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EEB3 | Anti-Substance Abuse Policy

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I. Introduction

During their development, young people face many challenges that may affect their health and well-being, including exposure to harmful substances (such as alcohol, tobacco, drugs (medicines), volatile substances, illegal drugs, psychoactive substances, and other unauthorised substances).

Moreover, adolescence and young adulthood are periods of risk-taking and experimentation that often includes substance misuse. In this context, our school has a part to play in promoting pupils' well-being, including the prevention of substances misuse/abuse.

EEB3 aims to offer a high-quality education provided in a safe, healthy, intellectually, and socially stimulating environment.

We focus on a global approach to pupils. The well-being of our pupils is fundamentally important in the type of education we aim to provide. Our aim is for young people to discover and acquire values, norms, skills, and good habits.

School is not about solving every social problem. The reality is that schools cannot single-handedly stop problems like substance abuse, smoking, drinking etc., among children and adolescents. What they can do is enhance students' knowledge and skills, promote the development of sound values, and take the necessary action when problems are identified so that the pupils concerned can find the necessary help and support.

The EEB3 Anti-Substance Abuse policy helps us implement these objectives. Our aim is to do our part in preventing the negative impact of drugs on the well-being of pupils and their environment. The aim of this policy document is to continue emphasizing that our school needs to continue being secure and offer a safe climate for teaching and learning to occur.

This Anti-Substance Abuse policy is in line with the Pupils' Well-Being Policy Framework ¹ of the European Schools.

II. Objectives and Application

The main objectives of this policy document are the following:

- ▶ To reinforce prevention activities and to increase awareness about substances misuse.
- ▶ Have a whole school approach to the issue of substance abuse where all stakeholders are aware of the school's policy.
- ▶ The Anti-Substance Abuse policy forms part of the EEB3 Well-Being Strategy.
- ▶ To ensure that the environment of schools is kept safe, and substance abuse free.
- ▶ To inform pupils, their parents/legal representatives, staff, and others, about the measures to be taken by the school in the situations of when substances are found or used in schools.
- ▶ To provide school staff with a practical tool that enables them to intervene in an appropriate manner when a substance is found or used in schools.
- ▶ To minimize harm and align with local legislation.
- ▶ To clarify the procedures for responding to and managing any substance-related incidents that may occur so that they are managed with confidence and consistency and in the best interests of those involved.

¹ <https://www.eursec.eu/BasicTexts/2022-01-D-6-en-2.pdf>

This policy:

- ▶ applies to all school staff (except for the medical staff who are governed by Belgian legislation. See Annex 1 for details), pupils, parents/legal representatives, and other partners working with/in the school.
- ▶ applies to the school premises, work experience, day, and residential school trips.
- ▶ must be communicated to all pupils, staff, and parents,
- ▶ This policy document is the fruit of the work carried out by the Anti-Substance Abuse Policy Working Group made up of school management and representatives of pupils, staff, and parents/legal representatives. The school's medical and safety and security services have also been consulted.

III. Definition

1. Definition of Drugs (Substances)

For the purpose of this policy, the term **drugs or substances** refers to any substance that alters brain function and results in changes in mood, perception, consciousness, cognition, or behavior.

This includes, but is not limited to:

- Alcohol
- Tobacco
- Illicit drugs
- Inhalants
- Vaping products
- Snus (oral tobacco)
- CBD (cannabidiol)
- Any other psychoactive substances

In some cases, this definition also extends to over the counter and prescribed medications (e.g., pharmaceuticals) that can induce a drug-like state.

2. Substance Abuse

Substance abuse refers to the harmful or hazardous use of psychoactive substances, including alcohol and illicit drugs. It encompasses both the misuse of legal substances and the use of illegal ones, often leading to addiction and other negative outcomes.

3. Illicit Drugs

An **illicit drug** is any substance whose use, possession, cultivation, or trafficking is prohibited by law. Illicit drug use includes:

- Using drugs in an illegal manner
- Using substances for unintended purposes
- Misusing products not intended to be drugs to achieve a drug-like effect.

4. Substance-Related Incidents

A **substance-related incident** involves any situation where a pupil is:

- Suspected of being under the influence of a drug and/or alcohol
- Found in possession of a drug or drug-use implement.
- In possession of a substance suspected to be illicit or unsanctioned
- Presenting or pretending to possess an illegal substance.
- Dealing/trafficking of a drug

IV. Prohibition

It is prohibited that on school premises and/or school organized activities (this includes when pupils are on a school activity or outside the school during the breaktime if they have the approval to do so) to:

- ▶ Possess, bring, and/or use any alcohol, tobacco and/or drugs.
- ▶ By law, no one can smoke within a 10-metre radius of a school.
- ▶ Deal, sell, share and/or traffic alcohol, tobacco and/or drugs.
- ▶ Be intoxicated and/or under the influence of a substance leading to unusual behaviour.
- ▶ Bring paraphanelia associated with substance abuse including lighters or matches.
- ▶ Incite others to make use of alcohol, tobacco, and/or drugs. Incitation may be verbal, written, online and via imagery and wording on clothes.

V. Prevention

Prevention of substance abuse should be focused on promoting healthy behaviour, building healthy lifestyles, and equipping pupils to face and respond appropriately to the challenges they will face in with respect to health-related issues, including the use of substances.

EEB3 will focus on prevention of substance abuse with its pupils in the following ways:

- ▶ Individual work with pupils who have a problem of substance abuse. The school does not offer therapy however we do offer support for pupils who wish to discuss such issues with a trusted member of staff. Normally, this would be the Pedagogical Advisor or the School Psychologist. The school will make links with external agencies when this is thought to be useful.
- ▶ Prevention workshops organized in house and/or external agencies (online and in situ) such as Stop a la Drogue. The frequency and distribution of such workshops depends on the availability of these external expert agencies. Health risks of substance abuse can be another area of prevention.
- ▶ Training of staff on issues related to substance abuse such as raising awareness, recognizing signs and symptoms, and knowing what to do if there is information or a strong suspicion of substance abuse.
- ▶ Communication of related policies and procedures to all stakeholders so that all are informed about the school's position and steps taken in such situations.

VI. Detection

Since awareness-raising measures alone cannot produce infallible results, monitoring is a must. Supervision is handled by all members of EEB 3 staff including those on supervisory duties. Supervision is normally general, i.e., not targeted at a particular pupil or group of pupils. A member of staff observing the use or possession of any substance will report this information to the Assistant Deputy Director (ADDs) of the Secondary Cycle, who will take appropriate action.

If a member of the school community suspects a pupil of using or possessing a substance(s), and these suspicions are supported by objective facts, he/she accompanies the pupil to a member of the management team.

In case of suspicion, searches of pupil property may be held at school. The school may invite pupils to empty their pockets, bag, and/or locker. This will be done in the presence of two adults. If a pupil refuses such search, then this will be logged down by the adults concerned and be a fact considered when the next step is being planned out, for example, when considering the involvement of reporting to outside agencies such as the police.

VII. Intervention

The school may receive information about an alleged case of substance abuse in several ways:

1. Disclosure by the actual pupil concerned.
2. Disclosure by third parties.
3. Evidence of substances which are not allowed at school found on school premises or activities (including exit time during the break time if a pupil is given permission by their parents to leave the school).
4. Strong suspicion of substance abuse due to signs and symptoms.

a. Assessing pupil's physical well-being

When the school receives such an allegation, the first important element that needs to be decided upon is the health of the pupil concerned.

If any member of the school staff sees signs of the pupil being physically unwell, the first action to be taken is to send or accompany the pupil to the infirmary. The situation will be treated as a medical emergency.

The infirmary will decide on the medical attention needed. If the pupil needs hospitalization, the infirmary will call an ambulance and the parents/legal representatives are informed by the infirmary as in any other medical emergency.

More information about how the EEB3 infirmary manage such cases can be found in Annex 1.

Not each case of suspected substance abuse will include a health issue and therefore the pupil may not need to be sent to the infirmary.

b. Initial Referral Procedure

The employee who has made the initial referral of the case must report the incident to the ADDS. The template found in Annex 2 needs to be filled in and handed to the ADDS. Some cases will be handled by the ADDS, for example, smoking in school/school activities. However, there are other more serious cases that will need to be referred by the, ADDS to the Deputy Director of the Secondary Cycle (DDS), and other very serious situations where the Director would need to be informed.

Cases involving smoking tobacco, vaping and possession of alcohol are dealt with at cycle level and will include sanctions in line with the school's Good Behaviour Policy. If a member of staff becomes aware of such a situation, the ADDS should be informed and the necessary action will take place.

