



Schola Europaea

EEB2

## **Privacy statement for Primary school assessment of pupil academic performance**

### **1. Description and purpose of the processing operation**

The assessment of pupil academic performance in the primary school begins with the teacher's assessment, in accordance with Article 55 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 primary school prepared by the Pedagogical Unit of the Office of the Secretary General.

Each teacher in the primary school keeps his/her own records of assessment of the pupils in his/her class, including test results. (There are no general instructions to teachers regarding such records.)

Each teacher enters grade reports and written assessments (which specify briefly the strengths and weaknesses of the pupil) for his/her pupils in the SMS. The teachers have access only to such data of their own pupils; the Deputy Director of the primary school has access to the data of all pupils.

A Class Council is held to decide on promotions at the end of the school year. All teachers who teach a given child must be present when his/her case is discussed. Minutes of the Class Council meeting are prepared and stored in SMS. SMS thereafter generates a PDF grade report electronically, and sends the pupil's legal representative a password-protected link to the grade report.

Taking account of the February and June grade reports, the teachers and, where necessary, the Deputy Director evaluate and take a decision during the year as to whether any pupils require learning or other support. The grade report at the end of the year is used to determine whether the pupil will be promoted to the next level.

Each teacher is responsible to record notes of all meetings with pupil's legal representatives, which may occur after receipt of the grade report (or at any other time).

Pupil performance data may be anonymised for analysis purposes, which is used for organisational and public scrutiny.

### **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, teachers' assessments of pupils; grades entered in SMS by the teacher; teachers' notes regarding meetings with pupil's legal representatives; minutes of the Class Council meetings; notes of any evaluation meetings concerning educational support needs of pupils, including individual learning plans when moderate or intensive learning support is offered.

### **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. In addition, the pupil's legal representative receives the grade report of that pupil.

### **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?**

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.

#### **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](mailto:WOL-DP-CONTROLLER@eursc.eu)).

You may contact the data protection officer ([WOL-DPO-CORRESPONDENT@eursc.eu](mailto: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%AAteune-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.