

# UCD Access & Lifelong Learning (ALL)

## Occupational Therapy Support Privacy Statement

### About UCD and UCD Occupational Therapy Support

University College Dublin (UCD) is one of Europe's leading research-intensive universities, with its great strength and diversity of disciplines.

The Occupational Therapy Support Service is part of the Disability Team within University College Dublin (UCD) Access and Lifelong Learning (ALL). Occupational Therapy may be provided to some students with disabilities who may benefit from one-to-one support to manage the academic, social, and personal aspects of their role of being a UCD student.

### About the service process

Occupational Therapy sessions may be held in-person on campus or remotely using Zoom. This document outlines the practices of the Occupational Therapy Service within UCD Access and Lifelong Learning in processing 'personal data', i.e. data which can directly or indirectly identify a person.

This section provides general details on the delivery of the Occupational Therapy Support Service.

- It is an Occupational Therapist's legal obligation to retain notes. Clinical **notes will be kept** in a secure UCD provided server location and on the UCD CRM system of your engagement with the service. You may request a copy of your notes at any time.
- Communication with the service will be in the **form of email to your @ucdconnect.ie address**.
- **Appointments last approximately 45 minutes**. Frequency of appointments will be dependent on students' needs and service demands.
- Students will be emailed a link to complete the OT consent form and you will be required to complete this 3 days prior to your initial OT meeting.
- When possible, please give us 24-hour notice for cancelling or rescheduling an appointment in order for it to be offered to another student. Please see our [cancellation policy](#) for further information.
- The Occupational Therapy Service is **not an emergency service** and **students must make an appointment to utilise the service**.
- The Occupational Therapy Support Service is a **confidential service**. However, **there are circumstances where the Occupational Therapist is not in a position to maintain confidentiality**.

### Personal data that will be collected

The Occupational Therapy Support Service processes your personal data for several purposes. "Processing" your data includes storing, collecting, retrieving, using, combining, erasing, and eventually destroying your personal data, and can involve automated or manual operations. Your data will be processed for the following purposes:

- To receive referrals and contact you upon receiving a referral to the service.
- To carry out appropriate assessments and interventions you engage with in the service. Some assessment tools used include the Trinity Student Occupational Performance Profile (TSOPP, Lombard, Nolan, & Heron, 2022), Adolescent/Adult sensory profile (Brown & Dunn, 2002), or the VARK learning style questionnaire.
- To document details of student engagement with the service (i.e., session notes, communications etc.) as per an Occupational Therapist's legal obligation.
- To link students up with the appropriate supports in the event of a student indicating that they are at risk to

themselves or others, or if the Occupational Therapist has significant concerns for the student's physical or emotional wellbeing.

- Where applicable, to fulfill the role as a mandated person by virtue of our profession of being an Occupational Therapist

<b>Data Source - Method of data collection/ processing</b>	<b>Data fields collected/processed</b>	<b>Purpose</b>
Occupational Therapy Referral Form	Full name, Student Number, Referral Source, nature of disability, Course and Year of Study, if repeating modules/year, reason for referral, information on other services	For receiving your referral to Occupational Therapy and to communicate with you.
Trinity Student Occupational Performance Profile (TSOPP; Lombard et al., 2022) assessment form	Full name, Student Number, Email address, Mobile Number, student's identified gender and preferred pronouns, other details relating to support (e.g., date of referral, Student Advisor, Disability Officer, Next of Kin contact details, Psychiatrist/GP, Year, Faculty, Course, Other Services, if Disability Service Consent Form completed)	Identification for communication and ensuring both written and verbal communications are inclusive.
	General questions relating to your previous college and work experience, hobbies/interests, academic/social/personal expectations	For assessment purposes.
	Rating statements about occupational performance on how difficult they are to manage and how much of a priority they are to work on in Occupational Therapy	For assessment purposes.
Occupational Therapy Support Service Consent Form*	Student's name, student number and mobile number.	To contact you.
	Consent to engage with remote support via Zoom (if applicable)	Retrieving explicit consent to engage with occupational therapy via the virtual video conferencing platform Zoom with the knowledge of

