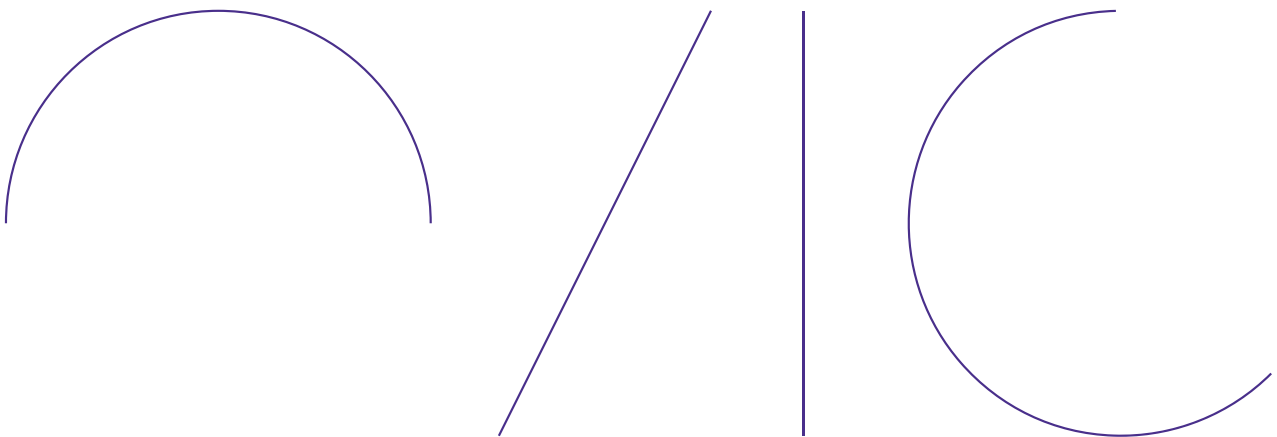




2026 | How-to Guide: Protective Data Security Plan (PDSP) for Class B Cemetery Trusts

Version 1.2

If you need help in completing the Protective Data Security Plan, call 1300 006 842 or email security@ovic.vic.gov.au



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Background

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

The Standards prescribe requirements designed to protect information across the Victorian public sector, including the information of Class B Cemetery Trusts. Under Part 4 of the PDP Act, Class B cemetery trusts must submit a Protective Data Security Plan (**PDSP**) to OVIC to fulfill this legislative information security obligation.

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.

In OVIC's discussions with trust members, it is clear there is a passion to protect paper (hard copy) and electronic (digital or soft copy) 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 is most needed. The historical value of these records reflects the importance the community places in the material you manage on the trust's behalf.

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, steps down or passes, and how the knowledge that has been built up over the years is then 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 also support good financial record keeping and help cemetery trust members manage their time and efforts relative to any risks.

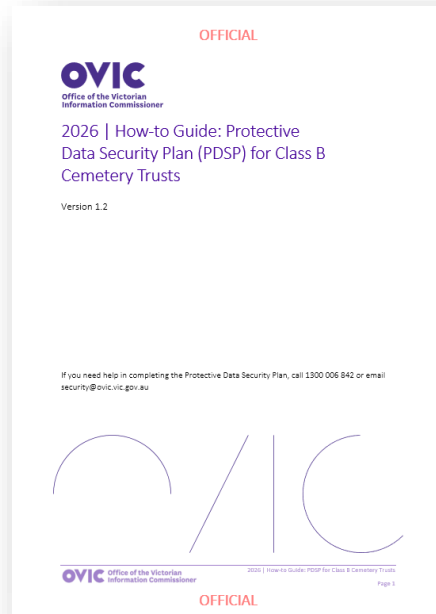
About this guide and the Class B Cemetery Trust PDSP form

There are 2 key documents you need to reference to enable you to submit a completed PDSP to OVIC:

Document 1 - This guide

2026 | How-to Guide: Protective Data Security Plan (PDSP) for Class B Cemetery Trusts

This guide provides you with instructions and assistance on how to complete and submit the PDSP form.



Document 2 - PDSP form

2026 | Class B Cemetery Trust Protective Data Security Plan (PDSP)



This form must be completed, and a copy returned to OVIC, by 31 August 2026.

The 14 requirements in the PDSP set out good information security management practices to ensure the protection of cemetery trust records.

The PDSP has been created to address the specific needs of Class B Cemetery Trusts. By completing the 2026 PDSP and submitting a signed copy to OVIC, your trust will have satisfied its PDSP reporting obligation to OVIC for 2026.

