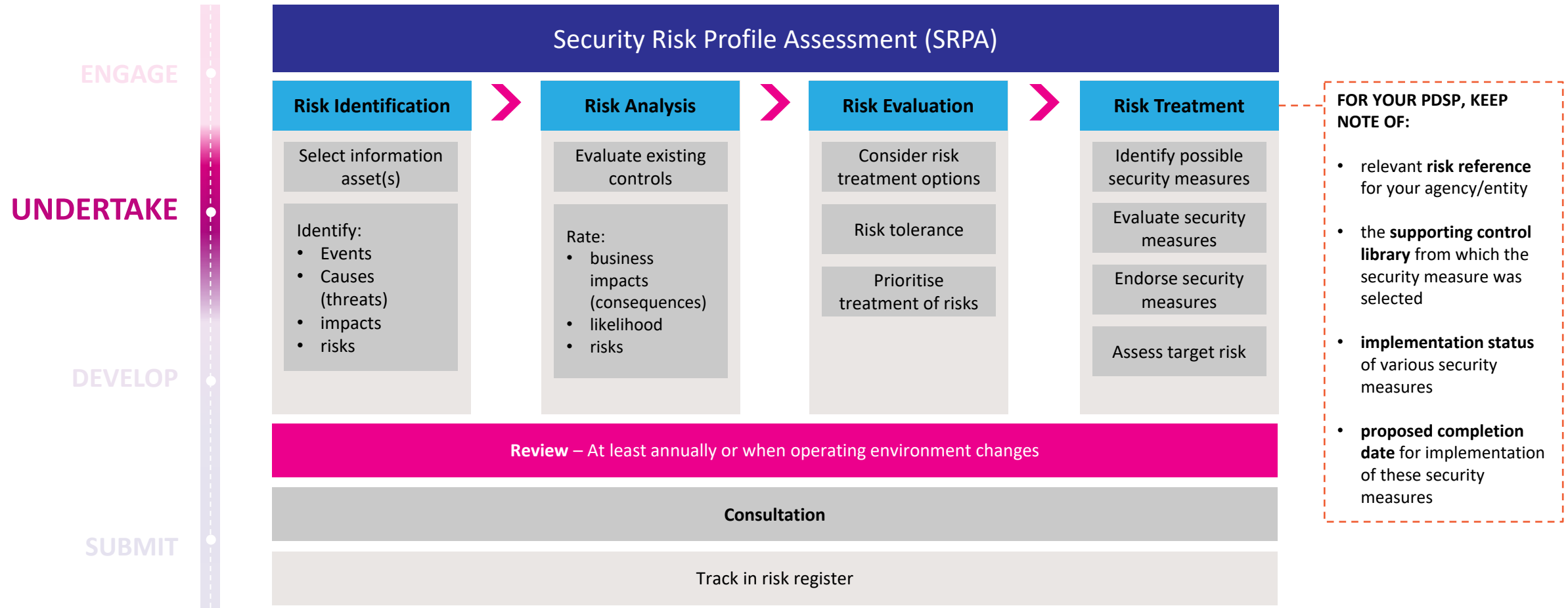
Not met

On track

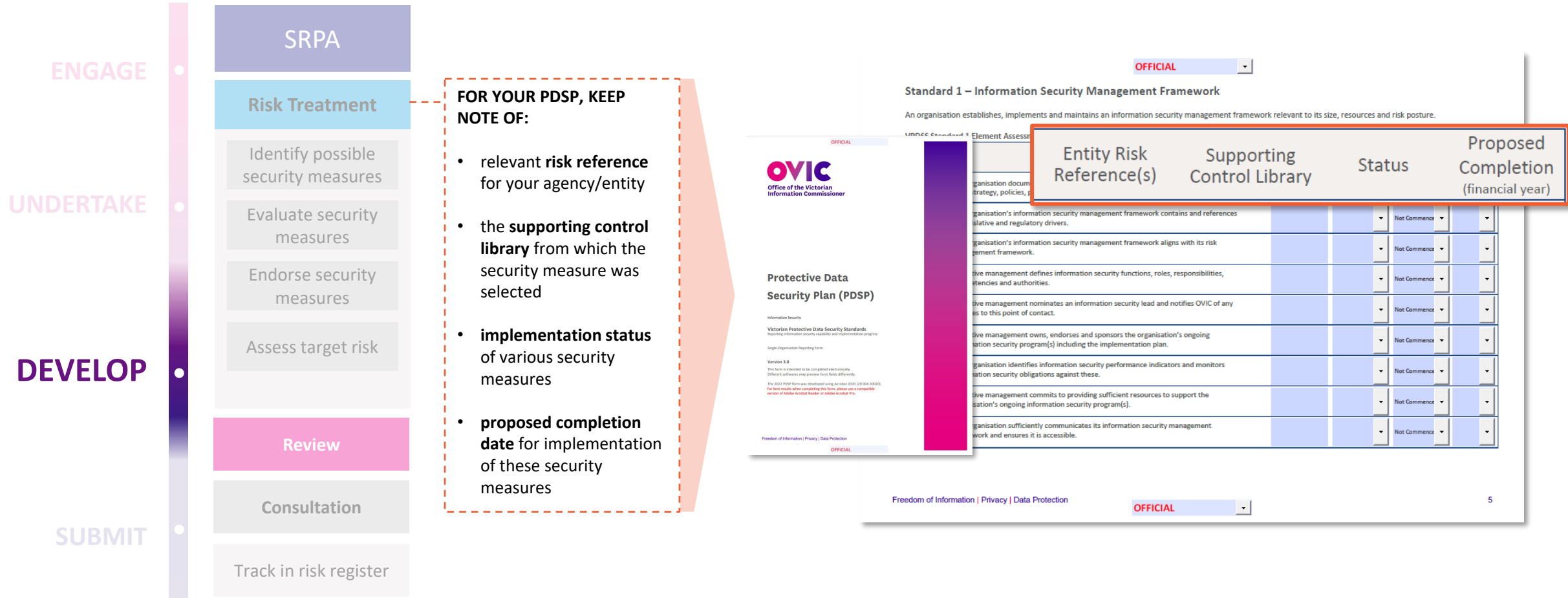
Complete



Undertake a SRPA



Develop – Approach 1: SRPA informing PDSP



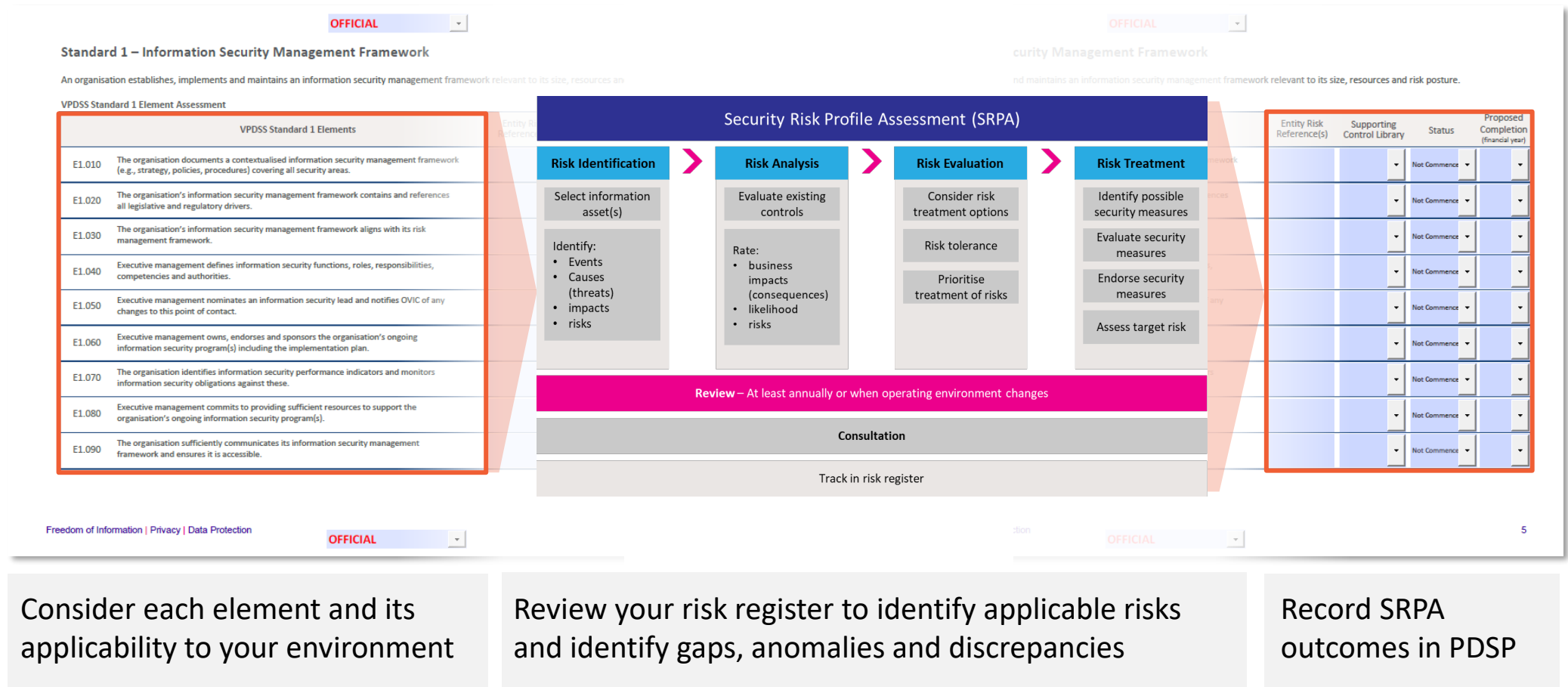
Develop - Approach 2: PDSP informing SRPA

ENGAGE

UNDERTAKE

DEVELOP

SUBMIT



The 2022 PDSP form – hot off the press!

ENGAGE

UNDERTAKE

DEVELOP

SUBMIT

VERSION 3.1

The screenshot shows the cover page of the 'Protective Data Security Plan (PDSP)' form, Version 3.1. At the top, there is a red 'OFFICIAL' label. Below it is the OVIC logo (Office of the Victorian Information Commissioner). The title 'Protective Data Security Plan (PDSP)' is prominently displayed. Underneath, it specifies 'Information Security' and 'Victorian Protective Data Security Standards'. Further down, it mentions 'Single-Organisation Reporting Form' and 'Version 3.1'. A small note states: 'This form is intended to be completed electronically. Different software may preview form fields differently.' Another note mentions: 'The 2022 PDSP form was developed using Acrobat 2020 (20.004.30020). For best results when completing this form, please use a compatible version of Adobe Acrobat Reader or Adobe Acrobat Pro.' At the bottom, there is a footer with 'Freedom of Information | Privacy | Data Protection' and another red 'OFFICIAL' label.

