



**EEB2**  
**CONTROLLER'S RECORD OF PERSONAL DATA**  
**PROCESSING ACTIVITY**

<b>Item No.</b>		
1.	Name, department and e-mail address of Delegated Controllers (authors)	Katrien Fernandez: <a href="mailto:katrien.fernandez@teacher.eursc.eu">katrien.fernandez@teacher.eursc.eu</a> (primary); Geraldine Gatto Roissard, <a href="mailto:Gattorge@teacher.eursc.eu">Gattorge@teacher.eursc.eu</a> (secondary) and Anabela Santos <a href="mailto:Anabela.santos@teacher.eursc.eu">Anabela.santos@teacher.eursc.eu</a>
2.	Name, department and e-mail address of Joint Controller (if any) - attach arrangement between Joint Controllers	
<b>I. Processing Activity</b>		
3.	Name of processing	Learning Support
4.	Description and purpose of processing	<p>Learning Support is offered to assist EEB2 school pupils with educational difficulties, in accordance with the Policy on the Provision of Educational Support in the European Schools of 7 February 2017 and the Provision of Educational Support in the European Schools – Procedural document, 2012-05-D-15-en-11. Three levels of support are available:</p> <p>-General support: for pupils with some learning difficulties or who have recently transferred to EEB2. In the primary school, this support is provided by a learning support teacher on the basis of the class teacher's request. In the secondary school, this support may be provided on individually or in a group on the basis of a teacher's request and after the pupil's legal representative has agreed.</p> <p>-Moderate support: for pupils who need more concentrated support than provided by general support, such as following a long absence or where minor attention issues are present. This type of support may be provided on the basis of a teacher's request and after informing the pupil's legal representative (for the primary school) or after the pupil's legal representative has agreed (for the secondary school).</p> <p>-Intensive support: for pupils who have been diagnosed with a learning difficulty/disability such as Attention Deficit Disorder, dyslexia, autism, etc. Intensive support is provided only after EEB2 has received a diagnosis by an external doctor, psychologist or team of therapists provided by the pupil's legal representative. Intensive support may include assignment of a specialist teacher. This type of support is provided on the basis of an agreement entered between EEB2 and the pupil's legal representative.</p> <p>For pupils in the primary school receiving learning support, the "Care Team" (consisting of the Deputy Director of the primary school, the school psychologist, and the Learning Support Coordinator) meets each week. Each Care Team member has access to the information relating to the concerned pupils, and during the meetings the Care Team strives to find solutions in order to help the pupils. To this end, it may invite to the</p>