Instructions for completing the PDSP

The Class B Cemetery Trust PDSP is made up of 5 parts:

2026 Protective Data Security Plan for Class B Cemetery Trusts		
Document details		<p>This part includes:</p> <ul style="list-style-type: none"> - versioning of the document (PDSP form) - reference to Part 4 PDP Act obligations - mapping between the 14 requirements for Class B Cemetery Trusts and the VPDSS.
Part A	Contact information	This part records basic information that will assist OVIC in identifying the key contacts for the Class B Cemetery Trust.
Part B	Self-assessment against the requirements	<p>OVIC has specified 14 requirements (aligned to the VPDSS)¹ that will enable Class B Cemetery Trusts to manage information in a consistent and secure way.</p> <p>This part provides OVIC with information on how the cemetery trust is tracking against the 14 requirements and provides some recommended supporting activities to help the trust address these.</p>
Part C	Attestation	The attestation must be signed by the Chairperson of the Class B Cemetery Trust or their authorised representative (as specified in Part A of the PDSP form).
Part D	Reporting on behalf of multiple Class B Cemetery Trusts	If you wish to report on behalf of your cemetery trust and other cemetery trusts in a single consolidated PDSP submission, you must have written authorisation from the other cemetery's Chairperson in order to include them. OVIC will use the responses you have provided for each of the 14 requirements as a reflection of both yours, and the other listed cemetery trusts' status and practices.

You have 2 options for completing the 2026 PDSP form:



Option 1 – 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 (digital version) of this form by emailing security@ovic.vic.gov.au




Option 2 - Hard copy (printed): You will need to note your responses using a pen on the PDSP form. Once completed, post or email a copy of the signed PDSP back to OVIC. Keep a copy (either photocopy or scanned) of your PDSP form for the trust's record/ reference.

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

Part A: Contact information (mandatory)

PART A - Contact information (mandatory)

	Chairperson	Person authorised by the Chairperson to submit a copy of this PDSP	Nominated point of contact (if different from the Chairperson)
Full name	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Position title	Chairperson	Click or tap here to enter text.	Click or tap here to enter text.
Phone number	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Email address	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Postal address	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

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Section description

Under Part A of the PDSP form, please provide basic information that will assist OVIC in identifying the key contacts for your Class B Cemetery Trust.

How to complete **Part A** of the PDSP form:

1. Provide the relevant contact information of your cemetery trust's Chairperson.
2. Provide the contact information of the person who is authorised by the Chairperson to submit a copy of the PDSP on behalf of the Chairperson (this might be the Secretary or another volunteer). If this is the same person, simply note this. If there is no authorised person, please leave this section blank.
3. Provide the details 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. This may be the Chairperson or Secretary, or an additional point of contact. If it's the same person, simply note that.

Please include a postal address as OVIC may mail material to your cemetery trust.

If there are adjustments to these details outside the standard reporting cycle remember to update OVIC of any changes.

Part B: Self-assessment against the 14 requirements (mandatory)

PART B – Self assessment against the requirements (mandatory)

Requirement 1

The cemetery trust records how it securely manages its information

This requirement maps to Standard 1 of the VPDSS: An organisation establishes, implements and maintains an information security management framework relevant to its size, resources and risk posture.

Explanation of requirement

Documentation informs all Class B Cemetery Trust (Class B CT) members (current and future) on the expectations around securely managing Class B CT information.

Recommended supporting activity

Trust members discuss and write down their approach to securely managing Class B CT 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.

Action required – complete the below

Current response (tick one box)		Proposed completion date for this Requirement (tick one box)
<input type="checkbox"/> Not Applicable (must provide rationale) »	If you select not applicable, you must provide a rationale for the selection here.	<input type="checkbox"/> 2026 / 2027
<input type="checkbox"/> Not commenced (select a proposed completion date)		<input type="checkbox"/> 2027 / 2028
<input type="checkbox"/> Planned (select a proposed completion date)		<input type="checkbox"/> 2028 / 2029
<input type="checkbox"/> Partial (select a proposed completion date)		<input type="checkbox"/> 2029 / 2030
<input type="checkbox"/> Implemented		<input type="checkbox"/> 2030+

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Section description

OVIC has specified 14 requirements that will assist the trust in managing Class B Cemetery Trust information in a consistent and secure way.

Part B of the PDSP form offers the cemetery trust an opportunity to outline how it is tracking against each of the 14 requirements and sets out some suggested activities to help the trust address these.


