

ADOPTION RIGHTS ALLIANCE

INFORMATION GUIDE FOR ADOPTED
PEOPLE



ABOUT THIS GUIDE

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We are also grateful to Fred Logue and Sandra Conway of FP Logue Solicitors for their invaluable assistance on the General Data Protection Regulation.

This guide refers to the legal opinion authored by O'Mahony, Logue and O'Rourke, available here:

<https://www.documentcloud.org/documents/6550426-Legal-Opinion-on-Adoption-Information-FINAL-15.html>

The methodology used in *Section 3: Obtaining Your Birth Certificate* was originally developed by Enda Pyne and subsequently distributed by AdoptionIreland: The Adopted People's Association.

We are also grateful to Elaine Doherty Nolan for her input on *Section 4: DNA Testing and Genetic Genealogy*.

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ABOUT ADOPTION RIGHTS ALLIANCE

Adoption Rights Alliance (ARA) advocates for equal human and civil rights for those affected by the Irish adoption system. ARA operates a peer support network of 2,000 members, providing advocacy and practical advice to adopted people, natural parents, natural family members and others who were in informal care settings.

Our website is here: <http://adoption.ie>

1. INTRODUCTION

Adopted people in the Republic of Ireland have no explicit statutory right to access their birth certificates or adoption records. In the absence of such explicit rights, but taking account of other legally available avenues, Adoption Rights Alliance (ARA) provides information and resources to assist adopted people and others affected by adoption in locating their birth certificates and obtaining adoption records. Please read the contents of this guide carefully, and we encourage you to join our peer support group on Facebook, where you can interact with others who are going through the same experience. Visit the following link for further details:

<https://www.facebook.com/groups/adoptionrightsalliance/>

Please note that requests for membership are vetted to ensure members have a connection to adoption in/from Ireland and to keep out spammers/trolls.

2. OBTAINING YOUR ADOPTION RECORDS

2.1 Where are adoption records held?

Most adopted people have at least two sets of records, firstly with the Adoption Authority of Ireland (AAI) and secondly with their adoption agency. Most adoption agencies have now closed, and their records have been transferred to Tusla. To find out where your records are now held, please visit the following page on the Tusla website:

<https://www.tusla.ie/services/alternative-care/adoption-services/tracing-service/where-are-records-held/>

2.2 Requesting information and applying for your records

In previous guides, we have advised adopted people to apply to their adoption agency or Tusla and the AAI for non-identifying information as a first step. We are now advising against this as your primary route to obtaining non-identifying information, because testimony suggests that such applications tend to yield limited results, other than being placed on a lengthy waiting list. Below we have set out an alternative method to apply for your records under the EU General Data Protection Regulation (GDPR).

Please note: if you would like Tusla or the AAI to locate your natural mother, natural father or another family member on your behalf, then you should go ahead with the application (and also register with the National Adoption Contact Preference Register), however, **we strongly advise against filling out or signing any forms which refer to Freedom of Information (see *Section 2.3.9* below), and we advise you to insist on proceeding instead under the GDPR.**

2.3 GDPR and Subject Access Requests

2.3.1 What is the GDPR and how does it affect adopted people?

The EU General Data Protection Regulation (GDPR) came into force in May 2018. The GDPR standardised data privacy law in the EU and is intended to reform how organisations approach the issue of data privacy. **Importantly for adopted people, a main aim of the GDPR is to protect and empower EU citizens in terms of their data privacy.** Unfortunately, Tusla has thus far interpreted the GDPR in a manner that severely restricts adopted people's right to basic information on the grounds that the provision of information would breach a natural mother's right to privacy. This interpretation of the GDPR is highly erroneous (see *Section 2.3.4* below), and it ignores the fact that adopted people are also data subjects who have the same rights as other citizens in this regard.

2.3.2 What is personal data?

Article 4(1) of the GDPR defines personal data as follows:

'Personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Your adoption records hold personal data relating to you. This includes information about your **physical identity**, such as your physical condition and circumstances during your early months and years, including your place of birth, your care records, the names of the people responsible for your care; your **genetic background and your cultural and social identity**, such as your original name, your natural parents' names, your natural family members' names and the circumstances surrounding your adoption.

2.3.3 What are data controllers?

Data controllers and data processors collect and/or use personal data. In the adoption context, data controllers include adoption agencies; Tusla; the Adoption Authority; the Mother and Baby Homes Commission of Investigation; individuals who arranged private adoptions; individuals who arranged illegal adoptions; doctors; priests or other agents of the Catholic or Protestant churches; and anyone who may have had a role in the adoption.

2.3.4 How is Tusla interpreting the GDPR and why is this incorrect?

The government, Tusla and other controllers of adopted people's personal data are implementing an extremely conservative interpretation of the meaning of 'personal data' and 'third party data'. In practice, this means that Tusla heavily redacts the records it releases to adopted people, and ARA understands the agency is even refusing to provide adopted people with information such as their own original first name or their natural mother's first names.

According to the legal opinion compiled by Dr Conor O'Mahony, Dr Fred Logue and Dr Maeve O'Rourke, this interpretation is erroneous and is 'a fundamental misunderstanding of the relevant law':

33. As the Court of Justice of the European Union (CJEU) acknowledged in *Nowak v Data Protection Commissioner of Ireland* (Case C-434/16, 20 December 2017), information may be linked to more than one individual and this does not affect the right of access: 'The same information may relate to a number of individuals and may constitute for each of them, provided that those persons are identified or identifiable, personal data' (para 45 of the *Nowak* judgment).

34. The Government, and indeed other State and non-State controllers of adopted persons' personal data, appear to be proceeding on an incorrect interpretation of 'personal data' and 'third party data' under the GDPR. It seems that these bodies have decided that an adopted person's birth name, their birth certificate and the name of their parent is 'third party data' (rather than a form of mixed personal data belonging to both parent and child). This is a fundamental misunderstanding of the relevant law.

