

HILLSONG CHURCH STANDARD OPERATING PROCEDURE			
DOCUMENT TITLE:	PRIVATE AND CONFIDENTIAL INFORMATION		
DOCUMENT ID:	5-3-021	VERSION:	1.3
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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 protection of private and/or confidential information while receiving a concern or disclosure of harm, during the planning and conducting an investigation, reporting a finding, and keeping records of investigations.

2. SCOPE

2.1. It is the responsibility of all Hillsong Workers to protect the confidentiality of information related to the Safe Church Framework, in particular those associated with disclosures of harm, subject to compliance with all relevant legislation.

2.2. The intended users of this procedure include those who have access to information relating to concerns or disclosures of harm, such as the Head of Agency, Safe Church Officer, 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. When Should Information Be Protected

- 4.1.1. It must be clearly understood that there can be no legitimate reason for Workers to withhold concerns or disclosures of harm. However, there is a process of reporting that needs to be followed.
- 4.1.2. The reporting process is required to ensure that the right outcome occurs from an investigation, and possible conviction. The reporting process is also essential to ensure that further harm does not occur to the victim or others associated.
- 4.1.3. By following the Safe Church Framework reporting procedures and associated tools you will enable sensitive information to be protected while still being effective in reducing the risk of further harm.
- 4.1.4. As prescribed in the Safe Church Policy, it is the responsibility of all Hillsong Workers to maintain and respect the privacy and confidentiality of information collected under the Safe Church Framework, in particular those associated with disclosures of harm, subject to compliance with all relevant legislation.

4.2. Whose Information Is Protected

- 4.2.1. During the process of an investigation sensitive information may be accessed from a number of sources, including:
 - the complainant
 - the accused
 - witnesses or disclosure recipients
 - family and friends of the victim or accused
 - work or church associates
 - Government agencies, including the police.

4.3. What Information Should Be Protected

- 4.3.1. Information obtained during the handling of an investigation include:
 - Personal details of those involved in the concern (i.e. see 4.2.1)
 - The nature of the alleged harm
 - When and where harm is said to have occurred
 - The time and place where the allegation was received disclosures of harm
 - Who has been appointed to investigate
 - Result of the investigation
 - Findings made
 - Reports issued to government agencies, including the police

- Risk mitigation/s adopted
- Resulting care to the victims, and others.

4.3.2. The information listed at 4.3.1 should be treated as private and confidential and not be shared other than as required at law and to properly implement the Safe Church Framework.

4.4. What Information Can Be Shared

- 4.4.1. Information described as ‘caring for the victim’ and ‘caring for the accused’ in procedure 5-3-017 can be shared in a format prescribed by the Safe Church Office.
- 4.4.2. Information required for the effective operation of the Safe Church Framework can be shared between those appointed to roles within the Safe Church Office, including Head of Agency and investigators.
- 4.4.3. In making a finding, the Head of Agency may consider necessary the engagement of an advisor, legal or other, in which case the information required to be provided to advisor/s can be shared.
- 4.4.4. Information required by government agencies in accordance with legislative requirements.
- 4.4.5. Otherwise, where consent to share to private information has been given by the individual, so long as it is for a proper purpose, such as requests for support in caring for people following an allegation.

4.5. How to Respond If A Breach Has Occurred

- 4.5.1. If a person becomes aware of a potential breach of this procedure and information potentially being inappropriately disclosed, or used, the Head of Safe Church Office should be notified immediately.
- 4.5.2. Where the breach may result in an increased risk of harm, the person/s at risk should be notified immediately.
- 4.5.3. Where the breach may affect the outcome of an investigation the relevant government agencies should be notified.
- 4.5.4. If the Safe Church Office is notified of a concern about how it has collected or managed a person’s personal information, the complainant should be instructed to refer to the Hillsong Privacy Policy (i.e. [Hillsong.com/policies/privacy](https://www.hillsong.com/policies/privacy)) and process for lodging a complaint.

5. RELATED WORK INSTRUCTIONS

DOCUMENT ID:	WORK INSTRUCTION TITLE:

6. RELATED PROCEDURES

DOCUMENT ID:	PROCEDURE TITLE:
5-3-017	Caring for People Following a Disclosure

7. RELATED RECORDS

DOCUMENT ID:	TITLE:	MIN PERIOD RETAINED: