

8 November 2024

██████████
Committee Manager, Legal and Social Issues Committee
Legislative Assembly
Parliament of Victoria

By email only: ██████████

Dear ██████████,

Thank you for contacting the Office of the Victorian Information Commissioner (**OVIC**) in relation to the Legal and Social Issues Committee's (**the Committee**) Inquiry into capturing data on family violence perpetrators in Victoria.

We are pleased to assist the Committee in answering your follow up questions around family violence training and the enquiries that OVIC receives on information sharing in a family violence context. Please see OVIC's responses below to the Committee's questions.

Training for family violence service agencies

OVIC provides privacy training to Victorian public sector (**VPS**) organisations on the Information Privacy Principles (**IPPs**) and the *Privacy and Data Protection Act 2014* (Vic) (**PDP Act**). OVIC has an e-learning module available, which provides VPS employees with an introductory understanding of their privacy obligations. OVIC also runs a facilitated webinar on a bi-monthly basis, which is designed to give VPS employees a detailed understanding of the IPPs and each stage of the information lifecycle.

Our training records for the last two years show that this training has been attended by organisations that provide family violence services.

As you may know, the Family Violence Information Sharing Scheme (**FVISS**) modified the application of some of the IPPs for organisations prescribed as Information Sharing Entities (**ISEs**), to facilitate information sharing for family violence purposes. Family Safety Victoria bore responsibility for developing training for organisations in the family violence sector on sharing information under the FVISS. We understand departments are now responsible for providing training to prescribed ISEs within their portfolios, as outlined on this [Victorian Government webpage](#).

OFFICIAL

Given the operation of the FVISS disappplies and amends certain privacy laws which OVIC oversees, it is not within OVIC's capability or remit to develop and deliver training for ISEs on how to appropriately share information under the FVISS. Furthermore, there are broader considerations beyond privacy law relating to the work of family violence service agencies that should also be incorporated into training, and OVIC does not have expertise in this area.

If OVIC's assistance is required to develop or deliver training for the FVISS, then OVIC would require a direct funding line from the responsible department for this work. However, OVIC is open to being consulted during the development of FVISS training, but only where that content relates to the PDP Act.

When the FVISS came into effect, OVIC received funding from government departments to aid the work we do in supporting agencies and the public who are impacted by family violence. This funding has since ceased and OVIC is now limited in what it can reasonably contribute to a training program for the family violence sector.

Enquiries on information sharing and the IPPs

Since the FVISS began, OVIC receives limited enquiries from VPS organisations on information sharing under the FVISS. However, the total number of enquiries relating to the FVISS are difficult to quantify as they not only relate to the direct application of the FVISS, but also concern individuals impacted by family violence in the privacy and access to information domains.

We hope the above information is helpful to the Committee. The Committee is welcome to contact OVIC again should it have any further questions. Please contact Anita Mugo, Senior Policy Officer, at [REDACTED] if we can assist further.

Yours sincerely

[REDACTED]
Sean Morrison

Information Commissioner