



Data Retention Policy

SCOPE

1. This Policy is aimed at regulating the retention, maintenance and disposal of documentation, both personal and other, within the different departments at the School of Business and Management in conformity 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 School of Business and Management is 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 at the School of Business and Management (SBM), 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 the required documentation, as well as to promote a sustainable use of paper and printing consumables.

ADMINISTRATION

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4. Documentation is held and recorded by the Registry and Administration sections within the department. This Policy is therefore applicable to all such documentation. It will be the responsibility of the relevant departments of the School of Business and Management and its Data Controller to ensure that all provisions of this Policy are adhered to. In the case of any issues with personal data, the final decision rests with the School of Business and Management Data Protection Officer for endorsement.

DOCUMENTATION HELD WITHIN THE DEPARTMENT OF INDUSTRIAL AND EMPLOYMENT RELATIONS

5. As part of its operating requirements the School of Business and Management, requests, keeps and maintains a wide range of documentation which may include personal data. The various types of documentation utilised by the School of Business and Management may be categorised as follows:

HR And Recruitment:

- a. Personal Data of all SBM employees
- b. Attendance and absence records
- c. Discipline related Records
- d. Financial records including payslips, tax and national insurance contributions
- e. Medical records

Marketing:

- a. Details of Agents and the signed agreement
- b. Personal Data of the contact person
- c. Details relating to the type of activities of each agency

Admissions:

- a. Students' personal details
- b. Students' next of kin contact
- c. Students' previous academic records
- d. Students' recruitment interview
- e. Students' fees and payment details

Academic Records:

- a. SOWs of each tutor
 - b. Lesson observation records
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- c. Assessment and Assignment records
- d. Attendance
- e. Students' certification
- f. Students' medical certificates;
- g. Other relevant details

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 different departments at the School of Business and Management.

<u>Category</u>	<u>Retention Period</u>
<u>HR and Recruitment</u>	
<u>Personal Information</u>	
Employee Personal File	1 year after end of contract

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Application forms for enlistment, calls, positions etc	1 year after position has been filled
Application Forms for the filling of positions co-financed from EU Funds	1 year after position has been filled
Attendance and Absence Records	
Attendance Sheets	2 years (in 2024 the 2022 records are deleted)
Vacation Leave Application Forms	2 years
Yearly Leave balances	2 years
Disciplinary records	
Admonishments	1 year
Disciplinary Charges	1 year
Medical Records	
Sick Leave Certificates	1 year
Sick Leave Records	1 year after end of contract
Medical History	Within 1 year of end of contract
Medical Referrals	Within 1 year of end of contract
Financial Documentation	
Tax and National Insurance Records	Retention period will be for 10 years
Procurement Records	Retention period will be for 10 years
Accounting Records	Retention period will be for 10 years
Inventory Records	Retention period will be for 10 years
Yearly Financial Statements	Retention period will be for 10 years
Marketing	
Details of Agents and the signed agreement.	Retention period will be for 10 years
Personal Data of the contact person	Retention period will be for 10 years
Details relating to the type of activities of each agency	Retention period will be for 10 years
<u>Admission</u>	
Students' personal details	Retention period will be for 10 years as per MFHEA requisites
Students' next of kin contact	Retention period will be for 10 years as per MFHEA requisites

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Students' previous academic records	Retention period will be for 10 years as per MFHEA requisites
Students' recruitment interview	Retention period will be for 10 years as per MFHEA requisites
Students' fees and payment details	Retention period will be for 10 years as per MFHEA requisites
Academic Records	
SOWs of each tutor	Retention period will be for 10 years as per MFHEA requisites
Lesson observation records	Retention period will be for 10 years as per MFHEA requisites
Assessment and Assignment records	Retention period will be for 10 years as per MFHEA requisites
Attendance	Retention period will be for 10 years as per MFHEA requisites
Students' certification	Retention period will be for 10 years as per MFHEA requisites
Students 'medical certificate	Retention period will be for 10 years as per MFHEA requisites
Other relevant details	Retention period will be for 10 years as per MFHEA requisites

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 different Departments at the School of Business and Management. 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.

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