

POLICY REGULATING THE RETENTION OF DOCUMENTATION IN NATIONAL SCHOOL SUPPORT SERVICES (NSSS)

SCOPE

1. This Policy is aimed at regulating the retention, maintenance and disposal of documentation, both personal and other, within the National School Support Services (NSSS), as provided for in the Education Act (Cap. 605), the Processing of Personal Data (Education Sector) Regulations (S.L. 586.07) and in accordance with the principles of data protection legislation, and other legal provisions in Maltese Law.

BACKGROUND

2. The GDPR puts forward the principle that personal data and sensitive personal data should not be retained for periods that are longer than necessary. In this context, the NSSS will be putting forward a retention policy for all data and documentation that it collects and processes, with the purpose of ensuring compliance to the Regulation and to ensure that no resources are utilised in the processing and archiving of data which is no longer of relevance.

OBJECTIVES

3. This policy aims to achieve the following objectives:
 - a. Regulate the retention of and disposal of the various types of documentation whether held in manual or automated filing systems within the NSSS, while adhering to the Data Protection principle that personal data should not be retained for a longer period than necessary;
 - b. Dispose of unnecessary documentation that is no longer relevant and is taking up useful storage space;

- c. Promote the digitisation of documentation as may be reasonably possible in order to minimize the use of storage space required to store documentation, as well as to promote a sustainable use of paper and printing consumables.

ADMINISTRATION

4. Documentation is held and recorded by NSSS. This Policy is therefore applicable to all such documentation. It will be the responsibility of the relevant NSSS and its Data Controller Director NSSS to ensure that all provisions of this Policy are adhered to.

DOCUMENTATION HELD WITHIN NSSS

5. As part of its operating requirements the NSSS, requests, keeps and maintains a wide range of documentation including personal data. The various types of documentation utilised by NSSS are listed in detail in section 10 of this policy.

SECURITY OF DOCUMENTATION

6. Documentation is maintained in an accessible but secure location with adequate access provided to officials who have the clearance level to access the relevant documentation. In the case of documents with sensitive personal data with higher clearance levels, access control protocols are fully adhered to, to ensure that only those that have the required security clearance have access to such documentation.
7. In the case of personal data, the GDPR also stipulates that only those required to process personal data should have access to personal records.
8. Personnel who are found to be in breach of these security protocols, and thus in breach of the GDPR, will be subject to disciplinary action.

MANUAL VS ELECTRONIC RECORDS

9. In terms of retention periods, it needs to be pointed out that the same retention period will apply for both electronic and manual data.

RETENTION PERIOD

10. Retention of different categories of documents is governed by different requirements and different legislation and regulations.

The following schedule outlines the retention requirements for the various categories of documentation within the NSSS.

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Statementing and Moderating Panel

Category of Document	Retention Period	Justification
<p>Statementing Panel Application Form by the Parent/Legal Guardian</p>	<p>Documents and data will be stored for the entire duration of the student's compulsory schooling, followed by one (1) year unregistered in another school. (*Since post-secondary education is not mandatory, a further one (1) year retention is required to cater for the below exception)</p> <p>Exceptionally, documents and/or data will be further stored until the student reaches twenty-two (22) year old of age; if he/she continues post-secondary education in either Dun Manuel Attard Young Adult Education Resource Centre, or Hellen Keller Secondary / Young Adult Education or Sannat Unit, Gozo.</p>	<p>Document and data need to be stored for this period as a proof of application by the parent/legal guardian for the student to receive support services at school according to the Inclusive Education Policy.</p>

<p>Consent Form/s by the Parent/Legal Guardian</p>	<p>Documents and data will be stored for the entire duration of the student’s compulsory schooling, followed by one (1) year unregistered in another school. (*Since post-secondary education is not mandatory, a further one (1) year retention is required to cater for the below exception)</p> <p>Exceptionally, documents and/or data will be further stored until the student reaches twenty-two (22) year old of age; if he/she continues post-secondary education in either Dun Manuel Attard Young Adult Education Resource Centre, or Hellen Keller Secondary / Young Adult Education or Sannat Unit, Gozo.</p>	<p>Documents and data need to be stored for this period as a proof of consent given by the parent/legal guardian to process and record student’s personal data and special categories of personal data.</p>
<p>Confidential Reports, including:</p> <ul style="list-style-type: none"> • Custody Papers • Medical Reports • Educational Reports • Other Supplementary Reports provided by the parent/legal guardian. 	<p>Documents and data will be stored for the entire duration of the student’s compulsory schooling, followed by one (1) year unregistered in another school. (*Since post-secondary education is not mandatory, a further one (1) year retention is required to cater for the below exception)</p> <p>Exceptionally, documents and/or data will be further stored until the student reaches twenty-two (22) year old of age; if he/she continues post-</p>	<p>Documents and data need to be stored for this period to integrate the information collected from these reports with the student’s profile.</p>