Cases involving illicit drugs or being intoxicated and/or under the influence of a substance leading to unusual and/or concerning behaviour will be processed in the following way:

- a. The member of staff who first refers such a case as the latter must inform the ADDS and fill in a report when it is possible. See Annex 2 for the template of the report. If the student appears to need immediate medical attention, the infirmary is notified.
- b. The ADDS who receives the allegation from the employee organizes an Anti-Substance Abuse Action Plan Meeting as soon as possible. Depending on the severity of the case the relevant members of staff will be invited. These can include Director, DDS, ADDS, referring employee, class teacher, pedagogical advisor, nurse, any other member of staff who can give a relevant contribution. The team present discuss the plan of action. Normally, the first step to be taken is to inform the parents/legal representatives of the

pupil/s concerned by telephone and generally call them in for a meeting. After each of such meetings, the minutes are taken. See template in Annex 3.

- c. The parents/legal representatives may be asked to come and collect the pupil immediately from school. In some cases, the parents may be advised to have a urine or blood test done. The school may ask for a medical certificate of fitness. If the pupil and/or the parents/legal representatives refuses to take a urine test, the school has the right to give back the guardianship of the pupil to the parents/ legal representatives until the school receives confirmation in writing (result of test or medical certificate) that the pupil concerned is fit to attend class. For actions taken by the school if a test is negative or positive, see Annex 4.
- d. There may be cases where the social services may need to be informed. In this case, SAJ (Service de l'aide a la jeunesse – Help Service for Youths) are to be contacted. The contact is made by a member of the school management or a designated member of staff such as the school psychologist.
- e. Depending on the case, if there is an allegation of a crime being committed, the school may need to inform and report to the police.

Any intervention must:

- ▶ Help the pupil concerned to change his/her behaviour.
- ▶ Protect other pupils from the negative influence this pupil could have on them.

In the case of a proven fact involving substances, a clear distinction must be made between two cases:

- a. Pupils under the influence of substance(s) at school: personal consumption
- b. Pupils inciting others to use substance(s)

VIII. Confidentiality

Confidentiality of disclosure made by pupils is kept unless there is:

1. Harm to self (or possible harm)
2. Harm to others
3. Harm being done to the pupil concerned.

In these cases, the employee who receives the disclosure must refer the case and cannot keep confidentiality.

IX. Confiscation

If alcohol and/or tobacco are found on school premises, actions will be taken by the school management in line with the school's Good Behaviour Policy. The ADDS should be informed and the above-mentioned policy (Good Behaviour Policy) will be implemented.

If the case involves illicit drugs, it will be processed in the following way.

- If illicit drugs are found on school premises (not on a pupil) by a member of staff, they are not to touch the substance, but are obliged to inform the ADDS immediately.
- The ADDS will go to the location with another member of staff (e.g., Safety and Security Officer, Pedagogical Advisor, etc). The said substance will be placed in a plastic bag and sealed.

- The two employees will then take this bag and place in the school safe which has limited access to authorised personnel. Inside the bag the details of location and date of when the substance was found will be included. Annex 5 will be filled in.
- The ADDS will start the referral procedure as explained above.
- The police are immediately informed that a substance is found on school premises and asked to come and collect the substance. The ADDS and witness will fill in Annex III. The date and name of police officer who picks up substance will also be noted in the form.
- If the employee who finds the substance knows who the substance belongs too, then the intervention procedure explained above will be activated.
- If an illicit drug is found on a pupil (e.g., a pupil caught smoking a joint, etc), the employee will ask the pupil to accompany them to the ADDS. The pupil will be asked to place the substance in the bag and the procedure explained above will be activated. Possession by pupils of illicit drugs on school premises and/ or activities linked to illicit drugs will generally trigger a Discipline Council in accordance with Chapter VI of the General Rules of the European Schools.
- Permanent exclusion from the school is a possible sanction.

X. Report Keeping and Retention

Records of cases of substance abuse are kept by the school.

The school keeps the following records with student personal data:

1. The referral form filled in by the employee who initially refers the case (Annex 2).
2. The form of the meeting/s held by the school to design a plan of action (Annex 3).

These forms are not kept in the pupil's individual file. They are kept in a confidential file kept by the ADDS. The Director and Deputy Director have access to this file.

This file will be destroyed after in accordance with the retention periods stipulated in the Privacy Statement in Annex 5.

The records of a disciplinary council are kept in accordance with the regulations stipulated in the General Rules of the European Schools.

Any results of urine tests that are provided to the school are kept in the pupil's medical file at school.

XI. Incitation and/or Dealing of Substances

EEB3 has a zero tolerance to any form of drug dealing, trafficking, selling, incitation on school premises or on school related activities (including school exit during break time).

If a pupil is found to have incited other pupil(s) to use substances (verbally, online or by supplying/selling substances), disciplinary sanctions will be very severe.

Although the measures taken will be aimed at helping the pupil concerned to modify his or her behavior, the school's primary concern will be to protect all other pupils.

In such cases, a Discipline Council is generally organized.

Depending on the case and the details known to the school, the police may need to be informed in such cases.

XII. Support for Pupils with Drug Related problems

The school will do its best to support any pupil who has a drug related problem. Pupils going through this experience are encouraged to make use of any support service the school has to offer. A pupil who has an addiction or is in danger of developing an addiction can find support at school to discuss the issue.

The school does not offer therapy however the pupil can discuss the matter with:

1. Pedagogical Advisor
2. School Psychologist

Pupils may also feel comfortable to talk to any member of staff; however, it is possible that this member of staff may need to refer the case to a more specialised person.

However, as stated before the school does not have specialized help in this area. The Home School Liaison Officer² will work with outside agencies if a pupil is in a residential drug rehabilitation programme and will monitor and coordinate any approved return to school.

While the school will be supportive of pupils who have a substance related problem, this does not mean that disciplinary action will not be put in place in such cases.

XIII. Consequences including Disciplinary Measures

Any situation related to substance abuse will be dealt with on an individual level and will analyse each situation so that all action is taken for the benefit of the pupil/s involved.

However, due to the EEB3 zero tolerance disciplinary consequences in such situations are common and to be expected. Possible disciplinary measures are stated in the school regulations.

The EEB3 Good Behaviour Policy will be implemented in cases related to substance abuse. The school will respond appropriately to each individual case by selecting from a range of possible sanctions.

Possession and/or dealing of illegal substances always triggers a Disciplinary Council.

As mentioned before, there may be serious circumstances when the school will decide to report the case to the police.

XIV. School's collaboration with the Police

There may be cases where the school is contacted by the Police seeking information about a case that is related to substance abuse. In such cases, the school is obliged by law to provide the police with any information that is in their possession.

XV. Helpful Resources

Information concerning (il)legal substance and support services in Belgium:

- www.vad.be (NL)
- www.druglijn.be (NL)
- <https://infordroques.be/> (FR) <https://www.talktofrank.com/> (EN)

² The Home School Liaison Officer is a teacher employed at EEB 3 who forms part of the Educational Support Programme and is responsible for creating links between the school, the family, the pupil and any outside agencies supporting the pupil.

Annex 1

The role of nurses and school doctors at EEB 3 in terms of substance abuse

Professional Confidentiality: A Fundamental Obligation

School doctors and nurses are, above all, healthcare professionals bound by professional confidentiality (Article 458 of the Penal Code). This means that they are not required to report simple drug use or possession to judicial authorities. Their role is to:

- Protect the student's health and safety
- Provide help and guidance
- Refer to specialized services when necessary

Exceptions to Confidentiality and Reporting to Authorities

Professional confidentiality may be lifted (Article 458bis of the Penal Code) **only** in cases of serious and imminent danger to a person's integrity, and **only** if no other protective measures are possible.

In practice, reporting to the police or the Public Prosecutor would generally occur only in cases of:

- Proven drug trafficking (a civic duty to report)
- Serious and ongoing danger to the minor
- Repeated problematic behavior
- Situations endangering other minors

Simply being under the influence of drugs or alcohol does **not** automatically lead to criminal reporting. The preferred approach of the infirmary is support and prevention, starting with the student's primary contacts (parents) and referral to youth services.

What Happens at the School Infirmary?

When a student comes to the infirmary under the influence of drugs or alcohol, our top priority is their **protection and safety**.

- **Health and Safety First:** We provide first aid, ensure a safe environment, and assess the student's condition.
- **Duty of Care:** A student under the influence is considered potentially at risk, and we have a duty to assist.
- **Informing Parents:** For minors, informing parents is almost always standard—unless the parents themselves pose a danger. We explain to the student, if they are able to understand, the importance and, depending on their age, the obligation to talk to their parents or go to the hospital if needed.

Annex 2

EEB3 | Initial Referral Form | Substance Abuse Concern | Confidential

EEB3 Staff are required to complete this form and send it to the ADDS, if they have a concern about Substance Abuse from a pupil in our school.

Information Required	Enter Information Here
First name of pupil	
Surname of Pupil	
Year	
Section	
Class	
Date of birth of pupil	
Position in school of person referring case (eg teacher, Educational Support Assistant, Secretary, etc)	
Did the pupil concerned disclose?	Yes No
Did other pupils disclose about another pupil?	Name, surname, year, and class including section of pupil/s concerned.
Nature of Disclosure (check one or more of the)	Usage by a pupil/s Dealing, trafficking, selling of substances Incitation to use
Facts of incident of situation (where possible include dates, location, physical signs observed, witnesses, etc)	
Time & date of incident:	
Name and Surname of Person referring case	
Signature of Person referring case	
Time and date this form has been completed and sent.	

Annex 3

Anti-Substance Abuse Action Plan Meeting | Confidential

Information Required	Enter Information Here		
First name of pupil/s			
Surname of pupil/s			
Year			
Section			
Class			
Date of birth of pupil/s			
Reason for this meeting			
Key points discussed			
Agreed action plan and key person responsible for each action	Action	Name and surname of person responsible	
Date and time of meeting			
Date and time of next meeting (if applicable)			
Names of persons present and their role in the school	Micheline Sciberras	Director	signature
	Peter Garry	Deputy Director	signature
	Beata Rudalska	Assistant Deputy Director	signature
		Teacher	signature
This form has been filled in by:			

Signature:	
Date:	

Annex 4

Recording of Substance/s found on school premises

Date of substance being found	Location of substance	Name and surname of Person who found substance	Name and Surname of Assistant Deputy Director	Signature of ADD	Name and Surname of Witness	Signature of Witness	Date of when police pick up substance	Name and Surname of Officer who picks up substance

Annex 5

Privacy statement related to the school's Anti-Substance Abuse Policy

This privacy statement explains how the European School of Brussels III ("the School") collects, uses, stores, and shares pupils' personal data in the context of its Anti-Substance Abuse Policy. The School is committed to handling this data with the utmost care and confidentiality, in compliance with the EU General Data Protection Regulation (GDPR) and applicable Belgian data protection laws. This statement is provided in a clear and transparent manner to inform parents, legal representatives, and pupils about our data practices and to uphold our obligations under GDPR.

I. Who is the Controller

The controller responsible for processing personal data under the Anti-Substance Abuse Policy is the European School of Brussels III.

II. What data do we process?

As part of the Anti-Substance Abuse Policy, the School may collect and process the following categories of pupil's data:

1. **Identification data:** Name, class, year group, date of birth, contact details.
2. **Incident records:** Date, time, location, description of the event, objective observations of people involved/witnesses, photos of items (if any) and forms (Annex 2); Items found/confiscated (Annex 4); Follow-up actions and plan (Annex 3); Disciplinary proceedings where applicable.
3. **Health data** (Art. 9 GDPR): Only where strictly necessary and handled by the school medical service (e.g., first-aid records, referrals). The School may receive a fit/unfit to attend statement from outside medical professionals where appropriate.
4. **Offence-related data** (Art. 10 GDPR): Facts that indicate a potential criminal offence under Belgian law in connection with an incident (e.g., alleged possession or supply of illegal drugs on school premises), communications and references needed to cooperate with competent authorities (e.g., police file numbers). We process such data only when authorised by law and strictly necessary, under Article 10 GDPR and the Belgian Act of 30 July 2018³, with appropriate safeguards (role-based access, access-lists, logging, strict minimisation).
5. **Communication records:** Emails or correspondence with parents or external specialists or agencies whenever abusive incident are detected.
6. **Administrative and security logs:** access-logs to case files, disclosure logs (e.g., to police or child/youth protection organisation).

III. Where the data come from

As mentioned in article VII of the Anti-substance abuse policy, the data is collected either through:

- 1) Directly disclosure from the pupils or their legal representatives.
- 2) Disclosure by third parties, either staff through the provided referral procedures or, if applicable, when the school is contacted directly by competent authorities (e.g., police/or youth protection service).

³ Act of 30 July 2018 on the protection of natural persons concerning the processing of personal data (the [Data Protection Act](#)).

IV. What are the legal basis and purposes for processing?

Purposes	Legal basis (Art. 6 GDPR)	Special-category health data (Art. 9 GDPR) or Offence-related data (Art. 10 GDPR)
Keep pupils and staff safe; maintain a substance-free environment	6(1)(e) public task (carrying out the school's duty to provide education and pupil welfare)	Not normally involving special category data
Assess and manage substance-related incidents (fact-finding, securing items, internal sharing on a strict need-to-know basis)	Art. 6(1)(e) Public task (maintaining a safe school environment); and/or Art. 6(1)(c) Legal obligation (health & safety/child protection duties); Art. 6(1)(d) where urgent to protect life/health	Art. 9(2)(g) – Substantial public interest (school health promotion and safeguarding duties under Belgian legislation); 9(2)(h) Health care (school nurse/doctor); 9(2)(f) Legal claims (where necessary to establish, exercise or defend claims); 9(2)(c) Vital interests (emergency situations)
Educational/disciplinary follow-up (apply school rules, sanctions, appeals)	6(1)(e) public task (education and pupil welfare)	Not normally involving special category data
Cooperate with authorities (police/SAJ) where required or strictly necessary	6(1)(c) legal obligation (reporting duties) and/or 6(1)(e) public task (pupil welfare - cooperation with competent authorities where necessary for safeguarding)	9(2)(c) vital interests or Art. 9(2)(g) – Substantial public interest (school health promotion and safeguarding duties under Belgian legislation); Art. 10 GDPR – Processing of offence-related data (e.g. suspected drug possession/use) permitted under Belgian law (Penal Code, education and youth aid decrees).
Maintain records (referral forms, action plans, communications, minutes, disclosure logs)	6(1)(e) public task (pupil welfare); 6(1)(c) where a record is legally required	Health data kept only by the medical service under 9(2)(h)
Medical assessment & emergency care (nurse/doctor/ambulance)	6(1)(d) vital interests (emergency situations) and/or 6(1)(e) public task (pupil welfare)	9(2)(c) vital interests (emergency situations) and/or 9(2)(h) health care by a professional.

V. With whom data is shared / disclosed?

We treat all personal data processed under this Anti-Substance Abuse Policy as confidential. Access and sharing occur only on a strict need-to-know basis and—where health data are involved—are subject to medical secrecy.

1) Within the School

- Designated leadership/student support services staff (e.g., ADDS, Deputy Director/Director, school psychologist, pedagogical advisor, etc) to assess and manage incidents.
- Relevant teaching or support staff only where necessary for follow-up (e.g., supervising a sanction or support plan).
- School medical service (nurses and school doctor) for health data only, held in a separate medical file under professional secrecy.

2) Outside the School

- Competent public authorities (e.g., police, SAJ) only where required by law or strictly necessary to address serious risks or offences. We minimise what we share and log every disclosure. Offence-related data are handled under Art.10 GDPR and the Belgian Data Protection Act with appropriate safeguards.
- IT Service providers (processors) that host or support our systems provided by the Office of the Secretary general of the European Schools (hereafter "OSGES") to facilitate the administrative management of the School's activities (i.e. SMS, O365).

VI. How we use and store the data?

The School utilizes OSGES-provided tools (e.g., Microsoft 365) for communication and secure data management, while paper records are either digitized or retained in locked cabinets. Please refer to the [School's main privacy statement](#) for further information.

VII. How we protect personal data (security measures)?

The School protects pupil data through layered technical, organisational, and physical safeguards, including secure OSGES systems with role-based access, staff training, and locked storage for paper records, with special-category data minimised and restricted to authorised personnel. Data sharing occurs only via secure channels, while monitoring, breach-response procedures, and regular reviews ensure compliance with GDPR and ongoing protection of pupil information. Please refer to the [School's main privacy statement](#) for further information.

VIII. How long we keep the data (Retention period)

We keep personal data only as long as necessary for safety, follow-up, and legal/appeal periods, then we delete or anonymise. Unless a procedure or claim is ongoing, we apply the following retention periods:

1. Unsubstantiated suspicions will be deleted within sixty (60) days.
2. Minor incidents (e.g., tobacco/vaping) and related forms/minutes are kept until the end of school year + one (1) year.
3. Serious incidents will be kept for three (3) years.
4. Disciplinary council outcomes: per retention policy currently in place. See the [Good Behaviour Policy](#) and the [Disciplinary Measures Record Keeping document](#)
5. Police/authority disclosure logs will be kept for five (5) years.
6. Health data: kept only in the medical file, per [General Rules of the European Schools](#)

IX. What are the pupil's rights?

Please refer to article 7 and 8 of the [School's main privacy statement](#) for further information.

We may update this section related to privacy to reflect legal or operational changes. Substantive changes will be communicated through our usual school channels