

T1 – Privacy Policy

Company Secretary and General Counsel Department, May 2026

Privacy Policy

Responsible group or department	Company Secretary and General Counsel Department
Document Owner	Governance Lead
Approved by	General Manager, People and Corporate
Compliance	Barwon Water & BAS employees and contractors
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Revision History

Version	Date	Contact	Description of Amendments	Communication Method
V4	1 September 2022	Governance Lead	Review and aligned to new policy template.	Connections article + reference in IDSG meeting
V5	7 September 2023	Governance Lead	Review and no updates required.	Not required – as no major changes to the policy
V6	17 September 2024	Governance Lead	Review and minor updates to formatting.	Not required – as no major changes to the policy
V7	7 May 2026	Governance Lead	Expanded the Policy Statement to include reference to all relevant legislation. Minor updates to formatting. Added in reference to use of Artificial Intelligence creating new personal information.	Connections article + reference in IDSG meeting

1 Policy Statement

At Barwon Water we have a strong commitment to ensuring that personal information is protected and used appropriately. The aim of privacy legislation is to give customers and individuals more control over the way organisations such as ours collect, use, secure and disclose personal information. It also gives customers the right to know what information we hold about them.

We acknowledge Aboriginal and Torres Strait Islander peoples as the First Peoples of Victoria and recognise that personal information relating to them can have cultural, historical and community significance. Barwon Water is committed to handling such information respectfully, lawfully and with cultural awareness, consistent with the *Privacy and Data Protection Act 2014 (Vic)* (PDP Act) and culturally appropriate practices.

This Privacy Policy and our associated [Privacy Charter](#) states Barwon Water Group's (BWG) position on privacy as related to the relevant privacy legislation, including the Information Privacy Principles (IPPs) and the Health Privacy Principles (HPPs). The IPPs and HPPs are contained in schedules to the PDP Act, and the *Health Records Act 2001 (Vic)* (HR Act).

In certain situations, regarding Tax file numbers, or when Barwon Asset Solutions (BAS) does work for non-Victorian Public Sector (VPS) organisations, the *Privacy Act 1988* (Commonwealth), the Australian Privacy Principles (APPs) and the Notifiable Data Breaches (NBD) scheme will apply.

Under the *Essential Services Commission Act 2001*, BWG have privacy obligations relating to the Water Industry Standard - Urban Customer Service (WIS).

In certain situations, we will create personal information about our customers and employees using Artificial Intelligence (AI) tools which may be considered a collection of that personal information. For further information regarding the adoption of AI at Barwon Water, please see our [Privacy Charter](#).

2 Scope

This Policy applies to all Barwon Region Water Corporation and BAS and their respective Boards of Directors, employees and contract service providers, referred to in this Policy as "Barwon Water", "Barwon Water Group", "we".

It applies to personal information we hold about individual customers, consumers, employees, and others.

Information identifying someone as Aboriginal or Torres Strait Islander (or relating to community/heritage) is an example of sensitive information that warrants culturally respectful handling.

In addition to our Privacy Policy and our associated Privacy Charter, we publish privacy statements for services like our website, associated third-party software, grants and job applications. These include more details about how we collect and handle personal information when we are delivering those services.

3 Purpose

The purpose of this Policy and our associated [Privacy Charter](#) is to provide for the responsible collection and handling of personal information within BWG and to outline our commitment to being open and honest when it comes to managing breaches and incidents.

In Victoria, a right to privacy is included in section 13 of the *Victorian Charter of Human Rights and Responsibilities Act 2006*, which says that everyone has the right not to have their privacy, family, home or correspondence unlawfully or arbitrarily interfered with.

Information privacy is crucial to the broader right to privacy. It relates to an individual's ability to determine for themselves when, how, and for what purpose their personal information is handled by others.

4 Definitions

Term	Description
Employees	The Directors, Managing Director, contractors and all other employees of Barwon Water and Barwon Asset Solutions.
Information Privacy Principles	The 10 Information Privacy Principles are the core of privacy law in Victoria and set out the minimum standard for how Victorian Public Sector organisations should manage personal information.
Personal information	Information or an opinion (including information or an opinion forming part of a database), that is recorded in any form and whether true or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion, but does not include information of a kind to which the <i>Health Records Act 2001</i> applies.
Privacy Impact Assessment	A process for analysing a program's impact on individuals' information privacy. The process of conducting a Privacy Impact Assessment can help to identify potential privacy risks and develop risk mitigation strategies to address these privacy impacts before a project or initiative commences.
Privacy legislation	<i>Essential Services Commission Act 2001</i> <i>Health Records Act 2001</i> (Victoria) <i>Privacy Act 1988</i> (Commonwealth) <i>Privacy and Data Protection Act 2014</i> <i>Public Records Act 1973</i> <i>Victorian Charter of Human Rights and Responsibilities Act 2006</i> (Vic)

