



# Aġenzija Sappport Data Protection & Records Policy

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# AĠENZIJA SAPPOR DATA PROTECTION POLICY

(National Archives Reference: REP2024-07)

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## Policy Statement

Data Protection legislation, namely the General Data Protection Regulation (GDPR) and the Data Protection Act (Chapter 586 of the Laws of Malta), regulate the processing of all personal data, whether such processing is carried out electronically or in manual form. Aġenzija SAPPOR, being a controller in terms of the law, is set to fully comply with the Data Protection Principles and obligations as set out in such legislation.

## Acronyms, Terminology & Definitions

- i. **DPO** – Data Protection Officer
  - ii. **EU** – European Union
  - iii. **GDPR** – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons about the processing of personal data and the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation)
  - iv. **IDPC** – Information and Data Protection Commissioner
  - v. **NAM** – National Archives of Malta
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- 1. **Data Controller or Controller** – A person, natural or legal, including a public authority, entity, or body, that alone or jointly with others determines the purpose/s and means of processing personal data. For this document, and unless the context indicates otherwise, it is the agency.

2. **Data Subject** – A natural person to whom the personal data relates (alive, identified, or identifiable).
3. **Personal Data** – Personal data refers to information that directly or indirectly identifies a natural person through physical, physiological, mental, economic, cultural, or social factors.
4. **Processing** – Any operation or set of operations performed on personal data or on sets of personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
5. **Record** – Any document, file, or other medium containing information that involves personal data, whether in electronic form or any other format.

## Policy Objectives

The Data Protection Policy underscores Aġenzija Sapport's dedication to handling information about employees, service users, stakeholders, and other concerned parties with the highest level of care and confidentiality while adhering to GDPR.

Through this policy, the agency guarantees the fair, transparent, and respectful gathering, storage, and handling of data, with due regard for individual rights and legal requirements. As such, all data collection and processing activities strictly adhere to the guiding principles of data protection legislation and other pertinent legal statutes within Maltese Law.

## Policy Scope and Applicability

This policy applies to all personal data processing by the agency, whether conducted manually or through automated means and encompasses activities performed by its employees and contracted processors.

## Purposes of Processing

The agency processes personal data to fulfil its obligations and execute functions as outlined in the Aġenzija SAPPOR (Establishment as an agency) Order. Furthermore, ancillary internal or outsourced support services, such as human resources, payroll, and administration, also process personal data to achieve the objectives pursued in each respective activity.

## Processed Data

To provide efficient and effective professional service, the agency processes information on service users and their respective relatives, guardians, or curators (where applicable), as well as its employees, contractors, partners, stakeholders, or collaborators.

All personal data records are detailed in the List of Records attached to this Policy.

## Policy Compliance and Enforcement

The processing of personal data by the agency primarily aligns with the provisions outlined in the Aġenzija SAPPOR (Establishment as an agency) Order, particularly concerning activities related to the execution of official functions or contractual obligations with service users, who benefit from a range of services provided by the agency.

The agency ensures that data subjects are informed of its processing activities and seeks consent, where necessary, through the Contract of Service, applications, or consent forms signed between the parties.

Furthermore, information may be collected from relatives, professionals, and other stakeholders with the service user's consent and presence. All processed information is deemed essential for the agency to deliver the services specified in the contract and to comply with the law.

However, there might be instances where the information processed for the stated purposes is further processed under legal obligations prescribed by law, in the legitimate interest of the parties involved, or to safeguard the vital interests of the data subjects or others.

The specifics and terms governing the processing activities within a service are consistently outlined in the service agreement signed between the agency and the respective beneficiaries.

In all scenarios, recognising its obligations and the rights and freedoms of the data subjects and others, the agency commits to operating according to and with the utmost respect for data protection principles.

### **Access and Exchanges to Data**

Personal data held by the agency concerning service users or employees may be accessed by designated employees tasked with fulfilling the agency's functions based on their respective responsibilities. Personal data may also be disclosed to government departments, other public entities, or professionals when necessary to deliver the service or to comply with legal requirements. Disclosure to private third parties is only permissible when authorised by law.

### **Public-Social Partnerships**

In its dedication to expanding services for individuals with disabilities and ensuring they receive high-quality assistance, the agency has established various Public-Social Partnerships (PSP) with Non-Governmental Organizations (NGOs) in the disability sector. These partnerships encompass a broad spectrum of services, including residential care on a permanent or respite basis, day programmes, and specialised intervention and support services for individuals with disabilities. The Government of Malta, the agency, and the service provider establish specific agreements governing these partnerships. More information on these PSPs can be found at <https://support.gov.mt/services/respite-services/>.

The agency shares personal data with these partners to facilitate access to services for individuals with disabilities seeking assistance and ensure high-quality service provision to service users, including monitoring service delivery.

The exchanged information may include identification details of service users, health-related information (both physical and mental), lifestyle information, and details on sexual orientation as relevant to the specific case and service, and with due consideration given to sharing such information to achieve the intended objective.

## Your Rights as a Data Subject

The agency strives to embed the core principles of these rights into its procedures and services. It aims to foster a professional, transparent, open relationship with its service users and other data subjects.

Nonetheless, under Data Protection Legislation, any individual whose personal data is being processed by the controller can exercise several rights within a regulatory framework to ensure that these rights are safeguarded and not compromised.

As a data subject, you have the right to be informed, free of charge, about the type of personal data processed by the agency, the reasons for processing, how it is stored, and for how long it is retained. You also have the right to keep your data accurate and up to date. This policy aims to provide general information regarding the processing activities conducted by the agency to promote fairness and transparency.

Furthermore, you are entitled to access your personal data through a formal procedure established by the GDPR, namely 'Data Subject Access Requests'. These requests should be made in writing and addressed to the agency's Data Protection Officer (DPO). Your identification details, such as your national identification (ID) number, name, and surname, must accompany the access request. You may be asked to present an identification document in cases where identification poses difficulties.

The agency is committed to promptly responding to access requests and ensuring that information is provided within a reasonable timeframe, not exceeding one month from receipt of the request, unless there are valid reasons for delay. If access cannot be granted



within a reasonable time, the reasons for the delay will be communicated in writing to the data subject.

Additionally, all data subjects have the right to request the amendment or deletion of their information if it is factually incorrect or held unlawfully. Moreover, data subjects may request that certain operations be restricted to their personal data, such as preventing communication with third parties or its deletion, for lawful purposes.

If dissatisfied with a request's outcome, you can file a complaint with the Information and Data Protection Commissioner (IDPC).

## Retention

A fundamental principle in data protection is that personal data should not be retained in a form that allows for the identification of data subjects for longer than necessary for the purposes for which the data is processed.

To adhere to this principle, the agency has devised a comprehensive List of Records containing personal data and their respective retention periods, which is appended to this Policy.

Upon expiration of the established retention periods, all such records are either destroyed or, in some instances, transferred to the National Archives per the provisions of the National Archives Act (Chapter 477 of the Laws of Malta).

However, notwithstanding the specified retention periods, certain records may need to be retained for a longer duration for specific purposes. For example, if a record or any part thereof is subject to a request under the Freedom of Information Act (Chapter 496 of the Laws of Malta) that is still being processed or if the record relates to a case pending before the Courts, it should not be destroyed. In such instances, the Data Protection Officer must be notified accordingly.

The agency is committed to maintaining an updated List of Records to ensure compliance with data protection regulations.

## Contact Details

The Data Protection Officer of the agency may be contacted at:

**Data Protection Officer**

Aġenzija SAPPOR

Patri Gwann Azzopardi Street,

Santa Venera SVP 1614

Telephone: +356 2256 8000

Email: [gdpr.sappor@gov.mt](mailto:gdpr.sappor@gov.mt) / [dpo.sappor@gov.mt](mailto:dpo.sappor@gov.mt)

The IDPC may be contacted at:

**The Information and Data Protection Commissioner**

Level 2, Airways House, High Street,

Sliema SLM 1549

Telephone: 23287100

Email: [idpc.info@gov.mt](mailto:idpc.info@gov.mt)

The National Archives of Malta may be contacted at:

**The National Archivist**

National Archives of Malta

Triq l-Isptar,

Rabat, RBT 1043

Telephone: +35621459863

Email: [rmu.archives@gov.mt](mailto:rmu.archives@gov.mt)

## Policy Review and Revision History

Version / Revision	Date	Description	Reviewer Initials
1.0	September 2019	Initial Policy creation	N/A
1.3	January 2023	Policy updated.	N/A
2.0	May 2024	Policy reviewed together with Consultant.	BC
3.0	July 2024	Revision of policy with feedback from parties.	BC
4.0	November 2024	Updated policy following IDPC review.	BC

## ANNEX I – List of Records

The following schedule lists the agency's records, their respective retention periods, and the actions taken upon the expiration of such periods.

### 1. Services

At the commencement of almost every service the agency provides, the respective team of professionals creates a file for each service user - the Service User File.

Such a file contains all the information about the user and the service provided from the commencement of the service until its termination. This file is necessary to provide high-quality service according to the service user's needs and to ensure accountability of the staff and the agency.