Some of you may have accessed an earlier version of the form (V3.0), however as of **9 February 2022 V3.1** has been published and supersedes V3.0.

Visit our website to access the latest version:

<https://ovic.vic.gov.au/agency-reporting-obligations-hub/vps-stakeholders/>

The 2022 PDSP form – what's new, what's changed

ENGAGE

UNDERTAKE

DEVELOP

SUBMIT

OVERALL FORM STRUCTURE

PART A

Introductory notes and all 12 Standards and associated Elements

PART B

Contact details and Organisational Profile Assessment (OPA)

PART C

Attestation

Removed

Feedback to OVIC and Appendix

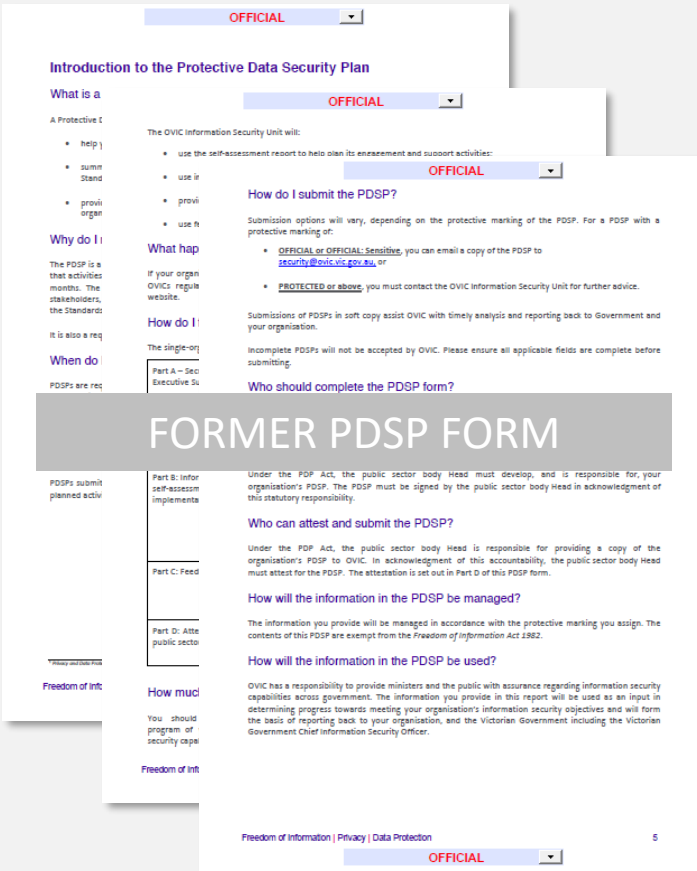
The 2022 PDSP form – what's new, what's changed

ENGAGE

UNDERTAKE

DEVELOP

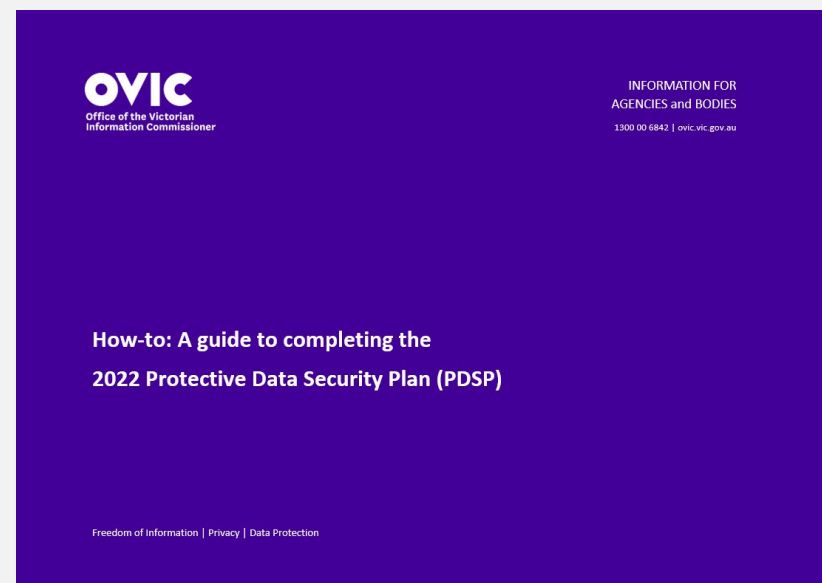
SUBMIT



The image shows a screenshot of the 'FORMER PDSP FORM'. It is a multi-page document with a header 'OFFICIAL' and a dropdown menu. The form is titled 'Introduction to the Protective Data Security Plan'. It contains sections for 'What is a', 'Why do I', 'When do', 'How do I', 'Who should complete the PDSP form?', 'How will the information in the PDSP be managed?', and 'How will the information in the PDSP be used?'. The form is divided into parts: Part A: Self-assessment, Part B: Information Security Unit, Part C: Information Security Unit, Part D: Information Security Unit, and Part E: Information Security Unit. The form is marked as 'OFFICIAL' and has a page number '5' at the bottom.