	<p>secondary education in either Dun Manuel Attard Young Adult Education Resource Centre, or Hellen Keller Secondary / Young Adult Education or Sannat Unit, Gozo.</p>	
<p>Reports authored by the Head of School, Class Teacher, NSSS employees and other Authorised Professionals</p>	<p>Documents and data will be stored for the entire duration of the student’s compulsory schooling, followed by one (1) year unregistered in another school. (*Since post-secondary education is not mandatory, a further one (1) year retention is required to cater for the below exception)</p> <p>Exceptionally, documents and/or data will be further stored until the student reaches twenty-two (22) year old of age; if he/she continues post-secondary education in either Dun Manuel Attard Young Adult Education Resource Centre, or Hellen Keller Secondary / Young Adult Education or Sannat Unit, Gozo.</p>	<p>Documents and data need to be stored for this period to integrate the information collected from these reports with the student’s profile.</p>

<p>Database:</p> <ul style="list-style-type: none"> ○ Database Reference: MySchool ○ Type of Database: Online Solution ○ Hosted: Externally ○ Name of Contractor: MySchool Limited 	<p>Documents and data will be stored for the entire duration of the student’s compulsory schooling, followed by one (1) year unregistered in another school. (*Since post-secondary education is not mandatory, a further one (1) year retention is required to cater for the below exception)</p> <p>Exceptionally, documents and/or data will be further stored until the student reaches twenty-two (22) year old of age; if he/she continues post-secondary education in either Dun Manuel Attard Young Adult Education Resource Centre, or Hellen Keller Secondary / Young Adult Education or Sannat Unit, Gozo.</p>	<p>Data needs to be stored for this period to process, record, and monitor the progress of the student.</p>
	<p>Once the retention period expires, the stored data will be anonymised. This process will remove any identifying information from the database, in such a way that a data subject can no longer be identified directly or indirectly, either by the data controller alone or in collaboration with any other party.</p>	

School Psychological Services (SPS)

Category of Document	Retention Period	Justification
SPS Files of Students, including: <ul style="list-style-type: none"> • Assessment Results • Intervention Notes 	In case of students who are referred during their compulsory schooling, documents and data will be stored until students reach age of twenty-five (25) years.	Documents and data need to be stored for this period, since it may be requested by the students to apply for MCAST, Access Exam Arrangements or other services, after leaving compulsory schooling.
	In case of students who are referred from a post-secondary school or other centres, the retention period will be five (5) years following the last intervention.	Documents and data need to be stored for this period, since it may be requested by the students and / or guardians of persons with Intellectual Disability to apply for other services.
Database: <ul style="list-style-type: none"> ○ Database Reference: SPS Database ○ Type of Database: Offline Solution ○ Hosted: Internally 	In case of students who are referred during their compulsory schooling, documents and data will be stored until students reach age of twenty-five (25) years.	Data needs to be stored for this period, since it may be requested by the students to apply for MCAST, Access Exam Arrangements or other services, after leaving compulsory schooling.

<ul style="list-style-type: none"> ○ Name of Contractor: Not Applicable 	<p>In case of students who are referred from a post-secondary school or other centres, the retention period will be five (5) years following the last intervention.</p>	<p>Data needs to be stored for this period, since it may be requested by the students and / or guardians of persons with Intellectual Disability to apply for other services.</p>
	<p>Once the retention period expires, the stored data will be anonymised. This process will remove any identifying information from the database, in such a way that a data subject can no longer be identified directly or indirectly, either by the data controller alone or in collaboration with any other party.</p>	

Inclusion Services		
Multi-Sensory Learning Room (MSLR)		
Category of Document	Retention Period	Justification
<p>Referral Documents, including:</p> <ul style="list-style-type: none"> • Referral document together with parent/guardian consent form and other affixed reports: <ul style="list-style-type: none"> ○ Psychological Report ○ IEP and Review report. ○ Any additional reports from professionals supporting student (Ex Report from Speech and Language pathologist, OT reports and medical reports.) 	<p>Documents and data will be stored for the entire duration of the student’s primary schooling, followed by one (1) year.</p>	<p>Documents and data need to be stored for this period:</p> <ul style="list-style-type: none"> • as a proof of application for the student to receive support services • as a proof of consent given by the parent/legal guardian to process and record student’s personal data and special categories of personal data • to integrate the information collected from these reports with the student’s profile • to enable resuming the service during the student’ primary schooling if necessary

