

**An Roinn Gnóthaí Eachtracha agus Trádáil**

Oifig na bPasanna, Teach Knockmaun, 42-47 Sráid an Mhóta Íochtarach,  
Baile Átha Cliath 2 D02 TN83

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**Department of Foreign Affairs and Trade**

Passport Office, Knockmaun House, 42-47 Mount Street Lower, Dublin 2 D02 TN83

Our Ref: FOI/Req/20/002

Mr. Kevin O'Neill  
Irish Examiner.

30 January, 2020

Dear Mr. O'Neill,

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

***The content of all complaints made to/about the Passport Service from 1 January, 2019 to 31 December 2019.***

***Details of data breaches from 1 January, 2019 to 31 December, 2019, including the nature of the breach and any action taken.***

I refer also to the acknowledgement of your request which was sent to you on 13 January, 2020.

As agreed with you I am releasing a representative sample of 20 complaints received by the Passport Office in 2019. The record is listed in the schedule attached. A record of the categories of the data breaches and the number of each type that occurred in the Passport Office in 2019 is also listed in the schedule. I have made a decision to part-grant record 1 and grant record 2. I am exempting part of record 1 as I deem it to be personal information under section 37 (1) of the Act. The records being released to you has only been edited to remove personal details of individuals in order to protect their identities.

There were 142 complaints received in 2019. The total number of passport applications received in 2019 was 960,000. This is a complaint rate of approximately 0.015%.

In 2019, the Passport Service has focussed on improving the customer experience for Irish citizens through a dedicated customer care hub handling up to 10,000 queries per week. The Passport Service won 'Team of the Year' and 'Impact in Digital' at the 2019 CX awards which recognise achievements in measuring and managing Customer Experience excellence that delivers better outcomes for customers.

The Passport Service is working on further reducing the number of complaints received and on ensuring that all complaints are resolved quickly.

The complaints relate to third party photograph providers, the requirements for documents, turnaround times, re-issuing of secure links for Passport Online and issues relating to the integrity of the Passport Service. Passport Online allows customers to submit their own photo taken at home but we also work with a number of digital photo providers to allow customers to use photo booths and pharmacies. When we received feedback on this, we pass it to the digital photo provider for action. The average turnaround times on the DFA website are estimates. We are continuing to improve on these. Where further documents are required or where it is a complex application processing takes more time. It is best that people not book flights until they have a valid passport. In addition, the Passport Service sends a reminder with all passports that the information should be checked when a new passport is received to ensure that all information is correct. The new Passport Online system generates links for people to complete their witness verification or guardianship consent for a child. In order to ensure that people data is secure, there are a number of security verification questions before the link can be accessed. The link will not work if the security questions are answered incorrectly. The integrity of the passport system is taken very seriously. This is why documents such as birth certificates are required for passport applications. In addition, where someone seeks to change their name on their passport, in most cases, they are required to demonstrate that they have been using the name for two years. In a small number of cases, where a customer has lost a number of passports, the passport may be restricted to a shorter duration.

With regard to data breaches, the Passport Service reported a total of 96 data breaches to the Data Protection Commission from the period 1 January 2019 to 31 December 2019. The most common nature of data breach was the unauthorised disclosure of a passport and/or supporting documents to a third party by virtue of outgoing envelopes being posted to the wrong address.

The Passport Service processed in excess of 990,000 applications (including applications for Foreign Birth Registrations) in 2019. The Passport Service endeavours to safeguard the personal data of applicants and takes its responsibilities in this regard very seriously. We monitor closely our compliance rate; in 2019, just 0.009% of the total applications which were processed were subject to a suspected breach. We continue to work towards lowering this figure further.

Mitigating actions taken by the Passport Service include:

- Promptly dealing with all suspected data breaches to alert affected parties and, where necessary, to recover documents.
- Reporting all lost passports to Interpol for stop listing
- Issuing gratis replacement passports to affected parties.
- Providing assistance with the replacement of certificates and other supporting documents.
- Undertaking regular reviews of our performance in this area.
- Requiring all staff to undergo data protection training and, as required, refresher training.
- Maintaining a network of data protection liaison officers throughout all of our work places.
- Liaising closely with the DPC and the Departments' Data Protection Officer to identify best practice.

Data protection training is a key element of the training programme provided by the Passport Service's dedicated training unit. All staff are aware of the implications of data protection legislation and their responsibilities in this regard. Staff are fully informed as to best practice in safeguarding personal data in the workplace. Data protection awareness continues to be a core element of the induction training provided to all new Passport Service staff on commencement of employment.

The Passport has implemented a Clean Desk Policy which seeks to maintain and improve security and confidentiality of all personal data held by the Passport Service, whilst also mitigating the likelihood of supporting documents or passports being sent to a third party in error.

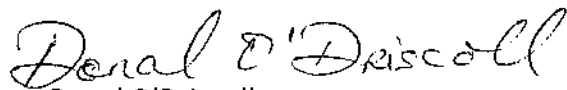
The Passport Service is fully committed to its responsibilities as a data controller under the GDPR and the Data Protection Act 2018. The Passport Service endeavours to identify and implement process enhancements in a bid to ensure full compliance with its responsibilities and obligations.

### **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](mailto: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. For methods of payment, please contact FOI Unit at [foi@dfa.ie](mailto:foi@dfa.ie), or 01-4082857.

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,



Donal O'Driscoll

Passport Service