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1. PURPOSE

1.1. To establish clear protocols and standards for the responsible handling, sharing, storage, access, retention and destruction of safeguarding-related information, balancing effective communication, lawful safeguarding action and individual privacy rights within the CRCA framework.

2. BIBLICAL AND THEOLOGICAL BASIS

2.1. This policy expresses trustworthiness and discretion as a way of honouring and protecting the privacy and dignity of every person. Proverbs 11:13 commends a trustworthy spirit that keeps confidence; in safeguarding, trustworthy information handling protects people and supports truthful, lawful response.

2.2. The CRCA handles information as part of its Christian duty to love, protect and act justly, recognising that careful records and appropriate information sharing help protect children, adults at risk and the wider church community.

3. SCOPE

3.1. This policy applies to all staff, volunteers, office bearers, leadership, contractors, Safe Church Representatives, the Safe Church Administrator, the Safe Church Unit, the Safe Church Advisory Committee and any person handling safeguarding information on behalf of the CRCA.

3.2. This policy applies to information in physical and digital form relating to safeguarding incidents, reports, complaints, disclosures, allegations, investigations, risk assessments, screening, training, statutory notifications, record keeping and related matters.

4. VALUES

4.1. The CRCA is committed to the following values so that the safety and well-being of all people remain at the forefront of decisions and actions.

4.1.1. **Scriptural teachings - upholding safety and dignity:** central to the Church's teaching is the call to embody love, mercy and justice. Colossians 3:17 calls all things to be done in the name of the Lord Jesus, and Luke 18:16 shows Jesus welcoming children and affirming their place in the kingdom. The responsibilities in this policy are therefore carried out in a way that honours the dignity, voice and safety of each person.

4.1.2. **Zero tolerance:** the CRCA has a zero-tolerance approach to abuse and harmful behaviour. The responsibilities in this policy must never be used to suppress, minimise or ignore concerns about safety, harm or abuse.

4.1.3. **Transparency and accountability:** the CRCA fosters a culture of openness, appropriate information sharing, feedback and accountable action.

4.1.4. **Shared responsibility:** safeguarding is everybody's responsibility and requires the participation of local churches, personnel, members and denominational safeguarding structures.

4.1.5. **Empowerment:** the CRCA supports people to understand their rights, speak up, raise concerns and contribute to the development of safer church environments.

4.1.6. **Integrity:** the CRCA fosters honest, ethical and respectful engagement at all levels of church life.

5. DEFINITIONS

5.1. Terms defined in the National Safeguarding Policy apply to this policy unless this section gives a more specific operational meaning.

5.2. **Safeguarding record** means a record created, received or held in connection with a safeguarding concern, complaint, disclosure, incident, risk assessment, decision, action, referral, training, screening or policy implementation requirement.

5.3. **Authorised CRCA record-holder** has the meaning given in the National Safeguarding Policy and includes the local or denominational person, role or body authorised to hold, access or manage the relevant safeguarding record.

5.4. **Confidential information** means information that is not intended for general access and must be handled only by people with a legitimate role, lawful basis or safeguarding need to know.

5.5. **Information sharing** means the lawful collection, use, disclosure, referral or transfer of information for safeguarding, statutory reporting, Police, regulator, privacy, governance, pastoral, disciplinary, employment or support purposes.

5.6. **Minimum necessary information** means the least amount of information reasonably required to achieve the authorised safeguarding, legal, governance or support purpose.

5.7. **Retention period** means the period for which a safeguarding record must be kept under policy, law, regulator guidance, archival requirement or safeguarding necessity.

5.8. **Access control** means the safeguards that limit who may access, view, change, transfer or disclose safeguarding information.

5.9. **Secure storage** means storage that protects safeguarding records against unauthorised access, loss, alteration, misuse or inappropriate disclosure.

6. POLICY

6.1. **Confidentiality:** the CRCA recognises the sensitive nature of safeguarding-related information and commits to preserving confidentiality, subject to lawful and safeguarding-related limits.

6.2. **Legislation adherence:** information handling is conducted consistently with privacy, safeguarding, record-keeping and reporting obligations that apply to the relevant CRCA entity, local church, role or activity.

6.3. Privacy and good practice: where the Privacy Act 1988 (Cth) and Australian Privacy Principles apply, the CRCA complies with them. Across safeguarding activities, the CRCA adopts the Australian Privacy Principles as a good-practice benchmark unless a higher legal, regulatory or safeguarding standard applies.

6.4. **Transparency with protection:** people are informed, where appropriate, about how information is collected, used, stored and shared. Information is not shared more broadly than necessary.

6.5. **Statutory information-sharing exceptions:** confidentiality is qualified by legal duties and authorisations that apply in the relevant jurisdiction, including Reportable Conduct Schemes, child information-sharing schemes, mandatory reporting regimes, Police directions, and court or tribunal directions including subpoenas and other compulsory production orders. Where such a duty or authorisation applies, the CRCA shares the information required on a need-to-know basis.

6.6. **Notifiable data breaches:** where the CRCA becomes aware of unauthorised access to, disclosure of or loss of personal information that is likely to result in serious harm, the matter is assessed without delay. Where assessment confirms an eligible data breach under the Notifiable Data Breaches scheme, required notifications are made in accordance with applicable law. Where a local church becomes aware of a suspected privacy or information-security breach involving safeguarding information, the Session / Church Council ensures the matter is escalated through the relevant CRCA safeguarding governance pathway without delay. Initial notification should be made to the relevant Session / Church Council and the Safe Church Administrator; where the breach relates to a safeguarding concern, complaint, disclosure or risk matter, the Safe Church Unit should also be notified through the applicable safeguarding pathway. The Safe Church Administrator may assist with record identification and system information. The Safe Church Unit may provide safeguarding response advice where the breach relates to a safeguarding concern, complaint, disclosure or risk matter.

