

# UKRAINIAN CATHOLIC CHURCH IN AUSTRALIA, NEW ZEALAND AND OCEANIA

## Privacy and Data Collection Policy 2026



## UKRAINIAN CATHOLIC CHURCH IN AUSTRALIA, NEW ZEALAND & OCEANIA

### PRIVACY & DATA COLLECTION POLICY

**“How precious is your unfailing love, O God!**

**All humanity finds shelter in the shadow of your wings.”**

**Psalm 36:7-8**

#### INTRODUCTION

The Ukrainian Catholic Eparchy of Ss Peter and Paul of Melbourne, comprises the Eparchial Office, clergy, parishes across Australia, missions and Parish Councils, two Saturday Ukrainian schools, an Early Childhood Education Centre and a wide variety of volunteers, all of whom serve the Church and its Community.

The Eparchy and its Parishes are committed to protecting the personal information they collect.

The Eparchy and its Parishes endeavour to comply with the Privacy Act 1988 (Cth) (Act) and its Amendments and the Australian Privacy Principles (APPs) in the Act (See Background)

**This Document needs to be read with the Risk Management Policy for Safeguarding of Children and Adults.**

#### PURPOSE

This Privacy Policy is designed to inform you about the Eparchy’s practices in relation to the collection, use, disclosure and storage of personal information.

Please refer to the links for more detailed information: [Privacy | OAIC](#) and [Australian Privacy Principles](#)

#### DOCUMENT INFORMATION

NAME OF POLICY	PRIVACY & DATA COLLECTION
DESCRIPTION	<p>This policy is designed to inform the reader about the Eparchy’s practices in relation to the collection, use, disclosure and storage of personal information.</p> <p>The policy applies where personal information is collected, used, disclosed, or otherwise handled by the Eparchy.</p>
POLICY SCOPE (applies to)	Eparchial & Parish Administration, clergy, Religious, Employees, Volunteers, Committee Members, Parishioners
POLICY STATUS	Update of Policy 2017, 2019, 2023
POLICY CATEGORY	ACNC Governance Standards & Standard 1 NCSS Committed leadership, governance and culture
POLICY SUB- CATEGORY	Legislative Compliance
APPROVAL AUTHORITY	Eparch Ukrainian Catholic Church in Australia, New Zealand & Oceania
GOVERNING AUTHORITY	Eparchial Finance Council; & Eparchial Safeguarding Committee
RESPONSIBLE OFFICER	Vicar General & Chair Eparchial Safeguarding Committee
APPROVAL DATE	20 December 2025



### 1. Philosophy and Approach to Privacy and Data Collection & Storage

- To develop practices that are safe, and respect privacy and confidentiality of Ukrainian Catholic Clergy, staff, volunteers, parishioners and others who may have contact with the Church.
- To ensure they are in line with and consistent with the values and beliefs and laws of the Ukrainian Catholic Church as well as Australian legislative and regulatory requirements.
- Specifically in relation to the Privacy Act 1988, the Ukrainian Catholic Church and its Eparchy will endeavour to always comply with the 13 Australian Privacy Principles (APPs) outlined in the Act in all facets of operations.
- Eparchial/Parish staff and volunteers are required to respect the confidentiality of the information and privacy of individuals.
- The Eparchy/Parish have in place steps to protect the personal information they hold from: misuse, interference, loss, unauthorised access, modifications or disclosure, by use of various methods, including locked storage of paper records and password restricted access rights to computer records.

