

# UCD Access & Lifelong Learning

## Disability Support Services Privacy Statement

### About UCD and UCD Disability Support Services

University College Dublin (UCD) is one of Europe's leading research-intensive universities, with its great strength and diversity of disciplines. UCD is committed to ensure that students with a disability have complete and equitable access to all facets of UCD life as can reasonably be provided and has adopted a policy for students with disabilities studying in UCD that is in accordance with the university's legal obligations.

Students with a disability are encouraged to register for disability support and 'reasonable accommodations' in the UCD Access and Lifelong Learning Centre to seek support in areas where their disability could affect their ability to participate fully in all aspects of the course.

### About the process

UCD Access & Lifelong Learning can work and consult with the students to ensure that any reasonable accommodation required is identified and facilitated. Any student wishing to receive disability support and reasonable accommodation must:

- attend a Needs Assessment taking into account the nature of the disability, course requirements and individual differences, or engage in an equivalent process
- read this Privacy Statement
- be willing to confirm and sign the Release and Disclosure of Disability Information Declaration, which is necessary for the provision of information to third parties on a need-to-know basis for the purpose of receiving reasonable accommodations.

### Personal data that will be collected

For the UCD Disability Support team to be able to assist students that wish to register with the service, they need to collect and further process standard personal data (e.g. name and contact details), but also what is called special category data. Special category data are more sensitive and therefore will be processed with a greater level of protection. Health and disability data are examples of special category data. When the UCD Disability Support team processes student personal data, this includes collecting data, using data, analysing data, even storing and deleting data.

<b>Data processed</b>	<b>Processing Purpose</b>
Full name	Identification for communication & conducting Needs Assessment.
Student Number	Identification for communication & conducting Needs Assessment.
Email address	<p>Communication regarding:</p> <ul style="list-style-type: none"> <li>● Answering general queries regarding disability support.</li> <li>● Booking a Needs Assessment.</li> <li>● Sending your Certificate of Disability Support and information to you following a Needs Assessment.</li> <li>● General information pertaining to reasonable accommodations (e.g. details about alternate exam locations, collection of exam stickers etc.).</li> <li>● Occasionally promoting awareness of disability-related activities or opportunities linked to UCD Access &amp; Lifelong Learning.</li> <li>● Occasionally inviting students to provide voluntary feedback for research for the purposes of service development.</li> <li>● Occasionally promoting voluntary opportunities and activities in external bodies such as research participation opportunities.</li> </ul>
Date of Birth	<ul style="list-style-type: none"> <li>● To verify your identity.</li> </ul>
Information pertaining to your disability in the form of evidence of disability, verbal communication during Needs Assessment	<ul style="list-style-type: none"> <li>● Eligibility criteria for the Funding for Students with Disabilities (FSD).</li> <li>● Determining impact of your disability on your role as a UCD student and subsequent appropriate reasonable accommodations.</li> <li>● Releasing necessary information to third parties on a need-to-know basis in order to implement reasonable accommodations.</li> <li>● Internal and external reporting using anonymised data.</li> </ul>
Information pertaining to your eligibility for the FSD fund (if applicable) including course details, Residency, Nationality, Immigration Status	<ul style="list-style-type: none"> <li>● Eligibility criteria for the FSD fund.</li> <li>● Coordinating, monitoring and evaluating the operation of the FSD fund using anonymised data.</li> </ul>

## Source of personal data

The data we collect will be used by UCD Access & Lifelong Learning in accordance with the purposes outlined in this Privacy Statement.

We will collect your data in the following manner:

- CAO/DARE2 disability evidence/DARE Educational Impact Assessment (and/or other application forms) if a disability is declared by the student during the DARE application which is sent to UCD by the CAO <sup>1)</sup>
- Students directly identifying themselves to UCD Access & Lifelong Learning seeking reasonable accommodations with appropriate evidence of disability <sup>1)</sup> (i.e. 'Evidence of Disability Form' or appropriate documentation from the relevant professional or specialist as per the 'Evidence of Disability Form')
- Students completing the Needs Assessment Request process on SISWeb
- Conducting a Needs Assessment with students
- Students completing various consent and funding forms
- Record of student interaction on CRM (secure online student recording system), including email, phone and in-person engagement

<sup>1)</sup> If the student provides this information in advance of registering on a UCD course and then chooses not to enroll, evidence of disability will be destroyed by August 31<sup>st</sup> at the end of the Academic Year in which it was received. If the student decides to study at UCD at a later date, they will need to re-submit their evidence of disability and agree to the Release and Disclosure of Disability Information Declaration document.