Each of the 14 requirements are presented using the following structure:

- Requirement number
- The requirement itself (i.e. what the Cemetery Trust is reporting against)
- Mapping of the requirement back to a Standard
- An explanation of the requirement
- A recommended supporting activity to assist in implementing the requirement and
- A current response
 - Note: If you select 'not applicable' as the response, you must provide a rationale outlining a reason why this requirement does not apply to your cemetery trust
- Proposed completion date for the requirement if it is not implemented

How to complete Part B of the PDSP form:

PART B – Self assessment against the requirements (mandatory)

Requirement 1		
The cemetery trust records how it securely manages its information		
This requirement maps to Standard 1 of the VPDS		An organisation establishes, implements and maintains an information security management framework relevant to its size, resources and risk posture.
Explanation of requirement Documentation informs all Class B Cemetery Trust (Class B CT) members (current and future) on the expectations around securely managing Class B CT information.		Recommended supporting activity Trust members discuss and write down their approach to securely managing Class B CT information. This could be recorded in the form of a single statement, or for more complex Trusts it may be recorded in one or more documents.
Action required – complete the below		
Current response (tick one box)		Proposed completion date for this Requirement (tick one box)
<input type="checkbox"/> Not Applicable (must provide rationale) »	If you select not applicable, you must provide a rationale for the selection here:	<input type="checkbox"/> 2026 / 2027
<input type="checkbox"/> Not commenced (select a proposed completion date)		<input type="checkbox"/> 2027 / 2028
<input type="checkbox"/> Planned (select a proposed completion date)		<input type="checkbox"/> 2028 / 2029
<input type="checkbox"/> Partial (select a proposed completion date)		<input type="checkbox"/> 2029 / 2030
<input type="checkbox"/> Implemented		<input type="checkbox"/> 2030+


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Step 1	Read	the requirement carefully.														
Step 2	Read	the explanation of the requirement to gain further understanding of what the requirement is asking of the cemetery trust.														
Step 3	Read	the recommended supporting activity to understand what steps can be taken to meet the related requirement. If you are unsure or need assistance, please contact OVIC.														
Step 4	Provide	<p>a current response (implementation status) by ticking the relevant box for each requirement.</p> <p>Your response should be based on an assessment of whether the cemetery trust is undertaking, or has undertaken, the required activity or a similar activity.</p> <p>Each response and an outline of what this means is offered below –</p> <table><tr><th>Current response (status)</th><th>What this means</th></tr><tr><td>Not Commenced</td><td>The cemetery trust acknowledges this requirement is applicable, however no work has been started or planned at the time of submitting this PDSP.</td></tr><tr><td>Planned</td><td>The cemetery trust is in the process of planning work to meet this requirement.</td></tr><tr><td>Partial</td><td>Work is underway by the cemetery trust to meet this requirement but not fully implemented.</td></tr><tr><td>Implemented</td><td>The requirement is fully implemented, and the cemetery trust is actively managing supporting activities.</td></tr><tr><td>Not Applicable</td><td>The cemetery trust does not believe this requirement is applicable to the cemetery trust and have documented why.</td></tr><tr><td>L Rationale</td><td>If '<i>not applicable</i>' is selected, the trust must provide a written rationale in the corresponding box explaining why this requirement does not apply to the cemetery trust.</td></tr></table>	Current response (status)	What this means	Not Commenced	The cemetery trust acknowledges this requirement is applicable, however no work has been started or planned at the time of submitting this PDSP.	Planned	The cemetery trust is in the process of planning work to meet this requirement.	Partial	Work is underway by the cemetery trust to meet this requirement but not fully implemented.	Implemented	The requirement is fully implemented, and the cemetery trust is actively managing supporting activities.	Not Applicable	The cemetery trust does not believe this requirement is applicable to the cemetery trust and have documented why.	L Rationale	If ' <i>not applicable</i> ' is selected, the trust must provide a written rationale in the corresponding box explaining why this requirement does not apply to the cemetery trust.
Current response (status)	What this means															
Not Commenced	The cemetery trust acknowledges this requirement is applicable, however no work has been started or planned at the time of submitting this PDSP.															
Planned	The cemetery trust is in the process of planning work to meet this requirement.															
Partial	Work is underway by the cemetery trust to meet this requirement but not fully implemented.															
Implemented	The requirement is fully implemented, and the cemetery trust is actively managing supporting activities.															
Not Applicable	The cemetery trust does not believe this requirement is applicable to the cemetery trust and have documented why.															
L Rationale	If ' <i>not applicable</i> ' is selected, the trust must provide a written rationale in the corresponding box explaining why this requirement does not apply to the cemetery trust.															

		<p>OVIC does not expect that every requirement of the Standards will be fully implemented, but to fulfil your obligations under the <i>Privacy and Data Protection Act 2014</i> (Vic) you do need to provide a response outlining the current response (status) for each requirement.</p> <p>You must provide a response for all 14 requirements. If you are unsure, give your best assessment, or contact OVIC for assistance.</p> <p>Some of the 14 requirements in the PDSP form will call on the cemetery trust to document processes or complete supporting activities. You do not need to provide OVIC with copies of these documents or evidence of these activities at this time. Simply keep a copy of this material for your reference and internal use.</p> <p>OVIC understands that each cemetery trust has its own unique way of operating. We encourage you to consider this when developing your local documentation. We know that some cemetery trusts may have more documentation than others to support operational activities.</p>
Step 5	Provide	<p>a proposed completion date for the requirement. A proposed completion date is:</p> <ul style="list-style-type: none"> • needed if you have selected the status of <i>'not commenced'</i>, <i>planned'</i>, or <i>'partial'</i>, • not needed if you have selected the status of <i>'implemented'</i> or <i>'not applicable'</i>.
Step 6	Repeat	the above steps for each of the 14 requirements .