### 2. Demographics Related to Policy Scope

- Australian Ukrainians reside in all states of Australia as well as New Zealand and Oceania. The majority is of the Catholic faith and belong to parishes in most States which form the Ukrainian Catholic Eparchy in Australia, New Zealand & Oceania.
- Ukrainian communities are composed of a large proportion of people in the 65+ age bracket. A sizable portion of these are now in their late 80's and 90's and are either in nursing homes, hospitals or being cared for by relatives or agency staff. Information about these people is required as there is an expectation that these will be visited by Ukrainian clergy or at least be given access to a liturgical service in their own language and information about current and historical events.
- The Ukrainian Catholic Church in Australia is also attended by children and people of various ages, including families with small children, who may be baptised, chrismated and make their Holy Communion in a Ukrainian Catholic Church. Others will marry and yet others will be given the last rites and buried through the Ukrainian Catholic Church. These situations may result in public information being released in Church newsletters for example. People associated with the Ukrainian Catholic Church, also donate to the Church, write articles and assist in cataloguing church artifacts and books. The Ukrainian Museum of Australia collects data of donors and descriptions of the donations.
- To undertake such work, the Eparchy has gathered limited information about its clergy, staff, volunteers and parishioners, even those who do not attend regularly.

### 3. What Types of Personal Information Will Be Collected

The Ukrainian Catholic Church in Australia has three main data bases:

- The Ukrainian Catholic Eparchy Address Database
- Parish Data Bases
- The Ukrainian Museum of Australia and Library data base
- Complaints to the Eparchy/Parish concerning a variety of matters, including safeguarding

Personal information is defined by the Privacy Act as: information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not. Examples of personal information might include an individual's name, address, phone number, email address, family details or any other information from which an individual could reasonably be identified. Sensitive information is a subset of personal information which is given additional protection by the Privacy Act and includes information about religious affiliation or beliefs, ethnic origin, criminal record and sexuality

Examples of personal information which the Ukrainian Catholic Church/Eparchy regularly collects, include an individual's:

- Name
- Address
- Contact details including telephone & Email
- Date of birth
- Baptism and Chrismation register information



- Holy Communion information
- Marriage register information
- Death register information
- Identification documents, including driver licence, passport, Working with Children Check card or proof of age card, sacramental records, and photographs, videos and news stories in respect of Catholic Church related events and activities.
- Financial information, such as donation history, for instance, when such details are provided directly to the Eparchy or on a collection envelope at Parishes or an online donation.
- The Church also has photos, generally of groups of children or adults, and records in written and recorded form, of events such as Holy Communion and other important dates on the Christian Catholic Calendar such as Easter and Christmas.
- In recent times filming of liturgical services occurs in the North Melbourne Cathedral and Ardeer Parish Church, which includes filming of attendees.

#### **4. Collection of Data**

Why does the Eparchy collect personal information?

The Eparchy collects and holds personal information for various reasons (which we generally notify you at the time of collection), including the following primary purposes:

- To administer the sacraments and to provide spiritual and pastoral care
- To place contact details on mailing lists and in computer databases to provide information about Catholic Church related activities, workshops, lectures, seminars, retreats, events, issues and initiatives,
- To provide services or goods to you or a person nominated by you
- To seek, receive and administer offerings and donations from you.
- To enable the Eparchy/Parish to provide services,
- To assess employment and volunteer applications, and to manage our volunteers
- As part of an investigation regarding Safeguarding

In the case of children, personal information will ordinarily be collected from their parents or guardians, unless specific and/or unusual circumstances require that collection be made directly from the child.

- There may be circumstances where information is received anonymously. This will be accepted in good faith but may not be able to be used.

#### **5. Use and Disclosure**

- We will generally only collect the personal information we need to provide information & church services, such as that needed for visiting sick and dying, house blessings and information letters.
- We endeavour to ensure we have consent to collect sensitive information such as photos of children doing their Holy Communion or filming of liturgical services.
- Where reasonably practicable, we will attempt to collect personal information directly from individuals, however, in some cases this may be impracticable, or the information may be held by a third party.
- While an individual may choose not to provide personal information to us, failure to do so may hamper the provision of information or pastoral care such as in emergency situations.

**We will usually only use or disclose personal information:**

- for the primary purpose for which it was collected.
- for related purpose which the individual would reasonably expect; or
- with consent.