## Legal basis (legal grounds) for processing

When UCD Disability Support processes student data for the purposes described, it is permitted to do so based on:

- Consent of the student
- Contract and service delivery
- Legal obligation
  - Disability Act 2005
  - Equal Status Acts 2000 (as amended)
  - The Children First Act 2015
- Public task
  - University Act 1997

The processing of special category data is based on students' consent. Where a student does not consent to their special category data being processed, including shared where it is necessary for the delivery of the services, it is likely that service delivery will be impacted or not possible at all.

## Sharing of data

UCD Access & Lifelong Learning will share personal data with third parties (internal and external, see Table below) where necessary for the purposes of processing outlined in this Privacy Statement. Specific medical or other documentation will not be disclosed to any third party, except where necessary to provide reasonable accommodations. Where UCD Access & Lifelong Learning, with agreement of the student, discloses relevant information to the individuals in those schools responsible for providing or facilitating students in accessing such accommodations, only information relevant to the particular situation will be disclosed. Where academic staff contact UCD Access & Lifelong Learning for advice regarding individual students, staff will be informed that it is necessary to obtain the permission of the student before doing so.

<b>External Bodies</b>	<b>Type of Disclosure</b>
Funding Body - Higher Education Authority (HEA) (e.g., external reporting activities, audits to our Funding Authority).	Name, student number, evidence of disability, reasonable accommodations, registration status, year of study, Nationality, Residency, and immigration status.
External Service (e.g., provision of Personal Assistants, Irish Sign Language interpreters).	Name, student number, contact information (phone number and UCD email address), nature of disability if required.
<b>Internal Bodies</b>	<b>Type of Disclosure</b>
School and Programme Staff (course/module staff, Student Advisers).	Name, student number, exam and classroom accommodations.
UCD Registry – UCD Assessment Staff (i.e. invigilators, alternate exam venue organisers).	Name, student number, exam and classroom accommodations.
Internal & external UCD Access and Lifelong Learning reporting activities.	Anonymised data related to the nature of disability, programme of study, year of needs assessment, fund for students with disability eligibility, and reasonable accommodations.
The Disability Support Team and the School placement staff, for Clinical Needs Assessment in the following programme: <b>Nursing</b> ; DN453, DN450, DN451, DN452, <b>Physio and Dietetics</b> - DN420, X784, X820, <b>Vet Med</b> DN300, DN301, <b>Vet Nursing</b> DN310, <b>Radiography</b> DN410, <b>Med</b> DN400 and <b>Grad Med</b> DN401.	Name, student number, evidence of disability and reasonable accommodations.
University Access Coordinator, if applicable.	Name, student number, nature of disability
College of Science for the purpose for a lab needs assessment.	Name, student number, reasonable accommodations.

When UCD Access & Lifelong Learning shares personal data with the third parties outlined here for the purposes of implementing reasonable accommodations, UCD Access & Lifelong Learning will ensure that the data is only processed according to our specific instructions and that the same standards of

confidentiality and security are maintained. Once the processing of personal data is complete, any third parties with whom data was shared will be required to return the data to UCD Access & Lifelong Learning, except where they are required to retain it by law.

**Responsibilities of Students and Faculty:**

- Students remain responsible for requesting reasonable accommodations from module coordinators/lecturers following the Needs Assessment, especially for in-class and local arranged exams.
- Module coordinators/lectures remain responsible for implementing these reasonable accommodations at the programme level.

**Sharing with parents/guardians & other students:** Information about students with disabilities and support requirements will not be shared or discussed with parents/guardians (except for minors) without written consent from the student. Please note that even if you provide such consent, parents cannot act, or request changes, on your behalf and that you retain responsibility for engaging with UCD Access & Lifelong Learning. UCD Access & Lifelong Learning will not disclose details of your disability to other students; it is your choice whether to tell others that you have a disability or that you are accessing/receiving support.

**Sharing with third parties not specified above:** Students remain in control of their data and UCD Access & Lifelong Learning will not share data with any third parties apart from those specified in the Release and Disclosure of Disability Information Declaration for the purpose of implementing reasonable accommodations. Should the student wish to share their data with other third parties, the student should request their own data from UCD Access & Lifelong Learning and once provided with their data, the student may share it with whom they wish.

