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

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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, custodians, suppliers and contracted employees is 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 and all the stakeholders mentioned above 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. In the case of contracted employees, a Data Processing Agreement is signed between the Foundation and the named contractor which details the processing of the information required by the Foundation related to the contracted employees.

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 date 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 an alteration or a 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 requesting 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 shall remain 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

Category	Retention Period	Storage location	FES employees having access to such
	*applies for both soft and hard		<u>information</u>
	copy documentation		
Human Resource	ces		
Affidavits	Retention period will be 5 years from	HR Department	CEO
	date of Affidavit.	Archive Room at Head Office	Head HR
			Manager HR
			Programme Coordinator HR
			Coordinator HR
			Programme Secretary HR
Application forms	Retention period will be for 5 years	Electronically on the FES recruitment portal	CEO
to work with the	following the validity period of the call	HR Department	Head HR
FES (both internal	unless a complaint has been filed on the	Archives	Manager HR
and external,	process in which case the relevant data		Programme Coordinator HR
successful and	needs to be retained until this		Coordinator HR
unsuccessful)	complaint is addressed.		Programme Secretary HR
			Interviewing Board
Attendances of	Retention period till 1 year from end of	Services Unit	Programme Coordinator Services
students requested	placement.	Child Care Centre	Centre Coordinator
by Jobsplus related			Programme Secretary HR
to Jobsplus			
placements			
Career Exposure	Retention period till 1 year from end of	Services Unit	CEO
Experience Form	placement.	Child Care Centre	Manager Services
			Programme Coordinator Services

			Centre Coordinator
			Programme Secretary HR
Centres Staff Lists	Retention period will be for 5 years	Electronically on the FES recruitment portal	CEO
(containing staff		HR Department	Head HR
details of a			Manager HR
particular centre)			Programme Coordinator HR
			Coordinator HR
			Programme Secretary HR
			Manager Services
			Programme Coordinator Services
			Centre Coordinator
Collective	Physical and Electronic file will be	All FES employees are entitled to have a	All FES employees are entitled to have a
Agreements	retained for 8 years from the date the	сору	сору
	collective agreement expires		
Contract of student	Retention period till 1 year from end of	Services Unit	Programme Coordinator Services
placements by	placement.	Child Care Centre	Centre Coordinator
Jobsplus			Programme Secretary HR
Employee Personal	Retention period will be for 10 years	HR Department	CEO
File (over 18 years)		Archive Room at Head Office (when the	Head HR
including:		employee leaves the entity)	Manager HR
 CV 			Programme Coordinator HR
 certificates 			Coordinator HR
 employment 			Programme Secretary HR
contract			Child Care Centre Coordinator
 teleworking 			
agreements			
 performance 			
reviews			
 disciplinary 			
records			

		T	
 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). 			
Employee Personal	Retention period will be for 10 years	HR Department	CEO
File (under 18		Archive Room at Head Office (when the	Head HR
years)		employee leaves the entity)	Manager HR
including:		,	Programme Coordinator HR
• CV			Coordinator HR
certificates			Programme Secretary HR
employment			,
contract			

 teleworking 		
agreements		
 performance 		
reviews		
 disciplinary 		
records		
 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)		
• Birth		
certificate		

(for students			
below 18			
years of age)			
 Letter of 			
approval			
from at least			
1 parent (for			
students			
below 18			
years of age)			
 Copy of 			
Consent			
Form to be			
given to			
parents			
 Underage 			
Risk			
Assessment	D	LID D	
Eye Test Records	Retention period will be for 1 year	HR Department	Manager HR
		Corporate Services Unit	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	CEO Head HR
		employee leaves the entity)	Manager HR Programme Coordinator HR Coordinator HR
			Programme Secretary HR
Industrial Tribunal	Retention period will be 5 years from	HR Department	CEO
Files (including	date of court sentence	Archive Room at Head Office (when the	Head HR
termination cases solved by DIER/Court)		employee leaves the entity)	Manager HR
Injuries on duty	Retention period will be for 1 year	HR Department	CEO
		Archive Room at Head Office (when the	Head HR
		employee leaves the entity)	Manager HR
			Programme Coordinator HR
			Coordinator HR
			Programme Secretary HR
Injuries on duty –	Retention period will be for 1 year	Corporate Services	Head Business Support
Insurance Claim			Manager Corporate Services
Forms			Programme Coordinator Procurement
			Insurance Provider
Interview Records	Retention period will be for 5 years	Electronically on the FES recruitment porta	· · · · · · · · · · · · · · · · · · ·
		HR Department	Head HR
		Archive Room at Head Office	Manager HR
			Programme Coordinator HR
			Coordinator HR
			Programme Secretary HR
			Interviewing Board
Recruitment File	Retention period will be for 5 years	HR Department	CEO (if the need arises)

Reference Letters	Detention period will be for 2 years or	Archive Room at Head Office	Head HR Manager HR Programme Coordinator HR Coordinator HR Programme Secretary HR Interviewing Board Head HR
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 Child Care Centre	Programme Coordinator Services Centre Coordinator Programme Secretary HR Child Care Educators
Student, Volunteer and Intern Placement Request Form which includes: Copy of ID Card of applicant Recent Police Conduct Certificate CV of applicant	Retention period till 3 years from end of placement.	Services Unit Child Care/Klabb 3-16/ Skolasajf centre where the student/volunteer is placed	Programme Coordinator Services Centre Coordinator Programme Secretary HR

Letter of reference		
by the referring		
tutor		
Birth certificate		
(for students		
below 18 years of		
age)		
 Letter of approval 		
from at least 1		
parent (for		
students below 18		
years of age)		
 Copy of Consent 		
Form to be given		
to parents		
 Underage Risk 		
Assessment		

Training			
CV	Retention period of 40 years	HR Department	Head HR
			Head Programmes
			Manager Programmes
			Manager HR
			Programme Coordinator HR
			Coordinator HR
			Programme Secretary HR
First Aid Certificate	Retention period of 40 years	HR Department	Head HR
			Head Programmes
			Manager Programmes
			Manager HR
			Programme Coordinator HR
			Coordinator HR
			Programme Secretary HR
Placement Sheet	Retention period of 40 years	HR Department	Head HR
			Head Programmes
			Manager Programmes
			Manager HR
			Programme Coordinator HR
			Coordinator HR
			Programme Secretary HR
Police Conduct	Retention period of 40 years	HR Department	Head HR
			Head Programmes
			Manager Programmes
			Manager HR
			Programme Coordinator HR
			Coordinator HR
			Programme Secretary HR
Reference Letter	Retention period of 40 years	HR Department	Head HR
			Head Programmes

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

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Activity Plans for Children	Retention of 6 months	Child Care Centre	Child Care Centre Coordinator Child Care Educator
		*in case of special cases this	Programmes Unit
		may be brought to HEAD	
		OFFICE	
Activity Evaluation	Retention of 6 months	Child Care Centre	Child Care Centre Coordinator
Forms			Programmes Unit
		*in case of special cases this	
		may be brought to HEAD	
		OFFICE	
AC Servicing Job Sheet	Retention period of 5 years	Child Care Centre	Manager Corporate Services
		Corporate Services Unit	Coordinator Administration
			Centre Coordinator
Affidavits	Retention till 1 year from termination	Child Care Centre	Child Care Centre Coordinator
	of service		Programmes Unit
		*in case of special cases this	
		may be brought to HEAD	
		OFFICE	
Agenzija Appogg Child	Retention till 1 year from termination	Child Care Centre	Child Care Centre Coordinator
Protection Referral	of service		Programmes Unit
Form		*in case of special cases this	Agenzija Appogg
		may be brought to HEAD	
		OFFICE	
Authorise third parties	Retention till 2 years from termination	Child Care Centre	Child Care Centre Coordinator
to collect children	of service		Services Unit
consent form		•	Child Care Educators
		may be brought to HEAD	Programme Secretary (Child Care)
		OFFICE	
Birth Certificate	Retention till 1 year from termination	Child Care Centre	Child Care Centre Coordinator
	of service		Services Unit

		*in case of special cases this	Programmes Unit
		may be brought to HEAD	Programme Secretary (Child Care)
		OFFICE	
Biting Incident Form	Retention till 1 year from termination	Child Care Centre	Child Care Centre Coordinator
	of service		Services Unit
		*in case of special cases this	Programmes Unit
		may be brought to HEAD OFFICE	Programme Secretary (Child Care)
CCTV Footage	Retention of 7 days depending on the	Child Care Centre	Child Care Centre Coordinator
	system installed		Programmes Unit if the need arises
CCTV Testing Job Sheet	Retention period of 5 years	Child Care Centre	Manager Corporate Services
		Corporate Services Unit	Coordinator Administration
			Centre Coordinator
Certification of Electrical	Retention period of 5 years	Child Care Centre	Manager Corporate Services
Installation		Corporate Services Unit	Coordinator Administration
			Centre Coordinator
Child well-being	Retention till 1 year from termination	Child Care Centre	Child Care Centre Coordinator
consent form	of service		Programmes Unit
		•	Programme Secretary (Child Care)
		may be brought to HEAD	
		OFFICE	
Children's personal	Retention till 1 year from termination	Child Care Centre	Child Care Centre Coordinator
information sheet	of service		Services Unit
		*in case of special cases this	Programmes Unit
		may be brought to HEAD	Child Care Educators
		OFFICE	Programme Secretary (Child Care)
Children's	Retention till 1 year from termination	Child Care Centre	Child Care Centre Coordinator
Attendances	of service		Services Unit
			Child Care Educators
			Programme Secretary (Child Care)

		*in case of special cases this may be brought to HEAD	
		OFFICE	
Children's Time in and	Retention till 1 year from termination	Child Care Centre	Child Care Centre Coordinator
Time out Sheet	of service		Services Unit
		*in case of special cases this	Child Care Educators
		may be brought to HEAD OFFICE	Programme Secretary (Child Care)
Cleaning Schedule	Retention period of 1 year	Child Care Centre	Child Care Centre Coordinator
			Corporate Services Unit
Cleaner's Time Sheets	Retention period of 2 years	Child Care Centre	Child Care Centre Coordinator
			Corporate Services Unit
			Programme Secretary (Child Care)
			Business Unit
Community Worker	Retention period of 2 years	Child Care Centre	Child Care Centre Coordinator
Time Sheets			Corporate Services Unit
			Programme Secretary (Child Care)
			Business Unit
Complaints Forms	Retention till 1 year from termination	Child Care Centre	Child Care Centre Coordinator
	of service		Services Unit
		*in case of special cases this	Programmes Unit
		may be brought to HEAD OFFICE	Programme Secretary (Child Care)
Coordinators'	Retention period of 2 years	Child Care Centre	Child Care Centre Coordinator
meetings minutes			Programmes Unit
(held at HO level)			Services Unit
			FES Management

