



Trinity College Dublin
Coláiste na Tríonóide, Baile Átha Cliath
The University of Dublin

Trinity College Dublin

Consent to Disclose and Share Disability Information

Trinity College Dublin, The University of Dublin is committed to ensuring that students with a disability have as complete and equitable access to all facets of Trinity life as can reasonably be provided. Trinity has adopted a Reasonable Accommodation Policy for students with disabilities studying in Trinity. This policy is in accordance with the Disability Act 2005, the Equal Status Acts 2000 (as amended), and the University Act 1997. As stated in the [Trinity Calendar](#), students with a disability are encouraged to apply to the Disability Service to seek supports where the disability could affect their ability to participate fully in all aspects of their course/modules. This Consent to Disclose and Share Disability Information form applies to all students, both undergraduate and postgraduate, with permanent or long-term disabilities, at Trinity.

Trinity Policy on confidentiality for students with disabilities

Trinity encourages students with disabilities to disclose information on their disability/specific learning difficulty to the Disability Service before they apply to Trinity or at any point during their studies. Such disclosure is encouraged so that Trinity can work with the student in ensuring that any reasonable accommodation required is identified and facilitated in consultation with the student.

An electronic record of your contact with us is held securely in accordance with the EU General Data Protection Regulation (GDPR) and Data Protection Act 2018, and information provided to the Disability Service is regarded as 'sensitive personal data'. The information may also be used for statistical and monitoring purposes without your identity being revealed.

For further information on Personal Data processing at Trinity College Dublin please see the following link: <https://www.tcd.ie/privacy/>

Any documentation or information presented in disclosing a disability is held by the Disability Service, and specific medical or other documentation will not be disclosed to any third party, except where necessary to provide reasonable accommodations. Where a student requests and is granted any form of reasonable accommodation, such as extra time in exams, or permission to record lectures, the Disability Service will, in consultation with the student, disclose relevant information to the individuals in those Schools responsible for providing or facilitating students in accessing such accommodations. In such instances, only information relevant to the particular situation will be disclosed. Where academic staff

contact the Disability Service for advice regarding individual students, staff will be informed that it is necessary to obtain the permission of the student before doing so.

Trinity has a duty under the Equality Status Act 2000 (as amended) to make “reasonable accommodations” for disabled students with disabilities as outlined in the [Trinity Reasonable Accommodation Policy](#). For the purposes of all Trinity policies relating to students with a disability, reasonable accommodations are determined through a [needs assessment process](#) taking into account the nature of the disability, course/module requirements, and individual differences. The most common forms of reasonable accommodations are available on the Disability Service website: <https://www.tcd.ie/disability/support-and-resources/>

The purpose and legal basis for collecting personal data

The personal data we collect will be used to provide students who apply to the Disability Service the reasonable accommodations identified at the needs assessment process, as this is the only way for students to receive reasonable accommodations in Trinity.

Purpose:

The personal data we collect will be used to ensure the reasonable accommodations contained in the Learning Educational Needs Summary (LENS) report will be implemented.

Legal Basis:

The legal basis for collecting and processing your personal data is to comply with our duties under the General Data Protection Regulation (GDPR), the Disability Acts 2005, Equality Status Act 2000-2015 (as amended), the Employment Equality Act 1998-2015 (as amended) and the Data Protection Acts 1988-2018 and provisions of sections 41 and 47 of the 2018 Act as follows:

Processing for purpose other than purpose for which data collected

41. Without prejudice to the processing of personal data for a purpose other than the purpose for which the data has been collected which is lawful under the Data Protection Regulation, the processing of personal data and special categories of personal data for a purpose other than the purpose for which the data has been collected shall be lawful to the extent that such processing is necessary and proportionate for the purposes—

- (a) of preventing a threat to national security, defence or public security,
- (b) of preventing, detecting, investigating or prosecuting criminal offences, or
- (c) set out in paragraph (a) or (b) of section 47.

Processing of special categories of personal data for purpose of legal advice and legal proceedings

47. The processing of special categories of personal data shall be lawful where the processing—

- (a) is necessary for the purposes of providing or obtaining legal advice or for the purposes of, or in connection with, legal claims, prospective legal claims, legal proceedings or prospective legal proceedings, or

(b) is otherwise necessary for the purposes of establishing, exercising or defending legal rights.