In addition to the service user's personal data, the file may contain information about the parents, guardians, relatives, and the assigned staff of the agency and other professionals. This depends on the specificities of the case.

The Service User File is generally held in electronic form in the Case Management System, and its content may only be accessed by the dedicated team of professionals. In certain instances, access may be granted to other professionals who must work jointly with the team in specific cases. Information deriving from the Service User File may be exchanged with other teams delivering other services on a need-to-know basis.

Only certain documents are kept in the physical file (paper-based) for legal reasons or operational necessities. Generally, these documents are signed by the service user, parents or guardians, or third parties, such as the service agreement and consent forms. When retaining a hard copy of documents or records drawn up or received in physical form (paper-based) is unnecessary, such copies are immediately destroyed once uploaded in the Case Management System.

In addition to the individual case file, the agency also keeps records of certain activities, services or individuals in a collective manner, such as waiting lists, event records, attendance sheets, etc.

The tables below demonstrate the type of records and documents created or held in the provision of the services, the categories of personal data that may be contained in such records and documents, and the respective retention periods.

### 1.1 Social Work

<b>Service User Files</b>			
<b><i>Records/Documents held in the File</i></b>	<b><i>Categories of Personal Data</i></b>	<b><i>Retention Period</i></b>	<b><i>Archival Action (when the retention period expires)</i></b>
Inbound and Outbound Referrals, Professional Assessments, Interviews, Medical Reports, Meeting Minutes, Service Agreements, Consent Forms, Recordings and Interventions, Care Plans, Individual Support Plans, Incident Reports, Correspondence, and other documents that may be necessary in the Specific Case	Personal Details, Contact Details, Disability and Health Data, Situational Information, Intervention Records, Opinions, Financial Data, and other information specific to the case.	Five (5) years from the Termination of all the Services	A random sample of one (1) % yearly to be transferred to NAM. Destroy remaining expired records.

### 1.2 Supported Independent Living (Residential Services)

The agency's residential homes serve as ordinary residences for service users who qualify for such service. The concept of this service is to provide a home for those vulnerable persons with constant tailor-designed support and assistance.

The agency processes and organises the personal data of its service users primarily by distinguishing between two categories of records.

The first category consists of the records the agency requires to deliver a comprehensive, high-quality service. Hence, this data refers mainly to the personal data collected or collated

by the agency through its adopted procedures, forms, contracts, external or intra-agency communications, referrals, or services. Most of these records are kept in the Service User File.

The second category includes all the documents and information an individual requires and keeps at home. It provides identification documents, academic records and certificates, employment and tax documents, medical results, etc. These documents belong to the service user and are usually kept in the service user's Personal File. The agency acts only as the custodian of these documents when they are deposited or entrusted with the agency until they are either handed over to the parents or guardians of the service user or the termination of the service.

Any record that is required daily or relevant to a specific appointment or event is inserted in a portable folder accessible to the staff and the service user. The staff carries the folder when accompanying the service user outside the residence unless otherwise determined by the Individual Support Plan (ISP).

<b>Service User Files</b>			
<b><i>Records/Documents held in the File</i></b>	<b><i>Categories of Personal Data</i></b>	<b><i>Retention Period</i></b>	<b><i>Archival Action (when the retention period expires)</i></b>
Inbound and Outbound Referrals, service user Profile, Professional Assessments, Interviews, Case Conferences and Reviews, Medical Assessment Reviews and Reports, Medical and Dental Appointment and Intervention Sheets (Cumulative Medical Sheets), PRN (Pro Re Nata) Administration Forms, Service Agreement, Consent Forms, Care and Treatment Plans, Individual Support Plans,	Personal Details, Contact Details, Disability and Health Data, Situational Information, Intervention Records, Opinions, Financial Data, Appointments Information, Training and Educational Data, and other	Five (5) years from Termination of Service.	A random sample of one (1) % yearly to be transferred to NAM. Destroy remaining expired records.

Incident Reports, Correspondence, and other documents that may be necessary in the Specific Case	information specific to the case.		
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Other Records			
<i>Record Name</i>	<i>Description</i>	<i>Retention Period</i>	<i>Archival Action (when the retention period expires)</i>
Individual Support Plan (ISP) Feedback Sheet	Sheets containing records of any progress made by the service user when following an ISP (Paper Format), containing personal details, and record of the activity, performance, and behaviour of the service user	Two (2) years.	Not required for permanent preservation by the NAM. Destroy expired records.
Records Booklet (also known as Handover Booklet)	Daily records of schedules, activities, tasks, and behaviours of service users and other information primarily intended for handover purposes kept in a booklet (Paper Format)	Two (2) years.	Not required for permanent preservation by the NAM. Destroy expired records.
Incident Reports	Reports which are drawn up about an incident, including the compiled pertinent documentation (Paper Format)	Five (5) years (Provided such reports concerning a service user are drawn up, they may be inserted in the Service User File).	Not required for permanent preservation by the NAM. Destroy expired records.