Dr Conor O'Mahony, Dr Fred Logue and Dr Maeve O'Rourke, Opinion on the application of the Irish Constitution and EU General Data Protection Regulation to the Adoption (Information and Tracing) Bill 2016 and the Government's 'Options for Consideration' dated 5th November 2019.

Available here: <https://www.documentcloud.org/documents/6550426-Legal-Opinion-on-Adoption-Information-FINAL-15.html>

2.3.5 If Tusla are releasing very little information, is there any point in applying?

Tusla (incorrectly) interprets the GDPR to mean that it should release less information to adopted people. However, as stated above, for adopted people the GDPR has major significance, as one of its main aims is to protect and empower EU citizens in exercising their data subject rights.

ARA intends to do everything it can to enable adopted people in vindicating their rights under the GDPR. In this regard, we are engaging with legal experts, and as soon as possible, ARA will publish information to assist people who wish to challenge the decisions made by Tusla regarding the release of their records. (Please also see *Section 7: Frequently Asked Questions*)

2.3.6 Where should I send my request to?

We recommend that you send Subject Access Requests to Tusla (or your adoption agency if it is still open), the AAI, and any other body you are aware of that was involved with your adoption. We also suggest that you send a Subject Access Request to the Commission of Investigation on Mother and Baby Homes, even if you have not given evidence, because the Commission has gathered a large number of adoption records as part of its work. If you have already applied for your records under FOI or the Data Protection Act, or indeed under the GDPR, we recommend that you send in a new Subject Access Request using our templates, which are available at **Appendix 1 and 2** at the end of this Guide, or at the following link: <http://adoption.ie/records/sar-templates/>.

2.3.7 How much does it cost?

Unlike Subject Access Requests under the Data Protection Act, you do not have to pay for requests under GDPR, so there is no need to enclose a fee.

2.3.8 The data controller has sent me back a form to fill in – what should I do?

Simply put, **do not fill out the form, particularly if it refers to FOI**. If the data controller sends you a separate form to fill out, we advise that you write back and remind them that you have applied under GDPR for the personal data they hold on you and that additional forms are not required for this process.

2.3.9 Should I apply under Freedom of Information?

ARA strongly advises that you do not apply for your records under Freedom of Information (FOI). With the exception of certain AAI administrative files,* adoption records are currently exempt from being released under FOI, and in our experience, you will be discriminated against if you use FOI to apply for your information.

*Under the Freedom of Information Act 2014, the AAI is subject to the provisions of the Freedom of Information Acts 1997 - 2014 effective from 21st April 2015.

2.3.10 Subject access template

ARA has compiled templates to assist adopted people in making Subject Access Requests under GDPR, and these can be found at Appendix 1 and 2 at the end of this Guide, or at the following link: <http://adoption.ie/records/sar-templates/>

To use the subject access template, just copy and paste the text into a new document, and please ensure to fill in your own details where we have highlighted. You should also feel free to adapt your letter to suit your own needs, but we strongly advise you to leave in the sections which spell out the specific kinds of personal data relating to adopted people and the paragraph on *Nowak v Data Protection Commissioner of Ireland*.

2.3.11 I have sent off my Subject Access Requests – what next?

Under the GDPR, data controllers (e.g., Tusla, AAI) have 30 days to respond to your request. If they do not respond within 30 days you have a right to complain. If the data controller has heavily redacted your records or if it has omitted any of your personal data from their response you should also complain. As noted above, very soon ARA will publish information to assist people who wish to challenge the decisions made by Tusla and other data controllers.

If you wish to complain to the Data Protection Commissioner (DPC), you can obtain information on how to complain on the DPC's website at this address:

<https://www.dataprotection.ie/docs/Making-a-Complaint-to-the-Data-Protection-Commissioner/r/18.htm>.

However, if you wish to avail of assistance from ARA in making your complaint, please wait until we publish further information.

2.4 I was born in Ireland and adopted to the United States, how do I proceed?

You firstly need to write to the US adoption agency involved in your adoption seeking confirmation in writing a) that you were adopted from Ireland to America, and b) the name of the Irish adoption agency that arranged your adoption. If you have difficulty in obtaining this information we recommend that you write to the Department of Foreign Affairs (DFA) at: Department of Foreign Affairs, Iveagh House, St Stephen's Green, Dublin 2, requesting written confirmation and evidence that you were indeed born in and legally adopted from Ireland and that your natural mother signed the adoption papers. You should also send a Subject Access Request to the DFA, as per the instructions above.

If you have your original name and surname you can file a Freedom of Information request from the US Citizenship and Information Services (CIS). You can do this via their website at **<https://www.uscis.gov/about-us/freedom-information-and-privacy-act-foia/how-file-foia-privacy-act-request/how-file-a-foiapa-request>** From here you can obtain certified copies of your Irish passport and visa records, your Irish birth certificate, and any other details pertaining to your immigration from Ireland.

2.5 I was born in the UK and adopted to Ireland, how do I obtain my records?

In England since 1975, adopted people have had the right to their birth records upon turning 18 years of age. If you were adopted before 12th November 1975, you will be required to meet with an approved adoption advisor before obtaining for your birth certificate. Further guidance on obtaining your birth certificate is available at this website: <https://www.gov.uk/adoption-records>. For Northern Ireland, visit this link: <https://www.nidirect.gov.uk/articles/tracing-and-contacting-birth-relatives-and-adopted-adults>

2.6 I was illegally adopted, how do I obtain my records?

2.6.1 What is an illegal adoption?

There are a number of ways in which a person could have been illegally adopted, however in the context of information gathering, when we refer to an illegal adoption, we mean a person who has been registered as the natural child of their adoptive parents.