Coordinators'	Retention period of 2 years	Child Care Centre	Child Care Centre Coordinator
meetings minutes			Programmes Unit
(held at centre level)			Services Unit
Custody Documents –	Retention till 1 year from termination	Child Care Centre	Child Care Centre Coordinator
where applicable	of service		Services Unit
		*in case of special cases this	Programmes Unit
		may be brought to HEAD	Programme Secretary (Child Care)
		OFFICE	
DQSE Licence	This should be never destroyed for the	Child Care Centre	Child Care Centre Coordinator
	sake of continuation of service.	Services Unit	Services Unit
			Corporate Services Unit
DQSE Report	This should be never destroyed for the	Child Care Centre	Child Care Centre Coordinator
	sake of continuation of service.	Services Unit	Services Unit
			Corporate Services Unit
Electrical Testing	Retention period of 5 years	Child Care Centre	Child Care Centre Coordinator
Reports		Corporate Services Unit	Manager Corporate Services
			Coordinator Administration
Exit Reports	Retention period of 1 year	Child Care Centre	Child Care Centre Coordinator
			Programmes Unit
Facebook Page	Retention period of 1 year	Child Care Centre	Child Care Centre Coordinator
Messages		Head Office	Manager Programmes
			Coordinator Marketing
Fire Alarm Testing Job	Retention period of 5 years	Child Care Centre	Child Care Centre Coordinator
Sheet		Corporate Services Unit	Manager Corporate Services
			Coordinator Administration
Fire Drills Evacuation	Retention period of 2 years	Child Care Centre	Child Care Centre Coordinator
Sheets		Corporate Services Unit	Programme Secretary (Child Care)
			Manager Corporate Services
			Coordinator Administration

Fire Extinguisher	Retention period of 5 years	Child Care Centre	Child Care Centre Coordinator
Testing Job Sheet		Corporate Services Unit	Manager Corporate Services
			Coordinator Administration
Free Child Care	Retention till 1 year from termination	Child Care Centre	Child Care Centre Coordinator
Scheme monthly	of service		Services Unit
booking		*in case of special cases this	Programme Secretary (Child Care)
		may be brought to HEAD	Business Support Unit
		OFFICE	Jobsplus
ID Cards – Authorised	Retention till end of service	Child Care Centre	Child Care Centre Coordinator
Persons to pick up			Services Unit
children		*in case of special cases this	Child Care Educators
		may be brought to HEAD	Programme Secretary (Child Care)
		OFFICE	
ID Cards – Parents	Retention till end of service	Child Care Centre	Child Care Centre Coordinator
			Services Unit
		*in case of special cases this	Child Care Educators
		may be brought to HEAD	Programme Secretary (Child Care)
		OFFICE	
Images, Photos,	Retention period of 5 years	Child Care Centre	Child Care Centre Coordinator
Videos (soft copy)		Programmes Unit	Programmes Unit
			HR Head
			Coordinator Marketing
			Child Care Educators
			Programme Secretary (Child Care)
Images, Photos,	No retention period		
Videos (used in			
publications)	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 child no longer attends the centre	Child Care Centre	Child Care Centre Coordinator Programmes Unit HR Head Coordinator Marketing 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 HR Head Coordinator Marketing
Images, Photos, Videos shared on social media	Retention period of 5 years	Social Media	Programmes Unit Child Care Centre Coordinator HR Head Coordinator Marketing
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) HR Head Coordinator Marketing
Immunization Record	Retention till 1 year from termination of service	*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	Child Care Centre Coordinator Services Unit Programmes Unit Child Care Educators

		*in case of special cases this may be brought to HEAD OFFICE	Programme Secretary (Child Care)
Injuries – Insurance Claim Forms	Retention period will be for 1 year	Corporate Services Unit	Head Business Support Manager Corporate Services Programme Coordinator Procurement Insurance Provider
Legionella Testing Reports	Retention period of 5 years	Child Care Centre Corporate Services Unit	Child Care Centre Coordinator Manager Corporate Services Coordinator Administration
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	*in case of special cases this may be brought to HEAD OFFICE	Child Care Centre Coordinator Services Unit
Meggit Developmental Checklist	Retention till 1 year from termination of service	*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
Retention period of 1 year	Child Care Centre	Child Care Centre Coordinator
*NB: once paperwork is brought to	Finance	Programme Secretary (Child Care)
Head Office, paperwork left at the		Head of Business
centre can be discarded after a period		Programme Coordinator – Finance
of 1 year.		Coordinator – Finance
Retention period of 1 year	Child Care Centre	Child Care Centre Coordinator
	All Head Office Units	All Head Office Units
		Child Care Educators
		CEO
Retention period of 2 years	Child Care Centre	Child Care Centre Coordinator
		Programme Secretary (Child Care)
		Business Unit
		Programmes Unit
		Corporate Services
Outdated versions can be discarded	Child Care Centre	Child Care Centre Coordinator
upon issuing of a new Operations	All Head Office Units	All Head Office Units
Manual		Child Care Educators
Retention till 1 year from termination	Child Care Centre	Child Care Centre Coordinator
of service		Programmes Unit
	*in case of special cases this	Child Care Educators
	may be brought to HEAD	Programme Secretary (Child Care)
	OFFICE	
Retention till end of year	Child Care Centre	Child Care Centre Coordinator
		Programmes Unit
	*in case of special cases this	Child Care Educators
	may be brought to HEAD	Programme Secretary (Child Care)
Retention period of 5 years		Child Care Centre Coordinator
Receition period of 5 years		Manager Corporate Services
	corporate services offic	Coordinator Administration
	*NB: once paperwork is brought to Head Office, paperwork left at the centre can be discarded after a period of 1 year. Retention period of 1 year Retention period of 2 years Outdated versions can be discarded upon issuing of a new Operations Manual Retention till 1 year from termination of service	*NB: once paperwork is brought to Head Office, paperwork left at the centre can be discarded after a period of 1 year. Retention period of 1 year Retention period of 2 years Child Care Centre All Head Office Units Child Care Centre All Head Office Units Child Care Centre Child Care Centre All Head Office Units Child Care Centre *in case of special cases this may be brought to HEAD OFFICE Retention till end of year *in case of special cases this may be brought to HEAD OFFICE The case of special cases this may be brought to HEAD OFFICE

