



**Schola Europaea
European School of Brussels IV (Laeken)**

**SPECIFIC PRIVACY STATEMENT RELATED
TO THE MANAGEMENT OF COVID-19 CASES
AT SCHOOL**

Statement approved in accordance with the written procedure 2020-05, completed on the 30th
November 2020

EEB4
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Specific privacy statement related to the management of Covid-19 cases at school

Context

In Belgium, the easing of social and economic lockdown measures following the Covid-19 outbreak is being supported by testing and contact tracing strategies put in place by the national authorities.

The school has adopted a stringent procedure concerning the management of Covid-19 cases so as to implement the sanitary measures decided by the Belgian authorities to limit, or even prevent, the virus' spread to other pupils and staff members.

This procedure encompasses two aspects:

1. Mandatory reporting through the dedicated e-mail address, LAE-COVID19-NOTIFICATION@eursc.eu: Pupils and staff members are required to communicate to the school their infection to Covid-19.
2. "Contact tracing": This well-known prevention method, used by public health authorities, aims at reducing the number of secondary cases of an infectious disease in an outbreak.

As a "community", the school must cooperate with the national health authorities and has been tasked, in particular, to perform its own "contact tracing", i.e. rapidly identify pupils/staff members who have come into close contact with a new Covid-19 case, and where necessary, notify them that they must self-isolate to help stop the spread of the virus.

The processing of a Covid-19 case notification and its subsequent contact tracing are managed by the school's medical service to ensure medical secrecy, in accordance with Belgian regulations.

The school's communicated to the parents and staff on the 3rd of September 2020 the procedures related to the management of Covid-19 cases. These were also validated by the school's Administrative Board, held on the 29th September 2020.

This *Specific privacy statement related to the management of Covid-19 cases at School* explains how your children personal information is processed in the implementation of these measures and is intended as a supplement to the School's [Standard Privacy Statements](#).



1. What personal data does the school collect during management of a Covid-19 case?

The school is following the Belgian authorities' advice and will collect and use only the following information for the purpose of the management of a Covid-19 case:

- 1.1. **Identity** (name, surname), **e-mail address and confirmation of the Covid-19 infection** provided through the mandatory reporting sent to the school using the dedicated e-mail address: LAE-COVID19-NOTIFICATION@eursc.eu.

In accordance with article 30. 3 d), v., of the General Rules of the European schools, when a pupil suffers from a contagious disease, **the pupil's legal representatives** must notify it in writing to the school. Covid-19 is a transmittable disease that is subject to such notification.

As part of their employment relationship, **the teaching and administrative staff** also have the obligation to inform the school if they are Covid-19 infected. This is to allow the school to take precautionary measures to limit the potential spread of the disease.

- 1.2. **Identity of "close contacts"** (name, surname and class where applicable) **of the confirmed Covid-19 case.**

When a case of Covid-19 is declared at school, its medical service will contact the concerned legal representatives of the pupil / staff member to identify, with their cooperation, the people on school premises that they may have had contact with, in the period spanning 48 hours prior to the onset of their symptoms up until their self-isolation.

The lists of "close contacts" are drawn based on the Belgian Institute of public health's (Sciensano) criteria and guidelines.

- 1.3. **Information provided by health authorities.**

The call centers tasked by the relevant regional authorities to perform tracing can contact the school to communicate the name of the person tested positive to Covid-19 so that all necessary measures can be put in place to limit the spread of the infection or to ensure an additional monitoring of the situation.

2. What are the legal basis for this processing?

The legal basis for processing your personal data for the management of a Covid-19 case under the General Data Protection Regulation (GDPR) is:

- Article 6.1 (c) GDPR, processing is necessary for compliance with a legal obligation to which the controller (school) is subject.

The processing of special categories of personal data, which includes data concerning a person's health, is prohibited unless specific further conditions can be met.

These additional relevant conditions are:

- Article 9.2 (i) GDPR, processing must be necessary for reasons of public interest in the area of public health (such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices).

The school follows in that regard the relevant Belgian regulations that govern mandatory reporting and tracing:

- The cooperation agreement of 25 August 2020 between the Federal State, the Flemish Community, the Walloon Region, the German-speaking Community and the Common Community Commission, concerning the joint processing of data by Sciensano and the contact centers designated by the federated entities competent authorities or by the competent agencies, by the hygiene inspection services and by the mobile teams as part of a follow-up of contacts with people (presumed) infected by the Covid-19 coronavirus based on a database from Sciensano.
- Article 12 § 2 of the Ordinance of July 19th, 2007 relating to the health prevention policy.
- The latest COCOM and FWB Protocol related to the management of Covid-19 cases and contacts in schools.

3. What are the purposes for which personal data is collected in the management of a Covid-19 case?

3.1. The school uses the data collected for the sole purpose of:

3.1.1. Identifying the infected people within the school as well as their contacts in order to advise them on the measures to be taken to prevent the spread of the disease.

3.1.2. Inform the health authorities in accordance with their instructions insofar as is strictly necessary to the performance of the missions they have been assigned by law.

3.2. Produce anonymized statistics (e.g. number per Covid-19 case per week) so as to inform the school community and monitor the evolution of the sanitary situation.

3.3. The data collected will be, under no circumstance, used and transmitted to police or judicial authorities to verify whether you have followed the national authorities' measures (e.g., compliance with a quarantine/testing requirement upon return of a red zone trip, etc.).

4. Who has access and with whom we share your data?

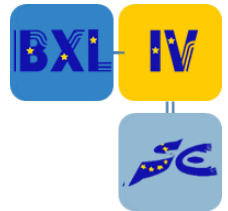
4.1. E-mails sent to the address LAE-COVID19-NOTIFICATION@eursc.eu are exclusively accessed by the school nurses, on delegation of the school Director, Mr. Bordoy.

The school's medical service is required to collaborate with the health authorities and

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provide them with the requested information.

The school medical service, the Security Officer and the competent agents of the health authorities or occupational medicine are bound by professional secrecy.

- 4.2. Parents are asked to contact and inform the OIB and APEEE directly if their children use their services.

5. How do we protect and safeguard your data?

In order to protect pupils' and legal representatives'/parents' personal data, a number of technical and organisational measures have been put in place. These include appropriate measures to address online security, physical security, risk of data loss, alteration or unauthorised access, taking into consideration the risk represented by the processing and the nature of the data being protected.

6. How long is your data kept?

The data collected will be kept for the time strictly necessary for the predefined purpose of the processing. In particular, the school will hold the lists of confirmed cases and/or close contacts for 3 months.

7. What are your rights under the General Data Protection Regulation?

With respect to the processing of your personal data, you have the right to be informed and to access your personal data. You also have the right to rectification, erasure and to object to the processing.

To facilitate the exercise of your rights, you may submit your request to our Data Protection Officer: LAE-DPO-CORRESPONDENT@eursc.eu.

If you consider that the school does not comply with applicable data protection laws (in particular the GDPR) or that your rights have been violated during the processing of your personal data, you have a right of recourse and you can contact the [Belgian Data Protection Authority](#).

For further information about how the OIB or the call centers that might contact the School process your information, including your rights as a data subject and how to exercise them, please consult their privacy policies or contact their respective Data Protection Officer directly:

- For the OIB: OIB-CPE-INFORMATIONS-CORONAVIRUS@ec.europa.eu
- For the call centers: Please refer to each regional call center's (Flanders, Brussels or Wallonia) website.

8. Modification

The school is likely to bring to changes to this Specific Privacy Statement in the light of changes in legislation or of guidelines by the Data Protection Authority.