For a full breakdown of scenarios which constitute an illegal adoption see para 1.66 of the *Clann Project* Report at this link: http://clannproject.org/wp-content/uploads/Clann-Submissions_Redacted-Public-Version-October-2018.pdf

2.6.2 Gather paperwork

As a first step, we advise that you gather whatever paperwork you can find in relation to your illegal adoption. This paperwork can include hospital bills, receipts, solicitor's letters, doctor's letters, or letters from nuns or priests, all of which contain potential leads. Even if you don't think it is of use, the smallest piece of information can often provide a crucial clue so treat everything as important. Each piece of information you gather can potentially lead you to further documentation. (See *Section 2.6.7* below)

2.6.3 Information on birth certificate

Take note of the name of the informant on your birth certificate, as this person may have information as to your original identity. If you know that person or have their contact details, we advise you to submit a Subject Access Request. You should also send a Subject Access Request to the hospital listed on your birth certificate.

Important: Please note that in the case of some illegal adoptions, the person's date of birth was changed, so you should bear that in mind as you proceed.

2.6.4 Check with your adoptive parents and/or family members

If possible, ask your adoptive parents and/or family members to share paperwork and as many memories as they can with you. Again, any piece of information, no matter how small, can provide a vital clue to work with.

2.6.5 Facilitators

In many cases, illegal adoptions were facilitated by adoption agencies, however many were also facilitated by private facilitators. In our experience, private facilitators can include social workers, priests, nuns, solicitors and doctors. In order to obtain information you will need to submit a Subject Access Request to the facilitator involved with your adoption. Remember you are doing nothing wrong, you are only asking for your personal data.

2.6.6 I don't know the facilitator that arranged my illegal adoption, what can I do?

If you do not know what facilitator dealt with your adoption and if the information is not readily available (e.g. if your adoptive parents are deceased) we suggest that you search through whatever paperwork you have gathered to look for clues (see *Section 2.6.2* above).

If you were registered as the natural child of your adoptive parents, check your birth certificate and look for the name of the informant, as this might be the person who facilitated your adoption, or they may be linked to the person or agency involved.

2.6.7 I have gathered all my paperwork – what next?

Once you have gathered all of your paperwork, you should examine it carefully to glean as much information as possible. The main piece of information you are seeking is obviously your natural mother's name, which can then be used to obtain further information (see *Section 3* below). In essence, you are looking for any names and addresses (including facilitators, other family members, etc.), which you can also use to obtain further information. This information can be obtained from the Thoms Directories, which are available at Dublin City Library. (Some Thoms Directories are available online here:

<http://www.askaboutireland.ie/griffith-valuation/index.xml?action=thomsSearch>).

Please note that if your natural mother was living in a rented property at the time of your birth, the building would be in the name of the landlord. If the landlord's name is unusual it may be possible to track that person down and enquire about their tenants around the time of your birth. Similarly, names and addresses on various documents may reveal the name of the facilitator and/or agency involved in your adoption, in which case you should send a Subject Access Request to every individual or agency involved.

2.6.8 Other options

Please also see *Sections 4 and 6* below for information on DNA genealogy and the National Adoption Contact Preference Register.

3. OBTAINING YOUR BIRTH CERTIFICATE

Every person who is born has his or her birth entered in the *Register of Live Births*, from which birth certificates are generated. Adopted people's births are registered in their original identity, however when they were legally adopted, they were entered into the *Adopted Children's Register* in their new adoptive identity. The document used by adopted people as a birth certificate in everyday life is in fact an *Extract from the Adopted Children's Register*. The term 'original birth certificate' is incorrect, because each person in Ireland has only one birth certificate. Hence, you need to obtain a copy of your birth certificate, which contains your original name. It is a public record, recorded in the *Register of Live Births*, which is open to inspection by the general public. Your birth certificate should say where you were born, your original name and your natural mother's name. It will sometimes contain an address (at the time of your birth) for your natural mother but not always.

Once you have received your adoption records (albeit they may be in redacted format, depending on how the data controller has interpreted the GDPR), you will be in a position to visit the Research Room of the General Registrar's Office (GRO), where birth, death and marriage records are held. You can still visit the GRO before you obtain your records, but you will not be able to easily narrow down the various possibilities without more information.

3.1 How to get to the General Registrar's Office

To obtain your birth certificate, you need to visit the Research Room in the General Registrar's Office. The Research Room is located at Werburgh Street, Dublin 2, Eircode: D08 E277 (see map on the next page). Opening hours are Monday to Friday (excluding public holidays) from 9.00am – 4.30pm (open during lunch).



3.2 What should I bring with me to the GRO?

We suggest you bring a copy of this Guide, as well as pens, notepaper and a ruler (this helps when searching through the books). You should also bring enough money to pay for searches and certificates.

3.3 Searching the registers at the GRO

There are two types of search available at the GRO Research Room:

1. A specific search covering a maximum of 5 years for a fee of €2.00
2. A general search covering any number of years for a fee of €20.00

We suggest that you pay for a 'general search' as you can look at as many books as you wish throughout your visit. A photocopy of an entry in the records costs €4.00. Please note that only eight photocopies of certificates per person per day are allowed, though the GRO will post out any surplus requests to you if you wish. You may want to consider bringing a friend or family member as this means you can order more certificates on the day.

3.4 Searching the Register of Live Births

- As you will be working from limited information, it is absolutely essential that you search through the registers with great care, and please read through the checklist below before proceeding.
- Take your time looking through the registers.
- Keep going to the end of the register(s), even if you think you have found your entry before you are finished.
- Even if you have obtained your original name prior to visiting the Research Room, make sure you check the registers thoroughly, as it is essential to confirm that the information is correct.
- You will need to fill out a form in the Research Room setting out what registers you wish to inspect. The registers are available for you to retrieve from the shelves yourself.
- For people born after January 1966, if you were born late in the year (November or December), you should check the register for the year after your birth as well, because it was common for these births to be registered at the beginning of the following year.