Parents' employers'	Retention period of 3 years or 1 year	Child Care Centre	Child Care Centre Coordinator
declaration of working	from termination of service		Services Unit
days and hours		*in case of special cases this	Programme Secretary (Child Care)
		may be brought to HEAD	Jobsplus
		OFFICE	
Parents' Employment	Retention period of 3 years or 1 year	Child Care Centre	Child Care Centre Coordinator
Contracts	from termination of service		Services Unit
		*in case of special cases this	Programme Secretary (Child Care)
		may be brought to HEAD	Jobsplus
		OFFICE	
Parents' Payslips	Retention period of 3 years or 1 year	Child Care Centre	Child Care Centre Coordinator
	from termination of service		Services Unit
		*in case of special cases this	Programme Secretary (Child Care)
		may be brought to HEAD	Jobsplus
		OFFICE	
Petty Cash Claim	Retention period of 10 years	Child Care Centre	Centre Coordinator
Forms			Programme Secretary (Child Care)
Petty Cash Receipts	Retention period of 2 years	Child Care Centre	Centre Coordinator
			Programme Secretary (Child Care)
Record of Injuries	Retention period of 3 years or 1 year	Child Care Centre	Child Care Centre Coordinator
Before Coming to the	from termination of service		Programme Secretary (Child Care)
Centre			Services Unit
			Child Care Educators
Record of Injuries	Retention period of 3 years or 1 year	Child Care Centre	Child Care Centre Coordinator
Occurring at the	from termination of service		Programme Secretary (Child Care)
Centre			Services Unit
			Programmes Unit
			HR Department
			Child Care Educators

Registration Form – Cancelled before it was accepted	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.	*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 after being already accepted	Retention period of 3 years or 1 year from termination of service	Child Care Centre	Child Care Centre Coordinator Programmes Unit Services Unit Programmes Secretary (Child Care)
Risk Assessments (Premises)	Retention period of 5 years	Child Care Centre Corporate Services Unit	Manager Corporate Services Coordinator Administration Centre Coordinator
Risk Assessments (Pregnant Employees)	Retention period of 2 years	Child Care Centre Corporate Services Unit	Manager Corporate Services Coordinator Administration Centre Coordinator HR Department
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 period of 3 years or 1 year from termination of service	Child Care Centre	Child Care Centre Coordinator Programmes Unit Services Unit Programme Secretary (Child Care)

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

Klabb 3-16			
Affidavits	Retention till 1 year from termination of service	*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	*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 (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 scholastic 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 –	Retention till end of service	Klabb 3-16 Centre	Centre Coordinator
Authorised Persons		*in case of special cases this	Services Unit
to pick up children		may be brought to HEAD	Play Worker with Extra Responsibilities
		OFFICE	Playworkers
			Child Support Workers and Nominated Child
			Support Workers
ID Cards - Parents	Retention till end of service	Klabb 3-16 Centre	Centre Coordinator
			Services Unit
		*in case of special cases this	Play Worker with Extra Responsibilities
		may be brought to HEAD	Playworkers
		OFFICE	Child Support Workers and Nominated Child
			Support Workers
IEP Report	Retention till 1 year from termination	Klabb 3-16 Centre	Centre Coordinator
Occupational	of service		Programmes Unit
Therapy Report		*in case of special cases this	Play Worker with Extra Responsibilities
Psychological		may be brought to HEAD	
Report		OFFICE	Child Support Workers and Nominated Child
CDAU Report			Support Workers
Speech Language			
Report			
Incident Report	Retention till 1 year from termination	Klabb 3-16 Centre	Centre Coordinator
	of service	4. 6	Programmes Unit
		*in case of special cases this	Services Unit
		may be brought to HEAD	Play Worker with Extra Responsibilities
		OFFICE	Playworkers
			Child Support Workers and Nominated Child
Let a Bassada	Data distribution of the second of the secon	Walta 2 4 C Caral as	Support Workers
Injury Reports	Retention till 1 year from termination	Klabb 3-16 Centre	Centre Coordinator
	of service		Services Unit
			Programmes Unit
			Play Worker with Extra Responsibilities