Medication Administration Records (MAR) Sheets	Daily records of administration of any medication and, or treatment to service users (Paper Format)	Two (2) years.	Not required for permanent preservation by the NAM. Destroy expired records.
Medication Error Report Form	A report drawn by the Staff when a medication error occurs or when the service user refuses to take the medication (Paper Format)	Two (2) years.	Not required for permanent preservation by the NAM. Destroy expired records.
Menstruation Records Sheet	Menstruation records of service users kept in physical form (Paper Format)	Three (3) years.	Not required for permanent preservation by the NAM. Destroy expired records.
Health Check-Up Sheets	Records of regular health check-ups of the service users, such as of blood pressure, glucose levels and weight, in physical form (Paper Format)	Two (2) years.	Not required for permanent preservation by the NAM. Destroy expired records.
Minutes of Meetings with the service users	Records of salient issues of the meetings held between the service user and the Assigned Professional kept in electronic form (Spreadsheet Format)	Five (5) years from Termination of Service.	Not required for permanent preservation by the NAM. Destroy expired records.
Waiting List	A record of individuals that require the service kept in electronic form (Spreadsheet Format), consisting mainly of	Indefinite or until the removal request is received or the	Not required for permanent preservation by the NAM. Destroy



	contact details and information related to the referral	service is initiated.	expired records.
Therapy Record	A record of the Therapists assigned to service users is held electronically (Spreadsheet Format) and consists mainly of Personal Details, Contact Details, and Service Records.	Five (5) years.	Not required for permanent preservation by the NAM. Destroy expired records.
SCSA Liaison Records	Refers to all correspondence with the SCSA, the NGOs, and other stakeholders concerning compliance and licencing, as well as mediation of efforts on specific issues or incidents, consisting mainly of emails and other information specific to the case, incident, or problem.	Five (5) years from last correspondence	Not required for permanent preservation by the NAM. Destroy expired records.

### 1.3 Day Centres

Service User Files			
<i>Records/Documents held in the File</i>	<i>Categories of Personal Data</i>	<i>Retention Period</i>	<i>Archival Action (when the retention period expires)</i>
Inbound and Outbound Referrals, service user Profile, Professional Assessments, Interviews, Case Conferences and Reviews, Medical	Personal Details, Contact Details, Disability and Health Data, Situational Information, Intervention Records, Opinions, Financial	Five (5) years from the Termination Service.	A random sample of one (1) % yearly to be transferred to NAM. Destroy remaining expired records.

Assessment Reviews and Reports, Medical and Dental Appointment and Intervention Sheets, PRN (Pro Re Nata) Administration Forms, Motor Activity Training Program (MATP) Sheets, Special Olympics Registration Forms, Service Agreement, Consent Forms, Recordings and Interventions, Care Plans, Individual Support Plans, Incident Reports, Closure Sheets, Correspondence and other documents that may be necessary in the Specific Case	Data, appointment information, Sports and Physical Activity Data, Training and Educational Data, and other information specific to the case.		
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Other Records			
<i><b>Record Name</b></i>	<i><b>Description</b></i>	<i><b>Retention Period</b></i>	<i><b>Archival Action (when the retention period expires)</b></i>
Swimming Consent Forms	Consent Forms for service users to participate in swimming sessions and, or outings, held in physical form (Paper Format)	Two (2) years.	Not required for permanent preservation by the NAM. Destroy expired records.
Screening Consent Forms	Consent Forms for service users to benefit from screening programmes such as dental and podiatric (Paper Format)	Two (2) years	Not required for permanent preservation by the NAM.

