



20 January 2025

Dear Principal

School Health Programme – Sharing of Data and Information with the HSE

I refer to my letter of 28 August 2024 regarding the HSE School Health Programme and the sharing of data and information with the HSE. The HSE School Health Programme is part of Ireland's universal programme of clinical care for all children. It includes:

- eyesight and hearing screening
- vaccines
- dental check-up including preventive and treatment service
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I am writing again now to advise you of a recent update to the legislation about sharing this data.

New Regulations

The Minister for Health recently signed two new statutory Regulations using his powers under the Health Acts. These are the:

1. [Infectious Diseases \(Amendment\) \(No. 3\) Regulations 2024](#); and
2. [Health \(Provision of Information for Health Examination and Treatment Service\) Regulations 2024](#).

These Regulations set out the information to be provided to the HSE by schools on foot of a request related to the School Health Programme examination and treatment service for pupils and/or immunisation under the National Immunisation Programme.

The Regulations provide that when such a request is made by the HSE, the school must provide the following:

- the name, address, date of birth and sex of the pupil;
- the mother's birth surname;
- contact details including the name, phone number and email address of their parent/guardian;
- the pupil's PPSN (if any);
- the name of the school which the pupil attends and the school roll number



Legal Basis to Share Personal Data

Schools are reminded of the following legal bases for sharing personal data under the GDPR:

Article 6:

- processing is necessary for compliance with a legal obligation to which the controller is subject;

Article 9:

- processing is necessary for the purposes of preventive medicine, medical diagnosis, the provision of health treatment or the management of health systems and services on the basis of law; and
- processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health on the basis of law.

Schools' legal obligations

These new Regulations create a legal obligation on schools to provide the personal data to the HSE within 10 days of a request from them. Schools are reminded of the need to set out clear procedures for transferring the personal data to the HSE and ensuring that adequate measures are in place to ensure a secure transfer.

Examples of acceptable transfer mechanisms include:

- a hardcopy printed list given directly to a member of the HSE Schools Team
- sending via a secure file sharing system. The HSE Schools Team can support schools with provision of a link to their HSE Citrix Share File should schools not have their own
- sending via email to a member of the HSE Schools Team HSE email address only (e.g., name.name@hse.ie). Please do not send to a member of the HSE Schools Teams personal email e.g. gmail, hotmail etc). The data should be supplied in an attachment which is password protected and the password then supplied separately to the HSE Schools Team.

Role of the HSE

The HSE will then use these details to send in consent forms and any other relevant materials to the school. The data also helps to make sure the programme reaches as many children as possible and allows the nurse to follow up with families who do not return the forms, so that the children do not miss out.



The HSE will store and retain the data securely within its system and in line with HSE storage and retention policies. The data sheet transferred to the HSE will be securely and safely destroyed by the HSE.

Providing Information to Parents/Guardians and Updating to School's Privacy Notice

When the HSE contacts you about School Health Programme, please ensure materials are shared in a timely manner with parents and guardians.

In order to meet their transparency obligations under the GDPR, schools as independent data controllers are requested to contact the parents/guardians of current pupils to remind them of this use of their child's data and advise of the updated legal basis for same. I have appended a template letter which schools may wish to use for this notification. I have also included an information sheet from the HSE about the School Health Programme – this should also be sent to parents/guardians.

In addition schools are now requested to ensure that this use of pupils' personal data and the updated legal basis for same are included in their Data Privacy Notice. I have appended some standard wording which schools may wish to use for this purpose.

Summary of actions required:

1. Update your school's privacy notice
2. Inform parents/guardians of this update
3. Provide the data to the HSE when requested (agreed with the local HSE team)
4. Disseminate the materials when provided by the HSE

If you have any queries in respect of the [School Health Programme](#), please contact the local HSE office, details for which can be found at [Local Health Offices - HSE.ie](#)

Once again, thank you for your support of the HSE's work as it strives to protect the health of our school children with these important health programmes.

Yours faithfully

Clodhna O'Neill
Acting Assistant Secretary



Suggested Template for Letter to Parents/Guardians

Dear Parent/Guardian,

The HSE's school health programme is part of Ireland's free universal programme of clinical care for all children.

It includes:

- eyesight and hearing screening
- vaccines
- dental checks

[X School] has facilitated the programme for a number of years through the:

- distribution of consent forms for participation
- use of the school premises by the HSE team

New legislation

Every school has obligations under GDPR (General Data Protection Regulation).

As part of this, I want to share a recent update to legislation. This update is about the sharing of pupil data with the HSE. The Minister for Health has signed two new statutory regulations. . These are the:

1. Infectious Diseases (Amendment) (No. 3) Regulations 2024
2. Health (Provision of Information for Health Examination and Treatment Service) Regulations 2024

Information request to the school

A HSE school health team will contact the school when planning their visits. They will ask for information about children who are eligible for the programme.

Under the regulations, the school must provide the following information:

- the name, address, date of birth and sex of the pupil
- the mother's birth surname
- contact details (including the name, phone number and email address of their parent/guardian)
- the pupil's PPSN (if any)
- the name of the school which the pupil attends and the school roll number

The school has a legal obligation to provide the data to the HSE within 10 days of a request from them.

**Why the information is needed**

The nurse uses these details to send in consent forms and any other relevant information to the school. The data also helps to make sure the programme reaches as many children as possible. It allows the nurse to follow up with families who do not return the consent form, providing additional information to make sure children do not miss out on the service.

You will continue to have the choice to consent to your child taking part in the services offered by the programme.

I have attached a note to parents/guardians from the HSE. This will give you more information about the [school health programme](#).

Yours faithfully

[Name], Principal



Suggested Wording for Update to School's Privacy Notice

In the section covering data sharing with third parties:

Certain pupil data may be shared with the HSE for the purpose of the School Health Programme

In the section covering the legal basis for processing:

Certain pupil data may be shared with the HSE for the purpose of the School Health Programme. The legal basis for this is:

- GDPR Article 6:
 - processing is necessary for compliance with a legal obligation to which the controller is subject;
- GDPR Article 9:
 - processing is necessary for the purposes of preventive medicine, medical diagnosis, the provision of health treatment or the management of health systems and services on the basis of law; and
 - processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health on the basis of law.
- Infectious Diseases (Amendment) (No. 2) Regulations 2024;
- Health (Provision of Information for Health Examination and Treatment Service) Regulations 2024.