	<p>In case of students who are discharged from service, documents and data will be stored for one (1) year after discharge/ refusal letter is received.</p>	<p>Documents and data need to be stored for this period to enable resuming the service if necessary.</p>
<p>MSLR Files of Students, including:</p> <ul style="list-style-type: none"> • Referral Document and Consent form • Psychological report. • Any supporting reports/documentation from other supporting professionals (Ex Speech and Language Pathologists, medical reports, OT reports) • Scheme of work and Record of work • IEP/ IEP Review document • Possible Discharge or refusal of service documents 	<p>Documents and data will be stored for the entire duration of the student’s primary schooling, followed by one (1) year.</p>	<p>Documents and data need to be stored for this period:</p> <ul style="list-style-type: none"> • as a proof of application for the student to receive support services • as a proof of consent given by the parent/legal guardian to process and record student’s personal data and special categories of personal data • to integrate the information collected from these reports with the student’s profile • to enable resuming the service during student’ primary schooling if necessary

	<p>In case of students who are discharged from service, documents and data will be stored for one (1) year after discharge/ refusal letter is received.</p>	<p>Documents and data need to be stored for this period to enable resuming the service if necessary.</p>
<p>Database:</p> <ul style="list-style-type: none"> ○ Database Reference: MSLR Database ○ Type of Database: Offline Solution ○ Hosted: Internally ○ Name of Contractor: Not Applicable 	<p>Data will be stored for the entire duration of the student’s primary schooling, followed by one (1) year.</p>	<p>Data needs to be stored for this period to process, record, and monitor the progress of the student.</p>
	<p>In case of students who are discharged from service, data will be stored for one (1) year after discharge/ refusal letter is received.</p>	<p>Data needs to be stored for this period to enable resuming the service if necessary.</p>
	<p>Once the retention period expires, the stored data will be anonymised. This process will remove any identifying information from the database, in such a way that a data subject can no longer be identified directly or indirectly, either by the data controller alone or in collaboration with any other party.</p>	

Autism Spectrum Support Team (ASST)		
Category of Document	Retention Period	Justification
<p>Referral Documents, including:</p> <ul style="list-style-type: none"> • Referral document together with parent/guardian consent form and other affixed reports: <ul style="list-style-type: none"> ○ Psychological report ○ In certain cases, additional reports from professionals supporting student (Report from Speech and Language pathologist, OT reports and medical reports.) 	<p>Documents and data will be stored for the entire duration of the student’s compulsory schooling, , followed by one (1) year.</p>	<p>Documents and data need to be stored for this period:</p> <ul style="list-style-type: none"> • as a proof of application for the student to receive support services • as a proof of consent given by the parent/legal guardian to process and record student’s personal data and special categories of personal data • to integrate the information collected from these reports with the student’s profile • to enable resuming the service during the student’ compulsory schooling if necessary

<p>ASST Files of Students, including:</p> <ul style="list-style-type: none"> • Referral Document and Consent form • Psychological report • Any supporting reports/documentation from other supporting professionals (Speech and Language Pathologists, medical reports, OT reports) • Case notes by ASST practitioners • IEP/Review document • Possible Discharge or Refusal of service documents 	<p>Documents and data will be stored for the entire duration of the student’s compulsory schooling, followed by one (1) year.</p>	<p>Documents and data need to be stored for this period:</p> <ul style="list-style-type: none"> • as a proof of application for the student to receive support services • as a proof of consent given by the parent/legal guardian to process and record student’s personal data and special categories of personal data • to integrate the information collected from these reports with the student’s profile • to enable resuming the service during the student’ compulsory schooling if necessary
	<p>With respect to consent forms which are being submitted at the start of every scholastic year, documents and data will be stored till end of the same scholastic year.</p>	<p>Documents and data need to be stored for this period as a proof of consent given by the parent/legal guardian to process and record student’s personal data and special categories of personal data.</p>

	<p>In case of students who are discharged from service, documents and data will be stored for one (1) year after discharge/ refusal letter is received.</p>	<p>Documents and data need to be stored for this period to enable resuming the service if necessary.</p>
<p>Database:</p> <ul style="list-style-type: none"> ○ Database Reference: ASST Database ○ Type of Database: Offline Solution ○ Hosted: Internally ○ Name of Contractor: Not Applicable 	<p>Data will be stored for the entire duration of the student’s compulsory schooling, followed by one (1) year.</p>	<p>Data needs to be stored for this period to process, record, and monitor the progress of the student.</p>
	<p>In case of students who are discharged from service, data will be stored for (1) year after discharge/ refusal letter is received.</p>	<p>Data needs to be stored for this period to enable resuming the service if necessary.</p>
	<p>Once the retention period expires, the stored data will be anonymised. This process will remove any identifying information from the database, in such a way that a data subject can no longer be identified directly or indirectly, either by the data controller alone or in collaboration with any other party.</p>	