- If you were born before January 1966, you should check the quarter in which you were born, but please ensure to check the following quarter if you were born near the end of the last month of any given quarter (i.e., March, June, September and December).
- Do not assume you were born in Dublin. All adoption certificates list the place of birth as Dublin, even if the person was born in another area of the country. The short form 'birth certificate' for adopted people cites the area 'NC4', which is the area of registration for the Adoption Authority.
- Please note, some birth/death/marriage certificates will have different first names on them – e.g. your natural mother might be known as Bridget, but on her birth certificate the name might be Mary Bridget.
- Check the back of the books for handwritten late registrations.
- Please note the father's name was rarely entered on non-marital birth certificates.

3.4.1 If you were born before January 1966

Births prior to January 1966 were registered every three months and the registers are separated into four quarters: March, June, September and December, with no dates of birth included in the registers. You should check the quarter in which you were born, but please ensure to check the following quarter if you were born near the end of the last month of any given quarter (i.e., March, June, September and December). The format of the pre-1966 registers is set out below.

Surname	Child's Name*	Mother's Maiden Name	District	Vol	Page
Murphy	Mary	Jones	Dublin S	2	421
<i>Murphy</i>	<i>John</i>	<i>Murphy</i>	<i>Delvin</i>	3	211
Murphy	Sheila	McKenna	Dublin N	4	433

**Note, the adopted person's name was usually changed by their adoptive parents, so do not expect to see the name you use now.*

You need to look for entries where the surname (i.e., the child's surname) and mother's maiden name are the same (see the example above in italics). You should take note of all such entries, only selecting male or female births as appropriate. If you know your original name or your natural mother's first name, this will help you to narrow things down (this is explained further below), however, we suggest you take note of all of the volume and page numbers just in case, and you will need these when ordering the photocopies.

3.4.2 If you were born from January 1966 onwards

Births from January 1966 are sorted alphabetically, and dates of birth are included in the registers. There will be three or four registers for your year of birth, sorted alphabetically, and **you should search all of the registers for that year.** The format of these is set out below.

Surname	Child's Name	Mother's Maiden Name	Area of Reg.	Date of Birth	Vol	Page	Qtr
Murphy	Mary	Jones	Dublin S	22-05-1973	2	421	2
<i>Murphy</i>	<i>John</i>	<i>Murphy</i>	<i>Delvin</i>	<i>15-02-1973</i>	3	211	1
Murphy	Sheila	McKenna	Dublin N	22-03-1973	4	433	1

Because the date of birth is included in the register, you can search via date of birth or, as with pre-1966 births, for instances where the mother's maiden name and the child's surname are the same (see the example above in italics).

Many people check for their date of birth and then check to see if the child's surname and mother's maiden name are the same. You should take note of all the entries where this occurs, eliminating male or female births as appropriate. Please ensure that you write down the volume and page numbers, as well as the quarter as you will need this information to order photocopies.

3.5 Process of elimination

Once you have checked all of the books for your year of birth you should have a number of possibilities to work from and you now need to engage in a process of elimination. The checklist below should help you narrow all the possibilities down to one birth certificate.

- If you are sure of the name given to you by your natural mother, check through your list for entries with that name;
- If you know where you were born (be careful of wrongly assuming you were born in Dublin), you can eliminate possibilities using this information. There are maps and lists of areas of registration available in the Research Room to help you with this (you may also find the following link helpful: <https://www.irish-genealogy-toolkit.com/Ireland-civil-registration.html>);
- If you have found only one entry, it is possible that it is your birth certificate; however, we would urge you to be extra careful and ensure that all of the details match up with the information you have.

At this point you should have narrowed down the possibilities significantly. You should request photocopies of the remaining entries on your list. To do this you must fill in a photocopy request form and hand it in to a staff member at the Research Room.

Hopefully at this stage, only one photocopy will match the information you have. If so, you have found your birth certificate. If more than one photocopy matches your details, you will need to do further research, as described below.

3.6 Further process of elimination

If you have two or more birth certificates that may be yours, but you have not been able to narrow things down, you need to use whatever information you have in a further process of elimination. For example, you may have been told your natural mother's age, the number of siblings she had, whether she was from an urban or rural area, her county of origin or whether either of her parents were deceased. Please see below for how to use this information to further your research.

3.6.1 Natural mother's birth certificate

As a first step, you need to try to locate the birth certificate of the mother in each of the certificates that are in your list of possibilities. You may have been previously told your natural mother's age or approximate age. The age you have been given may be accurate, however you should bear in mind that information provided by adoption agencies, Tusla and the AAI is often inaccurate, so allow for a number of years each side. Please see the example below for how to do this:

Adopted Person's Date of Birth: 01-01-1963
Natural Mother's Age: 19

From this information you can deduce that your natural mother would have been born around 1944. ($1963 - 19 = 1944$)

Therefore, in this situation you would need to check the *Register of Live Births* for at least the following years: 1942, 43, 44, 45 and 46.

Once you have established the years you need to search, you need to check those years in the *Register of Live Births* for each of the mothers on the list of possible certificates you have left. If you are still left with more than one possible birth certificate for yourself, and even if you can only find one of the mothers during these years, it is possible that this is your natural mother, you should do further research (as described below) to ensure that you have the right certificate.

3.6.2 Natural mother's siblings

You may have been given information about the number of siblings in your natural mother's family, and this can help you narrow down the various possibilities. Again, you should be careful and bear in mind that the information may not be fully accurate, so you should use all your information to confirm your research. If for example, you were told your natural mother had three brothers and four sisters, you can check the books for these siblings to help confirm your possibilities. Two examples are set out below.

Example 1: Two women of the same age with different names

In the first example, the two possible natural mothers' names are Mary Murphy and Deirdre Brophy. Mary Murphy's mother's maiden name was Dunphy, while Fiona Brophy's mother's maiden name was Coleman. See below for how these entries might look in the Register of Live Births:

Surname	Child's Name	Mother's Maiden Name	Area of Reg.	Vol	Page
Murphy	Mary	Jones	Dublin S	2	421
Murphy	Mary	Dunphy	Delvin	3	211
Murphy	Sheila	McKenna	Dublin N	4	433

Surname	Child's Name	Mother's Maiden Name	Area of Reg.	Vol	Page
Brophy	Margaret	Geoghegan	Dublin S	2	421
Brophy	Fiona	Coleman	Mountmellick	1	222
Brophy	Veronica	Fitzpatrick	Dublin N	4	433

Locating siblings

Siblings can generally be located by matching the mother's maiden name (though you should still double check in case there are two families whose mothers have the same maiden name). In the examples below in bold/italics, you can see possible siblings for Mary Murphy and Fiona Brophy. Please note that the registration district is the same for the siblings used in these examples, however if the family moved at some point this may not be the case.

