Supplementary Privacy Notice for Special Considerations, Extenuating Circumstances and Examination Accommodation Activities

Effective 1st September 2026

Relationship with the IOB Data Protection Notice

This Supplementary Privacy Notice for Special Considerations, Extenuating Circumstances and Examination Accommodation Activities supplements the IOB Data Protection Notice and should be read together with it.

The IOB Master Data Protection Notice (https://iob.ie/data-protection) contains general information regarding how IOB processes personal data, including information regarding categories of personal data, sources of personal data, lawful bases for processing, recipients, international transfers, retention principles, data security measures, data subject rights and how to contact the Data Protection Officer.

This Notice provides additional information regarding the processing of personal data in connection with:

- **Special considerations requests;**
- **Extenuating circumstances applications;**
- **Reasonable accommodation requests;**
- **Disability support arrangements;**
- **Examination adjustments and accommodations; and**
- **Related learner support activities.**

What Personal Data Do We Process?

In addition to the information described in the IOB Data Protection Notice, IOB may process personal data provided in connection with a request for special considerations, extenuating circumstances or examination-related support.

Depending on the nature of the request, this may include:

- Identity and contact information;
- Programme, module and assessment information;
- Health and medical information;
- Disability-related information;
- Accessibility requirements;
- Medical certificates;
- GP, consultant or specialist reports;
- Supporting statements and evidence submitted by or on behalf of the learner; and
- Records of communications relating to the request.

Where special category personal data is processed, IOB applies additional safeguards appropriate to the sensitivity of the information.

Where Do We Receive This Information From?

IOB will ordinarily obtain this information directly from the learner. Where authorised by the learner or otherwise permitted by law, information may also be provided by a parent or guardian, authorised representative, medical or healthcare professional, educational partner or another person supporting the request.

Why Do We Process This Information?

IOB processes this information in order to:

- Assess eligibility for special considerations, extenuating circumstances or examination accommodations;
- Determine whether reasonable accommodations should be implemented;
- Support learners experiencing temporary or ongoing medical, disability or welfare-related difficulties;
- Administer approved examination accommodations;
- Communicate decisions and outcomes;
- Facilitate examination and assessment arrangements;
- Respond to queries, reviews or appeals relating to the request; and

- Meet legal, regulatory and quality assurance obligations applicable to educational services.

What Is Our Lawful Basis for Processing?

IOB processes identity, contact, programme, assessment and administrative information where necessary to administer educational services and assess and implement special considerations, extenuating circumstances, reasonable accommodation and related learner support requests. Depending on the circumstances, this processing is necessary for the performance of IOB's contract with the learner, compliance with applicable legal obligations, or IOB's legitimate interests in administering educational services, supporting learners and maintaining fair and appropriate assessment arrangements.

Where the information includes health, disability or other special category personal data, IOB will process that information only where an applicable condition under Article 9 GDPR is satisfied. This may include the learner's explicit consent or another applicable condition provided for under data protection legislation.

Where IOB relies on explicit consent, the learner may withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing carried out before consent was withdrawn. However, if information necessary to assess or implement a request can no longer be processed, IOB may be unable to assess the request or provide the requested arrangement.

Do You Have to Provide This Information?

The provision of health, disability or supporting evidence is voluntary. However, IOB requires sufficient information to assess requests for special considerations, extenuating circumstances or examination accommodation. Where sufficient information is not provided, IOB may be unable to assess the request fully or provide the requested support measure.

Who Receives This Information?

Access to information relating to special considerations and accommodation requests is restricted to authorised personnel with a legitimate need to know.

Depending on the circumstances, relevant information may be shared with:

- Student Services personnel;
- Examination and Assessment Services personnel;
- Invigilators;
- Examiners;
- Educational partners, where they participate in determining or implementing the relevant academic, assessment or accommodation arrangements;
- Academic support personnel;
- Examination, invigilation and assessment platform providers, where necessary to configure or facilitate an approved accommodation; and
- Service providers involved in facilitating approved accommodations.

IOB will ensure that only the minimum information necessary to facilitate the approved support measure is disclosed.

Medical reports, medical certificates and other supporting evidence will not be routinely disclosed and will only be shared where necessary and proportionate for the administration of the approved accommodation or support measure.

How Long Do We Retain This Information?

IOB may create separate records relating to the application, supporting evidence, assessment of the request, decision and implementation of any approved arrangement.

Medical evidence and other supporting documentation which may contain special category personal data, such as health information, will normally be retained for up to 30 days and for no longer than is necessary to assess and administer the request. It will then be securely deleted, unless continued retention is necessary and permitted by law in connection with a review, appeal, complaint, legal claim or other exceptional requirement.

A limited record of the request, decision, accommodation granted and actions taken may be retained for a longer period where necessary to administer educational services, implement the arrangement, demonstrate compliance with examination or academic requirements, respond to a review or appeal, or establish, exercise or defend legal claims.

Further Information

Further information regarding how IOB processes personal data, including information regarding your rights, complaints procedures and how to contact the Data Protection Officer, is available in the IOB Data Protection Notice.