Home Tuition		
Category of Document	Retention Period	Justification
<p>Referral Documents, including:</p> <ul style="list-style-type: none"> • Referral document together with parent/guardian consent form and other affixed reports: <ul style="list-style-type: none"> ○ Psychiatric report. ○ In certain cases, additional reports from professionals supporting student. 	<p>Documents and data will be stored until end of each scholastic year.</p>	<p>Documents and data need to be stored for this period:</p> <ul style="list-style-type: none"> • as a proof of application for the student to receive support services • as a proof of consent given by the parent/legal guardian to process and record student's personal data and special categories of personal data • to integrate the information collected from these reports with the student's profile • to enable resuming the service during the same scholastic year if necessary
<p>Home Tuition Files of Students, including:</p> <ul style="list-style-type: none"> • Referral Document and Consent form • Psychiatric report. • Any documentation from other supporting professionals. • Scheme of work and Record of work 	<p>Documents and data will be stored for the entire duration of the student's compulsory schooling.</p>	<p>Documents and data need to be stored for this period:</p> <ul style="list-style-type: none"> • as a proof of application for the student to receive support services • as a proof of consent given by the parent/legal guardian to process and record student's personal data and special categories of personal data

<ul style="list-style-type: none"> • IEP/Review document if applicable • Termination of service documents 		<ul style="list-style-type: none"> • to integrate the information collected from these reports with the student's profile • to enable resuming the service during the student' compulsory schooling if necessary
<p>Database:</p> <ul style="list-style-type: none"> ○ Database Reference: Home Tuition Database ○ Type of Database: Offline Solution ○ Hosted: Internally ○ Name of Contractor: Not Applicable 	<p>In case of students who are discharged from service, documents and data will be stored for (1) year after discharge/ refusal letter is received.</p>	<p>Document and data need to be stored for this period to enable resuming the service during the next scholastic year if necessary.</p>
	<p>Data will be stored for the entire duration of the student's compulsory schooling.</p> <p>In case of students who are discharged from service, data will be stored for (1) year after discharge/ refusal letter is received.</p>	<p>Data needs to be stored for this period to process, record, and monitor the progress of the student.</p> <p>Data needs to be stored for this period to enable resuming the service during the student' compulsory schooling if necessary.</p>

	<p>Once the retention period expires, the stored data will be anonymised. This process will remove any identifying information from the database, in such a way that a data subject can no longer be identified directly or indirectly, either by the data controller alone or in collaboration with any other party.</p>	
<p>Hospital Classes</p>		
<p>Category of Document</p>	<p>Retention Period</p>	<p>Justification</p>
<p>Referral Documents, including:</p> <ul style="list-style-type: none"> • Referral document together with parent/guardian consent form. 	<p>Documents and data will be stored until end of each scholastic year.</p>	<p>Documents and data need to be stored for this period:</p> <ul style="list-style-type: none"> • as a proof of application for the student to receive support services • as a proof of consent given by the parent/legal guardian to process and record student’s personal data and special categories of personal data • to integrate the information collected from these reports with the student’s profile • to enable resuming the service during the same scholastic year if necessary.

<p>Database:</p> <ul style="list-style-type: none"> ○ Database Reference: Hospital Classes Database ○ Type of Database: Offline Solution ○ Hosted: Internally ○ Name of Contractor: Not Applicable 	<p>Data will be stored until end of each scholastic year.</p>	<p>Data needs to be stored for this period to process, record, and monitor the progress of the student.</p>
	<p>Once the retention period expires, the stored data will be anonymised. This process will remove any identifying information from the database, in such a way that a data subject can no longer be identified directly or indirectly, either by the data controller alone or in collaboration with any other party.</p>	
<p>Visually Impaired Services</p>		
<p>Category of Document</p>	<p>Retention Period</p>	<p>Justification</p>
<p>Referral Documents, including:</p> <ul style="list-style-type: none"> • Referral document together with parent/guardian consent form and other affixed reports: <ul style="list-style-type: none"> ○ Ophthalmologist report ○ In certain cases, additional reports from professionals supporting student (Ex Psychological reports, Report from Speech and Language pathologist, OT reports and medical reports.) 	<p>Documents and data will be stored for the entire duration of the student’s compulsory schooling, followed by the first term of Post-Secondary Education.</p>	<p>Documents and data need to be stored for this period:</p> <ul style="list-style-type: none"> • as a proof of application for the student to receive support services • as a proof of consent given by the parent/legal guardian to process and record student’s personal data and special categories of personal data • to integrate the information collected from these reports with the student’s profile