6.7. **Intake-phase information sharing:** when a person discloses a safeguarding concern, information is recorded carefully, shared only with those who need it for safety, legal or safeguarding reasons, and

handled consistently with this policy, the Complaints Handling Policy and the Disciplinary and Breach Response Policy.

7. PROCEDURES

7.1. **Information collection:** personal and sensitive information is collected only where relevant to safeguarding, risk management, complaint handling, statutory reporting, record keeping or related CRCA responsibilities. Consent is sought where appropriate, recognising that some information must be collected or shared because of legal or safeguarding obligations.

7.2. **Information storage:** digital records are stored in approved secure systems with appropriate access controls. Physical records are stored in locked storage within access-controlled areas.

7.3. **Accessing and sharing information:** access is limited to personnel with a defined role-based need. External sharing is vetted to ensure it is lawful, necessary, proportionate and aligned with safeguarding purposes. Access and sharing are logged where required.

7.4. **Retention:** records relating to safeguarding complaints, allegations and investigations are retained for a minimum of 45 years from the date of the last action on the file, or longer where law, regulator direction or safeguarding need requires.

7.5. **Destruction:** records are destroyed only where permitted. Destruction is recorded with the date, file identifier, method and authorising officer. Destruction is irreversible.

7.6. **Record-retention schedule:** specific retention periods, categories and access controls are maintained in a record-retention schedule administered by the Safe Church Administrator under the oversight of the Safe Church Advisory Committee. The schedule supports safeguarding induction, training and implementation guidance.

7.7. **Implementation guidance:** the Safe Church Administrator maintains implementation guidance for information sharing and record keeping, including any schedules approved for induction or training use.

7.8. **Audit cadence:** record-keeping practice under this policy is subject to regular internal audit and periodic external review aligned with the Continuous Quality Improvement Policy. Audit findings are reported to the Safe Church Advisory Committee for oversight and continuous improvement.

7.9. **Disclosure handling:** a person receiving a safeguarding disclosure listens with care, records the person's words where possible, explains the limits of confidentiality, records date, time, location and people present, explains next steps, does not promise confidentiality, does not ask leading questions, does not contact the alleged respondent at intake, does not delay reporting or escalation, and does not store records on personal devices or unsecured channels.

7.10. **Feedback and updates:** all personnel may provide feedback on this policy. Updates may be required because of feedback, breach, audit, legal amendment, regulator guidance or best-practice development.

8. ROLES AND RESPONSIBILITIES

8.1. Role definitions used in this policy are consistent across the CRCA policy suite.

8.2. **Session / Church Council:** ensures local safeguarding records are held securely, local digital and physical security is maintained, authorised access controls are followed, and local record-keeping obligations are met. The Session / Church Council remains responsible for local records and works with the Safe Church Representative, Safe Church Administrator and Safe Church Unit where local information-sharing or safeguarding response matters arise.

8.3. **Safe Church Representative:** supports local awareness of information-sharing and record-keeping requirements, assists with local referral pathways where appropriate, and helps ensure safeguarding concerns are directed through the relevant CRCA pathways.

8.4. **Safe Church Administrator:** acts as central records custodian for safeguarding records where central denominational records are required; administers approved record systems, record-retention

schedules, access logs, templates, restricted registers and implementation guidance; supports training and induction; and maintains records-management resources.

8.5. **Safe Church Unit:** provides safeguarding response advice, triage assistance and statutory-pathway support where information sharing is required for complaints, disclosures, risk matters, statutory reporting, Police matters, Reportable Conduct Scheme matters, regulator matters or notifiable data breach assessment. The Safe Church Unit supports, but does not replace, local church responsibility for local records or the Safe Church Administrator's records-management function.

8.6. **Safe Church Advisory Committee:** oversees policy alignment with safeguarding principles, receives audit findings, considers high-risk information-handling issues and supports continuous improvement.

8.7. **Personnel and members:** understand and uphold confidentiality, privacy, record-keeping and information-sharing requirements, and report suspected breaches or unauthorised access promptly.

9. BREACHES

9.1. Breach of this policy may result in retraining, review of role or responsibilities, disciplinary action under the Disciplinary and Breach Response Policy, privacy or data-breach response, reporting to a regulator, or legal action where required. Serious or repeated breaches may result in removal from role, termination of employment, or other action appropriate to the circumstances.

10. RELATED POLICIES

10.1. National Safeguarding Policy. Safeguarding Governance and Leadership Policy. Code of Conduct. HR / Recruitment Policy. Complaints Handling Policy. Disciplinary and Breach Response Policy. Whistleblower Policy. Learning and Development Policy. Internet Usage Policy. Social Media Policy. Privacy Policy. Continuous Quality Improvement Policy.

11. MONITORING AND REVIEW

11.1. This policy is reviewed every three years, or earlier where required by legislative change, regulator guidance, audit findings, serious incidents, a substantiated complaint, material safeguarding risk, or a decision of the Safe Church Advisory Committee. Feedback on this policy may be sent to the Safe Church Unit at scu@crca.org.au at any time.

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0.2	09/07/2026	09/07/2026	SCAC	Align Safeguarding	Statuary updates
0.3	28/07/2026	28/07/2026	SCAC (SIC)	Align Safeguarding	SCAC feedback
1.0	16/09/2026	16/09/2026	SCAC (SIC)	Align Safeguarding	First approved issue.