**We may also use or disclose non sensitive personal information for a secondary purpose (such as marketing or fundraising) if:**

- the individual has consented, or
- where it is impracticable to seek consent before this use (assuming consent has not already been denied). In such cases, the individual is given the opportunity to opt out of further communication.

**Situations where we may use or disclose information without an individual's consent include:**

- where we are investigating or reporting on suspected unlawful activity
- where the use or disclosure is required by law



- where we reasonably believe that the use is necessary for law enforcement, public revenue protection, prevention and remedying of serious improper conduct or conduct of court or tribunal proceedings, either by or on behalf of an enforcement body  
If we use or disclose information without consent, we will make a written note of such disclosure.

#### **6. Data Quality**

- We will take reasonable steps to ensure that the personal information we hold is accurate and current.
- This may involve us contacting you from time to time to verify your personal information. If you believe any information that we hold about you is incorrect, incomplete or out of date, please contact us at the Eparchy Office: office@catholicukes.org.au.

#### **7. Data Security**

- We will implement measures to protect personal information from misuse, loss, unauthorised access, changes, modifications or unlawful disclosure. This includes restricted access to the Eparchial/Parish Office and other areas where personal information is stored, including computer files that can only be accessed by authorised individuals using login names and passwords.
- We will destroy or permanently de-identify personal information when we no longer need it or have been asked to remove it.

#### **8. Security Measures Used to Protect your Data**

- We work to protect the security of your information. Only authorised users have access to the databases through administrators. Requests for individual information can be isolated from the rest of the stored database.
- We also have website protection, firewall & intrusion detection systems and real time surveillance server hardened environment, daily software updates and security patches.

#### **9. Openness**

- We will be open about how we manage personal information. If asked, we will provide information on our approach to privacy and ensure that this information is easily accessible on the Eparchy WEB site
- Notice of liturgical filming will be available at entrances to church buildings with contact information about issues or complaints.
- Parents of children preparing for Holy Communion are asked to sign consent forms regarding photographs and recording.

#### **10. Accessing and Correcting Personal Information**

Usually, when asked, we will give an individual access to their personal information, unless there is a reason why we cannot do so.

##### **We may deny a request for access if we reasonably believe:**

- It would pose a serious or imminent threat to the life or health of any person.
- The privacy of others would be unreasonably affected.
- The request is frivolous or vexatious.
- The information relates to existing legal proceedings with the person who is the subject of the information and would not be accessible through discovery.
- Providing access would prejudice negotiations with the person who is the subject of the information by revealing our intentions regarding those negotiations.
- Providing access would be unlawful or denying access is required or authorised by law.
- Providing access would be likely to prejudice an investigation of unlawful activity or law enforcement, public revenue protection, prevention and remedying of seriously improper conduct, or preparation or conduct of court or tribunal proceedings, either by or on behalf of an enforcement body.
- An enforcement body performing a lawful security function requests denial of access to protect national security.
- Where evaluative information generated by us in making a commercially sensitive decision would be revealed by providing access. In this situation we may provide an explanation for the commercially sensitive decision instead.

##### **If we refuse access, we will explain why.**

- An individual may request access to their personal information by contacting us using the details contained at the end of this document.



- When requesting access or correction of personal information we will require an individual to verify their identity by reference to their personal information. In some circumstances it may be necessary for an individual to visit one of our locations to properly verify their identity before access to personal information can be granted.
- Generally, we will not charge a fee to grant access to an individual's personal information, however in the case of requests for old or particularly voluminous information it may be necessary for us to charge a reasonable fee, commensurate with the work required to comply with the request. However, there will be no fee charged in relation to the making of the request for access itself.

In addition to requesting access to personal information an individual may request that we correct any personal information held about them. Once the individual's identity has been verified, we will take reasonable steps to correct their personal information.

#### **11. Data Flows**

We do not and will not provide an individual's personal information to any entity unless required by law.

