

<b>Controller's Record of Personal Data Processing Activity</b>		
<b>Item No.</b>		
1.	Name, department and e-mail address of Delegated Controller (author)	Chantal Pinck, <a href="mailto:chantal.pinck@eursc.eu">chantal.pinck@eursc.eu</a> ; Joelle Bombaerts, <a href="mailto:joelle.bombaerts@eursc.eu">joelle.bombaerts@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	Medical care and health monitoring
4.	Description and purpose of processing	<p>The EEB2 medical service treats mainly pupils, and occasionally also teachers and staff where necessary.</p> <p>When a pupil is enrolled at EEB2, the pupil's legal representative is asked to complete a confidential health questionnaire in paper form, which is required to assure appropriate medical care at school. If the form is not completed and returned, the form specifies that EEB2 will be obliged to take decisions for the well-being of the pupil. The questionnaire asks for information about the treating physician, the hospital to which the pupil should be sent in case of medical emergency, and whether the pupil suffers from any of a list of disorders, as well as basic medical history, allergies, and vaccinations. The completed questionnaires are stored in the nurses' office in a medical file for each pupil, accessible only by the nurses and the EEB2 staff physician.</p> <p>Upon receipt of the completed questionnaires, the nurses compile a list of pupils with special problems (e.g., diabetic, epileptic, haemophiliac, heart condition, etc.) and another list of pupils with allergies. The legal representative of the pupils on these lists are asked to complete an action plan to be followed should a medical emergency occur related to these conditions. In addition, with the consent of the legal representative, information about such conditions is provided orally to the teachers normally responsible for these pupils or who may be responsible for them on a school trip; however, no written records are provided. The nurses may also instruct the responsible teachers about how to administer a treatment that such pupils may require.</p> <p>Supplementary information about vaccination of pupils (e.g. diphtheria, tetanus, polio, measles, mumps, German measles)) may be requested of the pupils' legal representative in paper form. Such information is also</p>

		<p>retained in the pupil's medical file.</p> <p>Updated medical information may be collected in preparation for a school trip, as specified in the privacy statement concerning school trips.</p> <p>Medical checks by the EEB2 staff physician are made in the 1st, 3rd, and 5th years of primary school and in the 2nd and 5th years of secondary school.</p> <p>When a pupil is sick, he/she may come to the nurses' office and explain what is wrong. The nurses will analyse what care may be required and if it is of a minor nature, will provide the care. When a pupil presents a serious medical problem, the nurses will attempt to contact the pupil's legal representative before taking action, but if it is not possible to establish contact, then the nurses will take a decision on the appropriate care to provide. The nurses may take some notes when seeing pupils, which they keep in their own files.</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 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 <input checked="" type="checkbox"/> other (explain) The medical file of pupils who remain at EEB2 until they receive the BAC are retained for the duration of their presence, then sent to the pupil's legal representative. The medical file of pupils who leave before the BAC are retained for 5 years after the pupil's departure, then destroyed by the nurses.
<b>II. Legal basis</b>		
9.	Legal basis of processing	<input checked="" type="checkbox"/> Data subject's consent (attach blank consent form)(GDPR Art. 6(1)(a)) – to provide medical information to teachers and other professionals (e.g. psychologist) responsible for the pupil. <input type="checkbox"/> Necessary for performance of contract (GDPR Art. 6(1)(b)) <input checked="" type="checkbox"/> Necessary for compliance with legal obligation (GDPR Art. 6(1)(c)) <input checked="" type="checkbox"/> Necessary to protect data subject's vital interests (GDPR Art. 6(1)(d)) <input checked="" type="checkbox"/> Necessary for performance of task carried out in the public interest or in controller's official authority (GDPR Art. 6(1)(e)) <input type="checkbox"/> Necessary for legitimate interests of controller or 3 <sup>rd</sup> party (GDPR Art. 6(1)(f))
<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 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 checked="" type="checkbox"/> Personal email address <input checked="" type="checkbox"/> Professional email address <input checked="" type="checkbox"/> Professional phone number <input checked="" type="checkbox"/> Personal phone number <input checked="" type="checkbox"/> Home address <input checked="" type="checkbox"/> Picture <input 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) Information submitted on the medical questionnaire concerning the pupil's health, as described in response to question 4.
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	<i>Please specify type and justification for processing:</i> <b>1. Type:</b> <input checked="" type="checkbox"/> health data <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  <b>2. Justification for processing:</b>

		<input 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 checked="" 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 type="checkbox"/> Data collected from data subject <input 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:
<b>V. Access and disclosure</b>		
16.	Recipients of the data	<i>Please specify any recipients outside of EEB2 that receive the data e.g. OSG, banks, travel agencies, etc.: Data may be provided to external medical doctors where necessary, and to the Belgian health ministry where legally required (e.g. in a case of meningitis).</i>
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 _____  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 type="checkbox"/> Data subject's explicit consent <input 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 subject or others where data subject incapable of giving consent <input type="checkbox"/> Transfer of data from a public register
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: <input checked="" type="checkbox"/> Sensitive data or data of a highly personal nature

		<ul style="list-style-type: none"><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 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>
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