Injuries – Insurance	Retention period will be for 1 year	*in case of special cases this may be brought to HEAD OFFICE Corporate Services	Playworkers Child Support Workers and Nominated Child Support Workers HR Department CEO Head Business Support
Claim Forms	Neterition period will be for 1 year	corporate services	Manager Corporate Services Programme Coordinator Procurement Insurance Provider
Outing check list	Retention till end of scholastic year	Klabb 3-16 Centre	Centre Coordinator Programmes Unit
		*in case of special cases this may be brought to HEAD OFFICE	Play Worker with Extra Responsibilities Playworkers Child Support Workers and Nominated Child Support Workers
Outing Consent Form	Retention till 1 year from termination of service	*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 and Nominated Child Support Workers
Parents' employers' declaration of working days and hours	Retention till 2 years from termination of service	*in case of special cases this may be brought to HEAD OFFICE	Klabb Centre Coordinator Services Unit
Parents' Employment Contracts	Retention till 2 years from termination of service	*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	Klabb 3-16 Centre	Klabb Centre Coordinator
	of service		Services Unit
		*in case of special cases this	
		may be brought to HEAD	
		OFFICE	
Permission to walk	Retention till 1 year from termination	Klabb 3-16 Centre	Centre Coordinator
from home	of service		Services Unit
		*in case of special cases this	Play Worker with Extra Responsibilities
		may be brought to HEAD	Playworkers
		OFFICE	Child Support Workers and Nominated Child
			Support Workers
Images, Photos,	Retention period will be for 5 years or 5	Klabb 3-16 Centre	Centre Coordinator
Videos and	years after termination of service if the		Programmes Unit
newsletter consent	latter exceeds such period	*in case of special cases this	HR Head
form		may be brought to HEAD	Coordinator Marketing
		OFFICE	Play Worker with Extra Responsibilities
			Playworkers
			Child Support Workers and Nominated Child
			Support Workers
Images, Photos,	Retention period will be for 5 years or 5	Klabb 3-16 Centre	Centre Coordinator
Videos (soft copy)	years after termination of service if the	Programmes Unit	Programmes Unit
	latter exceeds such period		HR Head
			Coordinator Marketing
			Play Worker with Extra Responsibilities
			Playworkers
			Child Support Workers and Nominated Child
			Support Workers
Images, Photos,	No retention period		
Videos (used in			
publications)			

	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 HR Head Coordinator Marketing
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 HR Head Coordinator Marketing 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 and Nominated 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 and Nominated 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
Risk Assessments (Pregnant Employees)	Retention period of 2 years	Klabb 3-16 Centre Corporate Services Unit	Manager Corporate Services Coordinator Administration Centre Coordinator HR Department

Risk Assessments	Retention period of 1 year	Klabb 3-16 Centre	Manager Corporate Services
(Premises)		Corporate Services Unit	Coordinator Administration
			Centre Coordinator
			Play Worker with Extra Responsibilities
			Head of School
			College Principal
			Programme Coordinator Inclusion
Sign out sheets	Retention till 1 year from termination	Klabb 3-16 Centre	Centre Coordinator
(children)	of service		Services Unit
		*in case of special cases this	Play Worker with Extra Responsibilities
		may be brought to HEAD	Playworkers
		OFFICE	Child Support Workers and Nominated Child
			Support Workers
			Parents
Subsidy Application	Retention till renewal of application,	Klabb 3-16 Centre	Centre Coordinator
Forms	that is in October.		Services Unit
		*in case of special cases this	Play Worker with Extra Responsibilities
	If the application is not renewed,	may be brought to HEAD	Playworkers
	retention is yearly, in October	OFFICE	Child Support Workers and Nominated Child
			Support Workers
			Parents
Support Visit Sheets	Retention of 2 scholastic years	Services Unit	Programme Coordinator Services
		Programmes Unit	Programme Coordinator Programmes
			All Management at HO
Tax Rebate Record	Retention period will be for 10 years	Klabb 3-16 Centre	IRD
Sheet		Business Support Unit	Centre Coordinator
			Play Worker with Extra Responsibilities
			Business Support Unit
Timesheet -	Retention period of 2 years	Klabb 3-16 Centre	Centre Coordinator
Cleaners		Business Support Unit	Business Support Unit
Timesheet - Nurses	Retention period of 2 years	Klabb 3-16 Centre	Centre Coordinator

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

Skolasajf			
Affidavits	Retention till 1 year from the end of Skolasajf * This document is to continue being stored at Head Office Level only, upon termination of Skolasajf for that particular year. No documentation is to be left unattended at the Skolasajf centre, following the closure of service.	Skolasajf Centre	Centre Coordinator Programmes Unit Services Unit Play Worker with Extra Responsibilities
Agenzija Appogg Child Protection Referral Form	Retention till 1 year from the end of Skolasajf * This document is to continue being stored at Head Office Level only, upon termination of Skolasajf for that particular year. No documentation is to be left unattended at the Skolasajf centre, following the closure of service.	Skolasajf Centre	Centre Coordinator Programmes Unit Services Unit Play Worker with Extra Responsibilities
Birth Certificate – where applicable	Retention till 1 year from the end of Skolasajf * This document is to continue being stored at Head Office Level only, upon termination of Skolasajf for that particular year. No documentation is to be left unattended at the Skolasajf centre, following the closure of service.	Skolasajf Centre	Centre Coordinator Programmes Unit Services Unit Play Worker with Extra Responsibilities
Cleaning Schedule Custody Documents – where applicable	Retention till end of Skolasajf Retention till 1 year from the end of Skolasajf * This document is to continue being stored at Head Office Level only, upon	Skolasajf Centre Skolasajf Centre	Centre Coordinator Centre Coordinator Services Unit Play Worker with Extra Responsibilities

	termination of Skolasajf for that particular year. No documentation is to be left unattended at the Skolasajf centre, following the closure of service.		
Daily Checklist (Cleaning)	Retention till end of Skolasajf	Klabb 3-16 Centre	Centre Coordinator Play Worker with Extra Responsibilities Manager Corporate Services
Fire Drills Evacuation Reports	Retention of 2 years * This document is to continue being stored at Head Office Level only, upon termination of Skolasajf for that particular year. No documentation is to be left unattended at the Skolasajf centre, following the closure of service.	Skolasajf Centre Corporate Services Unit	Centre Coordinator Play Worker with Extra Responsibilities Manager Corporate Services Coordinator Administration Programmes Unit
ID Cards – Authorised Persons to pick up children	Retention till end of Skolasajf	*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 and Nominated Child Support Workers
ID Cards - Parents	Retention till 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 and Nominated Child Support Workers
IEP Report Occupational Therapy Report	Retention till 1 year from the end of Skolasajf * This document is to continue being stored at Head Office Level only, upon	Skolasajf Centre	Centre Coordinator Programmes Unit Play Worker with Extra Responsibilities

Psychological	termination of Skolasajf for that		Child Support Workers and Nominated Child
Report	particular year. No documentation is to		Support Workers
CDAU Report	be left unattended at the Skolasajf		
Speech Language	centre, following the closure of service.		
Report			
Incident Report	Retention till 2 months from the end of	Skolasajf Centre	Centre Coordinator
	Skolasajf		Programmes Unit
	* This document is to continue being		Services Unit
	stored at Head Office Level only, upon		Play Worker with Extra Responsibilities
	termination of Skolasajf for that		Playworkers
	particular year. No documentation is to		Child Support Workers and Nominated Child
	be left unattended at the Skolasajf		Support Workers
	centre, following the closure of service.		
Injury Reports	Retention till 1 year from the end of	Skolasajf Centre	Centre Coordinator
	Skolasajf		Programmes Unit
	* This document is to continue being		Services Unit
	stored at Head Office Level only, upon		Play Worker with Extra Responsibilities
	termination of Skolasajf for that		Playworkers
	particular year. No documentation is to		Child Support Workers and Nominated Child
	be left unattended at the Skolasajf		Support Workers
	centre, following the closure of service.		CEO
			HR Department
Outing check list	Retention till end of year	Skolasajf Centre	Centre Coordinator
	* This document is to continue being		Programmes Unit
	stored at Head Office Level only, upon		Play Worker with Extra Responsibilities
	termination of Skolasajf for that		Playworkers
	particular year. No documentation is to		Child Support Workers and Nominated Child
	be left unattended at the Skolasajf		Support Workers
	centre, following the closure of service.		
Outing Consent	Retention till 1 year from the end of	Skolasajf Centre	Centre Coordinator
Form	Skolasajf		Programmes Unit

	* This document is to continue being stored at Head Office Level only, upon termination of Skolasajf for that particular year. No documentation is to be left unattended at the Skolasajf centre, following the closure of service.		Play Worker with Extra Responsibilities Playworkers Child Support Workers and Nominated Child Support Workers
Parents' employers' declaration of working days and hours	Retention till 1 year from the end of Skolasajf * This document is to continue being stored at Head Office Level only, upon termination of Skolasajf for that particular year. No documentation is to be left unattended at the Skolasajf centre, following the closure of service.	Skolasajf Centre	Centre Coordinator Services Unit Jobsplus
Parents' Employment Contracts	Retention till 1 year from the end of Skolasajf * This document is to continue being stored at Head Office Level only, upon termination of Skolasajf for that particular year. No documentation is to be left unattended at the Skolasajf centre, following the closure of service.	Skolasajf Centre	Centre Coordinator Services Unit Jobsplus
Parents' Payslips	Retention till 1 year from the end of Skolasajf * This document is to continue being stored at Head Office Level only, upon termination of Skolasajf for that particular year. No documentation is to be left unattended at the Skolasajf centre, following the closure of service.	Skolasajf Centre	Centre Coordinator Services Unit Jobsplus

Permission to walk	Retention till 2 months from the end of	Skolasajf Centre	Centre Coordinator
from home	Skolasajf		Services Unit
	* This document is to continue being		Play Worker with Extra Responsibilities
	stored at Head Office Level only, upon		Playworkers
	termination of Skolasajf for that		Child Support Workers and Nominated Child
	particular year. No documentation is to		Support Workers
	be left unattended at the Skolasajf		
	centre, following the closure of service.		
Images, Photos,	Retention period will be for 5 years or 5	Skolasajf Centre	Centre Coordinator
Videos and	years after termination of service if the		Programmes Unit
newsletter consent	latter exceeds such period		Play Worker with Extra Responsibilities
form	* This document is to continue being		Playworkers
	stored at Head Office Level only, upon		Child Support Workers and Nominated Child
	termination of Skolasajf for that		Support Workers
	particular year. No documentation is to		HR Head
	be left unattended at the Skolasajf		Coordinator Marketing
	centre, following the closure of service.		
Images, Photos,	Retention period will be for 5 years or 5	Skolasajf Centre	Centre Coordinator
Videos (soft copy)	years after termination of service if the		Programmes Unit
	latter exceeds such period		Play Worker with Extra Responsibilities
	* This document is to continue being		Playworkers
	stored at Head Office Level only, upon		Child Support Workers and Nominated Child
	termination of Skolasajf for that		Support Workers
	particular year. No documentation is to		HR Head
	be left unattended at the Skolasajf		Coordinator Marketing
	centre, following the closure of service.		
Images, Photos,	No retention period		
Videos (used in			
publications)	Printed/electronic publications issued		
	by the FES are disseminated amongst		
	the general public		