Cut down explanatory
and introductory notes
from the 2020 PDSP form

These are now in the
How-to Guide



The 2022 PDSP form – what's new, what's changed

ENGAGE

UNDERTAKE

DEVELOP

SUBMIT

PART A

OFFICIAL

Part A - Information security self-assessment and implementation plan

Instructions
Each Standard has a number of mandatory fields to complete. For an explanation of the form fields, please refer to the accompanying resource "How to: A guide to completing the 2022 Protective Data Security Plan" available from OVIC's website.

How-to: A guide to completing the 2022 Protective Data Security Plan (PDSP)

Note to auditors
The purpose of the VPDSS is to provide a set of criteria for the consistent application of risk-based practices to manage the security of Victorian government information. Elements are security measures that modify risk.

When auditing against this PDSP, auditors should consider how specific controls are implemented with regard to the organisation's internal and external context; the security value of information; and, any associated risks. Auditors should avoid viewing the implementation of the Elements as a compliance activity and instead focus on the risk management aspects.

Freedom of Information | Privacy | Data Protection

OFFICIAL

Added a note to auditors reiterating the risk-based nature of the Victorian Protective Data Security Standards

Note to auditors

The purpose of the VPDSS is to provide a set of criteria for the consistent application of risk-based practices to manage the security of Victorian government information. Elements are security measures that modify risk.

When auditing against this PDSP, auditors should consider how specific controls are implemented with regard to the organisation's internal and external context; the security value of information; and, any associated risks. Auditors should avoid viewing the implementation of the Elements as a compliance activity and instead focus on the risk management aspects.

Freedom of Information | Privacy | Data Protection

4

OFFICIAL

The 2022 PDSP form – what's new, what's changed

ENGAGE

UNDERTAKE

DEVELOP

SUBMIT

PART A

Standard 1 – Information Security Management Framework

An organisation establishes, implements and maintains an information security management framework relevant to its size, resources and risk posture.

VPDSS Standard 1 Element Assessment

VPDSS Standard 1 Elements	Entity Risk Reference(s)	Supporting Control Library	Status	Proposed Completion (financial year)
E1.010 The organisation documents a contextualised information security management framework (e.g., strategy, policies, procedures) covering all security areas.			Not Commence	
E1.020 The organisation's information security management framework contains and references all legislative and regulatory drivers.			Not Commence	
E1.030 The organisation's information security management framework aligns with its risk management framework.			Not Commence	
E1.040 Executive management defines information security functions, roles, responsibilities, competencies and authorities.			Not Commence	
E1.050 Executive management nominates an information security lead and notifies OVIC of any changes to this point of contact.			Not Commence	
E1.060 Executive management owns, endorses and sponsors the organisation's ongoing information security program(s) including the implementation plan.			Not Commence	
E1.070 The organisation identifies information security performance indicators and monitors information security obligations against these.			Not Commence	
E1.080 Executive management commits to providing sufficient resources to support the organisation's ongoing information security program(s).			Not Commence	
E1.090 The organisation sufficiently communicates its information security management framework and ensures it is accessible.			Not Commence	

Freedom of Information | Privacy | Data Protection

OFFICIAL

5

Entity Risk Reference(s)

Supporting Control Library

Status

Proposed Completion (financial year)

Column order has shifted

Status

Not Commenced

Not Applicable

Not Commenced Planned

Partial (some)

Partial (most)

Implemented

'Partial' option allows for greater granularity with 'some' or 'most'

Proposed Completion (financial year)

2022/ 2023

2023/ 2024

2024/ 2025

2025/ 2026

2026+

Completed/ BAU

Completion dates updated

The 2022 PDSP form – what's new, what's changed

ENGAGE

UNDERTAKE

DEVELOP

SUBMIT

PART A

OFFICIAL

VPDSS Standard 1 Elements	Entity Risk Reference(s)	Supporting Control Library	Status	Proposed Completion (financial year)
E1.100 The organisation documents its internal control library that addresses its information security risks.			Not Commence	
E1.110 The organisation monitors, reviews, validates and updates the information security management framework.			Not Commence	

VPDSS Standard 1 Maturity Assessment

Current	2024 Target	2026 Aspiration
Informal	Informal	Informal

Use this space to provide any additional commentary around the organisation's implementation of this Standard (optional) (No character limit)

Freedom of Information | Privacy | Data Protection

OFFICIAL

6

Supporting Control Library

- ISO 27000 series
- ISM
- PSPF
- NIST
- VPDSSE
- Other

Added 'Other' option for supporting control libraries

Maturity assessment moved towards the end of the Standard

Optional free text field provided at the end of each Standard to contextualise responses

The 2022 PDSP form – what's new, what's changed

ENGAGE

UNDERTAKE

DEVELOP

SUBMIT

PART B – Organisational Profile Assessment

OFFICIAL

Organisation Profile Assessment

This section assists OVIC's understanding of the organisation's security profile.

Number of employees within the organisation	Full-Time Equivalent	Contractors	Volunteers

Does the organisation have Industrial Automation and Control Systems (IACS)? ☐

Does the organisation obtain, generate, receive or hold information at Business Impact Level (BIL) 3 or higher? ☐

Provide an approximate protective marking breakdown of the organisation's information assets:

BIL 1 (Confidentiality)	OFFICIAL	0	%
BIL 2 (Confidentiality)	OFFICIAL: Sensitive	0	%
BIL 3 (Confidentiality)	PROTECTED	0	%
BIL 3-4 (Confidentiality)	[security classification]// Cabinet-In-Confidence	0	%
BIL 4 (Confidentiality)	SECRET	0	%
BIL 5 (Confidentiality)	TOP SECRET	0	%
Percentage of information not assessed		0	%
Percentage of information marked using a former scheme or different scheme		0	%
Total information assets		0%	

Information Security Incidents

How many information security incidents were recorded in the organisation's internal incident register over the last 24 months?