If you know that your natural mother had three siblings, and only one of your 'possibles' has three siblings, then you are getting closer to narrowing things down. You should proceed with extreme caution however, as you can never fully rely on any non-identifying information you have been given.

Possible siblings for Mary Murphy:

Register of Live Births for 1961					
Surname	Child's Name	Mother's Maiden Name	Area of Reg.	Vol	Page
Murphy	Declan	Finnegan	Dublin S	2	421
Murphy	John	Dunphy	Delvin	4	256
Murphy	Sarah	Foster	Dublin N	4	433

Register of Live Births for 1964					
Surname	Child's Name	Mother's Maiden Name	Area of Reg.	Vol	Page
Murphy	Edward	Kennedy	Cavan	3	145
Murphy	Barbara	Dunphy	Delvin	1	181
Murphy	Thomas	Bergin	Macroon	2	226

Possible siblings for Fiona Brophy:

Register of Live Births for 1961					
Surname	Child's Name	Mother's Maiden Name	Area of Reg.	Vol	Page
Brophy	Dorothy	Adams	Dublin S	3	466
Brophy	Terence	Coleman	Mountmellick	1	222
Brophy	Caitriona	Hogan	Dublin N	3	413

Register of Live Births for 1964					
Surname	Child's Name	Mother's Maiden Name	Area of Reg.	Vol	Page
Brophy	Diarmuid	Davis	Granard	4	333
Brophy	Fergus	Coleman	Mountmellick	1	256
Brophy	Hilda	Smith	Oldcastle	4	111

Example 2: Two women of the same age with the same name

In this example, we have two women called Mary Murphy, either of which could be your natural mother. The two Mary Murphys below have different mother's maiden names, so you can use this to locate the siblings for each. You may have been told what order the siblings came in, e.g. two older brothers and all other siblings were younger. You can use this information to guide you in terms of what years you should check. Please see the example below for instances of brothers of both women.

Mary Murphy, mother's maiden name Dunphy:

Surname	Child's Name	Mother's Maiden Name	Area of Reg.	Vol	Page
Murphy	Mary	Jones	Dublin S	2	421
Murphy	Mary	Dunphy	Mullingar	3	211
Murphy	Francis	D'Arcy	Enniscorthy	4	333

Mary Murphy, mother's maiden name Jones:

Surname	Child's Name	Mother's Maiden Name	Area of Reg.	Vol	Page
Murphy	Sheila	McKenna	Dublin N	4	433
Murphy	Mary	Jones	Athlone	2	366
Murphy	Michael	Dillon	Tullamore	3	444

Possible siblings for Mary Murphy, mother's maiden name Dunphy:

Register of Live Births for 1961					
Surname	Child's Name	Mother's Maiden Name	Area of Reg.	Vol	Page
Murphy	Declan	Finnegan	Dublin S	2	421
Murphy	John	Dunphy	Mullingar	4	256
Murphy	Sarah	Foster	Dublin N	4	433

Register of Live Births for 1964

Surname	Child's Name	Mother's Maiden Name	Area of Reg.	Vol	Page
Murphy	Edward	Kennedy	Baltinglass	3	145
Murphy	Barbara	Dunphy	Mullingar	1	181
Murphy	Thomas	Bergin	Macroom	2	226

Possible siblings for Mary Murphy, mother's maiden name Jones:

Register of Live Births for 1961					
Surname	Child's Name	Mother's Maiden Name	Area of Reg.	Vol	Page
Murphy	Gavin	Kinsella	Dublin S	2	421
Murphy	Sean	Jones	Athlone	4	256
Murphy	Maureen	Duffy	Dublin N	4	433

Register of Live Births for 1964

Surname	Child's Name	Mother's Maiden Name	Area of Reg.	Vol	Page
Murphy	Eamonn	McLoughlin	Cavan	3	145
Murphy	Barbara	Dunphy	Athlone	1	181
Murphy	James	Bergin	Macroom	2	226

Hopefully both women would not have had the same number of siblings and this information will help narrow down the possibilities that you have. If not, don't worry; there are other ways of doing so.

Again, you should proceed with extreme caution, as you can never fully rely on any non-identifying information you have been given.

3.6.3 Your natural mother's father's occupation

If you were told what your natural mother's father's occupation was, this can also be helpful to eliminate possibilities. This information is usually contained on the birth certificate. So if you were told that your natural grandfather was a shopkeeper, if one of your possible certificates states that the father was a shopkeeper, while the other states that he was a labourer, this can be helpful to you in establishing whether you are on the right track. Please note, you should allow for paraphrasing of the job title and also allow for the possibility of the father having changed his occupation.

3.6.4 Death of one of your natural mother's parents

The information available to you might indicate that one of your natural mother's parents died. If the information includes the approximate year in which the death occurred, it will make it easier for you to search. You can search the *Register of Deaths* in the Research Room in a similar manner to the *Register of Live Births*, as outlined above.

If you find that more than one of your possibilities meets these criteria, often the cause of death (which is stated on the death certificate) can help you eliminate one or more possible matches if you have also been told this information.

3.7 If you cannot find your natural mother's birth certificate

3.7.1 Births outside Ireland

If you cannot find a birth certificate for your natural mother, it is possible that she may have been born outside of Ireland. UK records are relatively easy to search once you have internet access and these can be accessed at: <https://www.findmypast.co.uk/>.

