

HILLSONG CHURCH STANDARD OPERATING PROCEDURE			
DOCUMENT TITLE:	KEEPING RECORDS		
DOCUMENT ID:	5-3-019	VERSION:	1.6
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SPONSORED BY:	KEITH AINGE	FRAMEWORK REF:	SAFE CHURCH

1. PURPOSE

- 1.1. The purpose of this procedure is to provide clear instruction on what records should be kept of investigations, where they should be stored, and for how long.
- 1.2. Good record keeping assists in improving accountability and promotes transparent decision-making. Records demonstrate how Hillsong has responded to a reportable allegation or conviction against a Worker.

2. SCOPE

- 2.1. Record keeping is the responsibility of the Safe Church Office, and all those who have been given instruction to support the fulfilment of this responsibility.
- 2.2. The intended users of this procedure will include the Head of Agency, Head of Safe Church Office, Safe Church Office, and Investigators.

3. DEFINITIONS

Child/Children or Young Person/People	Hillsong considers a Child or Young person to be a person under the age of eighteen (18) years.
Child-Related Worker	A Worker involved in providing services that are directed towards a Child or Young person (whether in whole or in part), or conducting activities that may involve a Child or Young person (whether in whole or in part), and includes the supervision of Child-Related Workers, irrespective of whether they actually work with Children or Young people, because of their overarching supervisory duties.
Harm	Harm is any detrimental effect of a significant nature on the person's physical, psychological or emotional well-being. It is immaterial how the harm is caused. Harm can be caused by physical, psychological or emotional abuse or neglect; or sexual abuse or exploitation. Harm may result from a single act, omission or circumstance; or a series or combination of acts, omissions or circumstances.
Hillsong/Hillsong Church	Hillsong Church Limited (ABN: 37 002 745 879) and all its related entities operating within Australia.
Record/s	An account kept in writing or some other permanent form.
Workers	All those who are, or were at any relevant point in time, employees of Hillsong and all persons performing work, or facilitate activities, at the direction of, or on behalf of Hillsong. This includes directors, committee members, volunteers, HILC students, self-employed, contractors, sub-contractors, agents, consultants, temporary staff, people undertaking practical training as part of an educational or

	vocational course (other than as a school student undertaking work experience), or otherwise, defined under relevant legislation.
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4. PROCEDURE

4.1. What Records Should Be Kept

4.1.1. The following list of records should be kept in the case of each investigation into an allegation or incident of harm:

- the allegation (an accurate and as close to verbatim account as possible of what has been said and by whom)
- our initial response to the person making the allegation, the alleged victim(s) and the Worker who is the subject of the allegation
- consideration of the need to notify the Police of a suspected criminal offence; or a Child Wellbeing Unit of risk of harm; or Community Services of a child or young person who may be at risk of significant harm, and the outcome of any reports made
- a plan detailing how the investigation is to be carried out, including whether Community Services and/or police need to be notified
- the initial risk assessment, including what the identified risks are, the arrangements to manage those risks and decisions made about the Worker and the action taken in relation to the child or Worker (e.g. change in duties, support or counselling)
- all interviews, including details of the questions and responses. This should also include the location of the interview, who was present and the start and finish times of the interview. Where possible, records should be verbatim, verified, signed and dated by all involved
- any decisions made, both during and at the conclusion of the investigation, including their rationale, the position and name of the person making the decision and the date the decision was made
- any personal contact, discussions or emails with anyone about the matter. This should include the date, details of the discussions, questions, advice and outcome, the name of the person making the contact, details of their position and agency and where appropriate, the reason for the contact
- a summary report that details the allegation, the investigation process, the findings in relation to each allegation (including the rationale for the finding), the final risk assessment (which includes any final decision about the employee and the factors that have been considered) and any subsequent action that is to be or has been taken.

4.1.2. The records of harm will be referred to by the Safe Church Office, and also external regulators, when assessing an investigation or when conducting an audit.

4.1.3. The following list of records should be kept in response to the completion of an investigation into an allegation or incident:

- The Head of Safe Church Office should advise the person who is the subject of the allegation, in writing, of the findings in relation to each allegation and the action to be taken.
- Where appropriate, the Head of Safe Church Office should advise the alleged victim/s or their guardian/s in writing, in relation to the outcome of an investigation.

4.1.4. The records listed at 4.1.1. and 4.1.3. should be prepared in a standardised format, which:

- uses all templates and tools approved by the Safe Church Office
- ensures all records are legible, signed and dated
- confirms accuracy and consistency
- avoids subjective language
- includes all notes (however rough) in the file
- documents all discussions and place on file (including copies of all emails sent and received)
- documents all advice, both given and received.

4.2. Where Records Be Should Be Stored

- 4.2.1. Retention of records is the responsibility of the Safe Church Office.
- 4.2.2. The Safe Church Office is to maintain records within their information management system.
- 4.2.3. All Safe Church Office records should be kept confidentially and securely, with access granted to only those persons in Hillsong who have a need to know about that situation, as determined by the Head of Safe Church Office or Head of Agency.
- 4.2.4. Records relating to the allegation should be kept on a file that is separate to the personnel files maintained by the Human Resources Department.
- 4.2.5. For information, in relation to the investigation that may be pertinent to the care of the alleged victim or management of the Worker, some limited records may be shared with the Human Resources Department.
- 4.2.6. The exchange of records between the Safe Church Office, Investigators, and the Head of Agency should be conducted using approved templates and exchange methods.
- 4.2.7. Records should be kept on premise at Hillsong Church.
- 4.2.8. Records should not be stored on mobile devices or portable storage devices.
- 4.2.9. Records should only be sent using Hillsong Church email accounts.
- 4.2.10. Where possible, records should be sent using encrypted emails, and password protected attachments.

4.3. How Long Records Should Be Kept

- 4.3.1. Hillsong has legislative requirements to retain certain records of harm.
- 4.3.2. The period of record keeping should be as required by legislation, but not less than 30 years.
- 4.3.3. In the instance where Hillsong ceases trading, all records should be handed over to its successor or the appropriate regulatory bodies, as prescribed in legislation.
- 4.3.4. Prior to destroying records, the Safe Church Office should confirm that the records are no longer required for any current, or ongoing, matters relating to the allegation.
- 4.3.5. Destruction of records no longer required should be completed in a safe and secure manner, to avoid any possible breach of the *Privacy Act 1988*, or the Hillsong Private and Confidential Information Policy.

5. RELATED WORK INSTRUCTIONS

DOCUMENT ID:	WORK INSTRUCTION TITLE:
5-4-001	External Reporting Assessment

6. RELATED PROCEDURES

DOCUMENT ID:	PROCEDURE TITLE:
5-3-012	Receiving a Concern or Disclosure of Harm
5-3-013	Planning and Conducting an Investigation
5-3-014	Risk Management following a Concern
5-3-015	Making a Finding of Misconduct or Abuse
5-3-016	Reporting a Finding of Misconduct or Abuse

7. RELATED RECORDS

DOCUMENT ID:	TITLE:	MIN PERIOD RETAINED:
5-5-005	Receiving a Concern or Disclosure Form	30 years
5-5-006	Risk Assessment Following a Concern Form	30 years
5-5-007	External Reporting Assessment Form	30 years