<p>Occupational Therapy Support Service Consent Form* (con't)</p> <p><b>Note:</b> *Students choosing to provide this data via email will be encouraged to complete the Google Form rather than send this personal data via email. Furthermore, if the student does not complete the Emergency Contact Details section, the Occupational Therapist will use the Next of Kin details the student has inputted on SISWeb.</p>	Current location (if applicable, gathered verbally at the start of each remote meeting)	To advise an emergency contact or service of the student's location should the need arise (i.e., the Occupational Therapist has a significant concern for the student's physical or emotional wellbeing or is concerned that the student or another person is at risk of harm).
	Term-time emergency contact name and phone number	Emergency contact of the student's choice in the instance that the Occupational Therapist has a significant concern for the student's physical or emotional wellbeing or is concerned that the student or another person is at risk of harm.
	Consent to contact emergency contact	<p>In the event that an Occupational Therapist has significant concerns for the student's physical or emotional wellbeing, or is concerned that the student or another person is at risk of harm, confirming the understanding that:</p> <ul style="list-style-type: none"> <li>• The Occupational Therapist will encourage a student to engage with appropriate supports (e.g., emergency contact, GP, A&amp;E etc.).</li> <li>• The student has the right to choose, or refuse supports.</li> <li>• The Occupational Therapist is obligated to break confidentiality if there are doubts about the student's safety, or the safety of another person.</li> </ul>
	Understanding of general details relating to service delivery (i.e., note-keeping, communication, appointment length and frequency, cancellations, that it is not an emergency service, that remote support can only be provided if located in Ireland, circumstances where confidentiality must be broken)	To confirm your understanding and consent to how the Occupational Therapy Support Service works.

Notes retained during occupational therapy on secure computer harddrive & UCD CRM system	Documentation of communications, assessment, intervention practices and any other relevant information pertaining to your relationship with your Occupational Therapist. This will be recorded on the UCD CRM system and on your TSOPP file on the secure Disability Support Shared Novell Drive, only authorized UCD Access and Lifelong Learning staff have access to these records.	For the Occupational Therapist to meet their legal obligation of accurate documentation of services provided.
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## Legal basis (legal grounds) for processing

When UCD Occupational Therapy Services processes student data for the purposes described, it is permitted to do so based on one or more of the following:

- Consent of the student
- Legal obligation
  - o Disability Act 2005
  - o Equal Status Acts 2000 (as amended)
- Public task
  - o University Act 1997
- Vital interest, for example in emergency situations where your or someone else's life is at risk

Furthermore, Occupational Therapists are bound by [CORU's Code of Conduct](#) and [UCD's Student Mental Health & Wellbeing Policy](#).

The processing of your special category data, which includes data about health, is based in most instances on students' consent. Where a student does not consent to their special category data being processed, including shared where it is necessary for UCD Occupational Therapy to deliver their services, it is likely that the delivery will be impacted or not possible at all. On rare occasions, the processing of special category data will also be based on other conditions like vital interest.

## Sharing of data

UCD ALL will share personal data internally, or with third parties, but only where necessary for the purposes of processing outlined in this Privacy Statement.

The Occupational Therapy Service is confidential. This means for you:

- The Occupational Therapists work as part of the UCD Access and Lifelong Learning (ALL) Disability Team. The members of the Disability Team work together to ensure that students receive the supports they need. As a result, the Occupational Therapists may discuss details of your engagement with the Occupational Therapy service with other members of the Disability Team.
- The Occupational Therapists receive Professional Supervision from an external Occupational Therapy Supervisor. This involves the Occupational Therapists discussing some of the students they are working with, for the purpose of developing their skills and knowledge, and ensuring that the students receive a quality service. The Occupational Therapists do not use the student's full name during these discussions, and no identifiable details are used when documenting these meetings. The Occupational Therapy Supervisor is required to keep the details of these discussions confidential also.
- Other relevant members of the UCD ALL team (for example those working on the Welcome Desk) may become aware that you are attending the Occupational Therapy Service when you check in for meetings, however no details of your engagement with Occupational Therapy will be shared with them.

