



An Roinn Gnóthaí Eachtracha
Department of Foreign Affairs

Our Reference: Fol/Req/21/120

Date: 24 June 2021

Dear Mr. McDonagh,

I refer to the request which you have made under the Freedom of Information Act 2014 for access to records held by this Department, as follows:

'A log of all reported data protection breaches in respect of 2019 and 2020 to include the date, department or section, location and brief details of the reported breaches.'

I refer also to the acknowledgement of your request which was sent to you on 3 June 2021.

I have compiled the records that fall within the scope of your request. At this time I have identified one record that falls within the scope of this request. This record is listed in the schedule attached. I have made a decision to grant the record.

I also draw your attention to the explanatory note below prepared by the Data Protection Team in order to provide additional context in relation to the record provided.

Explanatory Note from the Data Protection Team

The Department necessarily collects, processes, and stores significant volumes of personal data from our customers, staff, and service providers. In particular, the effective delivery of passport and consular services for Irish citizens at home and abroad is a central component of the Department's work and necessitates the processing of personal data.

The Department endeavours to safeguard the personal data that it processes and takes its responsibilities in this regard very seriously. We monitor closely our compliance rate; in 2020, just 0.025% of the total number of passports and Foreign Birth Registration certificates that issued were subject to a suspected data breach. We continue to work towards lowering this figure further in 2021.

Since 2018, the data breaches recorded by this Department have been deemed low or medium risk to the data subject. The main cause of data breaches is human error. Examples

of such an error causing a data breach would include incorrectly addressed correspondence issued by post and email. The remainder of breaches are largely due to external unintentional acts. These are mainly attributable to documents that are correctly addressed but are lost in transit through the postal system.

Since Q1 2020, the Department has reported loss or mis-delivery caused by postal service providers to the Data Protection Commission (DPC). The Department engages with postal service providers in relation to lost / missing consignments in order to identify the issues related to delays in delivery, mis-delivery and loss of consignments. The data from 2020 may be skewed due to the impact of the pandemic on postal services, therefore the Department continues to monitor this in order to determine the scale of this issue.

Finally, of the breaches contained within the attached log, five are listed as having an “unknown” cause of the breach. While it wasn’t possible to identify the root cause in these cases, as they pertained to loss during transit, all of the necessary mitigation measures in relation to the personal data were fully implemented.

Also, a common cause where the breach is shown to be a “Suspected External Intentional Act” would be where an envelope issued known to contain personal data was subsequently returned to us having been opened.

Right of Appeal

Should you wish to appeal this decision, you may do so in writing to the Freedom of Information Unit, Department of Foreign Affairs and Trade, 76-78 Harcourt Street, Dublin 2 or by email to foi@dfa.ie. A fee applies for an appeal for access to non-personal information; the level of this fee has been set at €30, (€10 for medical card holders). A copy of the medical card should be provided to avail of the reduced fee. For methods of payment, please contact FOI Unit at foi@dfa.ie, or 01-4082618.

You should make your appeal within 4 weeks (20 working days) from the date of this notification. However, the making of a late appeal may be permitted in appropriate circumstances. The appeal will involve a complete reconsideration of the matter by a more senior member of the staff of this Department.

Yours sincerely,

Ciara O’ Shea
Data Protection Team