#### **12. Sensitive Information**

- Generally, we will only collect sensitive information with an individual's consent, except where:
- The collection is required or authorised by law or to establish, exercise or defend a legal or equitable claim, or;
- It is necessary to prevent or lessen a serious or imminent threat to the life or health of the person who is the subject of the information.

#### **13. Donations**

- The Ukrainian Catholic Church in Australia, New Zealand & Oceania retains some information regarding donors.
- Each donation is secured, and credit card details are not stored at any time. The only information collected and retained is the amount of donation, transactions date and contact details. This is required for financial documentation and auditing as well as receipting to the donor.
- A copy of the donation is retained for tax and audit purposes in a secure location.

#### **14. Complaints (Privacy & Data Collection)**

- If an individual wishes to make a complaint about our collection, use or disclosure of any personal information, or about any potential breach of an APP, they may contact the Parish Administrator or the Bishop's Chancery. (Also See the Australian Privacy Amendment (Notifiable Data Breaches, NDB) Act 2017.)
- When making a complaint an individual should include as many details as possible, including the nature of the personal information concerned, how it is believed to have been misused, which APP is believed to have been breached (if relevant), the details of any of our employees or representatives involved and any other information which may be relevant. Additional information may be requested to enable proper investigation of the complaint and take such reparatory action as necessary.
- Once a complaint is received by the Administrator of the Parish or if it is about the Eparchy, the Vicar General will investigate the circumstances of the complaint and determine whether a misuse of personal information has occurred and if so, how it may be rectified and whether/what action should be taken.
- The individual will be informed regarding the process of their complaint and any action taken.
- If the breach constitutes a Notifiable Data Breach, the Office of the Australian Information Commissioner (OAIC) will be informed as soon as possible of the breach and provided with the full circumstances and remedial action undertaken.
- Should an individual not be satisfied with the handling of their complaint then it may be referred to the Eparchy Bishop and/or the Church will generally agree to the complaint being referred to mediation and/or arbitration. Should the matter remain unresolved then an individual is entitled to refer their matter to the Office of the Australian Information Commissioner.

#### **15. Problems or questions**

If we become aware of any ongoing concerns or problems with our policy or procedure or information on our web sites or bulletins, we will take these issues seriously and work to address these concerns. If you have any further queries relating to our Privacy Policy, please contact us.

For more information about privacy issues in Australia and protecting your privacy, visit the Office of the Australian Information Commissioner's web site; <http://www.oaic.gov.au>.



### Further Information

Persons requiring **further information** about privacy at the Ukrainian Catholic Eparchy, should contact:

Phone: (03) 9320 2560

Email: [eparchy@catholicukes.org.au](mailto:eparchy@catholicukes.org.au)

Persons wishing to **make a complaint** can do so by email or written letter to:

Email: [safeguarding@catholicukes.org.au](mailto:safeguarding@catholicukes.org.au)

Address: 35 Canning Street, North Melbourne VIC 3051

### BACKGROUND

- **This Document needs to be read with the Risk Management Policy for Safeguarding of Children and Adults.**
- Privacy is a fundamental human right that underpins freedom of association, thought and expression, as well as freedom from discrimination.
- The *Privacy Act 1988* and its amendments, apply to Australian Government agencies and organisations with an annual turnover of more than \$3 million, and some other organisations. The Privacy Act includes 13 [Australian Privacy Principles](#) (APPs), which apply to some private sector organisations, as well as most Australian Government agencies. Such organisations and agencies are collectively known as ‘APP entities’.
- Most states and territories also have their own privacy laws which cover their public sector agencies.
- There are several Australian laws other than the Privacy Act, that relate to privacy.
- The most recent updates to the Privacy Act now apply to most private sector organisations, denominations and churches whose income is over \$3million/year. The Amendment Act sets out how personal information should be collected, used, kept, secured and disclosed.
- Office of the Australian Information Commissioner (OAIC) - the independent national regulator for privacy and freedom of information. It promotes and upholds people’s rights to access government-held information and have personal information protected