Of these incidents, how many affected information assets of a BIL 2 or higher?

Third-Party Arrangements

How many third-party arrangements currently have direct access to the organisation's information and information systems?

What is the highest protective marking that third parties are accessing?

How did the organisation validate the PDSP prior to submission to OVIC?

Internal Audit	External Audit	Self-Assessed	Other
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Freedom of Information | Privacy | Data Protection

OFFICIAL

Reframed Critical Infrastructure question (now IACS)

Reference to former protective marking scheme removed

Added field for indicating how the PDSP was validated

The 2022 PDSP form – what's new, what's changed

ENGAGE

UNDERTAKE

DEVELOP

SUBMIT

PART C – Attestation

OFFICIAL

Part C - Attestation

Attestation

This attestation is submitted to the Information Commissioner in accordance with s 8D(2) (b) of the *Privacy and Data Protection Act 2014* and Standard 9 in the Victorian Protective Data Security Standards 2.0 (the Standards).

Check this box to populate the attestation with details for the public sector body Head as listed in Part B of the PDSP. ☐ (Check box optional)

I, [redacted], verify that [redacted] has implemented the key activities or is in the process of implementing key activities (either in progress or planned), 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.

AND

Has undertaken a security risk profile assessment or is in the process of undertaking a security risk profile assessment for [redacted] 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.

[redacted]

Print name: [redacted]

Position: [redacted]

Date: [redacted]

Freedom of Information | Privacy | Data Protection

OFFICIAL

32

I, [redacted], verify that [redacted] has implemented the key activities or is in the process of implementing key activities (either in progress or planned), 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.

AND

Has undertaken a security risk profile assessment or is in the process of undertaking a security risk profile assessment for [redacted] 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.

Attestation must be signed by the public sector body Head, not a delegate

New guidance: How-to Guide

ENGAGE

UNDERTAKE

DEVELOP

SUBMIT

What is it?

A detailed guide designed to assist you in completing the 2022 PDSP form.

How do I use it?

You can work your way through the guide from start to finish, or jump ahead to Part A.

The How-to Guide sets out each field contained in the 2022 PDSP form and provides an accompanying explanation and/or description. Includes screenshots for visual references.

Where do I find it?

Download a copy from our website: <https://ovic.vic.gov.au/agency-reporting-obligations-hub/vps-stakeholders/>



What's inside?

ENGAGE

UNDERTAKE

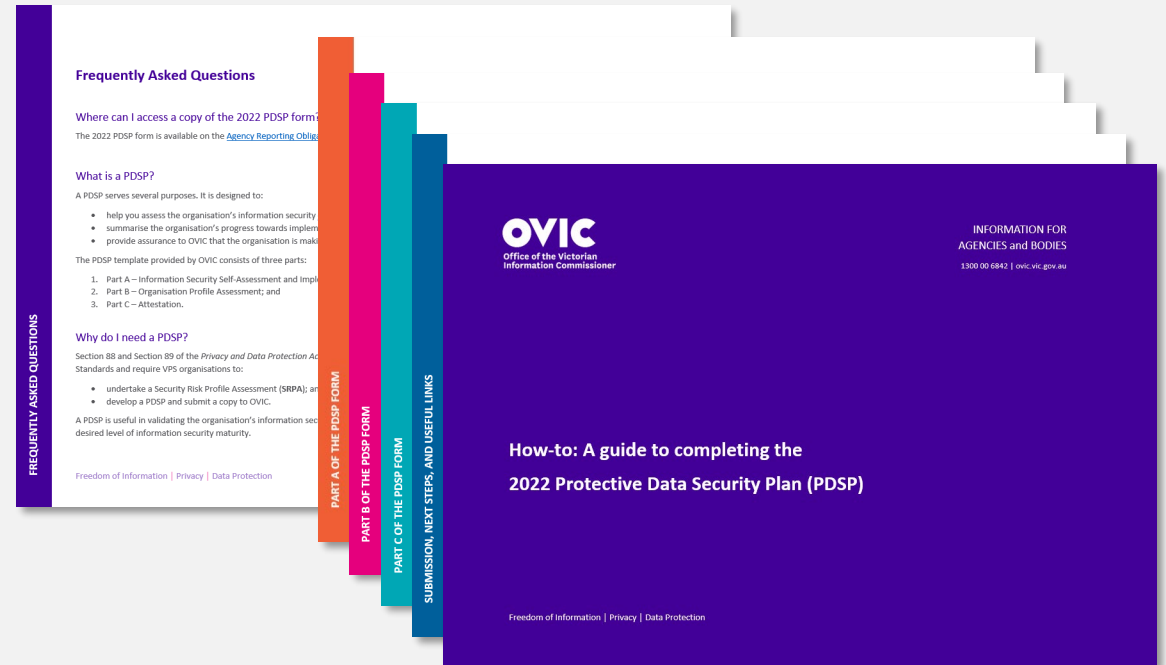
DEVELOP

SUBMIT

Frequently Asked Questions (FAQ)

Frequently asked questions about the PDSP and reporting period.