Why we hold your data:

In order to assess whether it is appropriate to make these reasonable accommodations and/or the nature of the accommodations to be made, the **Disability Service** may:

1. Collect and process the following types of data:
 - a. Personal/identification details (such as name and Trinity Student ID number)
 - b. CAO/DARE (and/or other application forms) if a disability is declared
 - c. Course/module details
 - d. Information you supply about your disability/medical condition (medical evidence, DARE disability evidence/DARE Educational Impact Assessment, Educational psychologist assessment reports or the Trinity Evidence of disability form)
 - e. Correspondence with funding bodies
 - f. Other relevant correspondence and reports

2. Share some information* about your disability, on a need-to-know basis, with:
 - a. Relevant University staff (e.g. Course/module Lecturers/Placement Co-ordinator/ Tutor/Assessment and Progression team in Academic Registry): usually via a LENS (Learning Education Needs Summary report)
 - b. External placements – in the case of students on Professional courses, where placement is an integral part of the course, a student may give consent to sharing their Placement Learning Educational Needs summary (PLENS) report
 - c. Funding bodies: HEA ESF Fund for students with disabilities and other Funding bodies and support providers (e.g. ISL or Personal Assistance)
 - d. Residential Accommodation Service: (if you apply to stay in Trinity Residence on disability grounds)
 - e. Trinity Counselling and Health Service (e.g. referral for these supports)
 - f. The Library (additional borrowing privileges)
 - g. Estates & Facilities (e.g. Swipe card access to ATIC rooms, universal toilets, respite)
 - h. We may seek your written permission to liaise with other named external professionals involved in your disability-related care and support.

*The information shared is minimised where possible and listed below. More detailed information about the nature of your disability is shared only where necessary for specialist reasonable accommodations to be made.

3. Store your data securely, as follows:
 - a. Paper records/documents – the Disability Service does not hold any paper documents and will give paper records back to student once scanned. Paper records posted to the Disability Service will be scanned and shredded.
 - b. Electronic records: all disability documentation you provide is stored on your student portal my.tcd.ie and are only available to the student and the Disability

Service. Notes on all interactions are stored on the Disability Service database, with access limited to authorised Disability Service staff.

- c. Retain your data for 7 years following graduation, in accordance with the University's Record Management policy. It will then be securely destroyed.
 - d. Statistical information gathered to monitor and evaluate the Disability Service will be anonymous.
4. Occasionally contact you to make you aware of disability-related activities or opportunities linked to Trinity that may be of interest to you; if you would prefer not to receive this information please inform a member of staff at the Disability Service.
 5. Feedback and research: The contribution of students who use the Disability Service is vital so that the service can develop in response to evidence-based research. By applying to the Disability Service, you understand that you may be asked to participate in surveys or other forms of research but that non-participation will not in any way prejudice the supports or accommodations you may be entitled to.

Please note that if you provide this information in advance of registering on a Trinity course and then choose to not enrol, your evidence of disability will be destroyed. If you decide to study at Trinity at a later date you will need to re-submit your medical evidence and disclosure form.

Other students: The University 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.

Parents/guardians: Due to General Data Protection Regulations (GDPR), information about your disability and your support requirements/arrangements will not be shared or discussed with your parents/guardians without your written consent using the [Consent to Confidentiality Waiver](#) form. Please note that parents cannot act, or request changes, on your behalf and that you retain responsibility for engaging with the Disability Service.

Your rights: You may at any time request restrictions to the processing or sharing of your data by the Disability Service. However, such restrictions may adversely affect the level of support or reasonable accommodations that the University or placement providers can offer. If you have any concerns about this or would like to discuss the consequences of disclosing or withholding information, speak to a Disability Officer.

You have the right to request access to the records held by the University relating to you. See the [University's Data Protection Policy](#) for further information, or contact the Disability Service to ask how to make a request for your data.

Reporting data breaches: Under the GDPR, a breach which is reportable to the Data Protection Commissioner must be reported not later than 72 hours after awareness is made of it. All breaches or suspected breaches should therefore be reported to the Data Protection Officer without delay for assessment.

