



Greater Western Water – submission

From: Jakin Ravalico [REDACTED]
Sent: Thursday, September 12, 2024 4:24 PM
To: Water Compliance <water.compliance@esc.vic.gov.au>; Lucy Idle (ESC)
[REDACTED]; Ann Randles (ESC) [REDACTED]
Cc: Brett Maurer [REDACTED]; Ben Allanson [REDACTED];
Kessia Thomson [REDACTED]; Suzanne Knight
[REDACTED]
Subject: GWW feedback on self-reporting guideline

Hi Lucy and Ann,

Thanks so much for the opportunity to comment on the self-reporting guideline and template. We appreciated the opportunity to discuss the application of the guideline and the standards at the recent workshop held at the ESC offices, and to understand some of the other incidents that have come up in other water corporations.

GWW have a history of transparency with the ESC and were already providing reports to the ESC on potential breaches to the water industry standards, including our delayed implementation of updated final notice and reminder content following the March 2023 implementation of the Water Industry Standards, as well as voluntarily reporting the privacy breach that has led to our recent offer of an enforceable undertaking. Following the inclusion of the self-reporting obligation in the Water Industry Standards, we have been reporting on the incidents arising from our billing system transition, including those that are not breaches of the water industry standards.

We are committed to keeping our customers and their data safe, and welcome the recent steps the commission has taken to support community members impacted by family violence, and ensure safety by design in our systems and processes.

When a material breach, or potential breach, incident occurs, our staff are focussed primarily on first ensuring safety of our customer or customers. Sometimes as part of that and sometimes following that is ensuring that the right people within our organisations are across the issue and are able to begin working on both remediation and recovery. At these early stages, usually the first 2-3 days, complete focus is crucial. For this reason we would recommend that the timing to initial written notification be extended to five business days, rather than two to three. Within the first two to three days, a verbal alert would remove layers of reporting approvals, and ensure rapid notification for commission staff, without unduly impacting the time required from key incident response staff.

GWW has been working through a risk matrix to support our assessment of materiality of reporting. Once things calm down more at our end, it would be great to take you through this and ensure alignment on the type of incidents that we should be reporting. I look forward to continuing to work with you to ensure ongoing protections and great service for our customers.

Cheers,

Jakin



Jakin Ravalico

Manager, Price Submission & Regulation



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