3.7.2 Non-registered births

It is also possible (particularly if your natural mother is quite old) that her birth wasn't registered. In this instance you should try seeking out church records, but you would need to know the area of the country in order to proceed.

3.7.3 Check for a marriage certificate

If you are having difficulty in locating your natural mother's birth certificate, you should check the *Register of Marriages* in the Research Room to see if there is a record of her getting married. Searching the *Register of Marriages* in the GRO is quite similar to searching the *Register of Live Births*. Marriages are registered in both the maiden and married names, so you should look for marriages in your natural mother's maiden name (i.e. the surname on your possible birth certificate) from your year of birth onwards. If you locate this information and the details match the information available to you, you should then be able to work backwards and locate her birth certificate, which might be in the Irish system, but you should also allow for her having been born abroad.

3.7.4 Advice and support

If you cannot find your natural mother's birth certificate and would like to discuss it with others in a similar situation, please feel free to join our peer support network which is at this link:

<https://www.facebook.com/groups/adoptionrightsalliance/>

(As noted above, membership is vetted)

3.8 Using DNA genealogy to narrow down possibilities

In the next section you will learn how to avail of DNA technology. The information gleaned can be invaluable in helping to narrow down possible birth certificates. For example, if you have narrowed your information down to two possible surnames, the surnames appearing in your DNA matches may be helpful in ruling one out, particularly if you use the civil registration records to research other surnames within that family tree. Also, many genealogical researchers make their family trees available to fellow service users, and you may find this information extremely helpful.

Please note that any lead is just a possible lead until you find other information to back it up, and you should try to obtain other evidence to corroborate your research.

4. DNA TESTING AND GENETIC GENEALOGY

Genetic genealogy is a research method involving the use of DNA testing in conjunction with conventional genealogical methods. In recent years, in the absence of explicit statutory rights, increasing numbers of adopted people and natural family members are availing of DNA testing services provided by companies such as Ancestry.

Please note that the information provided in this section is a guide to using these services from the perspective of adopted people, and is not intended as an endorsement of any service.

4.1 DNA Testing Services

Ancestry has the largest database and is the most popular DNA testing service. For this reason, you may wish to consider doing your initial test with Ancestry, and once you have obtained your DNA results you can then upload your raw data to other sites (as outlined below), in order to increase the number of possible matches. This guide uses Ancestry as an example, and please visit the websites of the other testing companies below for instructions on how to use their services.

To get started, visit <https://www.ancestry.com/dna/> and order your DNA kit. When you receive it, follow the instructions carefully, send the kit back and wait for the results to come in.

Other DNA testing services include:

Family Tree DNA: <https://www.familytreedna.com>

23 and Me: <https://www.23andme.com>

DNA Quest: <https://www.dnaquest.org>

MyHeritage DNA: <https://www.myheritage.com/dna>

4.2 Downloading raw DNA data to upload to other sites

Once you have received your DNA results you can visit the Ancestry website to download your raw DNA data. Visit this page on the Ancestry site to learn more:

<https://support.ancestry.com/s/article/Downloading-Raw-DNA-Data-1460089696533>

At the end of the process you will receive an email in which you will find a link to confirm the download of your DNA data. According to Ancestry, the link expires after seven days, so don't forget to check your spam folder. When you get the email, click on 'Confirm Data Download', and when you are redirected to the Ancestry site, click on 'Download DNA Raw Data'. Look in your downloads folder for a zip file, and ensure that you don't unzip it as you will need to upload the zipped version to GEDmatch and other services.

4.3 GEDmatch

GEDmatch does not provide DNA testing services; it is a free volunteer-run website providing DNA analysis and comparison uploaded by users.

4.3.1 Register with GEDmatch

Visit **<https://www.gedmatch.com/register.php>**. Enter your first and last name, and in the box below you can enter an 'optional alias' if you want additional privacy protection. Enter the rest of your details as instructed and click 'Register'. You will be redirected to a page telling you you're going to receive a registration code. Check your email in a different tab on your browser and copy and paste the code into the box on the GEDmatch site.

4.3.2 Upload your DNA data

To upload your DNA data to GEDmatch, visit the following page for instructions:

https://www.gedmatch.com/gedwiki/index.php?title=Universal_DNA_Upload

4.3.3 Analysing your matches

Once your DNA data has been uploaded to GEDmatch, you will receive a kit number, and you can use this to conduct a number of comparisons, including 'One-to-One' and 'One-to-Many'. Please note that it can take 24 hours for your data to be fully processed on the GEDmatch site.

4.4 Upload your DNA data to other sites

Please note that you can also upload your raw DNA file to MyHeritage, Family Tree DNA and other sites, and instructions are available on their websites:

- Family Tree DNA: **<https://www.familytreedna.com>**
- 23 and Me: **<https://www.23andme.com>**
- DNA Quest: **<https://www.dnaquest.org>**
- MyHeritage DNA: **<https://www.myheritage.com/dna>**

4.5 Analysing matches

Once you have completed your DNA test and uploaded your raw DNA file to other services, you will have a number of lists of DNA matches to work from. DNA testing companies estimate the relationships between matches using the amount of shared DNA between two people. It is important to note that the only (almost) certain relationship in the list of matches is that between parent and child, and all others are estimated relationships, e.g., siblings, half-siblings, cousins.

Further information on how to understand your matches is available here: <https://thegeneticgenealogist.com/2017/08/26/august-2017-update-to-the-shared-cm-project/>

4.6 Further use of DNA matches

As noted above, you can also use your DNA matches in conjunction with your research at the GRO to narrow down the various possibilities. Please note, this information should only be used as a guide, and you should try to obtain other evidence to corroborate your research.

4.7 Updates on DNA genealogy

The members of our online peer support group regularly post updates on news and developments in this area. You can find out more about how to join at this link:

<https://www.facebook.com/groups/adoptionrightsalliance/>

(As noted above, membership is vetted)

5. MEDICAL INFORMATION

The advancement of DNA technology has further advantages for adopted people in the area of medical information. A number of services now allow people to upload their raw DNA data file to their system for analysis on genetic health risks. We have set out a number of services below. This is not intended as an endorsement of these services, and we strongly encourage you to discuss any issues of concern with your doctor.