			Destroy expired records.
Medical Certificates	Certificates issued by Medical Professionals certifying service users of being fit to resume attendance (Paper Format)	Two (2) years	Not required for permanent preservation by the NAM. Destroy expired records.
Medication Administration Records (MAR) Sheets	Daily records of administration of any medication and, or treatment to service users (Paper Format)	Two (2) years	Not required for permanent preservation by the NAM. Destroy expired records.
Health Check-Up Sheets	Records of health aspects of the service users, such as blood pressure, glucose levels and weight, in physical form (Paper Format)	Two (2) years	Not required for permanent preservation by the NAM. Destroy expired records.
Unit Information Sheets	Sheets containing basic information about service users held within the Units necessary for the Staff in charge of supporting the respective Unit held in electronic form (Spreadsheet Format)	Whenever there are changes in service users or their information.	Not required for permanent preservation by the NAM. Destroy expired records.
Service User Training Records	Records of any participation in, or attendance to, courses or training organised, coordinated, or facilitated by the Centre held in electronic form (Spreadsheet Format)	Five (5) years from termination of Service.	Not required for permanent preservation by the NAM. Destroy expired records.
Minutes of Meetings with the Social Worker	Records of salient issues of the meetings held between the service user	Five (5) years from	Not required for permanent preservation by

	and the Social Worker kept in electronic form (Spreadsheet Format)	Termination of Service.	the NAM. Destroy expired records.
Handover Notebooks	Notes entered by the Staff in notebooks about service users or other matters of importance within the Units (Paper Format)	Two (2) years from last entry.	Not required for permanent preservation by the NAM. Destroy expired records.
Incident Reports	Reports drawn up concerning an incident, including the compiled pertinent documentation (Paper Format)	Five (5) years (Provided such reports are drawn up concerning a service user, they may be inserted in the Service User File).	Not required for permanent preservation by the NAM. Destroy expired records.
Individual Support Plan (ISP) Feedback Sheet	Sheets containing records of any progress made by the service user when following an ISP (Paper Format), containing personal details, and record of the activity, performance, and behaviour of the service user	Two (2) years.	Not required for permanent preservation by the NAM. Destroy expired records.
Programme 1:1	Records of the participation of service users in activities and duration of the Programme 1:1 (Paper Format)	Two (2) years.	Not required for permanent preservation by the NAM. Destroy expired records.
service user Attendance	Records of attendance of service user at the Day Centre held in electronic form (Spreadsheet Format)	Three (3) years.	Not required for permanent preservation by the NAM.

			Destroy expired records.
service user Handover Sheet	Records of pick-up or drop-off times of service users signed by parents, guardians, and the Staff (Paper Format)	One (1) year.	Not required for permanent preservation by the NAM. Destroy expired records.
service user Contact List	A list of service users and their personal and contact details held in electronic form (Spreadsheet Format)	Until Termination of Service.	Not required for permanent preservation by the NAM. Destroy expired records.

#### 1.4 Way to Work

Service User Files			
<b><i>Records/Documents held in the File</i></b>	<b><i>Categories of Personal Data</i></b>	<b><i>Retention Period</i></b>	<b><i>Archival Action (when the retention period expires)</i></b>
Inbound and Outbound Referrals, Professional Assessments, Interviews, Medical Forms, Service Agreements, Recordings and Interventions, Incident Reports, Correspondence, Training Participation Certificates, Timesheets	Personal Details, Contact Details, Disability and Health Data, Intervention Records, Training Information, Attendance Records, and other information specific to the case.	Three (3) years from Termination of the Service.	A random sample of one (1) % yearly to be transferred to NAM. Destroy remaining expired records.

<b>Other Records</b>			
<b><i>Record Name</i></b>	<b><i>Description</i></b>	<b><i>Retention Period</i></b>	<b><i>Archival Action (when the retention period expires)</i></b>
Timesheets	A physical file keeps records of service users' attendance at the Way to Work training programmes.	Three (3) years.	Not required for permanent preservation by the NAM. Destroy expired records.
Team Meeting Minutes	A record of the team discussions on referrals, issues and updates kept in electronic form (Document Format).	Five (5) years.	Not required for permanent preservation by the NAM. Destroy expired records.

### 1.5 My Programme (Community Service)

<b>Service User Files</b>			
<b><i>Records/Documents held in the File</i></b>	<b><i>Categories of Personal Data</i></b>	<b><i>Retention Period</i></b>	<b><i>Archival Action (when the retention period expires)</i></b>
Inbound Referrals, Decision Letters, Service Agreements, Consent Forms, Professional Assessments, Recordings and Intervention, Individual Support Plans, Case Conferences and Reviews, Service Termination or Suspension Letters, Incident Reports,	Personal Details, Contact Details, Disability and Health Data, Situational Information, Intervention Records, Financial Data, Service Record Information, and other information specific to the case.	Three (3) years from Termination of the Service.	A random sample of one (1) % yearly to be transferred to NAM. Destroy remaining expired records.