If you are new to the reporting process or would like to gain further insights into the intent of the PDSP form, we suggest starting with the FAQs as these may provide useful context and background.



What's inside?

ENGAGE

UNDERTAKE

DEVELOP

SUBMIT

Part A of the PDSP form

Provides detailed guidance on each field within Part A of the PDSP form, including:

- Purpose of each field
- Field explanations
- Examples for how to complete each field



What's inside?

ENGAGE

UNDERTAKE

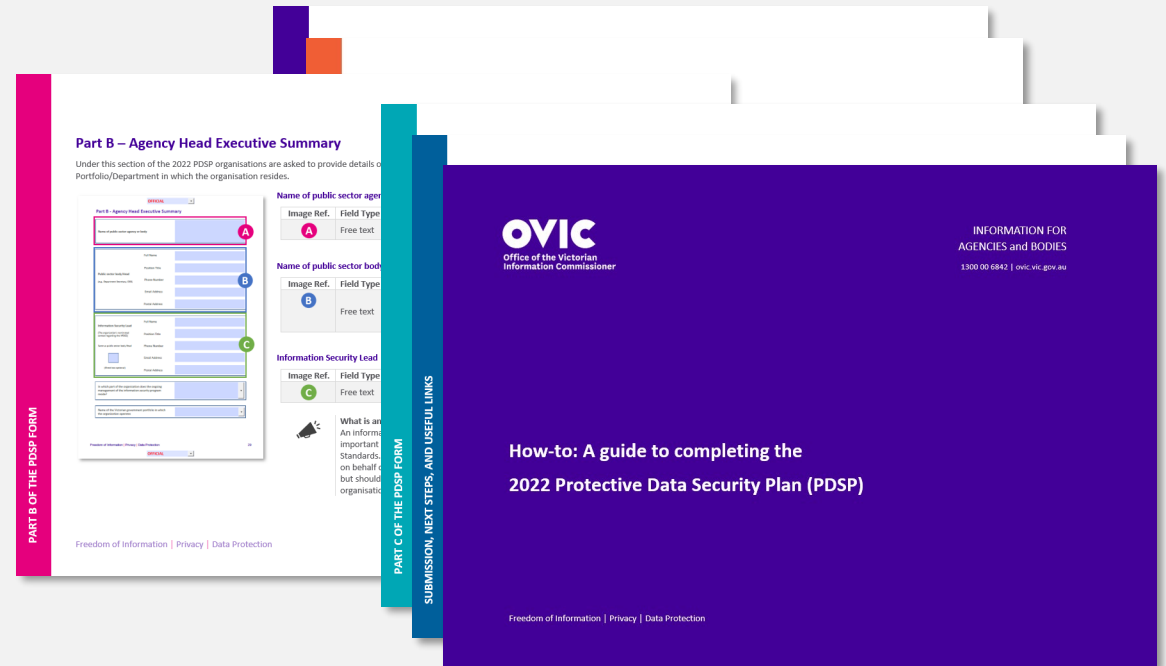
DEVELOP

SUBMIT

Part B of the PDSP form

Provides detailed guidance on each field within Part B PDSP form, including:

- The agency head executive summary
- Questions within the Organisational Profile Assessment (OPA)



What's inside?

ENGAGE

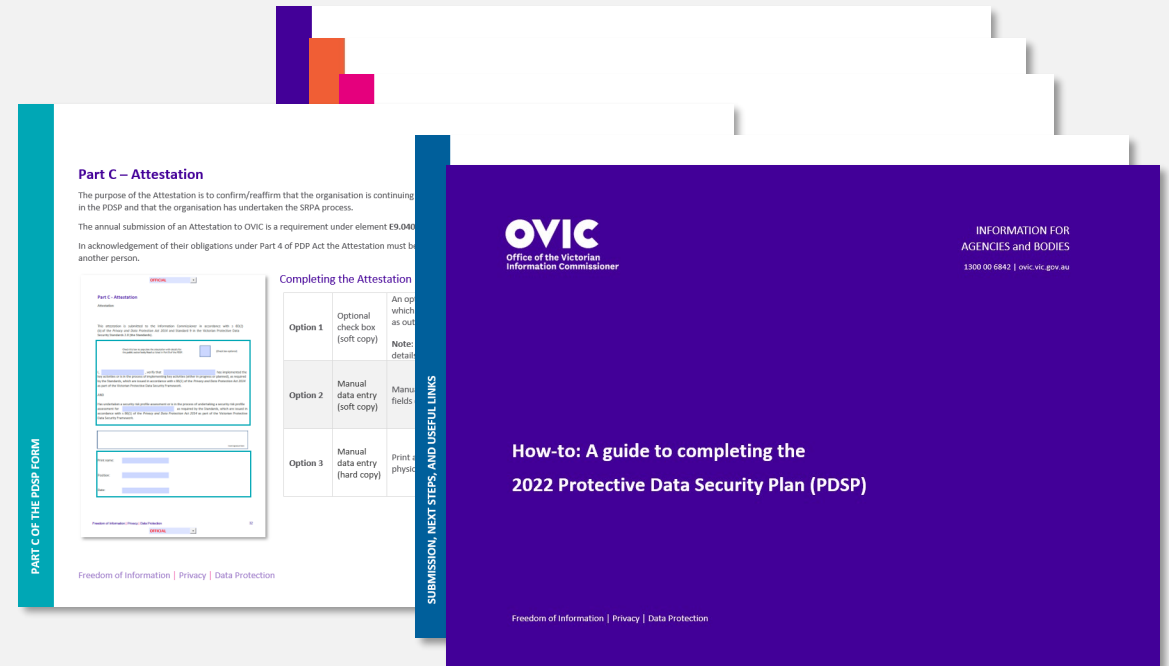
UNDERTAKE

DEVELOP

SUBMIT

Part C of the PDSP form

Provides guidance on the purpose of and options (soft copy vs. hard copy) for completing the Attestation within the PDSP form.