5.1 Promethease

Promethease analyses medical research literature and maps it against your genetic data in order to produce a report on genetic health risks. Promethease is free, but it has a number of limitations and is not an entirely user-friendly experience, however, it is possible to tweak the settings. For further information see: <https://medium.com/genomelink/3-filters-to-simplify-your-promethease-report-for-dna-newbies-656c8a5c1f9d>

Promethease is available at: <https://promethease.com/>

5.2 Genomelink

You can also upload your raw DNA data to Genomelink for analysis on nutrition, fitness, personality and intelligence. The first 25 reports are free of charge.

Genomelink can be accessed at: <https://genomelink.io/>

6. NATIONAL ADOPTION CONTACT PREFERENCE REGISTER

If you wish to contact your natural mother or another natural relative, you may also wish to consider registering with the National Adoption Contact Preference Register (NACPR), and information on how to register is available at this link: <https://aai.gov.ie/tracing/contact-preference-register.html>.

Please Note: Registering with the NACPR does not mean that the Adoption Authority will initiate a trace on your behalf. You should ensure to make your wishes explicitly clear to the Adoption Authority in terms of how you would like your case to be handled, e.g. you may not wish to deal with your adoption agency if a match is found.

In the coming months, ARA will publish a *Guide to Adoption Contact*.

7. FREQUENTLY ASKED QUESTIONS

Can I share this guide with other people?

ARA wishes to empower as many people as possible to obtain their personal data, so you are very welcome (and indeed encouraged) to share this guide with others. We simply ask that you share the guide in its entirety, rather than copying and pasting from it. We also ask activists, academics and others to use the citation on the inside cover when referring to the guide.

Is there any point in applying for my records if they are going to be redacted?

Yes, you should absolutely apply for your records, regardless of the outcome. Even if you only manage to obtain heavily redacted records, it is important to bear in mind that your response should include a **schedule of records**, which will detail the various documents in your adoption file(s). This is information that you are entitled to have, and it is extremely important in the context of proposals under the Adoption (Information and Tracing) Bill 2016, which, if the bill is passed as written, would mean that adopted people would receive a statement of non-identifying information compiled by Tusla in lieu of their original adoption file. In the (hopefully unlikely) event that this happens, by making a Subject Access Request, you will have a schedule of your adoption file and redacted records, which will assist you in the process of making complaints if your statement omits important information.

Can ARA do my research for me?

ARA is a completely voluntary unfunded group, and we are not in a position to provide research assistance to people obtaining their personal records. Moreover, only bodies which have been accredited with the Adoption Authority are permitted to provide such services. We very much hope that this guide will help empower you to conduct your own research.

I cannot visit the Research Room at the GRO, what can I do?

There are some instances where people are not in a position to make the trip to the Research Room at the GRO. In such instances, people often ask for the help of a research volunteer, sometimes referred to as a 'search angel'. Under the *Adoption Act 2010*, only accredited bodies are permitted to provide tracing and information services, and thus it is important to bear in mind that research volunteers are not permitted to conduct adoption traces. Instead, these volunteers simply visit the Research Room and obtain birth certificates and other civil registration documents on other people's behalf.

Please bear in mind that research volunteers do this work in their spare time. Therefore we strongly urge you to think before asking a volunteer to help. If you are based in Ireland and there are no other barriers to you making the trip to the GRO yourself, please take a day or two off work rather than asking someone else to do it.

Research volunteers are not paid for their work so please do not leave them out of pocket and make sure that their expenses are covered. Do not assume that the volunteer will have the money up front and offer the basic costs up front before the person travels to the Research Room. Volunteers in turn should supply receipts and furnish any certificates to the adopted person/natural relative once payment has been received. Photocopies at the Research Room are €4 each and a General Search fee is €20, so a trip to the GRO can be quite costly.

There are also parking expenses (usually €20-30 a day in Dublin) and fuel expenses, not to mention lunch etc., so please bear all this in mind. We also recommend that you agree a spending limit with your research volunteer prior to any money being spent by that volunteer. Research volunteers should not spend more than €10/€20 without checking with the person they are assisting.

You should also be wary of inexperienced volunteers, who are well-meaning, but are not necessarily very capable in terms of their research skills. Remember, it is important to ensure that the person helping with your research is responsible and has the necessary experience and knowledge to ensure that this work is carried out in an ethical, discreet and thorough manner. It is also absolutely essential that you are in control of your own research, and volunteers should bear this in mind.

In the case of people conducting adoption searches, we strongly recommend that adopted people and natural parents should never arrive on the doorstep of the person they are searching for. We suggest a discreet letter rather than calling in person or on the phone. Adoption Rights Alliance categorically disapproves of research volunteers going to the houses of the relatives of people they are helping. Please ensure that you make your wishes clear in this regard when dealing with research volunteers.

Last but not least, if you have been assisted by a research volunteer, please do not pass on their contact details on to other people.

How do I ask for help from a research volunteer?

To ask for help from a research volunteer, please join our online peer support group, and put up a post requesting assistance: <https://www.facebook.com/groups/adoptionrightsalliance/>.

Should I hire a private investigator?

ARA strongly advises against using private investigators, who, in our experience, are usually neither trained nor experienced in adoption and will often employ methods that are completely unsuitable to adoption research. And, as noted above, only bodies accredited with the Adoption Authority can carry out tracing and information services.

I have hit a brick wall in obtaining my information, what can I do?

We strongly recommend that you join our online peer support group, where you can discuss your situation with experienced ARA representatives and others who are also researching their information. Everything discussed in the group is completely confidential, and membership is vetted in order to ensure that only those with a genuine connection to adoption are granted access. If you wish, you are welcome to join under a pseudonym, and if you do, please let us know in your application.