**Disclosures in exceptional circumstances:** UCD Access & Lifelong Learning may, in exceptional circumstances, share data about a student's disability/condition with third parties without the student's consent. These circumstances include:

- Emergency situations
- To protect the vital interests of any person, including the student.
- Fitness to study concerns or a duty to report to a professional body (such as the Teaching Council).
- Complaints/appeals to UCD.
- Legal situations, e.g. legal disputes/advice/proceedings, or where required by a court of law.
- To law enforcement agencies, for the prevention/detection of crime or the apprehension/prosecution of an offender.
- Child Safeguarding - If a student discloses any information to UCD Access & Lifelong Learning, that indicates a child (someone under the age of 18) has been harmed or is at risk of being harmed, UCD Access & Lifelong Learning are obliged to pass this information onto the [Child and Family Agency \(Tusla\)](#) under The Children First Act 2015. This includes an adult disclosing abuse that occurred when they were a child. This report will be made in collaboration with the designated UCD Child Protection Officer (CPO). For more information see [UCD's Child Safeguarding Statement](#).

## Students on Overseas UCD-Accredited Programmes in Singapore/Hong Kong

UCD Access & Lifelong Learning is aware that students with a disability who are enrolled on an overseas UCD-accredited programme in Singapore/Hong Kong may wish to avail of disability support during their programme. As these courses are UCD-accredited, the data processing activities necessary to provide these supports must be in accordance with GDPR legislation. Due to GDPR data protection requirements, where it is not possible to process personal data to the same protection standards outside the EEA as within the EEA, UCD Access & Lifelong Learning are unable to make a direct transfer of personal data (including special category data) to personnel within these campuses for the purposes of providing reasonable accommodations.

To avail of reasonable accommodations on these programmes, students must contact UCD Access & Lifelong Learning in Dublin directly to complete a Needs Assessment. To complete the Needs Assessment, students will need to provide UCD Access & Lifelong Learning with appropriate 'Evidence of Disability' and agree with the Release and Disclosure of Disability Information Declaration for Students on Overseas Programmes, both of which will be retained securely by UCD. After the Needs Assessments, students will be provided with their Certificate of Disability Support via email which outlines the reasonable accommodations they require. Programme Managers based in UCD who have access to InfoHub (student record system) will have access to information regarding a student's reasonable accommodations. Students must use their Certificate of Disability Support at their own discretion to request their reasonable accommodations from the appropriate personnel (e.g. lecturers) directly within their overseas programme of study. UCD Access & Lifelong Learning and Programme Managers based in Dublin will not be in a position to transfer their personal data outside of the EEA.

## Data storage and retention

Any data UCD Disability Support collect from you will be stored confidentially and securely. The University is committed to ensuring all access to and processing of university data is performed in a secure manner and in keeping with the data protection principles, we will only store your data for as long as is necessary.

For the purposes described here UCD Access & Lifelong Learning will store 'your personal data securely, as follows:

- **Paper records:** UCD Access & Lifelong Learning does not hold any paper documents. When students provide us with documents in person, we will scan the documents and return them to the students. If students' documents are received by post, UCD Access & Lifelong Learning will scan them for their own records, where applicable, and shred them, unless advised by the student in writing not to do so.
- **Electronic records:** all documentation related to your disability and forms relating to the Needs Assessment are stored on the Disability Support UCD approved storage solution. Notes on all interactions are stored on the Disability Support CRM System provided through InfoHub. Access to these systems is limited to authorised UCD staff.
- **Retention of documentation:** UCD retains the records for as long as it has a lawful basis to do so and in line with and the [HEA's external reporting requirements for the FSD](#), data on FSD-eligible students is securely stored as electronic files for a maximum of seven years following programme

completion/ graduation/ withdrawal, after which the data will be anonymised and retained permanently for statistical purposes. Data pertaining to students who are not eligible for the FSD will be securely stored as electronic files until programme completion/graduation/withdrawal, after which it will be securely destroyed.

- UCD Access & Lifelong Learning keeps an electronic record of supports and equipment provided to students and interaction with students to ensure that a consistent service is provided to all students.
- Statistical information: data gathered to monitor and evaluate the service provided through UCD Access & Lifelong Learning will be anonymised.

