

**Foundation for Educational Services  
Data Protection Policy  
(including Childcare Centres, Skolasajf and  
Klabb 3-16 Services)  
Updated: 29th November 2021**



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## 1. Introductory Statement

- 1.1. All personal information which the Foundation for Educational services holds is protected by the Data Protection Act, Chapter 586 of the Laws of Malta.
- 1.2. This policy document sets out, in writing, the manner in which personal data relating to staff, students and other individuals such as parents, guardians and custodians, are kept, the retention period, and how the relative data is protected.
- 1.3. This policy document applies to the keeping and processing of personal data, both in manual as well as in electronic form. This policy aims to assist the Foundation for Educational Services to meet its statutory obligations and to inform the management, employees, service users and their parents/guardians/custodians how their data shall be treated.

## 2. Data Protection Principles

- 2.1. The Foundation for Educational Services act as a data controller of personal data relating to its past, present and future employees, service users, parents, guardians, custodians, boards of management, and various other individuals. To this end, the Foundation for Educational Services is obliged to comply with the principles of data protection set out in the Data Protection Act, which could be summarised as follows:

- 2.1.1. Obtainment and Processing of Personal Data in a Fair Manner:

Information about the Foundation for Educational Services' service users is gathered with the help of parents and/or guardians and/or custodians.

Information relating to employees, members of staff, individuals applying for positions within the Foundation for Educational Services is generally furnished by the individuals themselves, with full and informed consent, and compiled during the course of their employment or contact with the Foundation for Educational Services.

All such data is treated in accordance with the Data Protection Act and the terms of this Data Protection Policy. The information is obtained and processed fairly; an end achieved through the adoption of the appropriate data protection notices at the point of data capture, for example, Service Users' Enrolment Forms and Staff Application Forms.

- 2.1.2. Information is kept only for one or more specified and explicit lawful purpose: the Foundation for Educational Services informs individuals of the reasons behind the collection of their data, as well as of the uses to which their data will be put. All information is at all points maintained with the best interest of the individual in mind.
- 2.1.3. Information is only processed in ways compatible with the purposes for which it was originally given: data relating to individuals is only processed in a manner that is consistent with the purposes for which it was originally gathered. Information is only disclosed on a need-to-know basis, and access to it is strictly controlled. From time to time, it may be necessary for the Foundation for Educational Services to disclose employees' personal information to third parties, including but not limited to, the Inland Revenue Commissioner, the National Statistics' Office, educational institutions, trade unions, staff associations, and/or other governmental bodies.

Service users' data may be disclosed to third parties, including but not limited to, departments directly associated with child protection issues, medical bodies, and/or other bodies. At certain points, it may be necessary to disclose information in order to comply with any legal obligations. The Foundation for Educational Services takes all reasonable steps as required by law in order to ensure the safety, privacy and integrity of the disclosed information, and, where necessary and appropriate, enter into contracts with such third parties to fully protect the privacy and integrity of any information supplied.

2.1.4. Keeping personal data safe and secure: it is an all-time principle that only those individuals with genuine reasons to do so may gain access to the information. Sensitive personal data is securely stored under lock and key in the case of manual records, and protected by firewall software and password protection in the case of electronically stored data. The Foundation for Educational Services takes appropriate security measures against unauthorised access to, or alteration, disclosure or destruction of the data and against any accidental loss or destruction.

2.1.5. Keeping personal data in an accurate, complete and up-to-date manner: service users, parents/guardians/custodians, and/or employees are bound to inform the Foundation for Educational Services of any change which should be made to their personal data, and this to ensure that the individual's data is accurate, complete and up-to-date. Once so informed, the Foundation for Educational Services shall make all the necessary changes to the relative records.

Whenever alteration or correction is required, a note attesting to the authorisation to conduct the same as well as the alteration or correction to be made to any original record and/or documentation should be dated and signed by the person making the change.

2.1.6. Ensuring that obtained data is adequate, relevant and not excessive: only the necessary amount of information required to provide an adequate service will be gathered and stored.

2.1.7. Ensuring that data is retained for no longer than is necessary for the specific purposes for which it was given as outlined in Section 5 of this Policy.

Personal data processed for statistical and research purposes are made anonymous. Where data is required for research related to service users, consent is sought from the parent / legal guardian prior to its disclosure only when the research / statistics will not be rendered anonymous.

2.1.8. The Foundation for Educational Services obtains parents'/legal guardians' approval prior the taking of visual images in the form of photos, videos or other means, within its centres. It is pertinent to point out that Foundation is only responsible for visual images taken by its staff members. Other persons taking visual images for personal use during an activity are personally responsible for the use of such visual images. Where a public event is held in the centre for which there will be the press covering the event, the parents will be informed beforehand and asked for their consent. Following any filming/photography undertaken by the members of the press, the Foundation has no control on how such material will be used whatsoever.

- 2.1.9. Provision of copies of their personal data to any individual, on request: since individuals have a right to know what personal data is held about them, by who, and the purpose for which it is held, upon making an access request, any individual about whom the Foundation for Educational Services keeps personal data, is entitled to a copy of their personal data.

### 3. Definition of Data Protection Terms:

- 3.1. **Definitions:** In order to properly understand the Foundation for Educational Services' obligations, there are some key terms that need to be understood by all the management and staff.

- 3.1.1. Personal Data means ANY information relating to an identified or identifiable natural person; or an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

The term "any" makes it clear that the spirit of the Act is not to narrow the definition by listing what constitutes information, for instance, a person's name and surname, but leaves the definition open to interpretation.

- 3.1.2. Data subject means a natural person to whom the personal data relates. A deceased person and a legal person are not considered as data subjects.
- 3.1.3. Controller of personal data means a person who alone or jointly with others determines the purposes and means of the processing of personal data. A data controller could be individuals, organisations or any other body corporate. Data controllers must ensure that any processing of personal data for which they are responsible complies with the Act.
- 3.1.4. Processor means a person who processes personal data on behalf of the controller.
- 3.1.5. Processing of personal data, mean any operation or set of operations which is taken in regard to personal data, including the collection, recording, organisation, storage, adaptation, alteration, retrieval, gathering, use, disclosure by transmission, dissemination or otherwise making information available, alignment or combination, blocking, erasure or destruction of such data.

## 4. Other Legal Obligations

4.1. Implementation of this Policy should take full account of the legal obligations and responsibilities imposed on the Foundation for Educational Services. This is especially since some legislation places an obligation on the Foundation for Educational Services to obtain and retain personal data and is thus directly relevant to data protection. For example:

- i. Social Security Act; Chapter 318 of the Laws of Malta;
- ii. Children and Young Persons Act; Chapter 285 of the Laws of Malta;
- iii. Employment and Industrial Relations Act; Chapter 452 of the Laws of Malta;
- iv. Retirement Pensions Act; Chapter 514 of the Laws of Malta;
- v. Auditor General and National Audit Office Act; Chapter 396 of the Laws of Malta;
- vi. Occupational Health and Safety Authority Act; Chapter 424 of the Laws of Malta;
- vii. Education Act; Chapter 327 of the Laws of Malta.

## 5. Retention

| <u>Category</u>  | <u>Retention Period</u><br><b>*applies for both soft and hard copy</b>   | <u>Storage</u>  | <u>Employees having access to such information</u>   |
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| <b><u>Human Resources</u></b>  |  |   |  |
| Affidavits   | Retention period will be <b>5 years</b> from date of Affidavit.  | HR Department<br>Archive Room at Head Office                              | CEO<br>Head HR<br>Manager HR<br>Programme Coordinator HR<br>Coordinator HR<br>Programme Secretary HR                       |
| Application forms to work with the FES (both internal and external, successful and unsuccessful) | Retention period will be for <b>5 years</b> following the validity period of the call unless a complaint has been filed on the process in which case the relevant data needs to be retained until this complaint is addressed. | Electronically on the FES recruitment portal<br>HR Department<br>Archives | CEO<br>Head HR<br>Manager HR<br>Programme Coordinator HR<br>Coordinator HR<br>Programme Secretary HR<br>Interviewing Board |
| Attendances of students requested by Jobsplus related to Jobsplus placements                     | Retention period till <b>2 months from end of placement.</b>   | Services Unit<br>Childcare Centre   | Programme Coordinator Services<br>Centre Coordinator<br>Programme Secretary HR   |
| Career Exposure Experience Form  | Retention period till <b>2 months from end of placement.</b>   | Services Unit<br>Childcare Centre   | CEO<br>Manager Services<br>Programme Coordinator Services  |

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|   |   |   | Centre Coordinator<br>Programme Secretary HR   |
| Centres Staff Lists<br>(containing staff details of a particular centre)  | Retention period will be for <b>5 years</b>   | Electronically on the FES recruitment portal<br>HR Department                         | CEO<br>Head HR<br>Manager HR<br>Programme Coordinator HR<br>Coordinator HR<br>Programme Secretary HR<br>Manager Services<br>Programme Coordinator Services<br>Centre Coordinator |
| Collective Agreements   | Physical and Electronic file will be retained for <b>8 years</b> from the date the collective agreement expires | All FES employees are entitled to have a copy   | All FES employees are entitled to have a copy  |
| Contract of student placements by Jobsplus  | Retention period till <b>2 months from end of placement.</b>  | Services Unit<br>Childcare Centre   | Programme Coordinator Services<br>Centre Coordinator<br>Programme Secretary HR   |
| Employee Personal File<br>including: <ul style="list-style-type: none"> <li>• CV</li> <li>• certificates</li> <li>• employment contract</li> <li>• teleworking agreements</li> <li>• performance reviews</li> <li>• disciplinary records</li> </ul> | Retention period will be for <b>10 years</b>  | HR Department<br>Archive Room at Head Office<br>(when the employee leaves the entity) | CEO<br>Head HR<br>Manager HR<br>Programme Coordinator HR<br>Coordinator HR<br>Programme Secretary HR<br>Centre Coordinator   |



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| <ul style="list-style-type: none"> <li>• engagement forms (which includes taxation, social security and IBAN number)</li> <li>• medical history</li> <li>• data protection agreements</li> <li>• applications for transfer of leave</li> <li>• warnings.</li> </ul> |   |               |  |
| Generic Email – HR  | Retention period will be for <b>2 years</b> | HR Department | CEO<br>Head HR<br>Manager HR<br>Programme Coordinator HR<br>Coordinator HR<br>Programme Secretary HR |

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| Grievances File  | Retention period will be for <b>3 years</b>                         | HR Department<br>Archive Room at Head Office<br>(when the employee leaves the entity)        | CEO<br>Head HR<br>Manager HR<br>Programme Coordinator HR<br>Coordinator HR<br>Programme Secretary HR  |
| Industrial Tribunal Files (including termination cases solved by DIER/Court) | Retention period will be <b>5 years</b> from date of court sentence | HR Department<br>Archive Room at Head Office<br>(when the employee leaves the entity)        | CEO<br>Head HR<br>Manager HR  |
| Injuries on duty   | Retention period will be for <b>1 year</b>                          | HR Department<br>Archive Room at Head Office<br>(when the employee leaves the entity)        | CEO<br>Head HR<br>Manager HR<br>Programme Coordinator HR<br>Coordinator HR<br>Programme Secretary HR  |
| Interview Records  | Retention period will be for <b>5 years</b>                         | Electronically on the FES recruitment portal<br>HR Department<br>Archive Room at Head Office | CEO (if the need arises)<br>Head HR<br>Manager HR<br>Programme Coordinator HR<br>Coordinator HR<br>Programme Secretary HR<br>Interviewing Board |
| Recruitment File   | Retention period will be for <b>5 years</b>                         | HR Department<br>Archive Room at Head Office   | CEO (if the need arises)<br>Head HR<br>Manager HR<br>Programme Coordinator HR<br>Coordinator HR<br>Programme Secretary HR<br>Interviewing Board |

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| Reference Letters Issued  | Retention period will be for <b>2 years or until employee leaves the entity</b> | HR Department  | Head HR<br>Manager HR<br>Programme Coordinator HR<br>Coordinator HR<br>Programme Secretary HR           |
| Requests to deal with Jobsplus on their behalf  | Retention period will be for <b>3 years</b>                                     | HR Department  | Head HR<br>Manager HR<br>Programme Coordinator HR<br>Coordinator HR<br>Programme Secretary HR           |
| Student Placement Agreement (Child Care Centres)  | Retention period till <b>2 months from end of placement.</b>                    | Services Unit<br>Childcare Centre  | Programme Coordinator Services<br>Centre Coordinator<br>Programme Secretary HR<br>Child Care Assistants |
| Student, Volunteer and Intern Placement Request Form which includes: <ul style="list-style-type: none"> <li>• Copy of ID Card of applicant</li> <li>• Recent Police Conduct Certificate</li> <li>• CV of applicant</li> <li>• Letter of reference by the referring tutor</li> <li>• Letter of approval from parents (from students</li> </ul> | Retention period till <b>2 months from end of placement.</b>                    | Services Unit<br>Childcare/Klabb 3-16/<br>Skolasajf centre where the student/volunteer is placed | Programme Coordinator Services<br>Centre Coordinator<br>Programme Secretary HR                          |

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| below 18 years of age)<br>• Copy of Consent Form to be given to parents |                                     |  |  |
| <b>Training</b>   |                                     |  |  |
| CV  | Retention period of <b>40 years</b> | HR Department<br>Programmes Department | Head HR<br>Head Programmes<br>Manager HR<br>Programme Coordinator HR<br>Coordinator HR<br>Programme Secretary HR |
| First Aid Certificate   | Retention period of <b>40 years</b> | HR Department<br>Programmes Department | Head HR<br>Head Programmes<br>Manager HR<br>Programme Coordinator HR<br>Coordinator HR<br>Programme Secretary HR |
| Placement Sheet   | Retention period of <b>40 years</b> | HR Department<br>Programmes Department | Head HR<br>Head Programmes<br>Manager HR<br>Programme Coordinator HR<br>Coordinator HR<br>Programme Secretary HR |
| Police Conduct  | Retention period of <b>40 years</b> | HR Department<br>Programmes Department | Head HR<br>Head Programmes<br>Manager HR<br>Programme Coordinator HR   |

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|  |  |   | Coordinator HR<br>Programme Secretary HR   |
| Reference Letter                               | Retention period of <b>40 years</b>                        | HR Department<br>Programmes Department  | Head HR<br>Head Programmes<br>Manager HR<br>Programme Coordinator HR<br>Coordinator HR<br>Programme Secretary HR |
| School Leaving Certificate                     | Retention period of <b>40 years</b>                        | HR Department<br>Programmes Department  | Head HR<br>Head Programmes<br>Manager HR<br>Programme Coordinator HR<br>Coordinator HR<br>Programme Secretary HR |
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| <b>Childcare Services</b>                      |  |   |  |
| Activity Plans for Children                    | Retention of <b>6 months</b>                               | Child Care Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Child Care Centre Coordinator<br>Programmes Unit   |
| Affidavits                                     | Retention till <b>2 months from termination of service</b> | Child Care Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Child Care Centre Coordinator<br>Programmes Unit   |
| Agenzija Appogg Child Protection Referral Form | Retention till <b>2 months from termination of service</b> | Child Care Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Child Care Centre Coordinator<br>Programmes Unit<br>Agenzija Appogg  |

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| Authorise third parties to collect children consent form | Retention till <b>2 months from termination of service</b>          | Child Care Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Child Care Centre Coordinator<br>Programmes Unit<br>Childcare Assistants<br>Programme Secretary (Child Care) |
| Birth Certificate  | Retention till <b>2 months from termination of service</b>          | Child Care Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Child Care Centre Coordinator<br>Programmes Unit<br>Programme Secretary (Child Care)                         |
| Biting Incident Form                                     | Retention till <b>2 months from termination of service</b>          | Child Care Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Child Care Centre Coordinator<br>Programmes Unit<br>Programme Secretary (Child Care)                         |
| CCTV Footage   | Retention of <b>10 to 28 days</b> depending on the system installed | Childcare Centre  | Childcare Centre Coordinator<br>Programmes Unit if the need arises   |
| Child well-being consent form                            | Retention till <b>2 months from termination of service</b>          | Child Care Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Child Care Centre Coordinator<br>Programmes Unit<br>Programme Secretary (Child Care)                         |
| Children's personal information sheet                    | Retention till <b>2 months from termination of service</b>          | Child Care Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Child Care Centre Coordinator<br>Programmes Unit<br>Childcare Assistants<br>Programme Secretary (Child Care) |
| Children's Attendances                                   | Retention till <b>2 months from termination of service</b>          | Child Care Centre   | Child Care Centre Coordinator<br>Services Unit<br>Childcare Assistants<br>Programme Secretary (Child Care)   |

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|  |  | *in case of special cases this may be brought to HEAD OFFICE                          |  |
| Children's Time in and Time out Sheet  | Retention till <b>2 months from termination of service</b> | Child Care Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Child Care Centre Coordinator<br>Programmes Unit<br>Childcare Assistants<br>Programme Secretary (Child Care) |
| Cleaning Schedule                      | Retention till <b>end of year</b>                          | Child Care Centre   | Child Care Centre Coordinator  |
| Cleaning Time Sheet                    | Retention period of <b>10 years</b>                        | Child Care Centre   | Child Care Centre Coordinator<br>Programme Secretary (Child Care)<br>Business Unit                           |
| Complaints Forms                       | Retention till <b>2 months from termination of service</b> | Child Care Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Child Care Centre Coordinator<br>Programmes Unit<br>Programme Secretary (Child Care)                         |
| Coordinators' meetings minutes         | Retention period of <b>2 years</b>                         | Child Care Centre   | Child Care Centre Coordinator<br>Programmes Unit   |
| Custody Documents – where applicable   | Retention till <b>2 months from termination of service</b> | Child Care Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Child Care Centre Coordinator<br>Programmes Unit<br>Programme Secretary (Child Care)                         |
| Free Child Care Scheme monthly booking | Retention till <b>2 months from termination of service</b> | Child Care Centre   | Child Care Centre Coordinator<br>Programmes Unit<br>Programme Secretary (Child Care)                         |

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|   |  | *in case of special cases this may be brought to HEAD OFFICE                          | Business Support Unit<br>Jobsplus  |
| ID Cards –<br>Authorised Persons<br>to pick up children           | Retention till <b>2 months from termination of service</b>   | Child Care Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Child Care Centre Coordinator<br>Programmes Unit<br>Childcare Assistants<br>Programme Secretary (Child Care) |
| ID Cards - Parents  | Retention till <b>2 months from termination of service</b>   | Child Care Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Child Care Centre Coordinator<br>Programmes Unit<br>Childcare Assistants<br>Programme Secretary (Child Care) |
| Images, Photos,<br>Videos (soft copy)                             | Retention period of <b>5 years</b>   | Child Care Centre<br>Programmes Unit  | Child Care Centre Coordinator<br>Programmes Unit<br>Childcare Assistants<br>Programme Secretary (Child Care) |
| Images, Photos,<br>Videos (used in<br>publications)               | No retention period<br><br>Printed/electronic publications issued by the FES are disseminated amongst the general public |   |  |
| Images, Photos,<br>Videos (to be used<br>in Learning<br>Journals) | Images will be deleted as soon as the Learning Journals are given to the parents.  | Child Care Centre   | Child Care Centre Coordinator<br>Programmes Unit<br>Childcare Assistants<br>Programme Secretary (Child Care) |
| Images, Photos,<br>Videos and                                     | Retention period of <b>5 years</b><br><br>Group photos – yearly  | Child Care Centre<br>Programmes Unit  | Child Care Centre Coordinator<br>Programmes Unit   |



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| newsletter consent form  | Individual photos – upon termination of service            | *in case of special cases this may be brought to HEAD OFFICE                          |   |
| Images, Photos, Videos shared on social media                    | Retention period of <b>5 years</b>                         | Social Media  | Social Media  |
| Images, Videos (Staff) to be used for internal training purposes | Retention period of <b>5 years</b>                         | Child Care Centre Programmes Unit   | Child Care Centre Coordinator<br>Programmes Unit<br>Programme Secretary (Child Care)  |
| Immunization Record  | Retention till <b>2 months from termination of service</b> | Child Care Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Child Care Centre Coordinator<br>Programmes Unit<br>Childcare Assistants<br>Programme Secretary (Child Care)<br>Paediatrician |
| Incident report  | Retention till <b>2 months from termination of service</b> | Child Care Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Child Care Centre Coordinator<br>Programmes Unit<br>Childcare Assistants<br>Programme Secretary (Child Care)                  |
| Logbooks   | Retention period of <b>3 years</b>                         | Child Care Centre Programmes Unit   | Child Care Centre Coordinator<br>Programmes Unit<br>Childcare Assistants<br>CEO   |
| Maintenance Job Sheets   | Retention period of <b>10 yeras</b>                        | Child Care Centre Corporate Services  | Child Care Centre Coordinator<br>Manager Corporate Services<br>Programme Coordinator  |

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| Medical Screening Forms        | Retention till <b>2 months from termination of service</b>  | Child Care Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Child Care Centre Coordinator<br>Programmes Unit<br>Childcare Assistants<br>Programme Secretary (Child Care)<br>Parents                           |
| Meggit Developmental Checklist | Retention till <b>2 months from termination of service</b>  | Child Care Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Child Care Centre Coordinator<br>Programmes Unit<br>Childcare Assistants<br>Programme Secretary (Child Care)<br>Parents                           |
| Monthly Reports                | Retention period of <b>1 year</b>   | Child Care Centre<br>Programmes Unit  | Child Care Centre Coordinator<br>Programmes Unit<br>Childcare Assistants  |
| Monthly Contributions Sheet    | Retention period of <b>1 year</b><br>*NB: once paperwork is brought to Head Office, paperwork left at the centre can be discarded after a period of <b>1 year</b> . | Child Care Centre<br>Finance  | Child Care Centre Coordinator<br>Programme Secretary (Child Care)<br>Head of Business<br>Programme Coordinator – Finance<br>Coordinator – Finance |
| Notices for Staff              | Retention period of <b>1 year</b>   | Child Care Centre<br>Programmes Unit  | Child Care Centre Coordinator<br>Programmes Unit<br>Childcare Assistants<br>CEO   |
| Operations Manuals             | Outdated versions can be discarded upon issuing of a new Operations Manual  | Child Care Centre<br>Programmes Unit  | Child Care Centre Coordinator<br>Programmes Unit<br>Childcare Assistants  |

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| Outings Consent Form                                      | Retention till <b>2 months from termination of service</b> | Child Care Centre<br>*in case of special cases this may be brought to HEAD OFFICE | Child Care Centre Coordinator<br>Programmes Unit<br>Childcare Assistants<br>Programme Secretary (Child Care) |
| Outings Information                                       | Retention till <b>end of year</b>                          | Child Care Centre<br>*in case of special cases this may be brought to HEAD OFFICE | Child Care Centre Coordinator<br>Programmes Unit<br>Childcare Assistants<br>Programme Secretary (Child Care) |
| Parents' employers' declaration of working days and hours | Retention till <b>2 months from termination of service</b> | Child Care Centre<br>*in case of special cases this may be brought to HEAD OFFICE | Child Care Centre Coordinator<br>Programmes Unit<br>Programme Secretary (Child Care)<br>Jobsplus             |
| Parents' Employment Contracts                             | Retention till <b>2 months from termination of service</b> | Child Care Centre<br>*in case of special cases this may be brought to HEAD OFFICE | Child Care Centre Coordinator<br>Programmes Unit<br>Programme Secretary (Child Care)<br>Jobsplus             |
| Parents' Payslips   | Retention till <b>2 months from termination of service</b> | Child Care Centre<br>*in case of special cases this may be brought to HEAD OFFICE | Child Care Centre Coordinator<br>Programmes Unit<br>Programme Secretary (Child Care)<br>Jobsplus             |
| Record of Injuries Before Coming to the Centre            | Retention till <b>2 months from termination of service</b> | Child Care Centre   | Child Care Centre Coordinator<br>Programme Secretary (Child Care)<br>Childcare Assistants                    |

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| Record of Injuries Occurring at the Centre | Retention till <b>2 months from termination of service</b>   | Child Care Centre   | Child Care Centre Coordinator<br>Programme Secretary (Child Care)<br>Childcare Assistants                               |
| Registration Form                          | Retention till <b>2 months from termination of service</b><br><br>In case of forms received and parents/legal guardians decide not to avail of service these are to be destroyed as soon as parents/legal guardians inform the Centre Coordinator in writing that they are refusing the service or when the application is expired, that is, the child is eligible to attend KG. | Child Care Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Child Care Centre Coordinator<br>Programmes Unit<br>Programme Secretary (Child Care)<br>Childcare Assistants            |
| Registration Form – Cancelled              | Retention period of <b>3 years or when the child is eligible for kindergarten</b>  | Child Care Centre   | Child Care Centre Coordinator<br>Programmes Unit<br>Programmes Secretary (Child Care)                                   |
| Rosters                                    | Retention period of <b>3 months</b>  | Child Care Centre   | Child Care Centre Coordinator<br>Programmes Unit<br>Programme Secretary (Child Care)<br>Childcare Assistants            |
| Serious injury reports                     | Retention till <b>2 months from termination of service</b>   | Child Care Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Child Care Centre Coordinator<br>Programmes Unit<br>Programme Secretary (Child Care)<br>Childcare Assistants<br>Parents |

|                 |  |                                   |  |
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| Tax Rebate Form | Retention period will be for <b>10 years</b>   | Child Care Centre Programmes Unit | IRD<br>Child Care Centre Coordinator<br>Programme Secretary (Child Care)<br>Programmes Unit<br>Business Support Unit |
| Waiting List    | Retention till <b>2 months from when the child is placed within the centre / expiry / cancellation</b> | Child Care Centre Programmes Unit | Child Care Centre Coordinator<br>Programmes Unit<br>Programme Secretary (Child Care)<br>CEO                          |

| <b>Klabb 3-16</b>                                 |  |   |  |
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| Affidavits  | Retention till <b>2 months from termination of service</b> | Klabb 3-16 Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities   |
| Agenzija Appogg Child Protection Referral Form    | Retention till <b>2 months from termination of service</b> | Klabb 3-16 Centre   | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities   |
| Birth Certificate – where applicable              | Retention till <b>2 months from termination of service</b> | Klabb 3-16 Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities   |
| Bookings for Holidays (printed versions)          | Retention till <b>2 months from termination of service</b> | Klabb 3-16 Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers |
| Bookings for Holidays (online and excel versions) | Retention period of <b>10 years</b>                        | Klabb 3-16 Centre   | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers |
| Cleaning Schedule                                 | Retention till <b>end of year</b>                          | Klabb 3-16 Centre   | Centre Coordinator<br>Play Worker with Extra Responsibilities  |

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| Custody Documents – where applicable   | Retention till <b>2 months from termination of service</b> | Klabb 3-16 Centre<br>*in case of special cases this may be brought to HEAD OFFICE     | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities   |
| Daily Checklist (Cleaning)   | Retention of <b>3 months</b>                               | Klabb 3-16 Centre   | Centre Coordinator<br>Play Worker with Extra Responsibilities<br>Manager Corporate Services                              |
| ID Cards – Authorised Persons to pick up children  | Retention till <b>2 months from termination of service</b> | Klabb 3-16 Centre<br>*in case of special cases this may be brought to HEAD OFFICE     | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers |
| ID Cards - Parents   | Retention till <b>2 months from termination of service</b> | Klabb 3-16 Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers |
| IEP Report<br>Occupational Therapy Report<br>Psychological Report<br>CDAU Report<br>Speech Language Report | Retention till <b>2 months from termination of service</b> | Klabb 3-16 Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers |
| Incident Report  | Retention till <b>2 months from termination of service</b> | Klabb 3-16 Centre   | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities   |

|                              |  |   |   |
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|                              |  | *in case of special cases this may be brought to HEAD OFFICE                          | Playworkers<br>Child Support Workers  |
| Injury Reports               | Retention till <b>2 months from termination of service</b> | Klabb 3-16 Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers<br>CEO<br>Human Resources Department |
| Outing check list            | Retention till <b>end of year</b>                          | Klabb 3-16 Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers                                      |
| Outing Consent Form          | Retention till <b>2 months from termination of service</b> | Klabb 3-16 Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers                                      |
| Permission to walk from home | Retention till <b>2 months from termination of service</b> | Klabb 3-16 Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers                                      |



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| Images, Photos, Videos and newsletter consent form               | Retention period will be for <b>5 years or 5 years after termination of service if the latter exceeds such period</b>    | Klabb 3-16 Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers |
| Images, Photos, Videos (soft copy)                               | Retention period will be for <b>5 years or 5 years after termination of service if the latter exceeds such period</b>    | Klabb 3-16 Centre<br>Programmes Unit  | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers |
| Images, Photos, Videos (used in publications)                    | No retention period<br><br>Printed/electronic publications issued by the FES are disseminated amongst the general public |   |  |
| Images, Photos, Videos shared on social media                    | Retention period will be for <b>5 years or 5 years after termination of service if the latter exceeds such period</b>    | Social Media  | Social Media   |
| Images, Videos (Staff) to be used for internal training purposes | Retention period of <b>5 years</b>   | Child Care Centre<br>Programmes Unit  | Child Care Centre Coordinator<br>Programmes Unit<br>Programme Secretary (Child Care)                                     |
| Record of injuries before coming to centre                       | Retention till <b>2 months from termination of service</b>   | Klabb 3-16 Centre   | Centre Coordinator<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers                    |
| Registration Form  | Retention till <b>2 months from termination of service</b>   | Electronically on the FES services portal<br>Klabb 3-16 Centre                        | Centre Coordinator<br>Play Worker with Extra Responsibilities<br>Playworkers   |

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|                               |  | *in case of special cases this may be brought to HEAD OFFICE                          | Child Support Workers  |
| Registration Form - Cancelled | Retention period of <b>3 years</b>   | Electronically on the FES services portal<br>Klabb 3-16 Centre                        | Centre Coordinator<br>Play Worker with Extra Responsibilities  |
| Sign out sheets (children)    | Retention till <b>2 months from termination of service</b>   | Klabb 3-16 Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers<br>Parents |
| Subsidy Application Forms     | Retention till renewal of application, that is in October.<br><br>If the application is not renewed, retention is yearly, in October | Klabb 3-16 Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers<br>Parents |
| Tax Rebate Record Sheet       | Retention period will be for <b>10 years</b>   | Klabb 3-16 Centre<br>Programmes Unit  | IRD<br>Centre Coordinator<br>Play Worker with Extra Responsibilities<br>Programmes Unit<br>Business Support Unit |
| Weekly Plan of Activities     | Retention till <b>2 months from the end of scholastic year</b>   | Klabb 3-16 Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Programmes Unit  |

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| Waiting List | Retention till <b>2 months from when the child is placed within the centre</b> | Klabb 3-16 Centre Programmes Unit | Centre Coordinator Programmes Unit |
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| <b>Skolasajf</b>                                  |  |  |  |
|---|--|--|--|
| Affidavits  | Retention till <b>2 months from termination of service</b> | Skolasajf Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities   |
| Agencija Appogg Child Protection Referral Form    | Retention till <b>2 months from termination of service</b> | Skolasajf Centre   | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities   |
| Birth Certificate – where applicable              | Retention till <b>2 months from termination of service</b> | Skolasajf Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities   |
| Cleaning Schedule                                 | Retention till <b>end of Skolasajf</b>                     | Skolasajf Centre   | Centre Coordinator   |
| Custody Documents – where applicable              | Retention till <b>2 months from termination of service</b> | Skolasajf Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities   |
| Daily Checklist (Cleaning)                        | Retention of <b>3 months</b>                               | Klabb 3-16 Centre  | Centre Coordinator<br>Play Worker with Extra Responsibilities<br>Manager Corporate Services                              |
| ID Cards – Authorised Persons to pick up children | Retention till <b>2 months from termination of service</b> | Skolasajf Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers |

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| ID Cards - Parents   | Retention till <b>2 months from termination of service</b> | Skolasajf Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers                                      |
| IEP Report<br>Occupational Therapy Report<br>Psychological Report<br>CDAU Report<br>Speech Language Report | Retention till <b>2 months from termination of service</b> | Skolasajf Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers                                      |
| Incident Report  | Retention till <b>2 months from termination of service</b> | Skolasajf Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers                                      |
| Injury Reports   | Retention till <b>2 months from termination of service</b> | Skolasajf Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers<br>CEO<br>Human Resources Department |
| Outing check list  | Retention till <b>end of year</b>                          | Skolasajf Centre   | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities  |

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|  |   | *in case of special cases this may be brought to HEAD OFFICE                         | Playworkers<br>Child Support Workers   |
| Outing Consent Form                                | Retention till <b>2 months from termination of service</b>  | Skolasajf Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers |
| Permission to walk from home                       | Retention till <b>2 months from termination of service</b>  | Skolasajf Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers |
| Images, Photos, Videos and newsletter consent form | Retention period will be for <b>5 years or 5 years after termination of service if the latter exceeds such period</b> | Skolasajf Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers |
| Images, Photos, Videos (soft copy)                 | Retention period will be for <b>5 years or 5 years after termination of service if the latter exceeds such period</b> | Skolasajf Centre<br>Programmes Unit  | Centre Coordinator<br>Programmes Unit<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers |
| Images, Photos, Videos (used in publications)      | No retention period   |  |  |

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|--|---|--|---|
|  | Printed/electronic publications issued by the FES are disseminated amongst the general public                         |  |   |
| Images, Photos, Videos shared on social media                    | Retention period will be for <b>5 years or 5 years after termination of service if the latter exceeds such period</b> | Social Media   | Social Media  |
| Images, Videos (Staff) to be used for internal training purposes | Retention period of <b>5 years</b>  | Child Care Centre Programmes Unit  | Child Care Centre Coordinator<br>Programmes Unit<br>Programme Secretary (Child Care)  |
| Record of injuries before coming to centre                       | Retention till <b>2 months from termination of service</b>  | Skolasajf Centre   | Centre Coordinator<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers   |
| Registration Form  | Retention till <b>2 months from termination of service</b>  | Electronically on the FES services portal<br>Skolasajf Centre<br>Maltapost<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers<br>Maltapost employees until the forms are transferred to FES Head Office |
| Registration Form - Cancelled                                    | Retention period of <b>3 years</b>  | Skolasajf Centre   | Centre Coordinator<br>Play Worker with Extra Responsibilities   |
| School Contracts   | Retention period of <b>2 years</b>  | Skolasajf Centre<br>Corporate Services<br>Department   | Manager Corporate Services<br>Coordinator Administration<br>Centre Coordinator<br>Play Worker with Extra Responsibilities<br>Head of School<br>College Principal                |

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|                            |   |  | Programme Coordinator Inclusion  |
| Sign out sheets (children) | Retention till <b>2 months from termination of service</b>                    | Skolasajf Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Play Worker with Extra Responsibilities<br>Playworkers<br>Child Support Workers<br>Parents |
| Tax Rebate Record Sheet    | Retention period will be for <b>10 years</b>                                  | Skolasajf Centre<br>Programmes Unit  | IRD<br>Centre Coordinator<br>Play Worker with Extra Responsibilities<br>Programmes Unit<br>Business Support Unit |
| Weekly Plan of Activities  | Retention till <b>2 months from end of Skolasajf or return to Playworkers</b> | Skolasajf Centre<br><br>*in case of special cases this may be brought to HEAD OFFICE | Centre Coordinator<br>Programmes Unit  |



| <b>Finance</b>              |                                     |  |   |
|-----------------------------|-------------------------------------|--|---|
| Auditors' Reports           | Retention period of <b>10 years</b> | Business Support Unit<br>Archive Room at Head Office | FES Board<br>CEO<br>Head, Business Support Unit<br>Manager Finance  |
| Creditors Information       | Retention period of <b>10 years</b> | Business Support Unit<br>Archive Room at Head Office | CEO<br>Head, Business Support Unit<br>Manager Finance<br>Manager Corporate Services<br>Programme Coordinator Procurement<br>Coordinator Finance |
| Generic Email – Accounts    | Retention period of <b>2 years</b>  | Business Support Unit                                | CEO<br>Head, Business Support Unit<br>Manager Finance<br>Coordinator Finance  |
| Generic Email – Procurement | Retention period of <b>2 years</b>  | Business Support Unit                                | CEO<br>Head, Business Support Unit<br>Manager Corporate Services<br>Programme Coordinator Procurement<br>Coordinator Administration             |

|                           |                                     |  |  |
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| Petty Cash Claim Forms    | Retention period of <b>10 years</b> | Business Support Unit<br>Archive Room at Head Office | Head, Business Support Unit<br>Manager Finance<br>Coordinator Finance<br>Centre Coordinator                                  |
| Petty Cash Receipts       | Retention period of <b>10 years</b> | Business Support Unit<br>Archive Room at Head Office | Head, Business Support Unit<br>Manager Finance<br>Coordinator Finance<br>Centre Coordinator                                  |
| Procurement Documentation | Retention period of <b>10 years</b> | Business Support Unit<br>Archive Room at Head Office | Head, Business Support Unit<br>Manager Corporate Services<br>Programme Coordinator Procurement<br>Coordinator Administration |
| Receipt books             | Retention period of <b>10 years</b> | Business Support Unit<br>Archive Room at Head Office | Head, Business Support Unit<br>Manager Finance<br>Coordinator Finance<br>Centre Coordinator                                  |
| Receipts templates        | Retention period of <b>10 years</b> | Business Support Unit<br>Archive Room at Head Office | Head, Business Support Unit<br>Manager Finance<br>Coordinator Finance<br>Centre Coordinator                                  |

|                             |                                     |  |   |
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| Tenders                     | Retention period of <b>10 years</b> | Business Support Unit<br>Archive Room at Head Office | CEO<br>Head, Business Support Unit<br>Manager Corporate Services<br>Programme Coordinator Procurement<br>Coordinator Administration<br>Evaluation Committee |
| Yearly Financial Statements | Retention period of <b>10 years</b> | Business Support Unit<br>Archive Room at Head Office | FES Board<br>CEO<br>Head, Business Support Unit<br>Manager Finance  |

| <b>Payroll</b>                 |   |  |  |
|--------------------------------|---|--|--|
| Attendance Sheets              | Retention period will be for <b>2 years</b> | For Head Office Staff > electronically<br><br>For Centres Staff > physical timesheets are submitted to the Business Support Unit on a monthly basis. These are then archived within the Archive Room at Head Office. | Head, Business Support Unit<br>Manager Finance<br>Coordinator Finance<br>Programme Secretary (Payroll)<br>Centre Coordinator<br>Manager Services<br>Programme Coordinator Services |
| FS3                            | Retention period will be for <b>3 years</b> | Business Support Unit<br>Archive Room at Head Office   | Head, Business Support Unit<br>Manager Finance<br>Coordinator Finance<br>Programme Secretary (Payroll)   |
| Generic Email – Payroll        | Retention period will be for <b>2 years</b> | Business Support Unit  | Head, Business Support Unit<br>Manager Finance<br>Coordinator Finance<br>Programme Secretary (Payroll)   |
| Rosters attached to timesheets | Retention period will be for <b>3 years</b> | Business Support Unit<br>Archive Room at Head Office   | Head, Business Support Unit<br>Manager Finance<br>Coordinator Finance<br>Programme Secretary (Payroll)<br>Centre Coordinator<br>Manager Services<br>Programme Coordinator Services |
| Sick Leave Certificates        | Retention period will be for <b>1 year</b>  | Business Support Unit<br>Archive Room at Head Office   | Head, Business Support Unit<br>Manager Finance<br>Coordinator Finance<br>Programme Secretary (Payroll)   |

|                                     |   |  |  |
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|                                     |   |  | Centre Coordinator<br>Manager Services<br>Programme Coordinator Services   |
| Vacation Leave<br>Application Forms | Retention period will be for <b>3 years</b> | Business Support Unit<br>Archive Room at Head Office | Head, Business Support Unit<br>Manager Finance<br>Coordinator Finance<br>Programme Secretary (Payroll)<br>Centre Coordinator<br>Manager Services<br>Programme Coordinator Services |

| <b>Other Administration Documentation</b>     |  |                              |  |
|---|--|------------------------------|--|
| Company Car Insurance Details                 | Retention period till <b>2 months from end of service</b> of the CEO with entity | Business Support Unit        | CEO<br>Manager Corporate Services<br>Programme Coordinator Procurement<br>Coordinator Administration |
| Generic Email – Data Protection               | Retention period will be for <b>5 years</b>                                      | Corporate Services Unit      | CEO<br>Manager Corporate Services  |
| Generic Email - FES                           | Retention period will be for <b>2 years</b>                                      | Programmes Unit              | CEO<br>Manager Corporate Services<br>Manager Services<br>Programme Secretary (Services & HR)         |
| Generic Email – individual Child Care Centres | Retention period will be for <b>2 years</b>                                      | Within the respective centre | Centre Coordinator<br>Programme Coordinator<br>Manager Corporate Services<br>Manager Services        |
| Management Meeting Minutes                    | Retention period will be for <b>10 years</b>                                     | CEO's Office<br>Archive Room | CEO<br>Management  |

## 6. Dealing with Data Access Requests

- 6.1. **Access request:** In line with the provisions of the Data Protection Act, an individual has the right to be informed whether the data controller holds data about them and also to be given a description of the data together with details of the purposes for which their data is being kept. The individual must make this request in writing by sending an email on [dataprotection.fes@gov.mt](mailto:dataprotection.fes@gov.mt) and the data controller shall accede to the request within twenty-one days.

## 7. Whistle-blowing

- 7.1. **What does this term refer to?** – This refers to those instances where a person raises a concern about a wrong-doing occurring within the Foundation for Educational Services. The Foundation has a separate policy entirely dedicated to Whistle-Blowing.

## 8. Ratification and Communication

- 8.1. This policy was compiled and presented by Management to the Board of the Foundation on the 24th September 2019 and came into operation immediately.
- 8.2. It is also published on the Foundation for Educational Services' website [www.fes.gov.mt](http://www.fes.gov.mt), where it can be accessed by all staff, service users' parents and guardians and members of the public.
- 8.3. The policy will be brought to the attention of all the Foundation for Educational Services' staff, who must be familiar with the Data Protection Policy and who shall be ready to put it into practice in accordance with the specified implementation arrangements.
- 8.4. The Data Protection Policy shall be brought to the attention of new members of the Foundation for Educational Services during their induction.
- 8.5. Service users' parents and guardians shall be informed of the Data Protection Policy from the time of the enrolment of the service user.
- 8.6. Depending on the nature of the case, issues will be referred to either Child Protection Services at Agenzija Appogg or MEDE (Ministry for Education and Employment).

## 9. Monitoring the Implementation of the Policy

- 9.1. The implementation of the Policy shall be monitored by the Chief Executive Officer or his/her delegate and the delegated officers of the Foundation for Educational Services.

## 10. Reviewing and Evaluating the Policy

- 10.1. The Policy will be reviewed and evaluated at certain predetermined times and as necessary.

10.2. Ongoing review and evaluation will take cognisance of changing information or guidelines.

10.3. This Policy shall be revised as necessary in the light of such reviews and evaluations and within the framework of the Foundation for Educational Services' planning.