	<p>meetings the pupil's legal representative, teachers, assistants, and/or professionals from outside the school.</p> <p>For pupils in the secondary school receiving intensive support, meetings are held where the support coordinator, teachers, pupil's legal representative and sometimes the Deputy Director of the secondary school are present.</p> <p>The Learning Support Coordinators maintain a file for each pupil receiving learning support. Several types of records may be created and stored in the pupil's file in connection with the provision of learning support:</p> <ul style="list-style-type: none"> <li>-Evaluation report: The teacher providing learning support ("support teacher") prepares this report at the end of each semester and prints two copies (for secondary) and is send by mail (primary), one for the support team and one for the person legally responsible for the pupil.</li> <li>-Diagnostic report: This report, submitted by the person legally responsible for the pupil, is required for the provision of intensive support. It may contain a detailed history of the family situation, the results of tests and analyses, and other sensitive personal data, as well as recommendations for learning or psychological support.</li> <li>-Individual Learning Plan: This plan is made based on the diagnostic report and the recommendations contained therein. It will specify whether special arrangements are necessary for the pupil.</li> </ul> <p>Intensive support agreement: This is the agreement entered between EEB2 and the person legally responsible for the pupil receiving intensive support.</p> <ul style="list-style-type: none"> <li>-Email correspondence with persons legally responsible for pupils: All email correspondence is printed out and placed in the pupil's file.</li> <li>-Minutes of meetings in relation to intensive support in secondary: Minutes of such meetings is made and kept in a separate file, which may be updated based on events throughout the year. The minutes, which are prepared by the learning support coordinators, specify who was present and what was discussed at learning support team meetings.</li> </ul> <p>For primary school learning support, all paper files are stored in the secretariat of the Deputy Director for the primary school. The files may not be taken out of the secretariat and can only be shared with the teachers who teach the concerned child. An electronic version is kept (following receipt of a signed agreement from the pupil's legal representative) in the Care Team application in Sharepoint.</p> <p>For secondary school learning support, all of the above files are retained only in paper form in the locked office of the learning support coordinators for the school year that the pupil is receiving learning support. No electronic files are kept.</p> <p>In accordance with section 4.3.4 of the Educational Support Procedural Document, each teacher of a pupil receiving learning support may be given access to the pupil's learning support file, on a need-to-know basis and only in the Learning Support Coordinators' office.</p> <p>The Learning Support Coordinators prepare a list of pupils entitled to special arrangements in tests/exams (e.g., extra time) and their diagnosis is shared with the teachers, learning support advisors, psychologist and nurse following receipt of</p>
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		oral consent by the person legally responsible for the pupil.
5.	Name and e-mail address of processor (sub-contractor)	The individual learning plan and the support agreement are provided electronically to the BAC unit for pupils in S5, so that any necessary special arrangements will be provided in S6 and S7, and in the BAC exams.
6.	Does the processing operation involve any automated decision-making/profiling?	<input type="checkbox"/> Automated <input checked="" type="checkbox"/> Manual (not automated)
7.	Storage media	<input checked="" type="checkbox"/> Paper: all files <input checked="" type="checkbox"/> Electronic: email correspondence with the concerned pupils' legal representative and for the primary school, the files in sharepoint.
8.	Retention period	<i>Please suggest what you believe would be a reasonable retention period based on need and any applicable EU or Belgian legal obligations of which you are aware:</i> <input type="checkbox"/> ____ days <input type="checkbox"/> ____ weeks <input type="checkbox"/> ____ months <input type="checkbox"/> ____ <input checked="" type="checkbox"/> other: for the duration of the pupil's enrolment at EEB2; if the pupil leaves EEB2 before the BAC, then until the pupil is 18 years old
<b>II. Legal basis</b>		
9.	Legal basis of processing	<input type="checkbox"/> Data subject's consent (attach blank consent form) <input type="checkbox"/> Necessary for compliance with legal obligation <input checked="" type="checkbox"/> Necessary to protect data subject's vital interests <input checked="" type="checkbox"/> Necessary for performance of task carried out in the public interest or in controller's official authority <input type="checkbox"/> Necessary for legitimate interests of controller or 3 <sup>rd</sup> party <input type="checkbox"/> Necessary for performance of contract
<b>III. Data</b>		
10.	Categories of data subjects	<input checked="" type="checkbox"/> Pupils <= 16 yrs old <input checked="" type="checkbox"/> Pupils > 16 yrs old <input checked="" type="checkbox"/> Parents <input type="checkbox"/> PAS <input type="checkbox"/> Seconded staff (excluding teachers) <input type="checkbox"/> Seconded staff (teachers) <input type="checkbox"/> Locally recruited staff <input type="checkbox"/> Interim staff <input type="checkbox"/> (Successful) candidates (to a vacancy) <input type="checkbox"/> Unsuccessful candidates (to a vacancy) <input type="checkbox"/> Trainees <input type="checkbox"/> Vendors <input type="checkbox"/> Other (specify)
11.	Categories of personal data collected	<input checked="" type="checkbox"/> Name <input checked="" type="checkbox"/> Surname <input checked="" type="checkbox"/> Date of birth <input checked="" type="checkbox"/> City of birth <input checked="" type="checkbox"/> Country of birth <input checked="" type="checkbox"/> Nationality <input checked="" type="checkbox"/> Gender <input checked="" type="checkbox"/> Data concerning siblings <input checked="" type="checkbox"/> School email address <input type="checkbox"/> Personal email address <input checked="" type="checkbox"/> Professional email address <input checked="" type="checkbox"/> Professional phone number <input type="checkbox"/> Personal phone number <input checked="" type="checkbox"/> Home address