What's inside?

ENGAGE

UNDERTAKE

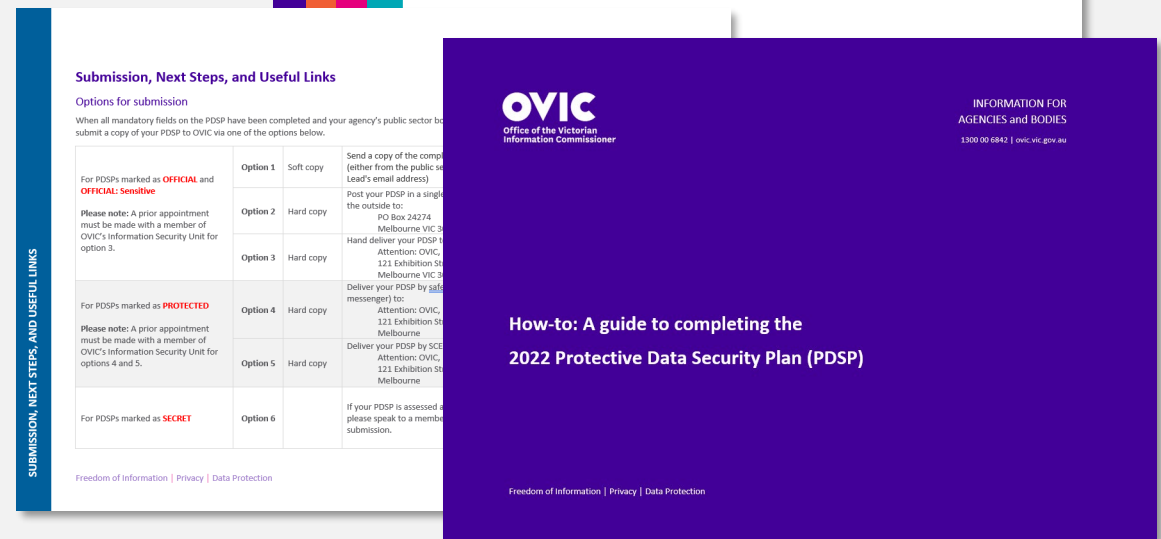
DEVELOP

SUBMIT

Submission, Next Steps, and Useful Links

Provides:

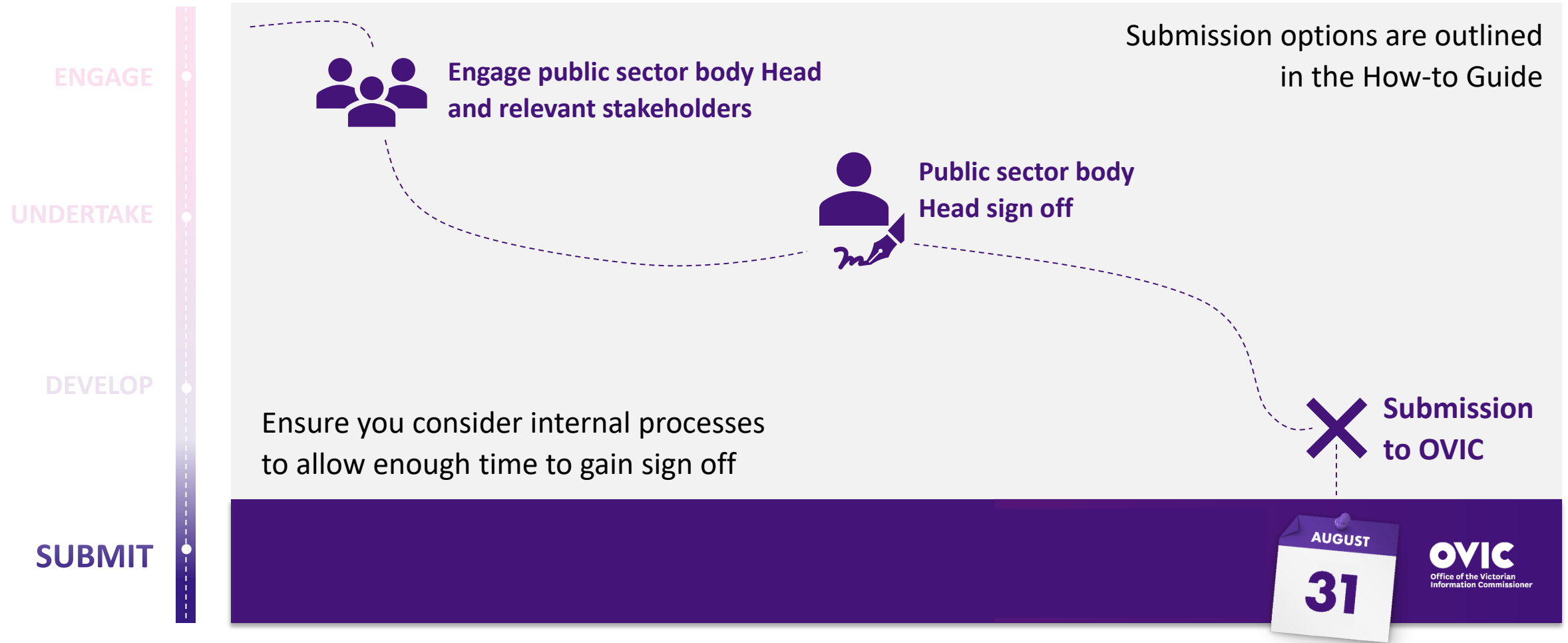
- options for submission based on the protective marking assigned to the PDSP
- next steps to consider following submission, and
- useful links that will help throughout the reporting process.



