



Schola Europaea

EEB2

Privacy statement for Psychological Support

1. Description and purpose of the processing operation

The provision of psychological support to a primary or secondary pupil may be initiated by a teacher, the school nurse, the pupil's legal representative, or directly by the pupil. An initial meeting between the school psychologist and the pupil will be held, and the school psychologist takes notes regarding background information, family history, and any current information relevant to the request for psychological support. The notes are placed in a paper file in the name of the pupil. Following this initial meeting, the school psychologist will contact the pupil's legal representative if the pupil is at level S5 or less, or in any event if there appears to be a risk to the health or life of the pupil or others. Normally, the teacher will have no further involvement after an initial contact, unless the problems addressed by the school psychologist involve the teacher.

All notes of subsequent meetings with the pupil are recorded in paper files. The only electronic files are e-mails to the pupil's legal representative.

The school psychologists of the secondary school do not provide therapy to pupils. For minor issues, the school psychologist will discuss problems with pupils during several meetings, normally not more than five. For more serious issues requiring longer term care, the school psychologist will talk to pupils on one or several occasions to gather information in order to make a recommendation for further action, such as treatment by an external therapist or to request the involvement of social services (in rare cases). In the more serious cases, the school psychologist may recommend several external professionals, whose names would be recorded in the file of the pupil concerned.

The school psychologist of the primary school may meet with a pupil over a longer period, normally up to one year, to discuss the problems of the pupil.

Both the primary and secondary school psychologists keep written notes of their meetings with pupils and their legal representatives, which they store in locked cabinets in their offices. The psychologists may also prepare reports where necessary. They strictly observe professional rules that their notes and reports are confidential and should not be divulged unless there is a specific need to do so. Accordingly, they will provide information to their superiors (the Deputy Directors and/or the Director of EEB2) on a need-to-know basis.

In cases presenting threats requiring urgent action¹, e.g. potential suicides or imminent harm to others, the school psychologists will immediately notify the legal representative of the pupil concerned by telephone and will inform the Deputy Director and the Director. ¹

If an external professional thereafter treats a pupil and asks for information from the school psychologist, the latter will provide the information, as long as the pupil's legal representative agrees.

The school psychologists also participate in learning support:

The psychologist for the primary school takes part in weekly "care meetings" also attended by the deputy director of the primary school, principal education advisor, and nurse to address the need for intensive support (see record on learning support). The most serious cases of incidents and behavioural problems are discussed in such meetings and a decision is taken as to follow-up measures. Each participant takes his/her own notes, and the psychologist stores her notes in files organized chronologically, which she keeps in her locked cabinet.

The psychologist for the secondary school meets with the two secondary school Learning Support Coordinators to determine appropriate follow-up actions for secondary pupils.

The school psychologists may contact Belgian social services or the Belgian police in cases where their intervention may be needed, such as long term absence from school without justification.

2. Legal basis for the processing

The legal basis for this processing operation is Article 6 paragraphs (1)(a) (data subject's consent), 6(1)(d) (processing necessary to protect data subject's vital interests), and 6(1)(e) (processing 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, photograph, family history, data concerning siblings, parental marital status, background relevant to child development (including some data downloaded from SMS), medical history where relevant, information relevant to current psychological issue, recommendations and referrals.

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, information may be sent to psychological counselors at the request of the pupil's legal representative, and in rare cases to Belgian social services or the police.

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?

Your personal data may be retained by EEB2 for 1 year after the pupil achieves the BAC or until the age of 18 if the pupil leaves the school before achieving the BAC.

Exceptionally, files may be kept longer if relevant for siblings of the pupil concerned. In such cases, they would be kept for 1 year after the sibling achieves the BAC or until the age of 18 if the sibling leaves the school before achieving the BAC.

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%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.