		<input checked="" type="checkbox"/> Picture <input checked="" type="checkbox"/> Student ID number <input checked="" type="checkbox"/> Parental marital status <input checked="" type="checkbox"/> Name of legal guardian (main custody of the child) <input type="checkbox"/> Salary or economic information <input checked="" type="checkbox"/> Other (specify) - Grades, data concerning pupil's medical/psychological condition relevant for assessment of learning support needs and for designing appropriate learning support programs (see listing of reports in description of processing).
12.	Documents collected containing personal data	<input type="checkbox"/> Copy of passport <input type="checkbox"/> Copy of ID <input type="checkbox"/> Copy of transport document <input type="checkbox"/> Birth certificate <input type="checkbox"/> Marriage certificate <input type="checkbox"/> Document proving the exercise of parental authority <input type="checkbox"/> CV <input type="checkbox"/> Motivation letter <input type="checkbox"/> Application email of the candidate <input type="checkbox"/> Correspondence with the candidate <input type="checkbox"/> Declaration concerning the relevant professional experience <input type="checkbox"/> Declaration concerning allowances <input type="checkbox"/> Copy of relevant diploma <input type="checkbox"/> Reference letter <input type="checkbox"/> Work contract <input type="checkbox"/> Evaluation sheets
13.	Special categories of data	<p><i>Please specify type and justification for processing:</i></p> <p>1. Type:</p> <input checked="" type="checkbox"/> health data - related to the need for educational support <input type="checkbox"/> data revealing religious/philosophical beliefs <input type="checkbox"/> data revealing trade union membership <input checked="" type="checkbox"/> data revealing racial or ethnic origin. Can be included in the psycho-educational report which is sent to the educational support coordinators <input type="checkbox"/> data concerning a natural person's sex life or sexual orientation <input type="checkbox"/> data revealing political opinions <input type="checkbox"/> genetic data <input type="checkbox"/> biometric data for the purpose of uniquely identifying a natural person <input type="checkbox"/> data concerning criminal convictions and offences <p>2. Justification for processing:</p> <input checked="" type="checkbox"/> data subject's explicit consent <input type="checkbox"/> relates to personal data made public by the data subject <input type="checkbox"/> Processing necessary to meet obligations in field of employment, social security and social protection law <input checked="" type="checkbox"/> Processing necessary to protect data subject's or other natural person's vital interests where data subject incapable of giving consent <input type="checkbox"/> Processing necessary for establishment, exercise or defence of legal claims <input type="checkbox"/> Processing necessary for reasons of substantial public interest <input checked="" type="checkbox"/> Processing necessary for medical/health care <input type="checkbox"/> Processing necessary for public health <input type="checkbox"/> Processing necessary for archiving, research or statistics
<b>IV. Rights of Data Subjects</b>		
14.	Privacy statement (Information provided to the data subject)	<input checked="" type="checkbox"/> Data collected from data subject <input checked="" type="checkbox"/> Data not obtained from data subject
15.	Manner of providing the privacy statement to the	<i>Please suggest what you believe would be a reasonable way to provide the privacy statement, such as a reference in the first</i>

	data subjects (procedure to grant rights)	<p>correspondence with the data subject to a link to the EEB2 website where the statement can be viewed.</p> <input checked="" type="checkbox"/> online <input type="checkbox"/> email <input type="checkbox"/> text (by phone number) Specify:
<b>V. Access and disclosure</b>		
16.	Recipients of the data	Please specify any recipients outside of EEB2 that receive the data e.g. OSG, banks, travel agencies, etc.
17.	Transfers to non-EU countries or international organisations	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If transfers are made, specify: Non-EU country to which transfers made_____ <p>Basis of transfer:</p> <input type="checkbox"/> Adequacy decision relating to recipient country (Andorra, Argentina, Canada (commercial organisations), Faroe Islands, Guernsey, Israel, Isle of Man, Jersey, New Zealand, Switzerland, Uruguay and the US (limited to the Privacy Shield framework) <input type="checkbox"/> Appropriate safeguards established <input type="checkbox"/> Derogation: <ul style="list-style-type: none"> <li><input type="checkbox"/> Data subject's explicit consent</li> <li><input type="checkbox"/> Transfer necessary for performance of contract with data subject</li> <li><input type="checkbox"/> Transfer necessary for performance of contract with other on data subject's behalf</li> <li><input type="checkbox"/> Transfer necessary for important reasons of public interest</li> <li><input type="checkbox"/> Transfer necessary for establishment, exercise or defence of legal claims</li> <li><input type="checkbox"/> Transfer necessary to protect vital interests of data subject or others where data subject incapable of giving consent</li> <li><input type="checkbox"/> Transfer of data from a public register</li> </ul>
18.	Is a Data Protection Impact Assessment required?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes, because the processing involves high risk of the following type: <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Sensitive data or data of a highly personal nature</li> <li><input checked="" type="checkbox"/> Data concerning vulnerable data subjects</li> <li><input type="checkbox"/> Data processed on a large scale</li> <li><input type="checkbox"/> Systematic monitoring</li> <li><input checked="" type="checkbox"/> Evaluation or scoring</li> <li><input type="checkbox"/> Innovative use or applying technological or organisational solutions</li> <li><input type="checkbox"/> Automated decision making with legal or similar significant effects</li> <li><input type="checkbox"/> Prevents data subject from exercising a right or using a service or a contract</li> </ul>