Part C: Attestation (mandatory)

Section Description

The Attestation must be signed by the Chairperson of the Class B Cemetery Trust or their authorised representative.

Note: If an authorised representative intends to sign the Attestation, their details must be specified in Part A of the PDSP form.

How to complete Part C of the PDSP form:

1. Ensure the Chairperson has reviewed and authorised the PDSP.
2. Complete each field including the full name of the person providing the attestation, the name of the cemetery trust, their signature, position, and the date.
3. If you are completing this PDSP on behalf of more than one cemetery trust, check the box marked and proceed to **Part D**.

Note: If this PDSP only captures your cemetery trust, you can leave Part D blank.

Part C – Attestation

The attestation must be signed by the Chairperson of the Class B Cemetery Trust or their authorised representative (as specified in Part A of this form).

This attestation is submitted to the Victorian Information Commissioner in support of section 89 of the *Privacy and Data Protection Act 2014* (Vic).

I, attest that

(Full Name) (Name of the Class B Cemetery Trust)

- has implemented the 14 requirements, or is in the process of implementing these requirements, and
- the contents of this PDSP accurately reflect the current information security program of the Class B Cemetery Trust.

I am authorised to make this attestation.

Signature:

Print name:

Position:

Date:

☐ Check this box if more than one Class B Cemetery Trust is captured by this PDSP.
(Ensure you list the details of the additional Class B Cemetery Trusts in **Part D of this form**)

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Part D: Reporting on behalf of multiple cemetery trusts (optional)

Section Description

Some cemeteries may have equivalent risk profiles, handle the same types of information and implement the same security measures, and have the same responses as other similar cemetery trusts. If multiple Class B Cemetery Trusts have the same:

- risk profiles
- types of information
- security practices and
- responses to each of the 14 requirements,

it may be appropriate to bundle these responses in a consolidated Class B Cemetery Trust PDSP submission to OVIC.

If you wish to report on behalf of your trust and other cemetery trusts in a consolidated PDSP submission, you must have written authorisation from the other cemetery’s Chairperson in order to include it in this PDSP submission.

If authorised, simply list the names and contact information of the other cemetery trusts in **Part D** of the PDSP.

OVIC will use the responses you have provided for each of the 14 requirements as a reflection of your cemetery trust and any other listed cemetery trust’s current responses.


Part D – Reporting on behalf of multiple cemetery trusts

The Class B Cemetery Trusts listed in this section have **the same**:

- risk profiles
- types of information
- security practices and
- responses to each of the 14 requirements

and have authorisation from the Chairperson of the Class B Cemetery Trust to be included in this submission.

Name of cemetery trust	Name of the Chairperson	Class B Cemetery Trust phone number and email address	The Chairperson of the Class B Cemetery Trust has authorised the submission of this PDSP on their behalf
			<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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How to complete Part D of the PDSP form:

To be included on a PDSP by a different trust, please ensure you:

1. speak to the submitting trust to ensure they are in agreement to submit on your trust's behalf.
2. provide written authorisation to the submitting trust, outlining that your trust is equivalent in all the criteria outlined in the page above.

To assist with this process, OVIC has provided an example of this written authorisation below:

I, *[insert chairperson name]*, authorise *[insert cemetery trust's name]* to be listed on the *[submitting cemetery trust's]* 2026 Protective Data Security Plan (PDSP).

I confirm that my cemetery trust has the same:

- a. risk profile
- b. types of information
- c. security practices
- d. responses to each of the 14 requirements listed on the PDSP

to that of the cemetery trust submitting on behalf of my trust.

As the submitting trust, you should:

1. obtain written authorisation from the Chairperson of each cemetery trust that you intend to list in this PDSP submission.
2. once authorised, list the name of each cemetery trust, the relevant Chairperson and the contact details for that trust.
3. check the box to indicate that each cemetery trust's Chairperson is aware that they are being reported on behalf of and included in this PDSP submission.

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Submitting a copy of the completed PDSP to OVIC

When: Submissions are due to OVIC by 31 August 2026.

How: Once you have completed all parts of the trust's PDSP form, you need to supply a completed and signed copy to OVIC. This can be done via email or post.



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



Mail a copy of your PDSP 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.

Need help?

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 PDP Act.

Please contact us to discuss any material you do not know how to address.



Phone us on 1300 006 842



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 experience to assist others.



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