

T1 – Privacy Policy

Governance Department, September 2024

Privacy Policy

Responsible group or department	Governance Department
Document Owner	Governance Lead
Approved by	General Manager, People and Corporate
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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 ITSG meeting
V5	7 September 2023	Governance Lead	Review and no updates required	Not required – as no major changes to the policy
V6	17 September	Governance Lead	Review and minor updates to formatting	Not required – as no major changes to the policy

Policy Statement

This policy states Barwon Water's position on privacy as related to the *Privacy and Data Protection Act 2014* (PDP Act).

Scope

This Privacy Policy covers Barwon Region Water Corporation and Barwon Asset Solutions and their respective Boards of Directors, employees and contract service providers (referred to in this Policy as "Barwon Water", "we"). It applies to personal information we hold about individual customers, consumers, employees and others.

In addition to our Privacy Policy we publish privacy statements for particular services like our website, grants and job applications. These include more detail about how we collect and handle personal information when we are delivering those services.

Purpose

The purpose of this Policy is to:

- (a) provide for the responsible collection and handling of personal information within Barwon Water and Barwon Asset Solutions; and
- (b) outline Barwon Water's commitment to being open and honest when it comes to managing breaches and incidents.

Definitions

Term	Description
Employees	The Directors, Managing Director, contractors and all other employees of Barwon Water and Barwon Asset Solutions.
Information Privacy Principles (IPPs)	The 10 IPPs are the core of privacy law in Victoria and set out the minimum standard for how Victorian public sector organisations should manage personal information.
OVIC	Office of the Victorian Information Commissioner.
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 (PIA)	A process for analysing a program's impact on individuals' information privacy. The process of conducting a PIA 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	The <i>Privacy and Data Protection Act 2014</i> (PDP Act).

Detailed Statement

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.

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.

Privacy Charter

At Barwon Water we have a strong commitment to ensuring that personal information is protected and used appropriately. To assist with this, Barwon Water has developed and will maintain a "Privacy Charter" that explains how Barwon Water handles personal information.

Privacy Procedure

To assist our employees comply with privacy legislation, Barwon Water has developed and will maintain a "Privacy Procedure" that sets out requirements of employees when handling personal information.

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.

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/breaches in an open and transparent way, fully complying with the *Privacy and Data Protection Act 2014*.

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.

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.

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.

Data retention

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

References

Related policies and documents

Document Hierarchy Tier	Description
1	Privacy Policy (this document)
5	Privacy Charter
3	Privacy Procedure
5	Privacy Impact Assessment
5	Privacy Collection Notice
5	Privacy e-Learn

Resources

Privacy and Data Protection Act 2014 (PDP Act)
Information Privacy Principles (IPPs)
Victorian Protective Data Security Standards (VPDSS)
Public Records Act 1973
Health Records Act 2001