The group can be accessed at the following link:

<https://www.facebook.com/groups/adoptionrightsalliance/>.

(As noted above, membership is vetted)

APPENDIX 1:

TEMPLATE FOR SUBJECT ACCESS REQUESTS TO THE ADOPTION AUTHORITY, TUSLA AND OTHER RECORD HOLDERS

This document can be downloaded in Microsoft Word format at this link:
<http://adoption.ie/records/sar-templates/>

APPENDIX 1

[Your name]

[Your address]

The Data Protection Officer

[Data Controller Name]

[Data Controller Address]

[Date]

Re: Subject Access Request for personal data held about [your name] by [name of data controller, e.g. adoption agency/Tusla]

To whom it may concern:

I request a copy of my personal data which is being processed by [data controller] consistent with your obligations as a data controller under Article 15 of the General Data Protection Regulation (GDPR) 2016/679.

In accordance with Article 15 of the GDPR, please also provide the following:

- inform me of the purposes of the processing;
- the categories of personal data held (including a complete index of same);
- the recipients or categories of recipients to which my personal data has been or will be disclosed;
- the period for which the data will be stored, or alternately the criteria that will be used to determine that period.

In making this request I would remind you that, as the Court of Justice of the European Union (CJEU) acknowledged in *Nowak v Data Protection Commissioner of Ireland* (Case C-434/16, 20 December 2017), information may be linked to more than one individual but this does not affect the right of access: 'The same information may relate to a number of individuals and may constitute for each of them, provided that those persons are identified or identifiable, personal data' (para 45).

In making my request I would also remind you that the GDPR defines personal data in terms of a person's 'physical, physiological, genetic, mental, economic, cultural or social identity'. Thus, the personal data I request includes but is not limited to the following:

- Personal data in terms of my physical, mental, and physiological identity, e.g.:
 - My place of birth;
 - My physical condition and circumstances during my early months and years;
 - My early-life care records;
 - My medical records, including x-rays, tests, vaccine trials;
 - My natural family's medical history.

APPENDIX 1

- Personal data in terms of my genetic identity, e.g.:
 - My original name (which is a public record, in the form of my birth certificate);
 - My natural mother's name (which is a public record, in the form of my birth certificate);
 - My natural father's name;
 - My natural family members' names (all of which are public records).
- Personal data in terms of my economic, cultural and social identity, both before and after my adoption—that is to say, my full, non-redacted records, all of which relate to my economic, cultural and social identity both around the time of my birth and after my adoption, and which relate to how I came to be [your adoptive name (i.e. the name you use now)], e.g.:
 - My original name (which is already a public record, in the form of my birth certificate);
 - My natural mother's name (which is already a public record, in the form of my birth certificate);
 - My natural father's name and my natural family members' names (all of which are public records);
 - My county/country of origin at the time of my birth;
 - The occupation of my natural parents and family members when I was born;
 - My natural parents' ages;
 - My natural grandparents' occupations;
 - The number of siblings in my natural mother's immediate family;
 - The circumstances surrounding my adoption;
 - Correspondence about me, including correspondence associated with the administrative process surrounding my adoption, and correspondence from my natural mother enquiring about me;
 - The assessment process associated with my adoption;
 - The administrative process surrounding my adoption, including records about the decision-making process around my placement (i.e., how I came to be [your adoptive name (i.e. the name you use now)]);
 - The names of the people responsible for my care during my early weeks, months and years.

I enclose a copy of photo identification, and my details are as follows:

Name at birth: [Your original name if known]

Date of Birth: [Your date of birth]

Place of Birth: [Your place of birth if known]

Name of Natural Mother: [Your natural mother's name if known]

Name of Adoptive Parents: [Your adoptive parents' names]

Date of Adoption/Placement: [The date on your adoption order, if known]

Current Name: [Your adoptive name (i.e. the name you use now)]

You are required to comply with this request within 30 days of receipt. Please note that this Subject Access Request has been filed electronically and you are required to reply to it electronically unless I agree otherwise.

Yours sincerely,
[Your Name]

APPENDIX 2:

TEMPLATE FOR SUBJECT ACCESS REQUESTS TO THE COMMISSION OF INVESTIGATION

This document can be downloaded in Microsoft Word format at this link:
<http://adoption.ie/records/sar-templates/>

APPENDIX 2

[Your name & address]

Mother and Baby Homes Commission of Investigation
73 Lower Baggot Street
Dublin 2
D02 N773
info@mbhcoi.ie

[Date]

Re: Subject Access Request for personal data held about [your name] by the Commission of Investigation into Mother and Baby Homes and certain related matters

To whom it may concern:

I request a copy of my personal data which is being processed by the Commission of Investigation into Mother and Baby Homes and certain related matters (MBHCOI) consistent with your obligations as a data controller under Article 15 of the General Data Protection Regulation (GDPR) 2016/679.

In making this request I would remind you that, as the Court of Justice of the European Union (CJEU) acknowledged in *Nowak v Data Protection Commissioner of Ireland* (Case C-434/16, 20 December 2017), information may be linked to more than one individual but this does not affect the right of access: 'The same information may relate to a number of individuals and may constitute for each of them, provided that those persons are identified or identifiable, personal data' (para 45).

In accordance with Article 15 of the GDPR, please also provide the following:

- inform me of the purposes of the processing;
- the categories of personal data held (including a complete index of same);
- the recipients or categories of recipients to which my personal data has been or will be disclosed;
- the period for which the data will be stored, or alternately the criteria that will be used to determine that period.

I enclose a copy of photo identification, and my details are as follows:

Name at birth: [Your original name if known]

Date of Birth: [Your date of birth]

Place of Birth: [Your place of birth if known]

Current Name: [If applicable, your adoptive name (i.e. the name you use now)]

You are required to comply with this request within 30 days of receipt. Please note that this Subject Access Request has been filed electronically and you are required to reply to it electronically unless I agree otherwise.

Yours sincerely,
[Your Name]