



GOVERNMENT OF MALTA

MINISTRY FOR EDUCATION, SPORT, YOUTH, RESEARCH AND
INNOVATION
RESEARCH AND SCHOOL INTERNAL REVIEW DIRECTORATE

**Research and School Internal Review Directorate (RSIRD) within the Ministry for
Education, Sport, Youth, Research and Innovation (MEYR)
Data Protection Policy
In relation to the Data Warehouse Solution**

The General Data Protection Regulation (EU) 2016/679 (GDPR) and the Data Protection Act (Cap 586), including the regulations made thereunder, regulate the processing of personal data whether held electronically or in manual form if it forms part of a filing system. The RSIRD within MEYR is set to fully comply with the applicable provisions of the data protection legislation.

Legal Basis and Purposes of Processing

The legal basis and the purposes of processing with regard to the processing operations conducted by the RSIRD within MEYR are the following:

Processing Operation	Legal Basis for processing	Purposes of Processing
The RSIRD within MEYR collects and processes pseudonymised personal data of students registered with State Education Institutions.	To carry out its functions and legal obligations vested in its authority by article 14(1), (2), and (3) of the Education Act (Cap. 605 of the Laws of Malta).	The processing of pseudonymised personal data of students registered within State Education is necessary for the inclusion of this dataset in the Data Warehouse Solution, the objective of which is to centralise the collection, integration, and access of education-related data, particularly in relation to Early Leaving from Education and Training (ELET). This enables the generation of data-driven insights, and the implementation of targeted interventions aimed at reducing ELET rates and supporting the attainment of national education objectives.

Personal Data and Special Categories of Personal Data

The categories of personal data and the special categories of personal data that will be processed are as follows:

Categories of Personal Data	Special Categories of Personal Data	Source/s
State School student registration data which include attendance data, class/course data, school and household locality data, gender related	Data relating to racial or ethnic origin in terms of nationality.	MIS MySchool Data

data, nationality data and school support information		
Data related to student stipend grant enrollment		Student Maintenance Grants' Board Data
State School Secondary School Leaving Certificate and Profile (SSC&P) data		State School Secondary School Leaving Certificate and Profile (SSC&P) Data
MATSEC O-Level attainment data		MATSEC O-Level Attainment Data
Past State School student year 6 Benchmark data		Year 6 Benchmark Data
Good Shephard Scheme data of Students attending State Schools		Good Shephard Scheme Data
State School Student IEP Target Likert Scale achievements		Student IEP Target Data

Recipients of Personal Data

Personal data may be accessed by or made available to Government Authorities and Institutions in the course of the performance of their functions and, or the exercise of their powers. Personal data may also be disclosed to third parties, not being the foregoing, by an expressly given consent of the data subject or as otherwise permitted by law.

Transfer of Personal Data outside the European Union (EU)

Personal data shall only be transferred outside the EU in compliance with the conditions for such transfers laid down in the GDPR, namely article 46(2)(c) of Regulation (EU) 2016/679.

All personal data shall be pseudonymised by the controller prior to the transfer of personal data to the processor established in India.

Your rights

Your rights as data subjects in connection with the processing of your personal data are:

- The right to receive a copy of your personal data undergoing processing, including information in relation to the processing activities.
- The right to request us to rectify personal data you think is inaccurate. You also have the right to ask us to complete personal data you think is incomplete.
- The right to request the erasure of your personal data in certain circumstances.
- The right to request the restriction of your personal data in certain circumstances.
- The right to object to the processing of your personal data if we are able to process your information because the process forms part of our public tasks or is in our legitimate interests.
- The right to not be subject to a decision based solely on automated processing including profiling.
- The right to withdraw your consent at any time, where applicable.

Requests to exercise your rights are free of charge and should preferably be made in writing and sent to the Data Protection Officer of the Ministry for Education, Sport, Youth, Research and Innovation (MEYR). Your identification details such as ID number, name and surname must be submitted with the request for the purpose of verifying your identity. In case the controller has reasonable doubts concerning your identity, you may be requested to provide additional information necessary to confirm it.

The RSIRD within MEYR aims to comply as quickly as possible with the request and is obliged to respond without undue delay and at the latest within one (1) month from receipt of request.

The right exercised by the data subject may be limited or restricted, where necessary, pursuant to the applicable law.

Retention Policy

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

Category of Document	Retention Period	Justification
State School Student Registration data which includes attendance data, class/course data, school and household locality data, Gender and Nationality data and School Aid information	Until student turns 24 years	To analyse such information across years with the aim of being able to derive predictive statistical information that will assist the Directorate in identifying and assisting potential Early School Leavers (ESL), and also assisting Administrative Staff within the Directorate in decision and policy making.
Data indicating State School Student Stipend Grant Enrollment	Until student turns 24 years	Same as above
State School Secondary School Leaving Certificate and Profile (SSC&P) Data	Until student turns 24 years	Same as above
MATSEC O-Level Attainment Data	Until student turns 24 years	Same as above
State School Student Year 6 Benchmark Data	Until student turns 24 years	Same as above
Good Shephard Scheme Data of Students that start attending a State School	Until student turns 24 years	Same as above
State School Student IEP Target Likert Scale achievements	One year after student completes year 11 and is not enrolled in a state school	Same as above

Data that needs to be deleted after the established timeframes will be destructed in a secure manner to ensure that such information is no longer processed within the RSIRD within MEYR. Upon the lapse of the above mentioned timeframes, all pseudonymised data shall be anonymised, thereby ensuring that the data subject would no longer be identifiable.

The Data Protection Officer

The Data Protection Officer may be contacted on:

Ministry for Education, Sport, Youth, Research and Innovation
Office of the Permanent Secretary
Triq l-Assedju l-Kbir, Floriana, VLT 2000

Telephone: +356 25981233

Email: dpo.meyr@gov.mt

The Data Controller

The Research and School Internal Review Directorate may be contacted at:

Ministry for Education, Sport, Youth, Research and Innovation
Office of the Permanent Secretary
Triq l-Assedju l-Kbir, Floriana, VLT 2000

Telephone: +356 25982442/3

Email: rsird.meyr@gov.mt

The Information and Data Protection Commissioner

You have the right to lodge a complaint with the supervisory authority, which could be reached at the following contact details:

The Information and Data Protection Commissioner

Airways House,

Triq il-Kbira

Tas-Sliema SLM 1549

Telephone: +356 2328 7100

Email: idpc.info@idpc.org.mt

Website: <https://idpc.org.mt>