

HILLSONG CHURCH STANDARD OPERATING PROCEDURE			
<b>DOCUMENT TITLE:</b>	CONFLICTS OF INTEREST		
<b>DOCUMENT ID:</b>	5-3-020	<b>VERSION:</b>	1.5
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## 1. PURPOSE

- 1.1. The purpose of this procedure is to provide clear instruction on how to identify and manage conflicts of interest within the Safe Church Framework.

## 2. SCOPE

- 2.1. Managing conflicts of interest is the responsibility of all Hillsong Workers. Within the Safe Church Framework there is particular responsibility placed on the Head of Agency, the Safe Church Office, and their Investigators.
- 2.2. The intended users of this procedure will include the Head of Agency, Board of Directors, Head of Safe Church Office, Safe Church Office, and Investigators.

## 3. DEFINITIONS

Conflict of Interest	<p>When a Worker is in a position of authority which requires them to investigate, or make a finding or decision in relation to matters within the Safe Church Framework, and also has a personal interest or obligation that might interfere with or influence the exercise of their judgement.</p> <p>An actual conflict of interest arises when a person's private interests improperly influence the performance of that person's professional duties and responsibilities. It is based on the actual things done.</p> <p>A potential or perceived conflict of interest arises when a person's private interests could be perceived as improperly influencing the performance of that person's professional duties and responsibilities, regardless of whether or not that has occurred.</p>
Decision	A conclusion reached after an evaluation of facts and legal obligations.
Hillsong/Hillsong Church	Hillsong Church Limited (ABN: 37 002 745 879) and all its related entities operating within Australia.
Personal Interest	<p>Anything that can have an actual or perceived impact or influence on the Worker, including:</p> <ul style="list-style-type: none"> <li>a) personal, family, professional, other ministry, or business interests;</li> <li>b) personal, family, professional, other ministry, or business interests of individuals or groups with whom a Worker is closely associated (for instance, relatives, friends, colleagues, or even a rival).</li> </ul>

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. Identification & Disclosure

4.1.1. For conflicts of interest that are not related to the operation of the Safe Church Framework this procedure should not be used.

4.1.2. When making an initial assessment of whether there is likely to be an actual or perceived conflict of interest, the following questions should be considered:

- What is the nature of the conflict of interest? For example, does the decision-maker have a personal, financial or identifiable relationship with the Worker against whom the allegation has been made?
- How significant is any such relationship or interest? For example, is the relationship one of simple acquaintance, has the decision-maker worked closely for a period of time with the person being investigated, or is the 'conflict' based on something more likely to give rise to personal feelings?
- Does the decision-maker hold any personal or professional biases that may lead to the conclusion that they are not an appropriate person to investigate or decide on the matter?
- How serious is the alleged conduct being investigated? The more serious the allegation, the more important it is there is no actual or reasonably perceived conflict of interests.
- Would the decision-maker, or anyone associated with them personally, benefit from or be damaged by the investigation finding?
- How likely is it that the person with the conflict of interests will be, or might appear to be, influenced in their role?
- Can the decision-maker be seen to be impartial?
- What are the views of the alleged victim, family, and the person the subject of the allegation? Do they object to the proposed decision-maker?
- Is the allegation about a member of the Safe Church Office, Church Oversight, or Head of Agency? What steps need to be taken to address this?

4.1.3. Based on responses to the questions listed at 4.1.2. if there is considered at least the potential for an actual or perceived conflict of interest, then a disclosure should be made to the appropriate person.

4.1.4. Once an actual or perceived conflict of interest relating to the Safe Church Framework is recognised the next step is to make an initial disclosure. By doing so immediately, the Worker's interests and that of Hillsong are protected.

4.1.5. Initial disclosures relating to the Safe Church Framework should be made to the Head of Safe Church Office via email. The email provided should include:

EMAIL SUBJECT:

To state 'Conflict of Interest'.

EMAIL BODY:

To include -

Name:

Department:

Role:

Overseeing Manager:

Campus:

Brief Conflict Description:

Relevant Timings:

4.1.6. In the event that the conflict of interest may relate to another Worker, the allegation must be assessed and disclosed using the same processes described in 4.1.2 to 4.1.5.

4.1.7. If the allegation described at 4.1.6 involves the Head of Safe Church Office, then the disclosure should be sent to either the Head of Agency or Chairman of the Audit Risk & Compliance Committee (whichever is more appropriate).

## 4.2. Resolution

4.2.1. The Head of Safe Church (or nominated alternative) who receives the disclosure regarding the conflict of interest must then determine how to respond to the conflict.

4.2.2. Any response must be sufficient to ensure that Hillsong can continue to fulfil objectives of its policy.

4.2.3. The response process may require further disclosure from the Worker, and the fulfilment of other measures.

4.2.4. Measures available to the Head of Safe Church (or alternative) to minimise a conflict within the operation of the Safe Church Office include one, or more, of the following:

- Restrict involvement of a Worker in matters in which they have (or are perceived to have) a conflict of interest
- Remove the Workers in matters in which they have (or are perceived to have) a conflict of interest
- Recruit third parties who do not have an interest to advise on or participate in the matter
- Requiring the Worker to relinquish assets or other personal interests in order to minimise the conflict

- Recommend to the Head of HR the resignation or redeployment of the employed Worker, or request conclusion of their contracted services, in the rare circumstances where there are no other appropriate means to minimise the conflict.

#### 4.3. Record Keeping

- 4.3.1. Records of the identification, disclosure and resolution of conflicts of interest should be kept in line with the procedure 5-3-019 Keeping Records.

#### 4.4. Conflict of Interest Breaches

- 4.4.1. Matters concerning the actual or perceived conflicts of interest of either yourself or other Workers must be reported.
- 4.4.2. A failure to comply with the obligations contained in the Policy will lead to disciplinary action which may include, but is not limited to, severance of the Worker's employment or services.
- 4.4.3. Employee breaches will be handled under Hillsong Discipline and Termination Policy.
- 4.4.4. Breaches by other Workers will be handled under the terms of their individual contract or obligations under relevant law.

### 5. RELATED WORK INSTRUCTIONS

DOCUMENT ID:	WORK INSTRUCTION TITLE:

### 6. RELATED PROCEDURES

DOCUMENT ID:	PROCEDURE TITLE:
5-3-019	Keeping Records

### 7. RELATED RECORDS

DOCUMENT ID:	TITLE:	MIN PERIOD RETAINED: