

**Foundation for Educational Services
Data Protection & Retention Policy
(including Childcare Centres, Skolasajf and
Klabb 3-16 Services)**

Updated: 25th August 2023



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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 collection, processing, and retention 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 from 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. The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

- 2.1.2. Information is kept only for one or more specified and explicit lawful purposes: the Foundation for Educational Services informs individuals about the reasons behind the collection of their data, as well as how and when the data will be used. 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 (in relation to union members only), 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, the Police Force and/or other entities whose data request is justified by the Laws of Malta. 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 document 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 anonymous. Where data is required for research related to service users, consent is sought from the parent / legal guardian prior to its collection and disclosure.

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. The FES might also team up with other stakeholders who offer sessions during Skolasajf, who request their own consent from parents to take visual images during the activities. 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 as per Section 6 of this policy.

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 means any operation or set of operations which is/are 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> <u>*applies for both soft and hard copy</u>	<u>Storage</u>	<u>Employees having access to such information</u>
<u>Human Resources</u>			
Affidavits	Retention period will be 5 years from date of Affidavit.	HR Department Archive Room at Head Office	CEO Head HR Manager HR Programme Coordinator HR Coordinator HR Programme Secretary HR
Application forms to work with the FES (both internal and external, successful and unsuccessful)	Retention period will be for 5 years 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 HR Department Archives	CEO Head HR Manager HR Programme Coordinator HR Coordinator HR Programme Secretary HR Interviewing Board
Attendances of students requested by Jobsplus related to Jobsplus placements	Retention period till 1 year from end of placement.	Services Unit Childcare Centre	Programme Coordinator Services Centre Coordinator Programme Secretary HR
Career Exposure Experience Form	Retention period till 1 year from end of placement.	Services Unit Childcare Centre	CEO Manager Services Programme Coordinator Services

			Centre Coordinator Programme Secretary HR
Centres Staff Lists (containing staff details of a particular centre)	Retention period will be for 5 years	Electronically on the FES recruitment portal HR Department	CEO Head HR Manager HR Programme Coordinator HR Coordinator HR Programme Secretary HR Manager Services Programme Coordinator Services Centre Coordinator
Collective Agreements	Physical and Electronic file will be retained for 8 years 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 1 year from end of placement.	Services Unit Childcare Centre	Programme Coordinator Services Centre Coordinator Programme Secretary HR
Employee Personal File including: <ul style="list-style-type: none"> • CV • certificates • employment contract • teleworking agreements • performance reviews • disciplinary records 	Retention period will be for 10 years	HR Department Archive Room at Head Office (when the employee leaves the entity)	CEO Head HR Manager HR Programme Coordinator HR Coordinator HR Programme Secretary HR Centre Coordinator

<ul style="list-style-type: none"> • engagement forms (which includes taxation, social security and IBAN number) • medical history • data protection agreements • applications for transfer of leave • warnings • risk assessments (pregnant or young persons). 			
Eye Test Records	Retention period will be for 1 year	HR Department Corporate Services Department	Manager HR Programme Coordinator HR Coordinator HR Programme Secretary HR Manager Corporate Services Programme Coordinator Procurement Coordinator Administration
Generic Email – HR	Retention period will be for 2 years	HR Department	CEO

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

			Manager HR Programme Coordinator HR Coordinator HR Programme Secretary HR Interviewing Board
Reference Letters Issued	Retention period will be for 2 years or until employee leaves the entity	HR Department	Head HR Manager HR Programme Coordinator HR Coordinator HR Programme Secretary HR
Requests to deal with Jobsplus on their behalf	Retention period will be for 3 years	HR Department	Head HR Manager HR Programme Coordinator HR Coordinator HR Programme Secretary HR
Student Placement Agreement (Child Care Centres)	Retention period till 1 year from end of placement.	Services Unit Childcare Centre	Programme Coordinator Services Centre Coordinator Programme Secretary HR Child Care Educators
Student, Volunteer and Intern Placement Request Form which includes: <ul style="list-style-type: none"> • Copy of ID Card of applicant • Recent Police Conduct Certificate • CV of applicant • Letter of reference by the referring tutor 	Retention period till 1 year from end of placement.	Services Unit Childcare/Klabb 3-16/ Skolasajf centre where the student/volunteer is placed	Programme Coordinator Services Centre Coordinator Programme Secretary HR

<ul style="list-style-type: none"> • Letter of approval from parents (from students below 18 years of age) • Copy of Consent Form to be given to parents 			
Training			
CV	Retention period of 40 years	HR Department Programmes Department	Head HR Head Programmes Manager HR Programme Coordinator HR Coordinator HR Programme Secretary HR
First Aid Certificate	Retention period of 40 years	HR Department Programmes Department	Head HR Head Programmes Manager HR Programme Coordinator HR Coordinator HR Programme Secretary HR
Placement Sheet	Retention period of 40 years	HR Department Programmes Department	Head HR Head Programmes Manager HR Programme Coordinator HR Coordinator HR Programme Secretary HR

Police Conduct	Retention period of 40 years	HR Department Programmes Department	Head HR Head Programmes Manager HR Programme Coordinator HR Coordinator HR Programme Secretary HR
Reference Letter	Retention period of 40 years	HR Department Programmes Department	Head HR Head Programmes Manager HR Programme Coordinator HR Coordinator HR Programme Secretary HR
School Leaving Certificate	Retention period of 40 years	HR Department Programmes Department	Head HR Head Programmes Manager HR Programme Coordinator HR Coordinator HR Programme Secretary HR

Childcare Services			
Activity Plans for Children	Retention of 6 months	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Programmes Unit
Activity Evaluation Forms	Retention of 6 months	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Programmes Unit
Affidavits	Retention till 1 year from termination of service	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Programmes Unit
Agenzija Appogg Child Protection Referral Form	Retention till 1 year from termination of service	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Programmes Unit Agenzija Appogg
Authorise third parties to collect children consent form	Retention till 2 years from termination of service	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Services Unit Child Care Educators Programme Secretary (Child Care)
Birth Certificate	Retention till 1 year from termination of service	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Services Unit Programmes Unit Programme Secretary (Child Care)

Biting Incident Form	Retention till 1 year from termination of service	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Services Unit Programmes Unit Programme Secretary (Child Care)
CCTV Footage	Retention of 10 to 28 days depending on the system installed	Childcare Centre	Childcare Centre Coordinator Programmes Unit if the need arises
Child well-being consent form	Retention till 1 year from termination of service	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Programmes Unit Programme Secretary (Child Care)
Children's personal information sheet	Retention till 1 year from termination of service	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Services Unit Programmes Unit Child Care Educators Programme Secretary (Child Care)
Children's Attendances	Retention till 1 year from termination of service	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Services Unit Child Care Educators Programme Secretary (Child Care)
Children's Time in and Time out Sheet	Retention till 1 year from termination of service	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Services Unit Child Care Educators Programme Secretary (Child Care)
Cleaning Schedule	Retention period of 1 year	Child Care Centre	Child Care Centre Coordinator

Cleaning Time Sheet	Retention period of 10 years	Child Care Centre	Child Care Centre Coordinator Programme Secretary (Child Care) Business Unit
Complaints Forms	Retention till 1 year from termination of service	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Services Unit Programmes Unit Programme Secretary (Child Care)
Coordinators' meetings minutes	Retention period of 2 years	Child Care Centre	Child Care Centre Coordinator Programmes Unit Services Unit
Custody Documents – where applicable	Retention till 1 year from termination of service	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Services Unit Programmes Unit Programme Secretary (Child Care)
Facebook Page Messages	Retention period of 1 year	Child Care Centre Head Office	Child Care Centre Coordinator Manager Programmes Coordinator Marketing
Free Child Care Scheme monthly booking	Retention till 1 year from termination of service	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Services Unit Programme Secretary (Child Care) Business Support Unit Jobsplus
ID Cards – Authorised Persons to pick up children	Retention till 2 years from termination of service	Child Care Centre	Child Care Centre Coordinator Services Unit Child Care Educators

		*in case of special cases this may be brought to HEAD OFFICE	Programme Secretary (Child Care)
ID Cards – Parents	Retention till 2 years from termination of service	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Services Unit Child Care Educators Programme Secretary (Child Care)
Images, Photos, Videos (soft copy)	Retention period of 5 years	Child Care Centre Programmes Unit	Child Care Centre Coordinator Programmes Unit Child Care Educators Programme Secretary (Child Care)
Images, Photos, Videos (used in publications)	No retention period Printed/electronic publications issued by the FES are disseminated amongst the general public		
Images, Photos, Videos (to be used in Learning Journals)	Images will be deleted as soon as the the child no longer attends the centre	Child Care Centre	Child Care Centre Coordinator Programmes Unit Child Care Educators Programme Secretary (Child Care)
Images, Photos, Videos and newsletter consent form	Retention period of 5 years	Child Care Centre Programmes Unit *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Programmes Unit

Images, Photos, Videos shared on social media	Retention period of 5 years	Social Media	Programmes Unit Child Care Centre Coordinator
Images, Videos (Staff) to be used for internal training purposes	Retention period of 5 years	Child Care Centre Programmes Unit	Child Care Centre Coordinator Programmes Unit Programme Secretary (Child Care)
Immunization Record	Retention till 1 year from termination of service	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Services Unit Programmes Unit Child Care Educators Programme Secretary (Child Care) Paediatrician
Incident report	Retention till 1 year from termination of service	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Services Unit Programmes Unit Child Care Educators Programme Secretary (Child Care)
Logbooks	Retention period of 3 years	Child Care Centre Programmes Unit	Child Care Centre Coordinator Programmes Unit Child Care Educators CEO
Maintenance Job Sheets	Retention period of 10 years	Child Care Centre Corporate Services	Child Care Centre Coordinator Manager Corporate Services Programme Coordinator
Medical Screening Forms	Retention till 1 year from termination of service	Child Care Centre	Child Care Centre Coordinator Services Unit

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

Outings Consent Form	Retention till 1 year from termination of service	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Programmes Unit Child Care Educators Programme Secretary (Child Care)
Outings Information	Retention till end of year	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Programmes Unit Child Care Educators Programme Secretary (Child Care)
Parents' employers' declaration of working days and hours	Retention till 2 years from termination of service	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Services Unit Programme Secretary (Child Care) Jobsplus
Parents' Employment Contracts	Retention till 2 years from termination of service	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Services Unit Programme Secretary (Child Care) Jobsplus
Parents' Payslips	Retention till 2 years from termination of service	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Services Unit Programme Secretary (Child Care) Jobsplus
Petty Cash Claim Forms	Retention period of 10 years	Child Care Centre	Centre Coordinator Programme Secretary (Child Care)
Petty Cash Receipts	Retention period of 2 years	Child Care Centre	Centre Coordinator Programme Secretary (Child Care)

Record of Injuries Before Coming to the Centre	Retention till 1 year from termination of service	Child Care Centre	Child Care Centre Coordinator Programme Secretary (Child Care) Services Unit Child Care Educators
Record of Injuries Occurring at the Centre	Retention till 1 year from termination of service	Child Care Centre	Child Care Centre Coordinator Programme Secretary (Child Care) Services Unit Child Care Educators
Registration Form	Retention till 1 year from termination of service 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 *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Programmes Unit Services Unit Programme Secretary (Child Care) Child Care Educators
Registration Form – Cancelled	Retention period of 3 years or when the child is eligible for kindergarten	Child Care Centre	Child Care Centre Coordinator Programmes Unit Services Unit Programmes Secretary (Child Care)
Rosters	Retention period of 3 months	Child Care Centre	Child Care Centre Coordinator Services Unit Programme Secretary (Child Care) Child Care Educators

Serious injury reports	Retention till 1 year from termination of service	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Programmes Unit Services Unit Programme Secretary (Child Care) Child Care Educators Parents
Support Visit Sheets	Retention of 2 scholastic years	Services Unit Programmes Unit	Programme Coordinator Services Programme Coordinator Programmes All Management at HO
Tax Rebate Form	Retention period will be for 10 years	Child Care Centre Business Support Unit	IRD Child Care Centre Coordinator Programme Secretary (Child Care) Business Support Unit
Waiting List	Retention till 2 months from when the child is placed within the centre / expiry / cancellation	Child Care Centre Services Unit	Child Care Centre Coordinator Services Unit Programme Secretary (Child Care) CEO
Whatsapp Messages	Retention period of 1 year	Head Office	Child Care Centre Coordinator Manager Programmes Coordinator Marketing

Klabb 3-16			
Affidavits	Retention till 1 year from termination of service	Klabb 3-16 Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Programmes Unit Services Unit Play Worker with Extra Responsibilities
Agenzija Appogg Child Protection Referral Form	Retention till 1 year from termination of service	Klabb 3-16 Centre	Centre Coordinator Programmes Unit Services Unit Play Worker with Extra Responsibilities
Birth Certificate – where applicable	Retention till 1 year from termination of service	Klabb 3-16 Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Programmes Unit Services Unit Play Worker with Extra Responsibilities
Bookings for Holidays (printed versions)	Retention till 1 year from termination of service	Klabb 3-16 Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Services Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers
Bookings for Holidays (online and excel versions)	Retention period of 10 years	Klabb 3-16 Centre	Centre Coordinator Services Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers

Cleaning Schedule	Retention till end of year	Klabb 3-16 Centre	Centre Coordinator Play Worker with Extra Responsibilities
Custody Documents – where applicable	Retention till 1 year from termination of service	Klabb 3-16 Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Services Unit Play Worker with Extra Responsibilities
Daily Checklist (Cleaning)	Retention of 3 months	Klabb 3-16 Centre	Centre Coordinator Play Worker with Extra Responsibilities Manager Corporate Services
ID Cards – Authorised Persons to pick up children	Retention till 2 years from termination of service	Klabb 3-16 Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Services Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers
ID Cards - Parents	Retention till 2 years from termination of service	Klabb 3-16 Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Services Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers
IEP Report Occupational Therapy Report Psychological Report CDAU Report Speech Language Report	Retention till 1 year from termination of service	Klabb 3-16 Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Programmes Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers

Incident Report	Retention till 1 year from termination of service	Klabb 3-16 Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Programmes Unit Services Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers
Injury Reports	Retention till 1 year from termination of service	Klabb 3-16 Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Services Unit Programmes Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers CEO Human Resources Department
Outing check list	Retention till end of year	Klabb 3-16 Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Programmes Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers
Outing Consent Form	Retention till 1 year from termination of service	Klabb 3-16 Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Programmes Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers
Parents' employers' declaration of	Retention till 2 years from termination of service	Klabb 3-16 Centre	Klabb Centre Coordinator Services Unit

working days and hours		*in case of special cases this may be brought to HEAD OFFICE	
Parents' Employment Contracts	Retention till 2 years from termination of service	Klabb 3-16 Centre *in case of special cases this may be brought to HEAD OFFICE	Klabb Centre Coordinator Services Unit
Parents' Payslips	Retention till 2 years from termination of service	Klabb 3-16 Centre *in case of special cases this may be brought to HEAD OFFICE	Klabb Centre Coordinator Services Unit
Permission to walk from home	Retention till 1 year from termination of service	Klabb 3-16 Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Services Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers
Images, Photos, Videos and newsletter consent form	Retention period will be for 5 years or 5 years after termination of service if the latter exceeds such period	Klabb 3-16 Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Programmes Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers
Images, Photos, Videos (soft copy)	Retention period will be for 5 years or 5 years after termination of service if the latter exceeds such period	Klabb 3-16 Centre Programmes Unit	Centre Coordinator Programmes Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers

Images, Photos, Videos (used in publications)	No retention period 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 5 years or 5 years after termination of service if the latter exceeds such period	Social Media	Social Media
Images, Videos (Staff) to be used for internal training purposes	Retention period of 5 years	Child Care Centre Programmes Unit	Child Care Centre Coordinator Programmes Unit Programme Secretary (Child Care)
Record of injuries before coming to centre	Retention till 1 year from termination of service	Klabb 3-16 Centre	Centre Coordinator Services Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers

Registration Form	Retention till 1 year from termination of service	Electronically on the FES services portal Klabb 3-16 Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Services Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers
Registration Form - Cancelled	Retention period of 3 years	Electronically on the FES services portal Klabb 3-16 Centre	Centre Coordinator Services Unit Play Worker with Extra Responsibilities
Sign out sheets (children)	Retention till 1 year from termination of service	Klabb 3-16 Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Services Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers Parents
Subsidy Application Forms	Retention till renewal of application, that is in October. If the application is not renewed, retention is yearly, in October	Klabb 3-16 Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Services Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers Parents
Support Visit Sheets	Retention of 2 scholastic years	Services Unit Programmes Unit	Programme Coordinator Services Programme Coordinator Programmes All Management at HO
Tax Rebate Record Sheet	Retention period will be for 10 years	Klabb 3-16 Centre Business Support Unit	IRD Centre Coordinator

			Play Worker with Extra Responsibilities Business Support Unit
Transport Routes	Retention period of 1 year	Skolasajf Centre Services Unit	Centre Coordinator Coordinator Services Programme Coordinator Services Manager Services
Weekly Plan of Activities	Retention period of 2 years	Skolasajf Centre	Centre Coordinator Play Worker with Extra Responsibilities Programmes Unit Business Support Unit
Waiting List	Retention till 2 months from when the child is placed within the centre	Klabb 3-16 Centre Services Unit	Centre Coordinator Services Unit

Skolasajf			
Affidavits	Retention till 1 year from termination of service	Skolasajf Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Programmes Unit Services Unit Play Worker with Extra Responsibilities
Agencija Appogg Child Protection Referral Form	Retention till 1 year from termination of service	Skolasajf Centre	Centre Coordinator Programmes Unit Services Unit Play Worker with Extra Responsibilities
Birth Certificate – where applicable	Retention till 1 year from termination of service	Skolasajf Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Programmes Unit Services Unit Play Worker with Extra Responsibilities
Cleaning Schedule	Retention till end of Skolasajf	Skolasajf Centre	Centre Coordinator
Custody Documents – where applicable	Retention till 1 year from termination of service (NB if available on portal printed copies are to be shredded at the end of Skolasajf)	Skolasajf Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Services Unit Play Worker with Extra Responsibilities
Daily Checklist (Cleaning)	Retention of 3 months	Klabb 3-16 Centre	Centre Coordinator Play Worker with Extra Responsibilities Manager Corporate Services
Fire Drills	Retention of 2 years	Skolasajf Centre Corporate Services Department	Centre Coordinator Play Worker with Extra Responsibilities Manager Corporate Services

			Coordinator Administration Programmes Unit
ID Cards – Authorised Persons to pick up children	Retention till 2 years from termination of service (NB if available on portal printed copies are to be shredded at the end of Skolasajf)	Skolasajf Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Services Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers
ID Cards - Parents	Retention till 2 years from termination of service (NB if available on portal printed copies are to be shredded at the end of Skolasajf)	Skolasajf Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Programmes Unit Services Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers
IEP Report Occupational Therapy Report Psychological Report CDAU Report Speech Language Report	Retention till 1 year from termination of service	Skolasajf Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Programmes Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers
Incident Report	Retention till 2 months from termination of service	Skolasajf Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Programmes Unit Services Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers

Injury Reports	Retention till 1 year from termination of service	Skolasajf Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Programmes Unit Services Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers CEO Human Resources Department
Outing check list	Retention till end of year	Skolasajf Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Programmes Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers
Outing Consent Form	Retention till 1 year from termination of service	Skolasajf Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Programmes Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers
Parents' employers' declaration of working days and hours	Retention till 1 year from termination of service	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Services Unit Programme Secretary (Child Care) Jobsplus
Parents' Employment Contracts	Retention till 1 year from termination of service	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Services Unit Programme Secretary (Child Care) Jobsplus

Parents' Payslips	Retention till 1 year from termination of service	Child Care Centre *in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Services Unit Programme Secretary (Child Care) Jobsplus
Permission to walk from home	Retention till 2 months from termination of service	Skolasajf Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Services Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers
Images, Photos, Videos and newsletter consent form	Retention period will be for 5 years or 5 years after termination of service if the latter exceeds such period	Skolasajf Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Programmes Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers
Images, Photos, Videos (soft copy)	Retention period will be for 5 years or 5 years after termination of service if the latter exceeds such period	Skolasajf Centre Programmes Unit	Centre Coordinator Programmes Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers
Images, Photos, Videos (used in publications)	No retention period 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 5 years or 5 years after termination of service if the latter exceeds such period	Social Media	Social Media

Images, Videos (Staff) to be used for internal training purposes	Retention period of 5 years	Child Care Centre Programmes Unit	Child Care Centre Coordinator Programmes Unit Programme Secretary (Child Care)
Record of injuries before coming to centre	Retention till 2 months from termination of service	Skolasajf Centre	Centre Coordinator Services Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers
Registration Form	Retention till 1 year from termination of service (NB if available on portal printed copies are to be shredded at the end of Skolasajf)	Electronically on the FES services portal Skolasajf Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Services Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers
Registration Form - Cancelled	Retention period of 2 years	Skolasajf Centre	Centre Coordinator Services Unit Play Worker with Extra Responsibilities
Request for Regular Administration of Medication and Treatment of Students Attending Mainstream	Retention till 2 months from termination of service	Skolasajf Centre Programmes Unit	Centre Coordinator Programmes Unit Nursing Service Provider Play Worker with Extra Responsibilities Child Support Workers
Risk Assessments (Premises)	Retention period of 2 years	Skolasajf Centre Corporate Services Department	Manager Corporate Services Coordinator Administration Centre Coordinator Play Worker with Extra Responsibilities Head of School

			College Principal Programme Coordinator Inclusion
School Contracts	Retention period of 2 years	Skolasajf Centre Corporate Services Department	Manager Corporate Services Coordinator Administration Centre Coordinator Play Worker with Extra Responsibilities Head of School College Principal Programme Coordinator Inclusion
Sign out sheets (children)	Retention till 1 year from termination of service	Skolasajf Centre *in case of special cases this may be brought to HEAD OFFICE	Centre Coordinator Services Unit Play Worker with Extra Responsibilities Playworkers Child Support Workers Parents
Tax Rebate Record Sheet	Retention period will be for 10 years	Skolasajf Centre Services Unit	IRD Centre Coordinator Play Worker with Extra Responsibilities Services Unit Business Support Unit
Transport Routes	Retention period of 1 year	Skolasajf Centre Services Unit	Centre Coordinator Coordinator Services Programme Coordinator Services Manager Services
Transport Expression of Interest	Retention period of 1 year	Skolasajf Centre Services Unit	Centre Coordinator Coordinator Services Programme Coordinator Services Manager Services

Weekly Plan of Activities	Retention period of 2 years	Skolasajf Centre	Centre Coordinator Play Worker with Extra Responsibilities Programmes Unit Business Support Unit
Weekly Feedback Form	Retention of 2 scholastic years	Services Unit Programmes Unit	Programme Coordinator Services Programme Coordinator Programmes All Management at HO

Finance			
Auditors' Reports	Retention period of 10 years	Business Support Unit Archive Room at Head Office	FES Board CEO Head, Business Support Unit Manager Finance
Contracts for Service	Retention period of 10 years	Business Support Unit Archive Room at Head Office	Head, Business Support Unit Manager Corporate Services Programme Coordinator Procurement Coordinator Administration
Creditors Information	Retention period of 10 years	Business Support Unit Archive Room at Head Office	CEO Head, Business Support Unit Manager Finance Manager Corporate Services Programme Coordinator Procurement Coordinator Finance
Direct Orders Documentation	Retention period of 10 years	Business Support Unit Archive Room at Head Office	CEO Head, Business Support Unit

			Manager Finance Manager Corporate Services Programme Coordinator Procurement Coordinator Finance
Generic Email – Accounts	Retention period of 2 years	Business Support Unit	CEO Head, Business Support Unit Manager Finance Coordinator Finance
Generic Email – Procurement	Retention period of 4 years	Business Support Unit	CEO Head, Business Support Unit Manager Corporate Services Programme Coordinator Procurement Coordinator Administration
Petty Cash Claim Forms	Retention period of 10 years	Business Support Unit Archive Room at Head Office	Head, Business Support Unit Manager Finance Coordinator Finance Centre Coordinator
Petty Cash Receipts	Retention period of 10 years	Business Support Unit Archive Room at Head Office	Head, Business Support Unit Manager Finance Coordinator Finance Centre Coordinator
Procurement Documentation	Retention period of 10 years	Business Support Unit Archive Room at Head Office	Head, Business Support Unit Manager Corporate Services Programme Coordinator Procurement Coordinator Administration

Procurement Contracts	Retention period of 10 years	Business Support Unit Archive Room at Head Office	Head, Business Support Unit Manager Corporate Services Programme Coordinator Procurement Coordinator Administration
Receipt books	Retention period of 10 years	Business Support Unit Archive Room at Head Office	Head, Business Support Unit Manager Finance Coordinator Finance Centre Coordinator
Receipts templates	Retention period of 10 years	Business Support Unit Archive Room at Head Office	Head, Business Support Unit Manager Finance Coordinator Finance Centre Coordinator
Tenders & Tender Documentation	Retention period of 10 years	Business Support Unit Archive Room at Head Office	CEO Head, Business Support Unit Manager Corporate Services Programme Coordinator Procurement Coordinator Administration Evaluation Committee
Yearly Financial Statements	Retention period of 10 years	Business Support Unit Archive Room at Head Office	FES Board CEO Head, Business Support Unit Manager Finance

Payroll			
Attendance Sheets	Retention period will be for 2 years	For Head Office Staff > electronically 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 Manager Finance Coordinator Finance Programme Secretary (Payroll) Centre Coordinator Manager Services Programme Coordinator Services
FS3	Retention period will be for 3 years	Business Support Unit Archive Room at Head Office	Head, Business Support Unit Manager Finance Coordinator Finance Programme Secretary (Payroll)
Generic Email – Payroll	Retention period will be for 2 years	Business Support Unit	Head, Business Support Unit Manager Finance Coordinator Finance Programme Secretary (Payroll)
Rosters attached to timesheets	Retention period will be for 3 years	Business Support Unit Archive Room at Head Office	Head, Business Support Unit Manager Finance Coordinator Finance Programme Secretary (Payroll) Centre Coordinator Manager Services Programme Coordinator Services
Sick Leave Certificates	Retention period will be for 1 year	Business Support Unit Archive Room at Head Office	Head, Business Support Unit Manager Finance Coordinator Finance Programme Secretary (Payroll)

			Centre Coordinator Manager Services Programme Coordinator Services
COVID Quarantine Letters	Retention period will be for 1 year	Business Support Unit Archive Room at Head Office	Head, Business Support Unit Head HR Manager Finance Manager HR Programme Coordinator HR Coordinator HR Coordinator Finance Programme Secretary (Payroll) Programme Secretary (HR) Centre Coordinator Manager Services Programme Coordinator Services
Vacation Leave Application Forms	Retention period will be for 3 years	Business Support Unit Archive Room at Head Office	Head, Business Support Unit Manager Finance Coordinator Finance Programme Secretary (Payroll) Centre Coordinator Manager Services Programme Coordinator Services

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

6. Destruction of Data

The purpose of these guidelines is to detail the procedures for the disposal of data (whether in hard or soft copy format). Data shall be disposed of as dictated by the retention periods outlined in this policy.

The Data Protection Officer shall remind all Head Office Staff and Centre Coordinators every quarter to review the retention policy. Any changes in retention periods shall be communicated via email by the Data Protection Officer, duly highlighted so that the change is noted. Staff is also encouraged to discuss with the Data Protection Officer any necessary changes to the stipulated retention periods.

All Centres are equipped with cross-cut shredders to assist in the destruction of printed data. Data stored in laptops and computers are to be discarded manually by the individual user.

7. Dealing with Data Access Requests

7.1. **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 and the data controller shall accede to the request within twenty-one days.

8. Whistle-blowing

8.1. **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.

9. Ratification and Communication

9.1. This policy was compiled and presented by Management to the Board of the Foundation on the 24th September 2019 and came into operation immediately.

9.2. It is also published on the Foundation for Educational Services' website www.fes.gov.mt, where it can be accessed by all staff, service users' parents and guardians and members of the public.

9.3. 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.

9.4. The Data Protection Policy shall be brought to the attention of new members of the Foundation for Educational Services during their induction.

9.5. Service users' parents and guardians shall be informed of the Data Protection Policy from the time of the enrolment of the service user.

9.6. Depending on the nature of the case, issues will be referred to either Child Protection Services at Agenzija Appogg or MEYR (Ministry for Education, Sport, Research, Youth and Innovation).

10. Monitoring the Implementation of the Policy

10.1. 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.

11. Reviewing and Evaluating the Policy

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

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

11.3. 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.