



EEB2
CONTROLLER'S RECORD OF PERSONAL DATA
PROCESSING ACTIVITY

Item No.		
1.	Name, department and e-mail address of Delegated Controller (author)	Joachim Schmelz WOL-DEPUTY-DIRECTOR-SECONDARY-CYCLE@eursc.eu Deputy Director of the secondary school
2.	Name, department and e-mail address of Joint Controller (if any) - attach arrangement between Joint Controllers	
I. Processing Activity		
3.	Name of processing	Secondary school assessment of pupil academic performance
4.	Description and purpose of processing	<p>The assessment of pupil academic performance in the secondary school begins with the teacher's assessment, in accordance with Article 59 of the General Rules of the European Schools and the outline for objectives, competencies and contents set out for each subject in the syllabuses for the secondary school prepared by the Pedagogical Unit of the Office of the Secretary General.</p> <ul style="list-style-type: none"> • Teachers in grades S1-S3 may perform the assessment as they see fit, in accordance with habit and cultural norms for their Member State's educational system. (Efforts are currently underway for greater harmonisation in grading in the different language sections.) • Teachers in grades S4-S7 perform assessments in a more standardized manner. The "A-grade" relates to a wide list of different evaluation criteria and tools such as oral participation, performance on announced and unannounced written tests, motivation, etc. The "B-grade" relates to performance on written exams. In Grades S6 and S7, there are more written exams, which are more harmonized, than in the earlier grades, in preparation for the BAC written exam. <p>The "form teachers" and "subject teachers" enter the grades they have given to each pupil in the SMS application designed for this purpose. Form teachers have access to all grade information for the pupils for which they are responsible, while subject teachers have access to only the grade information for the pupils and subjects for which they are responsible. Form teachers discuss with subject teachers the grades given to their pupils in order to prepare the Class Council.</p> <p>The Council is held by year level for each language section before the winter and the summer grade reports are finalized. At the Council, all teachers for a given language section and a given level convene to discuss any issues related to grade reports.</p>

		<ul style="list-style-type: none"> The Council meetings preceding the winter report as well as the less formal preparatory meetings held by the form teachers with his/her colleagues (Autumn and Spring) focus on identifying cases where learning support may be needed. Warning letters are sent to the legal representative of pupils in difficulty, including a request that they reply in writing to the letter. General and moderate support may thereafter be provided to pupils with certain special needs. The Council meetings held before the fourth (and final) grade reports for the year are issued focus on any questionable cases for promotion to the next grade level. <p>Official grade reports are stored in SMS. A link to the grade report of each pupil is sent to the pupil's legal representative four times per year. The latter may make an appointment with the form or subject teacher following receipt of the grade report (or at any other time). Correspondence between a teachers and a pupil's legal representative may also be made by email.</p> <p>Pupil performance data may be anonymised for analysis purposes, which is used for organisational and public scrutiny.</p>
5.	Name and e-mail address of processor (sub-contractor)	
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 <input checked="" type="checkbox"/> Electronic
8.	Retention period	<p><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></p> <input type="checkbox"/> ___ days <input type="checkbox"/> ___ weeks <input type="checkbox"/> ___ months <input type="checkbox"/> ___ years after the award of the baccalaureate <input type="checkbox"/> other: Grade reports, Class Council minutes, educational support documents, teachers notes and correspondence with the pupil's legal representative are retained 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. Teachers' personal grading records are retained for the current school year +1.
II. Legal basis		
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 (concerning the intensive support only) <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 rd party <input checked="" type="checkbox"/> Necessary for performance of contract
III. Data		
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 type="checkbox"/> Date of birth <input type="checkbox"/> City of birth <input type="checkbox"/> Country of birth <input type="checkbox"/> Nationality <input type="checkbox"/> Gender <input type="checkbox"/> Data concerning siblings <input type="checkbox"/> School email address <input type="checkbox"/> Personal email address <input type="checkbox"/> Professional email address <input type="checkbox"/> Professional phone number <input type="checkbox"/> Personal phone number <input type="checkbox"/> Home address <input type="checkbox"/> Picture <input type="checkbox"/> Student ID number <input type="checkbox"/> Parental marital status <input type="checkbox"/> Name of legal guardian (main custody of the child) <input type="checkbox"/> Salary or economic information <input checked="" type="checkbox"/> Other: Teachers' assessments of pupils; grades entered in SMS by the teacher; teachers' notes regarding meetings with pupil's legal representative; notes of council meetings.
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 checked="" type="checkbox"/> Evaluation sheets <input checked="" type="checkbox"/> Other – psychological-medical report submitted by person legally responsible for pupil where intensive support needed.
13.	Special categories of data	<i>Please specify type and justification for processing:</i> 1. Type: <input checked="" type="checkbox"/> health data (for pupils requiring intensive support) <input type="checkbox"/> data revealing religious/philosophical beliefs <input type="checkbox"/> data revealing trade union membership <input type="checkbox"/> data revealing racial or ethnic origin <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 2. Justification for processing: <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 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 checked="" 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
IV. Rights of Data Subjects		
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 data subjects (procedure to grant rights)	<i>Please suggest what you believe would be a reasonable way to provide the privacy statement, such as a reference in the first correspondence with the data subject to a link to the EEB2 website where the statement can be viewed.</i> <input checked="" type="checkbox"/> online <input type="checkbox"/> email <input type="checkbox"/> text (by phone number) Specify:
V. Access and disclosure		
16.	Recipients of the data	<i>Please specify any recipients outside of EEB2 that receive the data e.g. OSG, banks, travel agencies, etc.</i> The person legally responsible for a pupil receives the grade report of that pupil; universities within the EU to which the pupil is applying for admission (at pupil's request).
17.	Transfers to non-EU countries or international organisations	<input checked="" type="checkbox"/> Yes – Universities to which the pupil is applying for admission (at pupil's request) <input type="checkbox"/> No If transfers are made, specify: Non-EU country to which transfers made Depends on the request of the pupil. Basis of transfer: <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: <input checked="" type="checkbox"/> Data subject's explicit consent <input checked="" type="checkbox"/> Transfer necessary for performance of contract with data subject <input type="checkbox"/> Transfer necessary for performance of contract with other on data subject's behalf <input type="checkbox"/> Transfer necessary for important reasons of public interest <input type="checkbox"/> Transfer necessary for establishment, exercise or defence of legal claims <input type="checkbox"/> Transfer necessary to protect vital interests of data

		<p>subject or others where data subject incapable of giving consent</p> <p><input type="checkbox"/> Transfer of data from a public register</p>
18.	Is a Data Protection Impact Assessment required?	<p><input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes, because the processing involves high risk of the following type:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Sensitive data or data of a highly personal nature – intensive support files only <input checked="" type="checkbox"/> Data concerning vulnerable data subjects <input type="checkbox"/> Data processed on a large scale <input type="checkbox"/> Systematic monitoring <input checked="" type="checkbox"/> Evaluation or scoring <input type="checkbox"/> Innovative use or applying technological or organisational solutions <input type="checkbox"/> Automated decision making with legal or similar significant effects <input type="checkbox"/> Prevents data subject from exercising a right or using a service or a contract