Correspondence, and other documents that may be necessary in the Specific Case			
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Other Records			
<i><b>Record Name</b></i>	<i><b>Description</b></i>	<i><b>Retention Period</b></i>	<i><b>Archival Action (when the retention period expires)</b></i>
Service Roster	Schedules of service containing contact details of service users and staff working schedules. These are kept in electronic form (Word Document Format).	Three (3) years.	Not required for permanent preservation by the NAM. Destroy expired records.
Call Records	Records of incoming and outgoing calls related to the service and other work issues with service users, agency staff, professionals, and others who call or are called by the team. These are kept in electronic form (Spreadsheet Format).	Three (3) years.	Not required for permanent preservation by the NAM. Destroy expired records.

## 1.6 Independent Community Living Monitoring (ICLM) Service

Service User Files			
<i><b>Records/Documents held in the File</b></i>	<i><b>Categories of Personal Data</b></i>	<i><b>Retention Period</b></i>	<i><b>Archival Action (when the retention period expires)</b></i>
Inbound and Outbound Referrals, Reports for the Board (Personal Assistance	Personal Details, Contact Details, Disability and	Three (3) years from the	A random sample of one (1) % yearly to be transferred

Fund (PAF) / Service Allocation), Board Decision Letters, Service Agreements, Consent Forms, Professional Assessments, Recordings and Interventions, Individual Support Plans, Case Reviews, Closure Sheets, Resources to Reach Goals (Schedules, Rewards Charts, etc), Correspondence and other documents that may be necessary in the Specific Case.	Health Data, Intervention Records, Financial and Bank Data, Opinions, Skills Information, Situational Information, Historical Data, and other information specific to the case.	Termination of the Service.	to NAM. Destroy remaining expired records.
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### 1.7 Occupational Therapy

Service User Files			
Records/Documents held in the File	Categories of Personal Data	Retention Period	Archival Action (when the retention period expires)
Inbound and Outbound Referrals, Professional Assessments, Professional Reports, Applications for external Services, including any required document, Individual Support Plans, Individual Education Plans, Records of Interventions,	Personal Details, Contact Details, Disability and Health Data, Intervention Records, Financial and Banking Data, Skills and Abilities Information, Situational Information, Historical Data, Professional Notes and Observations, and other	Five (5) years from the Termination of the Service.	A random sample of one (1) % yearly to be transferred to NAM. Destroy remaining expired records.



Discharge Notes, Correspondence, and other documents that may be necessary in the Specific Case	information specific to the case.		
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Other Records			
<i><b>Record Name</b></i>	<i><b>Description</b></i>	<i><b>Retention Period</b></i>	<i><b>Archival Action (when the retention period expires)</b></i>
Waiting List	A record of individuals that require the service kept in electronic form (Spreadsheet Format), consisting mainly of contact details and information related to the referral	Indefinite or until the removal request is received or the service is initiated.	Not required for permanent preservation by the NAM. Destroy expired records.
Case List	A record of individuals receiving a service is kept in electronic form (Spreadsheet Format) and consists mainly of contact details and service records.	Five (5) years from the Termination of the Service.	Not required for permanent preservation by the NAM. Destroy expired records.
Team Meeting Minutes	A record of the team discussions on referrals, issues and updates kept in electronic form (Document Format).	Five (5) years.	Not required for permanent preservation by the NAM. Destroy expired records.

## 1.8 Sonia Tanti Independent Living Centre (STILC)

<b>Service User Files</b>			
<b><i>Records/Documents held in the File</i></b>	<b><i>Categories of Personal Data</i></b>	<b><i>Retention Period</i></b>	<b><i>Archival Action (when the retention period expires)</i></b>
Inbound and Outbound Referrals, Service Application Forms, Consent Forms, Referrals, Professional Assessments and Reports, Vehicle Logbooks, Driving Lessons Documents, Application Forms for Schemes, Permits and Licenses, Vehicle Inspection Reports, Correspondence, and other documents that may be necessary in the Specific Case	Personal Details, Contact Details, Disability and Health Data, Driving License and Vehicle Information, Service Record Information, Meeting and Appointment Records, and other information specific to the case	Five (5) years from the Termination of the Service.	A random sample of one (1) % yearly to be transferred to NAM. Destroy remaining expired records.