		<ul style="list-style-type: none"> to enable resuming the service till the first term of Post-Secondary Education if necessary
<p>Visually Impaired Files of Students, including:</p> <ul style="list-style-type: none"> Referral Document and Consent form Ophthalmologist report Any supporting reports/documentation from other supporting professionals (Paediatrician/ Speech and Language Pathologists, psychological reports, medical reports, OT reports) Case notes by Teacher of the Visually Impaired IEP/Review document Possible Discharge/periodical support or refusal of service documents 	<p>Documents and data will be stored for the entire duration of the student’s compulsory schooling, followed by the first term of Post-Secondary Education.</p>	<p>Documents and data need to be stored for this period:</p> <ul style="list-style-type: none"> as a proof of application for the student to receive support services as a proof of consent given by the parent/legal guardian to process and record student’s personal data and special categories of personal data to integrate the information collected from these reports with the student’s profile to enable resuming the service till the first term of Post-Secondary Education if necessary
	<p>In case of students who are discharged from service, data will be stored for (1) year after discharge/ refusal letter is received.</p>	<p>Documents and data need to be stored for this period to enable resuming the service till the first term of Post-Secondary Education if necessary.</p>

Database: <ul style="list-style-type: none"> ○ Database Reference: Visually Impaired Database ○ Type of Database: Offline Solution ○ Hosted: Internally ○ Name of Contractor: Not Applicable 	<p>Data will be stored for the entire duration of the student’s compulsory schooling, followed by the first term of Post-Secondary Education.</p>	<p>Data needs to be stored for this period to process, record, and monitor the progress of the student.</p>
	<p>In case of students who are discharged from service, data will be stored for (1) year after discharge/ refusal letter is received.</p>	<p>Data needs to be stored for this period to enable resuming the service till the first term of Post-Secondary Education if necessary.</p>
	<p>Once the retention period expires, the stored data will be anonymised. This process will remove any identifying information from the database, in such a way that a data subject can no longer be identified directly or indirectly, either by the data controller alone or in collaboration with any other party.</p>	
Hearing Impaired Services		
Category of Document	Retention Period	Justification
Referral Documents, including:	<p>Documents and data will be stored for the entire duration of the student’s compulsory schooling, followed by the</p>	<p>Documents and data need to be stored for this period:</p> <ul style="list-style-type: none"> • as a proof of application for the student to receive support services

<ul style="list-style-type: none"> • Referral document together with parent/guardian consent form and other affixed reports: <ul style="list-style-type: none"> ○ Audiogram report ○ In certain cases, additional reports from professionals supporting student (Ex Psychological reports, Report from Speech and Language pathologist, OT reports and medical reports.) 	<p>first term of Post-Secondary Education.</p>	<ul style="list-style-type: none"> • as a proof of consent given by the parent/legal guardian to process and record student’s personal data and special categories of personal data • to integrate the information collected from these reports with the student’s profile • to enable resuming the service till the first term of Post-Secondary Education if necessary
<p>Hearing Impaired Files of Students, including:</p> <ul style="list-style-type: none"> • Referral Document and Consent form • Audiogram report • Any supporting reports/documentation from other supporting professionals (Paediatrician/ Speech and Language Pathologists, psychological reports, medical reports, OT reports) • Case notes by Teacher of the Hearing Impaired • IEP/Review document • Possible Discharge/periodical support or refusal of service documents 	<p>Documents and data will be stored for the entire duration of the student’s compulsory schooling, followed by the first term of Post-Secondary Education.</p>	<p>Documents and data need to be stored for this period:</p> <ul style="list-style-type: none"> • as a proof of application for the student to receive support services • as a proof of consent given by the parent/legal guardian to process and record student’s personal data and special categories of personal data • to integrate the information collected from these reports with the student’s profile • to enable resuming the service till the first term of Post-Secondary Education if necessary

	<p>In case of students who are discharged from service, data will be stored for (1) year after discharge/ refusal letter is received.</p>	<p>Documents and data need to be stored for this period to enable resuming the service till the first term of Post-Secondary Education if necessary.</p>
<p>Database:</p> <ul style="list-style-type: none"> ○ Database Reference: Hearing Impaired Database ○ Type of Database: Offline Solution ○ Hosted: Internally ○ Name of Contractor: Not Applicable 	<p>Data will be stored for the entire duration of the student’s compulsory schooling, followed by the first term of Post-Secondary Education.</p>	<p>Data needs to be stored for this period to process, record, and monitor the progress of the student.</p>
	<p>In case of students who are discharged from service, data will be stored for (1) year after discharge/ refusal letter is received.</p>	<p>Data needs to be stored for this period to enable resuming the service till the first term of Post-Secondary Education if necessary.</p>
	<p>Once the retention period expires, the stored data will be anonymised. This process will remove any identifying information from the database, in such a way that a data subject can no longer be identified directly or indirectly, either by the data controller alone or in collaboration with any other party.</p>	