## Recording of Lectures by Students with Disabilities - Information for Current Students and External Lecturers

**Current Students:** UCD has adopted a policy for students with disabilities studying in UCD which is in accordance with the Disability Act 2005, the Equal Status Acts of 2000 (as amended), and the University Act 1997. Students with disabilities are encouraged to avail of disability support and 'reasonable accommodations' with UCD Access & Lifelong Learning. Students must provide documentary evidence of disability and complete a Needs Assessment to avail of reasonable accommodations.

One example of reasonable accommodation is 'Permission to Audio Record Lecture(s)'. If this is approved as reasonable accommodation, an audio recording device (e.g. mobile phone, laptop) may be used to ensure full access to lecture material. Only audio and not video recording is permitted and recordings of lectures only and not tutorials. Furthermore, some students with disabilities may use assistive technology which generates captions and/or transcripts of recorded lectures. It is your responsibility, as an eligible student, to ensure that these recordings are used exclusively for the purposes of your own private study and that you don't share them with any third party under any circumstances. This includes copying, lending or otherwise making the lecture recordings available to the public, including other students. A breach of the conditions outlined here will constitute a breach of UCD's disciplinary regulations and will be brought before the Registrar or his/her nominee as per the [UCD Student Code](#). For more information, please contact [disability@ucd.ie](mailto:disability@ucd.ie).

**External Lecturers:** UCD has adopted a policy for students with disabilities studying in UCD which is in accordance with the Disability Act 2005, the Equal Status Acts of 2000 (as amended), and the University Act 1997. Students with disabilities are encouraged to avail of disability support and 'reasonable accommodations' with UCD Access & Lifelong Learning. Students must provide documentary evidence of disability and complete a Needs Assessment to avail of reasonable accommodations. Module coordinators can access the list of students taking a module in receipt of reasonable accommodations, including those with permission to audio record lectures using assistive technology. Hence, it is possible that lecture(s) you facilitate within UCD are being audio recorded using assistive technology by student(s) with disabilities who have been granted this as a reasonable accommodation. Furthermore, some students with disabilities may use assistive technology which generates captions and/or transcripts of recorded lectures. It is the student's responsibility to ensure that these recordings are used exclusively for the purposes of their own private study and that they are not shared with any third party under any circumstances. This includes copying, lending or otherwise making the lecture recordings available to the public including other students is not permitted. A breach of the conditions outlined here will constitute a breach of UCD's disciplinary

regulations and will be brought before the Registrar or his/her nominee as per the [UCD Student Code](#). For more information, please contact the module coordinator/lecturer of the module for which you are facilitating a lecture or contact [disability@ucd.ie](mailto:disability@ucd.ie).

## UCD Access & Lifelong Learning service user data subject rights

Students based in Ireland, as well as students based overseas, have the following rights over the way UCD processes their personal data.

- **Right to access** and get a copy of their own personal data
- **Right to withdraw consent**, where processing is based on consent. Withdrawal of consent might impact service delivery
- **Right to have their personal data corrected (rectification)** or supplemented if it is inaccurate or incomplete
- **Right to have their personal data deleted** or erased, if incorrect or there is no longer a lawful basis available to retain the data
- **Right to limit or restrict** how their personal data are used; but this is not an absolute right and only applies in certain circumstances
- **Right to object** to processing gives individuals the right to object to the processing of their personal data in certain circumstances
- **Right not to be subject to automated decisions** without human involvement, where it would significantly affect them

## Contact details

If you have any queries relating to this Privacy Statement and the Release and Disclosure of Disability Information Declaration or to the processing of your personal data for the purposes outlined above or you wish to make a request in relation to your rights, you can contact any member of the Disability Support team via:

Disability Support Team

UCD Access & Lifelong Learning Level 1, James Joyce Library Building,

University College Dublin, Belfield, Dublin, D04 V1W8 Phone: 01 716 7123

Email: [disability@ucd.ie](mailto:disability@ucd.ie)

Complaints in relation to decisions made by UCD Access & Lifelong Learning staff or with service delivery should be dealt with through the [UCD Complaints Procedure](#) if they are not resolved by UCD Access & Lifelong Learning to your satisfaction.

If you wish to make a complaint or escalate an issue relating to your privacy rights under the GDPR, you can contact the Data Protection Officer via:

UCD Data Protection Officer

Email: [gdpr@ucd.ie](mailto:gdpr@ucd.ie)

You have also the right to make a complaint to the Irish Data Protection Commission (DPC), if you think



your data protection rights have not been respected by UCD. <https://www.dataprotection.ie/en>

Disability Support Services Privacy Statement valid from July 2025