



Refs: PQ 19969/25 & PQ 19970/25

12th June 2025

Deputy Marie Sherlock
Dáil Eireann
Dublin 2

Dear Deputy Sherlock

I refer to your parliamentary questions below which have been forwarded to me for attention. Firstly, please accept my apologies for the delay in issuing a response.

PQ 19969/25 – To ask the Minister for Health the number of data breaches in CHI that were reported to the Data Protection Commissioner for each of the years 2019 to 2024, in tabular form; and the actions taken on foot of such data breaches.

PQ 19970/25 – To ask the Minister for Health if she was made aware of any or all of the data breaches in CHI that were reported to the Data Protection Commissioner for each of the years 2019 to 2025.

Children's Health Ireland (CHI) Response:

Please see information you require from Children's Health Ireland (CHI) below.

Data Breaches in CHI reported to the Data Protection Commissioner (DPC)	
2019	11 – CHI at Crumlin*
2020	6 – CHI at Crumlin and Connolly*
2021	10
2022	4
2023	13
2024	9
2025 – YTD 07/05	2

*Please note that the information on all data breaches reported to the DPC cannot be easily extracted for years 2019 and 2020 and would disrupt normal work in order to collate the required data. Provided above for 2019 and 2020 is information for CHI sites outlined.

The Minister for Health is not routinely notified of each individual data breach reported by CHI to the DPC. CHI acts as an independent data controller and is advised by its designated Data Protection Officer (DPO), who advises as regards compliance with applicable obligations under the General Data Protection Regulation (GDPR) and Data Protection Act (2018).

Children's Health Ireland at Connolly | Crumlin | Tallaght | Temple Street

Our Mission is to: Promote and provide child-centred, research-led and learning informed healthcare, to the highest standards of safety and excellence. We will do this in partnership with each other, with children, young people and their families through a network of children's services in Ireland.

CRA Registered Charity Number (RCN): 20202295 **Revenue Charitable Status CHY:** 22235

Board Members: Prof James Browne (Chairman), Ms Mary Cryan, Ms Mary Donovan, Ms Catherine Guy, Dr Gavin Lavery, Ms Brigid McManus, Ms Eleanor O'Neill



In the event of a personal data breach, CHI is legally required under Article 33(1) GDPR to notify the supervisory authority (the DPC), without undue delay and, where feasible, not later than 72 hours after becoming aware of the breach, unless it is unlikely to result in a risk to the rights and freedoms of natural persons.

In such instances, CHI aligns with the DPC on appropriate mitigation measures. These actions are tailored to the specific breach and are aimed at reducing harm to the rights and freedoms of the data subjects concerned and ensuring compliance with data protection obligations. While disclosing the exact measures could reveal CHI's specific technical and organisational safeguards, a general overview of common mitigations includes:

- Retrieval or secure destruction of the data where feasible;
- Confirmation that personal data was not accessed, copied, or further disclosed;
- Correction or updating of personal data to prevent recurrence;
- Notification of affected individuals and relevant third parties;
- Detailed review of access logs and audit trails;
- Internal policy and procedure updates, including additional staff training;
- Restriction or revocation of access rights where required;
- Review and update of Data Processing Agreements with relevant third parties.

CHI maintains a documented breach response process, including comprehensive record-keeping, in line with its GDPR accountability obligations.

Yours sincerely

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