- We do not share any information about you or your engagement with the Occupational Therapy Service with anyone else, unless:
  1. You consent to this OR
  2. The Occupational Therapist has significant concerns about your physical or emotional wellbeing or is concerned that you or somebody else is at risk of harm. If this happens, the Occupational Therapist will not be able to keep this information confidential. The Occupational Therapist may need to get in touch with your emergency contact person, and/or link you in with a relevant professional/service, to ensure that you are supported and/or any risk of harm to you or another person is responded to.
- UCD Access and Lifelong learning may, in exceptional circumstances, share some data about a student with third parties without the student's consent. These circumstances are permitted under the Data Protection Act and include:
  - Emergencies, e.g., if the student is unwell/injured; or at risk of injury to themselves/others.
  - To protect the vital interests of any person, including the student.
  - Fitness to study issues 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 or prosecution of an offender.
  - Child Safeguarding - Occupational Therapists are [mandated persons](#). This means if a student discloses any information to that indicates a child (someone under the age of 18) has been harmed or is at risk of being harmed, the Occupational Therapist is 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 Child Safeguarding Statement](#).

## Data storage and retention

Any data UCD Disability Support Services 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.

Information gathered on the Occupational Therapy Referral Form will be stored securely on a UCD approved and provided drive. This data will be used to compile the annual Occupational Therapy Report, however no identifiable information will be included. This data will be de-identified after a period of 3 years post-graduation. Information gathered via the Occupational Therapy Support Service Consent Form will be kept for the duration of the Academic Year in which it is gathered, after which it will be destroyed. If a student continues to engage with the Occupational Therapy Support Service the next Academic year, this data will need to be recollected. The TSOPP file and any other assessment files will be stored securely on our Disability Support UCD Drive. Data gathered and correspondence documented on the TSOPP form will be retained for a period of 7 years post-graduation (Aligned with the HEA retention policy), after which it will be destroyed.

## Virtual meetings

### **Measures implemented by UCD IT Services to minimise the risks of using Zoom for remote meetings** (if applicable)

There are inherent risks of using Zoom or any video conferencing platform, such as the possibility of third parties accessing a call, cloud recordings of meetings and visual of home environment. However, UCD's IT Services have implemented several measures to increase the privacy and security of using Zoom for University meetings. The Occupational Therapists will follow these measures and will ensure that only the therapist and student will be invited to the Zoom link on Google Calendar (unless the student consents to a third party attending the session for a particular purpose), meetings will not be recorded, and messages sent via the chat function are not saved. The Occupational Therapist will only invite you to the meeting using your @ucdconnect.ie email address. UCD ALL are not responsible for third parties who may gain access to your UCD Gmail and/or Google Calendar account either via your own device or other devices. You may wish to use an alternative Zoom

background if this makes you more comfortable. However, you will need to provide your current location at the beginning of the meeting.

## Safety & wellbeing

### Responding to Concerns about the Student's and/or Other's Well-being and/or Safety During Meetings/Contacts

The Occupational Therapy Service is not an emergency service. However, if the Occupational Therapist has significant concerns about your physical or emotional wellbeing or is concerned that you or somebody else is at risk of harm then the Occupational Therapist will not be able to keep this information confidential. The Occupational Therapist may need to get in touch with your emergency contact person, and/or link you in with a relevant professional/service (e.g., student's GP or other healthcare professional; UCD Student Health and Counselling; the local Emergency departments; an ambulance or the Gardaí; college security staff), to ensure that you are supported and/or any risk of harm to you or another person is responded to.

Where possible, students will be encouraged to choose and engage with appropriate supports. The student has the right to choose between and/or refuse suggested supports. However, if the Occupational Therapist has immediate concerns for the safety of the student, or another person, they may need to go against the student's wishes and contact the emergency contact and/or a relevant professional/service without the student's agreement.

In the case of a student indicating risk to their or another's well-being/safety on Zoom call (and then disconnects) or via a message/email, the Occupational Therapist will attempt to contact the student using the phone number provided on the Emergency Contact Details section of the Consent Form. If there is no answer and if the Occupational Therapist has doubts about the immediate safety of the student or another person, they must break confidentiality and contact the emergency contact provided on the Google Form and/or the student's health service and/or the Gardaí.

### Groups

If you opt to attend a group run by the occupational therapy service, all students must maintain the confidentiality of group members by not discussing any sensitive information disclosed in the group outside of the group. Other group rules will be defined through discussion with group members during the first meeting and throughout. Students can withdraw from a group at any stage.

## UCD ALL service user data subject rights

Students 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 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 ALL staff or with service delivery should be dealt with through the [UCD Student Complaints Procedure](#) if they are not resolved by UCD ALL 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>