Sensitive information	Information or an opinion about an individual's: racial or ethnic origin; political opinions; membership of a political association; religious beliefs or affiliations; philosophical beliefs; membership of a professional or trade association; membership of a trade union; sexual preferences or practices; or criminal record; that is also personal information.
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Acronym	Definition
APPs	Australian Privacy Principles
BAS	Barwon Asset Solutions
BWG	Barwon Water Group
ESC	Essential Services Commission
HPPs	Health Privacy Principles
HR Act	<i>Health Records Act 2001 (Victoria)</i>
IPPs	Information Privacy Principles
IDSG	Information and Data Security Governance
NDB	Notifiable Data Breaches
OVIC	Office of the Victorian Information Commissioner
PDP Act	<i>Privacy and Data Protection Act 2014</i>
PIA	Privacy Impact Assessment
VPDSS	Victorian Protective Data Security Standards
VPS	Victorian Public Sector
WIS	Water Industry Standard – Urban Customer Service

5 Information Privacy Principles (IPPs)

Barwon Water is bound to comply with the IPPs contained in privacy legislation in the way we handle personal information about customers and other individuals.

6 Privacy Charter

In addition to this Privacy Policy, Barwon Water has an associated [Privacy Charter](#) that explains in more detail how we handle personal information.

7 Privacy Impact Assessment (PIA)

Barwon Water recognises that new initiatives or programs of work may impact the management of personal information through either new collection or new use of information already held by Barwon Water. A PIA template, with supporting references, has been developed which sets out a series of questions regarding how the program is collecting, using, or disclosing any personal information. Through providing a granular assessment against the IPPs, and assessment of privacy risks more broadly, the PIA provides assurance over adequate management of personal information and identifies any possible gaps for rectification.

8 Privacy Breach Response Procedure

To assist our employees to comply with privacy legislation, Barwon Water has developed a "Privacy Breach Response Procedure" that sets out requirements of employees when handling personal information and responding to potential privacy breaches.

9 Disclosure of Incidents and Breaches

Barwon Water is committed to fully disclosing incidents and breaches in a timely manner. Barwon Water will respond to and manage incidents and breaches in an open and transparent way, fully complying with the relevant privacy legislation.

10 Access Permissions

Where Barwon Water holds personal information in conjunction with others (e.g. where an account is a joint one), we will allow each individual access to their own personal information and to the joint information (e.g. account balance and transaction details) but not to the personal information of other individuals. Other individuals will not be given account balances, transaction details or other personal information relating to someone else's account, unless the account holder provides permission to disclose the information to individuals not listed on an account. Customers can contact us if they wish to arrange for someone else to have access to their account details.

11 Data Protection

Barwon Water will take reasonable steps to protect the information we hold from unauthorised use, disclosure, access, modification, loss or misuse and our employees are bound by the Victorian Public Sector Code of Conduct.

Barwon Water has appropriate procedures to safeguard and help prevent unauthorised access to personal information, to maintain data security and ensure we use and disclose the information we collect appropriately.

12 Data Security

Barwon Water manages data in accordance with the Victorian Protective Data Security Standards (VPDSS) and submit a protective data security plan in-line with legislative requirements.

13 Data Retention

Barwon Water maintains records in accordance with the Public Records Act 1973 and will dispose of or permanently de-identify personal information if it is no longer needed for any purpose.

14 References

Related Policies and documents:

Document Hierarchy Tier	Description
1	Privacy Policy (this document)
5	Privacy Charter
3	Privacy Breach Response Procedure
5	Privacy Impact Assessments
5	Privacy Collection Notices
5	Privacy e-Learn

Resources

Title
<i>Essential Services Commission Act 2001</i>
<i>Health Records Act 2001</i>
<i>Victorian Charter of Human Rights and Responsibilities Act 2006 (Vic)</i>
Information Privacy Principles
<i>Privacy Act 1988</i>
<i>Privacy and Data Protection Act 2014</i>
<i>Public Records Act 1973</i>
Victorian Protective Data Security Standards

15 Review

In accordance with the Barwon Water [document hierarchy](#), this Policy will be reviewed 1 year from the date of issue. However, any document may be reviewed at any time if required, including due to a change in legislation or as business operations change.