<b>Other Records</b>			
<b><i>Record Name</i></b>	<b><i>Description</i></b>	<b><i>Retention Period</i></b>	<b><i>Archival Action (when the retention period expires)</i></b>
STILC Main Database	A record of individuals that request, are using, or have used the service kept in electronic form	Five (5) years from Termination of Service for service users.	Not required for permanent preservation by

	(Spreadsheet Format), consisting mainly of Personal Details, Contact Details and information related to the referral.	Indefinite or until the removal request is received from individuals waiting to receive the service.	the NAM. Destroy expired records.
Waiting List	A record of individuals who require the service is kept in electronic form (Spreadsheet Format), consisting mainly of personal details, contact details, and information related to the referral.	Indefinite or until the removal request is received or the service is initiated.	Not required for permanent preservation by the NAM. Destroy expired records.
Wheelchair & Seating Clinic Schedules	A schedule of appointments, meetings, and sessions is held in electronic form (Spreadsheet Format) and consists mainly of personal details, contact details, and information on upcoming appointments.	Three (3) years.	Not required for permanent preservation by the NAM. Destroy expired records.
Driving Clinic Schedules	A schedule of appointments, meetings and sessions held in electronic form (Spreadsheet Format) consisting of personal details, contact details, and information on upcoming appointments.	Three (3) years.	Not required for permanent preservation by the NAM. Destroy expired records.

## 1.9 Access to Communication & Technology Unit (ACTU)

<b>Service User Files</b>			
<b><i>Records/Documents held in the File</i></b>	<b><i>Categories of Personal Data</i></b>	<b><i>Retention Period</i></b>	<b><i>Archival Action (when the retention period expires)</i></b>
Inbound and Outbound Referrals, Consent Forms, Professional Assessments, Tests and Reports (including Occupational, Health, Psychological, Speech and Language), Appointment and Service Records, Notes and Observations, Correspondence and other documents that may be necessary in the Specific Case	Personal Details, Contact Details, Disability and Health Data, Service Record Information, Meeting and Appointment Records, Performance and Progress Information, and other information specific to the case.	Five (5) years from the Termination of the Service.	A random sample of one (1) % yearly to be transferred to NAM. Destroy remaining expired records.

<b>Other Records</b>			
<b><i>Record Name</i></b>	<b><i>Description</i></b>	<b><i>Retention Period</i></b>	<b><i>Archival Action (when the retention period expires)</i></b>
ACTU Main Database	A record of service users is kept in electronic form (Spreadsheet format), consisting mainly of personal details, contact details, and information related to the referral.	Five (5) years from Termination of Service for service users.	Not required for permanent preservation by the NAM. Destroy expired records.
Waiting List	A record of individuals who require the service is kept in electronic form	Indefinite or until the removal request is	Not required for permanent preservation by the

	(Spreadsheet Format), consisting mainly of personal details, contact details, and information related to the referral.	received or the service is initiated.	NAM. Destroy expired records.
Therapist Caseload List	A record of the cases assigned to each therapist is held electronically (Spreadsheet Format) and consists mainly of personal details, contact details, and service records.	Until Termination of Service.	Not required for permanent preservation by the NAM. Destroy expired records.

#### 1.10 Sign Language Interpretation

Service User Files			
<b><i>Records/Documents held in the File</i></b>	<b><i>Categories of Personal Data</i></b>	<b><i>Retention Period</i></b>	<b><i>Archival Action (when the retention period expires)</i></b>
Service Agreement Consent Forms, Professional Reports (including Audiology, Occupational, Health Care, Speech, Language and Education), Correspondence and other documents that may be necessary in the Specific Case	Personal Details, Contact Details, Disability and Health Data, Service Record Information, Meeting and Appointment Records, Performance and Progress Information, and other information specific to the case.	Three (3) years from Termination of the Service.	A random sample of one (1) % yearly to be transferred to NAM. Destroy remaining expired records.

<b>Other Records</b>			
<b><i>Record Name</i></b>	<b><i>Description</i></b>	<b><i>Retention Period</i></b>	<b><i>Archival Action (when the retention period expires)</i></b>
Refused Appointments Lists	A record of services requested by the individuals that could not be accommodated held in electronic form (Spreadsheet Format),  consisting mainly of personal details, appointment details, and Reasons for not accommodating appointments.	Three (3) years.	Not required for permanent preservation by the NAM. Destroy expired records.
Contracted Sign Language Interpreters (SLI) Schedules/Records	A record of appointments accommodated by the Contracted Sign Language Interpreters, held in electronic form (Spreadsheet Format), consisting mainly of Personal Details of the service user, Personal Details of the Interpreter and Appointment Details.	Three (3) years.	Not required for permanent preservation by the NAM. Destroy expired records.

## 1.11 Family Unit

<b>Records</b>			
<b><i>Record Name</i></b>	<b><i>Description</i></b>	<b><i>Retention Period</i></b>	<b><i>Archival Action (when the retention period expires)</i></b>
Parenting Groups' Database	A record of individuals who apply to attend a parenting group (waiting list) and parents who participated in the parenting groups (Spreadsheet), consisting mainly of Contact Details and attendance records.	Three (3) years from completion of the group session.  Indefinite for waiting lists or until a removal request is received.	A random sample of one (1) % is to be transferred to NAM. Destroy remaining expired records.
Super Sibs Groups Database	A record of individuals who apply to attend sibling support groups (waiting list) and siblings who attend the Super Sibs Groups (Spreadsheet), consisting mainly of Contact Details and attendance records.	Three (3) years from completion of the group session.  Indefinite for waiting lists or until a removal request is received.	A random sample of one (1) % is to be transferred to NAM. Destroy remaining expired records.

