



Schola Europaea

EEB2

Privacy statement for Primary school pupil disciplinary events

1. Description and purpose of the processing operation

When an incident occurs involving a primary school pupil (often in the playground), the Coordinator (a skilled professional for dealing with children who is present at the playground) will determine what immediate action to take. This will often be to take the concerned pupil to the “Quiet Room” where the supervisor of that room will educate the child. The Coordinator records all incidents in “Vivre Ensemble”, a sharepoint application used only in the primary school for recording such incidents. The Coordinator records the time and date of the incident, the measures taken with respect to all involved pupils, and recommended follow-up measures. The legal representatives and class teachers of the involved pupils are informed automatically by email, generated by the “Vivre Ensemble” application. The pupil’s legal representatives thereby receive a description of the incident and the action taken.

Each week, the “Care Team” meets, consisting of the Deputy Director of the primary school, the school psychologist, the Learning Support coordinator, and the Quiet Room supervisor to review the reported incidents for that week. Each Care Team member receives information about the incident automatically through “Vivre Ensemble”. The Team discusses each incident and determines whether further action is necessary. The Care Team members have access to a list of all incidents of each child, enabling them to know whether the incidents are repetitive, which is essential for determining appropriate further action.

Where necessary, the pupil’s legal representative meets with the Care Team and the class teacher to find solutions for pupils involved in repetitive or serious incidents. Notes taken by staff participating in such meetings are stored in Vivre Ensemble.

All data regarding the incident are stored locally at EEB2 within the “Vivre Ensemble” application of sharepoint.

2. Legal basis for the processing

The legal basis for this processing operation is Article 6 paragraph (1)(e) (processing is necessary for the performance of a task carried out in the public interest or in the exercise of authority vested in the controller).

3. Categories of personal data collected

In order to carry out this processing operation, EEB2 collects the following categories of personal data: name, surname, description of event and persons involved, notes regarding meetings of Care Team and with the pupil’s legal representative, follow-up action taken.

4. Who has access to your personal data and to whom is it disclosed?

EEB2 staff responsible for carrying out this processing operation has access to your personal data.

5. How do we protect and safeguard your personal data?

In order to protect your personal data, a number of technical and organisational measures have been put in place. Technical measures include appropriate actions to address online security, physical security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk

presented by the processing and the nature of the data being processed. Organisational measures include restricting access to the data to authorised persons with a legitimate need to know for the purposes of this processing operation.

6. How long do we keep your personal data?

The pupil's disciplinary file (serious disciplinary incidents) is retained by EEB2 for a maximum of 3 years after conclusion of all proceedings related to the disciplinary event, in accordance with Article 42(a) of the General Rules of the European Schools.

7. What are your rights and how can you exercise them?

You have the right to request access to your personal data, rectification or erasure of the data, or restriction of the processing of your data. You have the right to object to the processing of your data as well as the right to data portability. If the legal basis for processing is your consent, you have the right to withdraw your consent at any time. (The withdrawal of consent will not affect the lawfulness of the processing before the consent was withdrawn.) Any request to exercise one of these rights should be directed to the Controller (WOL-DP-CONTROLLER@eursc.eu).

You may contact the data protection officer (WOL-DPO-CORRESPONDENT@eursc.eu) with regard to all issues related to processing of your personal data and the exercise of your rights under Regulation (EU) 2016/679 or relevant Belgian national law.

8. Right of recourse

You have the right to have recourse to the Belgian Data Protection Authority (<https://www.autoriteprotectiondonnees.be/introduire-une-requ%C3%AAte-une-plainte>) if you consider that your rights under Regulation (EU) 2016/679 or relevant Belgian national law have been infringed as a result of the processing of your personal data by EEB2.