Early Intervention Services		
Category of Document	Retention Period	Justification
Referral Documents	Documents and data will be stored until students finish Year 2.	<p>Documents and data need to be stored for this period:</p> <ul style="list-style-type: none"> • as a proof of application for the student to receive support services • as a proof of consent given by the parent/legal guardian to process and record student’s personal data and special categories of personal data • to integrate the information collected from these reports with the student’s profile • as quoted below, Year 2 is the year when students finish their Early Years stage of their educational journey and practitioners might refer to these documents till end of Year 2 <p><i>The National Curriculum Framework defines the Early Years as follows: The Early Years (KG 1 - Year 2): The Early Years refer to the period in a child’s life which spans from birth</i></p>

		<p><i>through to the age of seven or eight (p. 45).</i></p> <p>Link: NCF.pdf (gov.mt)</p>
<p>Early Intervention Files of Students, including:</p> <ul style="list-style-type: none"> • Referral Document and Consent form • Early Intervention Checklists • Any supporting reports/documentation from referring professionals (Paediatrician/ Speech and Language Pathologists) • Reports/documentation from supporting professionals (Occupational Therapists/Physiotherapists/Psychologists/Audiologist/ other) • Case notes by Early Intervention Practitioners • IEP/Review document • Possible Discharge/refusal of service documents 	<p>Documents and data will be stored until students finish Year 2.</p>	<p>Documents and data need to be stored for this period:</p> <ul style="list-style-type: none"> • as a proof of application for the student to receive support services • as a proof of consent given by the parent/legal guardian to process and record student’s personal data and special categories of personal data • to integrate the information collected from these reports with the student’s profile • as quoted below, Year 2 is the year when students finish their Early Years stage of their educational journey and practitioners might refer to these documents till end of Year 2 <p><i>The National Curriculum Framework defines the Early Years as follows: The Early Years (KG 1 - Year 2): The Early Years refer to the period in a child’s life which spans from birth</i></p>

		<p><i>through to the age of seven or eight (p. 45).</i></p> <p>Link: NCF.pdf (gov.mt)</p>
<p>Application Forms of Students attending Early Intervention Summer Groups</p>	<p>Documents and data will be stored until students finish Year 2.</p>	<p>Documents and data need to be stored for this period:</p> <ul style="list-style-type: none"> • as a proof of application for the student to receive support services • as a proof of consent given by the parent/legal guardian to process and record student’s personal data and special categories of personal data • to integrate the information collected from these reports with the student’s profile • as quoted below, Year 2 is the year when students finish their Early Years stage of their educational journey and practitioners might refer to these documents till end of Year 2 <p><i>The National Curriculum Framework defines the Early Years as follows: The Early Years (KG 1 - Year 2): The Early Years refer to the period in a child’s life which spans from birth</i></p>

		<p><i>through to the age of seven or eight (p. 45).</i></p> <p>Link: NCF.pdf (gov.mt)</p>
<p>Database:</p> <ul style="list-style-type: none"> ○ Database Reference: Early Intervention Database ○ Type of Database: Offline Solution ○ Hosted: Internally ○ Name of Contractor: Not Applicable 	<p>Data will be stored until students finish Year 2.</p>	<p>Data needs to be stored for this period to process, record, and monitor the progress of the student.</p>
	<p>Once the retention period expires, the stored data will be anonymised. This process will remove any identifying information from the database, in such a way that a data subject can no longer be identified directly or indirectly, either by the data controller alone or in collaboration with any other party.</p>	

Child Safety Services (CSS)		
Category of Document	Retention Period	Justification
Referral Documents	Documents and data will be stored until the student reaches eighteen (18) year old of age.	Documents and data need to be stored for this period to enable practitioners to provide evidence when summoned to court.
Database: <ul style="list-style-type: none"> ○ Database Reference: CSS Database ○ Type of Database: Offline Solution ○ Hosted: Internally ○ Name of Contractor: Not Applicable 	Data will be stored until the student reaches eighteen (18) year old of age.	Data needs to be stored for this period to enable practitioners to provide evidence when summoned to court.
	Once the retention period expires, the stored data will be anonymised. This process will remove any identifying information from the database, in such a way that a data subject can no longer be identified directly or indirectly, either by the data controller alone or in collaboration with any other party.	
Tracing Folders	Documents and data will be stored until the student reaches eighteen (18) year old of age.	Documents and data need to be stored for this period to enable practitioners to provide evidence when summoned to court.

Consultation Files	Documents and data will be stored until the student reaches eighteen (18) year old of age.	Documents and data need to be stored for this period to enable practitioners to provide evidence when summoned to court.
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Anti-Substance Abuse Services		
Category of Document	Retention Period	Justification
Referral Documents	Documents and data will be stored until the student reaches eighteen (18) year old of age.	Documents and data need to be stored for this period to enable practitioners to provide evidence when summoned to court.
Database: <ul style="list-style-type: none"> ○ Database Reference: Anti-Substance Abuse Database ○ Type of Database: Offline Solution ○ Hosted: Internally ○ Name of Contractor: Not Applicable 	<p>Data will be stored until the student reaches eighteen (18) year old of age.</p> <hr/> <p>Once the retention period expires, the stored data will be anonymised. This process will remove any identifying information from the database, in such a way that a data subject can no longer be identified directly or indirectly, either by the data controller alone or in collaboration with any other party.</p>	<p>Data needs to be stored for this period to enable practitioners to provide evidence when summoned to court.</p>

Anti-Bullying Services		
Category of Document	Retention Period	Justification
Anti-Bullying File of Students, including: <ul style="list-style-type: none"> • Referral Documents • Case Notes 	Documents and data will be stored for the entire duration of the student's compulsory schooling.	Documents and data need to be stored for this period to enable practitioners to refer for any past occurrences of the same student.

Counselling Services		
Category of Document	Retention Period	Justification
Counselling File of Students, including: <ul style="list-style-type: none"> • Referral Documents • Session Notes • Referrals to Other Services • Other Confidential Reports 	Documents and data will be stored until the student reaches eighteen (18) year old of age.	Documents and data need to be stored for this period to enable practitioners to provide evidence when summoned to court.
Miscellaneous Documentation, including: <ul style="list-style-type: none"> • Psychological Reports • Copies of Care and Custody • Copy of Psychiatrist Certificates 	Documents and data will be stored until the student reaches eighteen (18) year old of age.	Documents and data need to be stored for this period to enable practitioners to provide evidence when summoned to court.

Psychotherapy Services		
Category of Document	Retention Period	Justification
Psychotherapy File of Students, including: <ul style="list-style-type: none"> • Referral Documents • Recording of Interventions • Referrals to Other Services • Legal Documents • Other Confidential Reports 	Documents and data will be stored until the student reaches eighteen (18) year old of age.	Documents and data need to be stored for this period, to enable practitioners to provide feedback to post-secondary schools and/or to enable practitioners to provide evidence when summoned to court.
Database: <ul style="list-style-type: none"> ○ Database Reference: Psychotherapy Cases Database ○ Type of Database: Offline Solution ○ Hosted: Internally ○ Name of Contractor: Not Applicable 	Data will be stored until the student reaches eighteen (18) year old of age.	Data needs to be stored for this period, to enable practitioners to provide feedback to post-secondary schools and/or to enable practitioners to provide evidence when summoned to court.
	Once the retention period expires, the stored data will be anonymised. This process will remove any identifying information from the database, in such a way that a data subject can no longer be identified directly or indirectly, either by the data controller alone or in collaboration with any other party.	

Servizz Għozza		
Category of Document	Retention Period	Justification
Servizz Għozza File of Students, including: <ul style="list-style-type: none"> • Referral Documents • Recording of interventions • Referral to other services • Legal documents • Other confidential reports • Supervision notes 	Documents and data will be stored up to ten (10) years from referral date.	Documents and data need to be stored for this period to enable practitioners to provide evidence when summoned to court.
Registry of Cases	Documents and data will be stored up to ten (10) years from referral date.	Documents and data need to be stored for this period to enable practitioners to provide evidence when summoned to court.
Other Confidential Reports	Documents and data will be stored up to ten (10) years from referral date.	Documents and data need to be stored for this period to enable practitioners to provide evidence when summoned to court.
Students' Attendance Record	Document and data will be stored up to three (3) years from referral date.	Documents and data need to be stored for this period, for administrative purposes related to this service.

Social Work Services		
Social Work Services (at NSSS offices)		
Category of Document	Retention Period	Justification
Tribunal Files	Documents and data will be stored until the student reaches eighteen (18) year old of age.	Documents and data need to be stored for this period to enable practitioners to provide evidence when summoned to court.
Database: <ul style="list-style-type: none"> ○ Database Reference: Students referred to Tribunal Database ○ Type of Database: Offline Solution ○ Hosted: Internally ○ Name of Contractor: Not Applicable 	Data will be stored until the student reaches eighteen (18) year old of age.	Data needs to be stored for this period to enable practitioners to provide evidence when summoned to court.
	Once the retention period expires, the stored data will be anonymised. This process will remove any identifying information from the database, in such a way that a data subject can no longer be identified directly or indirectly, either by the data controller alone or in collaboration with any other party.	
Juvenile Court Files	Documents and data will be stored until the student reaches eighteen (18) year old of age.	Documents and data need to be stored for this period to enable practitioners