Images, Photos,	Retention period will be for 5 years or 5	Social Media	Social Media
Videos shared on	years after termination of service if the		HR Head
social media	latter exceeds such period		Coordinator Marketing
Images, Videos	Retention period of 5 years	Skolasajf Centre	Centre Coordinator
(Staff) to be used	* This document is to continue being		Programmes Unit
for internal training	stored at Head Office Level only, upon		HR Head
purposes	termination of Skolasajf for that		Coordinator Marketing
	particular year. No documentation is to		
	be left unattended at the Skolasajf		
	centre, following the closure of service.		
Record of injuries	Retention till 2 months from the end of	Skolasajf Centre	Centre Coordinator
before coming to	Skolasajf		Services Unit
centre	* This document is to continue being		Play Worker with Extra Responsibilities
	stored at Head Office Level only, upon		Playworkers
	termination of Skolasajf for that		Child Support Workers and Nominated Child
	particular year. No documentation is to		Support Workers
	be left unattended at the Skolasajf		
	centre, following the closure of service.		
Registration Form	Retention till 1 year from the end of	Electronically on the FES	Centre Coordinator
	Skolasajf	services portal	Services Unit
	* This document is to continue being	Skolasajf Centre	Play Worker with Extra Responsibilities
	stored at Head Office Level only, upon		Playworkers
	termination of Skolasajf for that		Child Support Workers and Nominated Child
	particular year. No documentation is to		Support Workers
	be left unattended at the Skolasajf		
	centre, following the closure of service.		
Registration Form -	Retention period of 1 year from the end	Skolasajf Centre	Centre Coordinator
Cancelled	of Skolasajf		Services Unit
			Play Worker with Extra Responsibilities
Request for Regular	Retention till 2 months from the end of	Skolasajf Centre	Centre Coordinator
Administration of	Skolasajf	Programmes Unit	Programmes Unit

Medication and	* This document is to continue being		Programme Coordinator Inclusion
Treatment of	stored at Head Office Level only, upon		Nursing Service Provider
Students Attending	termination of Skolasajf for that		Play Worker with Extra Responsibilities
Mainstream	particular year. No documentation is to		Child Support Workers and Nominated Child
	be left unattended at the Skolasajf		Support Workers
	centre, following the closure of service.		
Risk Assessments	Retention period of 1 year	Skolasajf Centre	Manager Corporate Services
(Premises)	* This document is to continue being	Corporate Services Unit	Coordinator Administration
	stored at Head Office Level only, upon		Centre Coordinator
	termination of Skolasajf for that		Play Worker with Extra Responsibilities
	particular year. No documentation is to		Head of School
	be left unattended at the Skolasajf		College Principal
	centre, following the closure of service.		Programme Coordinator Inclusion
Risk Assessments	Retention period of 2 years from the	Skolasajf Centre	Manager Corporate Services
(Pregnant	end of Skolasajf	Corporate Services Unit	Coordinator Administration
Employees)	* This document is to continue being		Centre Coordinator
	stored at Head Office Level only, upon		HR Department
	termination of Skolasajf for that		
	particular year. No documentation is to		
	be left unattended at the Skolasajf		
	centre, following the closure of service.		
Risk Assessments	Retention period of 2 years from the	Skolasajf Centre	Manager Corporate Services
(Underage)	end of Skolasajf	Corporate Services Unit	Coordinator Administration
	* This document is to continue being		Centre Coordinator
	stored at Head Office Level only, upon		HR Department
	termination of Skolasajf for that		
	particular year. No documentation is to		
	be left unattended at the Skolasajf		
	centre, following the closure of service.		
School Contracts	Retention period of 2 years from the	Skolasajf Centre	Manager Corporate Services
	end of Skolasajf	Corporate Services Unit	Coordinator Administration

	* This document is to be brought at		Centre Coordinator
	Head Office before the start of		Play Worker with Extra Responsibilities
	Skolasajf. It will continue being stored at		Head of School
	Head Office accordingly.		College Principal
			Programme Coordinator Inclusion
			Regional Coordinators
Support Visit Sheets	Retention period of 2 years from the	Skolasajf Centre	Centre Coordinator
	end of Skolasajf	Head Office – access is	FES Head Office
	* This document is to continue being	granted to all Departments	Regional Coordinators
	stored at Head Office Level only, upon		
	termination of Skolasajf for that		
	particular year. No documentation is to		
	be left unattended at the Skolasajf		
	centre, following the closure of service.		
Sign out sheets	Retention till 1 year from the end of	Skolasajf Centre	Centre Coordinator
(children)	Skolasajf		Services Unit
	* This document is to continue being	*in case of special cases this	Play Worker with Extra Responsibilities
	stored at Head Office Level only, upon	may be brought to HEAD	Playworkers
	termination of Skolasajf for that	OFFICE	Child Support Workers and Nominated Child
	particular year. No documentation is to		Support Workers
	be left unattended at the Skolasajf		Parents
	centre, following the closure of service.		
Tax Rebate Record	Retention period will be for 10 years	Skolasajf Centre	IRD
Sheet	* This document is to continue being	Services Unit	Centre Coordinator
	stored at Head Office Level only, upon		Play Worker with Extra Responsibilities
	termination of Skolasajf for that		Services Unit
	particular year. No documentation is to		Business Support Unit
	be left unattended at the Skolasajf		
	centre, following the closure of service.		
Timesheet -	Retention period of 2 years from the	Skolasajf Centre	Centre Coordinator
Cleaners	end of Skolasajf	Business Support Unit	Business Support Unit

	* This document is to continue being stored at Head Office Level only, upon termination of Skolasajf for that particular year. No documentation is to be left unattended at the Skolasajf		
	centre, following the closure of service.		
Timesheet – Nurses	Retention period of 2 years from the	Skolasajf Centre	Centre Coordinator
	end of Skolasajf	Business Support Unit	Business Support Unit
	* This document is to continue being		Programmes Unit
	stored at Head Office Level only, upon		
	termination of Skolasajf for that		
	particular year. No documentation is to		
	be left unattended at the Skolasajf		
	centre, following the closure of service.		
Timesheet - Police	Retention period of 2 years from the	Skolasajf Centre	Centre Coordinator
	end of Skolasajf	Business Support Unit	Business Support Unit
	* This document is to continue being		
	stored at Head Office Level only, upon		
	termination of Skolasajf for that		
	particular year. No documentation is to		
	be left unattended at the Skolasajf		
	centre, following the closure of service.		
Timesheet –	Retention period of 2 years from the	Skolasajf Centre	Centre Coordinator
Security	end of Skolasajf	Business Support Unit	Business Support Unit
	* This document is to continue being		
	stored at Head Office Level only, upon		
	termination of Skolasajf for that		
	particular year. No documentation is to		
	be left unattended at the Skolasajf		
	centre, following the closure of service.		

Transport	Retention period of 1 year from the end	Skolasajf Centre	Centre Coordinator
Expression of	of Skolasajf	Services Unit	Coordinator Services
Interest	* This document is to continue being		Programme Coordinator Services
	stored at Head Office Level only, upon		Manager Services
	termination of Skolasajf for that		
	particular year. No documentation is to		
	be left unattended at the Skolasajf		
	centre, following the closure of service.		
Weekly Plan of	Retention period of 2 years from the	Skolasajf Centre	Centre Coordinator
Activities	end of Skolasajf		Play Worker with Extra Responsibilities
	* This document is to continue being		Programmes Unit
	stored at Head Office Level only, upon		Business Support Unit
	termination of Skolasajf for that		
	particular year. No documentation is to		
	be left unattended at the Skolasajf		
	centre, following the closure of service.		

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 5 years	Business Support Unit	CEO Head, Business Support Unit Manager Corporate Services Programme Coordinator Procurement Coordinator Administration

Petty Cash Claim	Retention period of 10 years	Business Support Unit	Head, Business Support Unit
Forms		Archive Room at Head Office	Manager Finance
			Coordinator Finance
			Centre Coordinator
Petty Cash Receipts	Retention period of 10 years	Business Support Unit	Head, Business Support Unit
		Archive Room at Head Office	Manager Finance
			Coordinator Finance
			Centre Coordinator
Procurement	Retention period of 10 years	Business Support Unit	Head, Business Support Unit
Documentation		Archive Room at Head Office	Manager Corporate Services
			Programme Coordinator Procurement
			Coordinator Administration
Procurement	Retention period of 10 years	Business Support Unit	Head, Business Support Unit
Contracts		Archive Room at Head Office	Manager Corporate Services
			Programme Coordinator Procurement
			Coordinator Administration
Receipt books	Retention period of 10 years	Business Support Unit	Head, Business Support Unit
		Archive Room at Head Office	Manager Finance
			Coordinator Finance
			Centre Coordinator
Receipts templates	Retention period of 10 years	Business Support Unit	Head, Business Support Unit
		Archive Room at Head Office	Manager Finance
			Coordinator Finance
			Centre Coordinator
Tenders & Tender	Retention period of 10 years	Business Support Unit	CEO
Documentation		Archive Room at Head Office	Head, Business Support Unit
			Manager Corporate Services
			Programme Coordinator Procurement
			Coordinator Administration
			Evaluation Committee

Yearly Financial	Retention period of 10 years	Business Support Unit	FES Board
Statements		Archive Room at Head Office	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	Head, Business Support Unit Manager Finance Coordinator Finance Programme Secretary (Payroll)
		timesheets are submitted to the Business Support Unit on a monthly basis. These are then archived within the Archive Room at Head Office.	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	Retention period will be for 1 year	Business Support Unit	Head, Business Support Unit
Certificates		Archive Room at Head Office	Manager Finance
			Coordinator Finance
			Programme Secretary (Payroll)
			Centre Coordinator
			Manager Services
			Programme Coordinator Services
COVID Quarantine	Retention period will be for 1 year	Business Support Unit	Head, Business Support Unit
Letters		Archive Room at Head Office	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	Retention period will be for 3 years	Business Support Unit	Head, Business Support Unit
Application Forms		Archive Room at Head Office	Manager Finance
			Coordinator Finance
			Programme Secretary (Payroll)
			Centre Coordinator
			Manager Services
			Programme Coordinator Services

Company Car	Retention period till 2 months from end	Business Support Unit	CEO
Insurance Details	of service of the CEO with entity		Manager Corporate Services
	,		Programme Coordinator Procurement
			Coordinator Administration
Delivery notes	Retention period of 1 year	Corporate Services Unit	Manager Corporate Services
			Coordinator Administration
			Administration Assistant
Equipment/Laptop	Retention period till 2 months from	Business Support Unit	Manager Corporate Services
Handing Over	when the employee leaves the entity		Programme Coordinator Technical Support
Forms			Coordinator Administration
Generic Email –	Retention period will be for 5 years	Corporate Services Unit	Manager Corporate Services in the role of Data
Data Protection			Protection Officer
Generic Email – FES	Retention period will be for 2 years	Services Unit	Manager Services
			Programme Secretary (Services & HR)
Generic Email –	Retention period will be for 2 years	Programmes Unit	Head Programmes
Programmes			Manager Programmes
			Programme Coordinator Programmes
Generic Email –	Retention period will be for 3 years	Programmes Unit	Head Programmes
Inclusion			Manager Programmes
			Programme Coordinator Inclusion
Generic Email –	Retention period will be for 2 years	HR Department	Head HR
Marketing			Coordinator Marketing
Generic Email -	Retention period will be for 2 years	Corporate Services Unit	Manager Corporate Services
Supplies			Coordinator Administration
			Administration Assistant
Generic Email –	Retention period will be for 5 years	Corporate Services Unit	FOI and Alternate FOI Officers
Freedom of			
Information			

Generic Email –	Retention period will be for 2 years	Within the respective centre	Centre Coordinator
individual Child			Programme Coordinator
Care Centres			Manager Corporate Services
			Manager Services
Management	Retention period will be for 10 years	CEO's Office	CEO
Meeting Minutes		Archive Room	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.