Disclosures in exceptional circumstances: The University may, in exceptional circumstances, share some data about your disability/condition with third parties without your consent. These circumstances are provided for, in full, under the Data Protection Act and include:

- a) Emergencies, e.g., if you are unwell / injured; or at risk of injury to yourself / others.
- b) To protect the vital interests of any person, including yourself.
- c) Fitness to practice issues or a duty to report to a professional body (such as CORU).
- d) Complaints/appeals to the University
- e) Legal situations, e.g., legal disputes/advice/proceedings, or where required by a Court of Law.
- f) To law enforcement agencies, for the prevention/detection of crime or the apprehension/prosecution of an offender.

Please contact the Disability Service immediately if there is a change in the circumstances concerning your disability that you feel the university should be aware of.

Declaration of understanding of consent to disclose and release disability information

I request reasonable accommodations from Trinity's Disability Service. I understand the Disability Service will ensure that personal data will only be used to facilitate the required and agreed levels of reasonable accommodations and supports.

I consent to the Disability Service to add information relating to academic and disability support requirements to my student record at my.tcd.ie. I understand that reasonable accommodations will only be provided following a needs assessment and that my explicit consent will be required via my.tcd.ie to allow the Disability Service implement and communicate my reasonable accommodations via a Lens report. Depending on what reasonable accommodations are needed and agreed, the following areas in Trinity and types of disclosure may apply:

<i>Trinity Service and third party supports</i>	<i>Type and Purpose of Disclosure</i>
Academic Registry (including Examinations)	Name, student number, exam codes, to ensure students receive the reasonable accommodations identified for them in University Examinations.
Residential Accommodation Services	Name, student number, disability category to support applicants through the Special Consideration form for students with disabilities
ESF/International Office	Name, student number, disability category, support requirements as part of the Disability Services application for financial support on behalf of the student.
External Professionals e.g. GPs', Educational Psychologists, Community Mental Health Team	In order to provide or receive additional information or advice on the supports required.
Family Members	Students may wish for us to talk to a family member or other professionals who have played a part in their support in the past. Please note that we cannot disclose personal data or support needs at university unless students consent to disclose and have identified named individuals to us on the Trinity consent to disclose Disability Information form.
Library	Name, student number to avail of extended borrowing rights.
Mobility and Employment Skills; this includes study abroad, course or work placement, internship and post-graduation career support	Placement Learning Educational Needs summary (PLENS) report to ensure the student receives the appropriate levels of reasonable accommodations identified in the Needs Assessment. Can also apply where external

for 1 year as Trinity Alumni.	placements are an integral part of the course (such as a professional course, work placement, internship or study abroad), or if career supports are requested, a student may give consent to share their PLENS.
Print Credit Supplier (Datapac)	Email & student number to provide students with access to print credit.
Assistive Technology (licensing agreements for Apps and AT Software)	Email, first name, last name
Safety Office	Personal Emergency Evacuation Plan to ensure students' needs are supported in the event of an emergency evacuation.
School/Department (course/module staff) and external placement staff if relevant	School and Department Staff are provided with the students (Placement) Learning Educational Needs Summary – (P)LENS to ensure agreed reasonable accommodations are provided to the student.
Sports Centre - Respite	Name, student number – to ensure students receive access to respite facilities.
my.tcd.ie Student Information System (SITS) and Student Information Desk (SID)	Students with disabilities are supported by the Disability Service through Trinity's Student Information System (SITS) and Student Information Desk (SID). The following student personal data that will be viewed via a bridge from SITS to SID; the student number, student first name, surname, contact details, course details code and name, year of study, tutor's name, their Learning Educational Needs Summary (LENS) report and all interactions with the Disability Service either by phone, email and meetings.
Student Counselling and Health Service	Name, student number, ESF FSD eligibility To ensure students receive appropriate support when referred for these supports.
Superintendent - Locker	To ensure students receive locker facilities as identified in their LENS.
Trinity Tutor	To ensure students receive the reasonable accommodations identified in the needs assessment process and reported in their Learning Educational Needs Summary (LENS) report.

Non-disclosure of information: I understand that not providing consent to disclose will mean that I will not be able to receive those reasonable accommodations that require disclosure of information.

I understand that my personal details and documentation will be retained as electronic files for the duration of my time as a student in Trinity. I understand that official Trinity communication is via student email (student name@tcd.ie) and will check this regularly and respond accordingly.