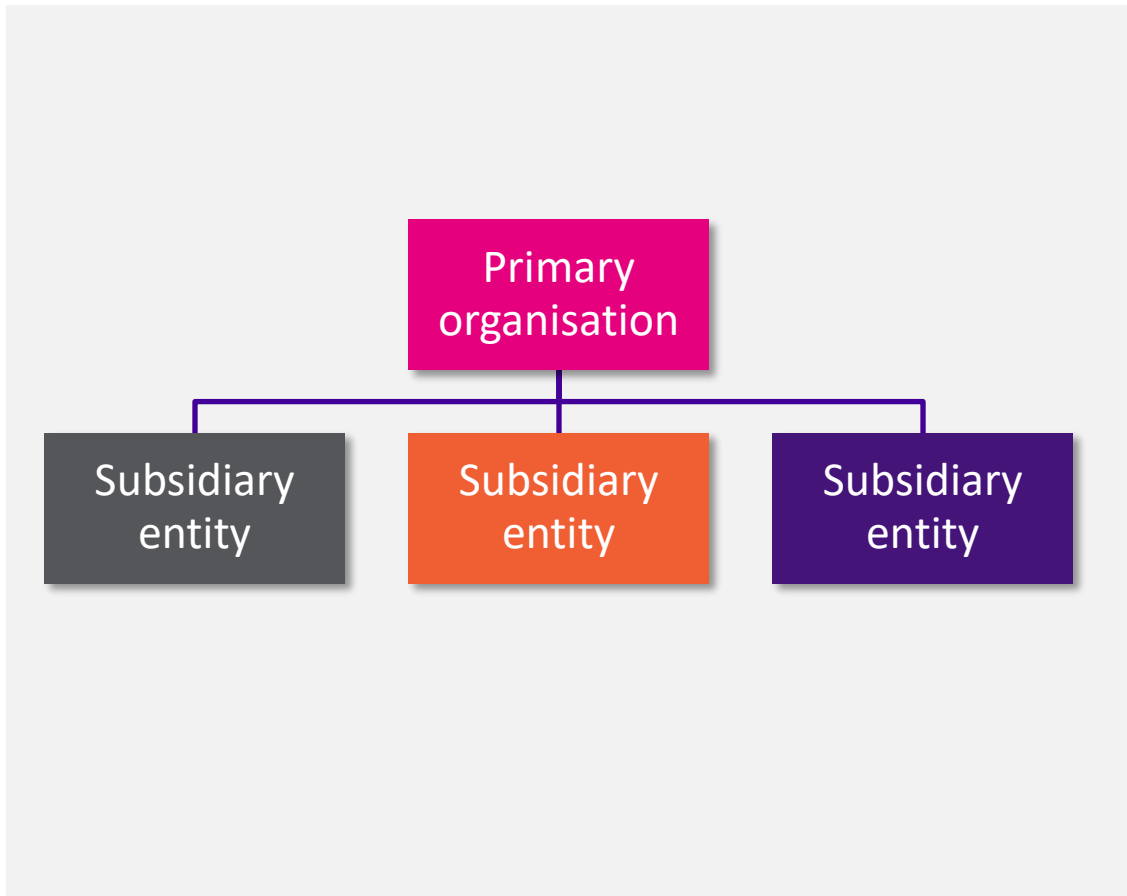
Single Organisation Sample Approach



Submit



A word on the Multi-organisation Reporting model



Where appropriate an organisation (primary organisation) may request a multi-organisation PDSP form to use to report on behalf of itself and its subsidiary entities.

This reporting approach may be based upon a portfolio model where agencies or bodies fall within the portfolio of responsibilities of a department (primary organisation) and have a similar control environment and risk profile to nominated subsidiary entities.

Please contact OVIC's Information Security Unit to discuss your requirements.

Additional Resources: VPDSS Glossary v2.1



In January 2022, we released version 2.1 of the VPDSS Glossary.

This document defines the terms and acronyms used in the VPDSS and VPDSF material, including the Protective Data Security Plan.

With thanks from the Deputy Commissioner



Rachel Dixon

Deputy Commissioner
Privacy and Data Protection



Feedback and Questions

Please provide any **feedback** you have on today's session.

slido

Go to slido.com

Joining as a participant?

FebVISN



For those with **questions** following this forum, please email:



security@ovic.vic.gov.au



Thank you!

OFFICIAL

OFFICIAL