		to provide evidence when summoned to court.
Database: <ul style="list-style-type: none"> ○ Database Reference: Juvenile Court Cases Database ○ Type of Database: Offline Solution ○ Hosted: Internally ○ Name of Contractor: Not Applicable 	Data will be stored until the student reaches eighteen (18) year old of age.	Data needs to be stored for this period to enable practitioners to provide evidence when summoned to court.
	Once the retention period expires, the stored data will be anonymised. This process will remove any identifying information from the database, in such a way that a data subject can no longer be identified directly or indirectly, either by the data controller alone or in collaboration with any other party.	
Applications for School Exemptions	Documents and data will be stored until the student reaches eighteen (18) year old of age.	Documents and data need to be stored for this period to enable practitioners to provide evidence when summoned to court.
Database: <ul style="list-style-type: none"> ○ Database Reference: School and Travel Exemptions Database ○ Type of Database: Offline Solution ○ Hosted: Internally ○ Name of Contractor: Not Applicable 	Data will be stored until the student reaches eighteen (18) year old of age.	Data needs to be stored for this period to enable practitioners to provide evidence when summoned to court.
	Once the retention period expires, the stored data will be anonymised. This process will remove any identifying information from the database, in such a way that a data subject can no longer be identified directly or indirectly,	

	either by the data controller alone or in collaboration with any other party.	
Applications for Travel Exemptions	Documents and data will be stored until end of each scholastic year.	Documents and data need to be stored for this period, for administrative purposes related to this service.
Attendance of Students	Documents and data will be stored for the entire duration of the student's compulsory schooling.	Documents and data need to be stored for this period, for administrative purposes related to this service.
Social Work Services (in Colleges)		
Category of Document	Retention Period	Justification
Referral Documents	Documents and data will be stored until the student reaches eighteen (18) year old of age.	Documents and data need to be stored for this period to enable practitioners to provide evidence when summoned to court.
Social Work Files of Students, including: <ul style="list-style-type: none"> • Referrals • Recording of interventions • Referrals to other services • Legal documents • Other confidential reports • Supervision notes 	Documents and data will be stored until the student reaches eighteen (18) year old of age.	Documents and data need to be stored for this period to enable practitioners to provide evidence when summoned to court.

Database: <ul style="list-style-type: none"> ○ Database Reference: Registry of Cases Database ○ Type of Database: Offline Solution ○ Hosted: Internally ○ Name of Contractor: Not Applicable 	Data will be stored until the student reaches eighteen (18) year old of age.	Data needs to be stored for this period to enable practitioners to provide evidence when summoned to court.
	Once the retention period expires, the stored data will be anonymised. This process will remove any identifying information from the database, in such a way that a data subject can no longer be identified directly or indirectly, either by the data controller alone or in collaboration with any other party.	

Scheme 9		
Category of Document	Retention Period	Justification
Database: <ul style="list-style-type: none"> ○ Database Reference: Eligible Students Database ○ Type of Database: Offline Solution ○ Hosted: Internally ○ Name of Contractor: Not Applicable 	Data will be stored for up to three (3) scholastic years from application date.	Data needs to be stored for this period, to check what services were provided as per Scheme 9 Eligibility Criteria.
	Once the retention period expires, the stored data will be anonymised. This process will remove any identifying information from the database, in such a way that a data subject can no longer be identified directly or indirectly,	

	either by the data controller alone or in collaboration with any other party.	
Application Forms	Documents and data will be stored for up to two (2) scholastic years from application date.	Documents and data need to be stored for this period, to check what services were provided as per Scheme 9 Eligibility Criteria.
Contracts (between Parents and Colleges)	Documents and data will be stored for up to one (1) scholastic year from last signature of the contract.	Documents and data need to be stored for this period, to check what services were provided as per Scheme 9 Eligibility Criteria.
Lists of Eligible Students per Benefit	Documents and data will be stored for up to two (2) scholastic years from application date.	Documents and data need to be stored for this period, to check what services were provided as per Scheme 9 Eligibility Criteria.
Database: <ul style="list-style-type: none"> ○ Database Reference: Exceptional Cases Database ○ Type of Database: Offline Solution ○ Hosted: Internally ○ Name of Contractor: Not Applicable 	Data will be stored for up to three (3) scholastic years from application date.	Data needs to be stored for this period, to check what services were provided as per Scheme 9 Eligibility Criteria.
	Once the retention period expires, the stored data will be anonymised. This process will remove any identifying information from the database, in such a way that a data subject can no longer be identified directly or indirectly, either by the data controller alone or in collaboration with any other party.	

CONCLUSION

This retention policy aims to achieve a good working balance between the retention of useful and meaningful information in line with the provisions of the relevant legislation and the disposal of data which is no longer required and is being archived unnecessarily. Data that needs to be destroyed after the noted timeframes will be disposed of in an efficient manner to ensure that such information will no longer be available within the NSSS. Data Protection Controllers, Heads, and DPOs are aware of the noted retention periods and will instruct all relevant personnel to follow the indicated procedures accordingly.

It is to be noted that anonymised or statistical data do not fall within the parameters of this Retention Policy, since they do not constitute identifying personal data.