



18 May 2026

The Honourable David O'Byrne MP
Member for Franklin
Parliament House
HOBART TAS 7000

Attention: Mathew Williams

By email only: mathew.williams@parliament.tas.gov.au

Dear Mr O'Byrne,

Application for Assessed Disclosure

I refer to your application for Assessed Disclosure under the *Right to Information Act 2009* (Tas) (**RTI Act**) accepted 18 March 2026.

I am authorised to make decisions on behalf of Hydro Tasmania in respect of applications for information under the RTI Act, being a delegated officer of the principal officer, appointed by an instrument of delegation in accordance with section 24 of the RTI Act.

1. Your Request

Your request was received by Hydro Tasmania on 27 February, and negotiations took place between us to refine the request to avoid it constituting a substantial and unreasonable diversion of resources pursuant to section 19 of the RTI Act.

Following refinement, your request sought the following:

- a) *The number of Hydro Tasmania staff (excluding Entura and Momentum Energy employees) with a remuneration package of \$150,000 or more, including superannuation, bonuses, motor vehicle and any other benefits; and*
- b) *The employment title of each role with a salary of \$150,000 or more (the 'request').*

2. Determination of Request

I have undertaken a search of the information held by Hydro Tasmania to locate any records that may be relevant to the request.

A – The number of Hydro Tasmania staff (excluding Entura and Momentum Energy employees) with a remuneration package of \$150,000 or more, including superannuation, bonuses, motor vehicle and any other benefits.

As at 22 April 2026, the number of Hydro Tasmania staff with a remuneration package of \$150,000 or more (including super, bonuses, motor vehicle and any other benefits) was **447**.



B – The employment title of each role with a salary of \$150,000 or more (including superannuation, bonuses, motor vehicle and any other benefits).

Position titles of part of the 447 employees include:

- I. Chief Executive Officer;
- II. Executive General Manager Assets and Infrastructure;
- III. Executive General Manager Strategy and Commercial;
- IV. Executive General Manager Finance;
- V. Executive General Manager Major Projects and Entura;
- VI. Chief Executive Officer, Momentum Energy;¹
- VII. Executive General Manager People, Governance & Corporate Affairs.

I have determined the remaining 440 position titles are exempt information under section 36 of the RTI Act and, applying section 33 of the RTI Act, I am satisfied that disclosure would be contrary to the public interest. In applying section 33, I have had regard to the matters in Schedule 1 of the RTI Act and have not taken into account matters in Schedule 2.

Reasons

The exemption under section 36 of the RTI Act is subject to the public interest test in section 33 – i.e. the information must be personal information and its disclosure, on balance, be contrary to the public interest.

Personal Information

Section 5 of the RTI Act defines *personal information* as:

any information or opinion in any recorded format about an individual –

- (a) *whose identity is apparent or is reasonably ascertainable from the information or opinion; and*
- (b) *is alive, or has not been dead for more than 25 years.*

Position titles with remuneration of \$150,000 or more constitute personal information as position titles can reasonably identify a person when used with other information. This includes publicly available information such as LinkedIn profiles and other publicly available information that identify a person and their position title. Employees can also be identified by position title internally at Hydro Tasmania by referring to organisational structures and other internal systems such as Microsoft Teams and the intranet.

Consultation

I consulted with employees whose position title was within the scope of the request. The majority of respondents objected to disclosure and raised concerns, which included:

- potential misuse of the information by former partners, creating a risk of family violence;

¹ Chief Executive Officer, Momentum Energy has been included as within scope as this role is part of the Hydro Tasmania Leadership team.

