

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 pupil disciplinary events
4.	Description and purpose of processing	<p>When a pupil in the secondary school is involved in an incident which may constitute an infringement of a school rule or general rule on communal life within the school, disciplinary measures may be imposed in accordance with Chapter VI of the General Rules of the European Schools and Chapter VIII and the Annex of the EEB2 School Rules Secondary Cycle.</p> <p>Whenever an EEB2 staff member witnesses an incident, he/she may tell the pupil to stop the offending behaviour, then ask for the identity card of the pupil. The staff member should inform the responsible Educational Advisor of the incident.</p> <p>Upon receipt of such information, the Educational Advisor will note the information received and keep it in his/her own file of such incidents. Records of minor offences remain with the Educational Advisor. Repetitive offences or serious offences are reported to the Principal Educational Advisor and the senior management of EEB2. The Educational Advisor also informs the pupil's legal representative of the incident(s) by e-mail, sent through SMS. All correspondence between the pupil's legal representative and the Educational Advisor concerning the incident are kept in the latter's file of the incident, in a folder in Outlook.</p> <p>The Principal Educational Advisor meets with the concerned pupil and thereafter decides on the next steps to be taken, in accordance with the disciplinary rules in the General Rules of the European Schools and the EEB2 School Rules Secondary Cycle referenced above. These follow-up steps are recorded in a document created by the Educational</p>

		<p>Advisor, which is placed in the disciplinary folder (paper or digital version).</p> <p>Files of the Educational Advisors may be shared with the Principal Educational Advisor. Files of both the Educational Advisors and the Principal Educational Advisor may be shared with the school psychologists and the form teacher of the pupil concerned, as necessary.</p> <p>Repetitive or serious offenses may be taken up in a Disciplinary Council, in accordance with Article 44 of the General Rules of the European Schools. If a Disciplinary Council takes up the matter, all documentation in the files of the Educational Advisor and Principal Educational Advisor are moved to the Disciplinary Council file. The conclusions of the Disciplinary Council, including any sanctions imposed, are also kept in the disciplinary file.</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 checked="" type="checkbox"/> 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. <input type="checkbox"/> other (explain)
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 type="checkbox"/> Necessary to protect data subject's vital interests <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 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 checked="" type="checkbox"/> PAS <input checked="" type="checkbox"/> Seconded staff (excluding teachers) <input checked="" type="checkbox"/> Seconded staff (teachers) <input checked="" type="checkbox"/> Locally recruited staff <input checked="" 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 checked="" type="checkbox"/> Other (specify) – Any person who has witnessed the incident
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 – Notes of educational advisor responsible for the concerned pupil, notes and recommendations of principal educational advisor, disciplinary council files.
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	<p><i>Please specify type and justification for processing:</i></p> <p>1. Type:</p> <input 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 checked="" type="checkbox"/> data concerning criminal convictions and offences <p>2. Justification for processing:</p> <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 type="checkbox"/> Processing necessary to protect data subject's or other natural person's vital interests where data subject incapable of giving consent <input checked="" type="checkbox"/> Processing necessary for establishment, exercise or defence of legal claims <input type="checkbox"/> Processing necessary for reasons of substantial public interest <input 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>
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 <input checked="" type="checkbox"/> Data concerning vulnerable data subjects <input type="checkbox"/> Data processed on a large scale <input type="checkbox"/> Systematic monitoring <input type="checkbox"/> Evaluation or scoring <input type="checkbox"/> Innovative use or applying technological or organisational solutions

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