- increased exposure to harassment, unwanted contact, or safety risks, including the risk of targeted phishing, scams or other malicious activity;
- negative impacts on their ability to engage with the public, particularly for those with roles who frequently engage with the public;
- the ability to infer an individual's remuneration from the combination of role title and scope of the request;
- adverse assumptions about income, seniority or personal circumstances, leading to stress or reputational harm;
- public scrutiny and criticism, including from media, political actors and other external stakeholders;
- use of position titles in public debate without sufficient context or expertise to fairly assess remuneration;
- risk that roles titles may be outdated, incomplete or not reflective of current duties, leading to misleading conclusions; and
- heightened risks for employees living in small or remote communities where individuals are more readily identifiable.

Public Interest Test

Matters (m), (q), (a) and (b) of Schedule 1 of the RTI Act were relevant to my assessment of whether disclosure would be contrary to the public interest.

(m) – whether the disclosure would promote or harm the interests of an individual or group of individuals

I considered matter (m) as relevant and determined it weighs against disclosure of the remaining position titles. The information reveals personal financial information of individual employees. Employees have a reasonable expectation of privacy regarding their compensation. Given the majority of respondents in consultation objected to disclosure and raised concerns (as above), I consider the release of this information could harm the interests of the relevant employees.

(q) – whether the disclosure would have a substantial adverse effect on the industrial relations of a public authority

I considered matter (q) as relevant and have determined it weighs against disclosure of the remaining position titles. In consultation, a majority of respondents objected to position titles being released and raised concerns regarding its release. The release of position titles has the potential to contribute to a breakdown in the relationship between Hydro Tasmania and its employees, and it may negatively impact Hydro Tasmania's ability to recruit staff in the future, if it becomes known to the wider public that Hydro Tasmania releases personal information of employees.

(a) – the general public need for government information to be accessible and (b) – whether the disclosure would contribute to or hinder debate on a matter of public interest.

I have considered matters (a) and (b) as relevant and determined that they weigh in favour of disclosure. There is a degree of justified public interest in the release of information which relates to the expenditure of government business enterprises. However, aggregate information about the amount spent on employee salary and entitlements is already provided in Hydro Tasmania's annual reports (refer to the Statement of Financial Performance on page 34 of the FY2024/25 Annual Report), including a breakdown of executive remuneration (page 100 of the FY2024/25 Annual Report).

On balance, I find it contrary to the public interest to release the remaining 440 position titles and determine they are exempt under section 36 of the RTI Act.



3. Other information which may be of interest

I note from email correspondence with your office on 12 March that the second part of your request seeks to gain an understanding of the roles performed by employees who earn a salary package of \$150,000 or more. The Hydro Tasmania Careers page includes current vacancies, often with an advertised salary range. The job description of roles with an advertised salary range of \$150,000 or more may assist in your understanding. Further, the Hydro Tasmania Enterprise Agreement (available via the Fair Work Commission website) covers some staff who fit within the criteria of the request and includes information about classification bands, corresponding salary ranges and examples of position titles that fit within these bands.

4. Rights of Review

Internal Review

You are entitled under section 43 of the RTI Act to apply for an internal review of this decision.

Any request for such a review should be made in writing within twenty (20) working days of receiving this letter and addressed to:

Ms Rachel Watson
Chief Executive Officer
Hydro Tasmania
4 Elizabeth Street
Hobart TASMANIA 7000

External Review

Please note that you may apply to the Ombudsman for a review pursuant to section 44 of the RTI Act, if you have made an application for internal review under section 43(1), (2) or (3) in relation to the decision, a decision has been made and you have been advised in relation to that review, or 15 working days have elapsed since the application for review was made.

An application pursuant to section 44 must be made to the Ombudsman within 20 working days of an event referred to in section 44(1)(b).

Other applications for review

A person who has applied for information under section 13 of the RTI Act may also apply to the Ombudsman for a review of a decision in certain other circumstances, which are set out in sections 45 and 46 of the RTI Act.

Please contact me if you have any questions about the information provided. This request is now considered closed.

Yours sincerely,

Madeleine Farrar
**Delegated Officer pursuant to the
Right to Information Act 2009 (Tas)**

e madeleine.farrar@hydro.com.au