## 1.12 Service Providers Monitoring

While the monitoring function within the Agency is a service, in the sense that it is designed to benefit service users, it differs from other services. The Service Providers' Monitoring Team is a professional group responsible for conducting assessments to enable service users to access services provided through PSPs or other contracted service providers. The team is also

tasked with overseeing these agreements and contracts. Therefore, the purpose of this unit is to facilitate service users in receiving services from external NGOs or other contracted providers, and to monitor those services, ensuring they meet high-quality standards, whether funded by the Ministry or the Agency. These services are either respite or residential in nature. The documents and information held by this unit are either collected directly from the service user or the Agency's professionals, or received from NGOs or contracted service providers, either at the Agency's request or at the initiative of the NGO or service provider, depending on the circumstances.

<b>Service User Files</b>			
<b><i>Records/Documents held in the File</i></b>	<b><i>Categories of Personal Data</i></b>	<b><i>Retention Period</i></b>	<b><i>Archival Action (when the retention period expires)</i></b>
Service Agreement Consent Forms, Professional Assessments and other Reports, Visits or Spot-Checks Reports, Incident Reports, Correspondence and other documents that may be necessary in the Specific Case	Personal Details, Contact Details, Disability and Health Data, Service Record Information, Performance and Progress Information, and other information specific to the case.	Three (3) years from Termination of the Service.	A random sample of one (1) % yearly to be transferred to NAM. Destroy remaining expired records.

<b>Other Records</b>			
<b><i>Record Name</i></b>	<b><i>Description</i></b>	<b><i>Retention Period</i></b>	<b><i>Archival Action (when the retention period expires)</i></b>
Service-Users List	A record of the individuals receiving services from the NGO or the contracted service provider within a particular period, provided by the service	Three (3) years.	Not required for permanent preservation by the NAM. Destroy expired records.



	provider in electronic form (spreadsheet format) consisting mainly of personal details and basic information on services received.		
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## 2. People Assistance Schemes (PAS)

The agency receives and processes applications by individuals to benefit from schemes. To process these applications, irrespective of whether the ultimate decision rests with the agency or external entities, a file is always created for the applicant (Applicant File), and a profile is generated on the PAS Database.

The Applicant File is paper-based and contains all the information and documentation pertinent to the application. All information in the file is necessary to determine an application and ensure the accountability of the staff and the agency.

The profile on the PAS Database contains general information about the Applicant, namely identification and contact details and records of all applications submitted by the applicant.

All information may only be accessed by the assigned agency staff and forwarded to the designated Board responsible for determining the application.

In addition to the individual Applicant File, the agency keeps records of all applications for any scheme in a collective manner.

The tables below demonstrate the type of records and documents created or held in pursuit of an application for any schemes, the categories of personal data that may be contained, and the respective retention periods.

## 2.1 Empowerment Scheme

<b>Applicant File</b>			
<b><i>Records/Documents held in the File</i></b>	<b><i>Categories of Personal Data</i></b>	<b><i>Retention Period</i></b>	<b><i>Archival Action (when the retention period expires)</i></b>
Application including a copy of the EU Disability Card, Medical Certificate, Quotations, Professional Report, Decision Letter of the Empowerment Board, Correspondence, and other documents that may be necessary in the Specific Case	Personal Details, Contact Details, Disability and Health Data, Professional Assessment and Opinion, Bank Account Details, and other information specific to the case.	Refused Applications - Three (3) years from Application.  Approved Applications - Three (3) years from Payment.	A random sample of one (1) % yearly to be transferred to NAM. Destroy remaining expired records.

<b>Profile on the PAS Database</b>			
<b><i>Records held in the Database</i></b>	<b><i>Categories of Personal Data</i></b>	<b><i>Retention Period</i></b>	<b><i>Archival Action (when the retention period expires)</i></b>
Applicant Profile, records of Applications, Medical Certificates, Professional Reports and Assessments, Application Outcome, Payment record	Personal Details, Contact Details, Basic Disability and Health Data, Basic Professional Assessment and Opinion Data, Grant Amount and Payment Record and other information specific to the case.	Three (3) years from the Death of Applicant.	Not required for permanent preservation by the NAM. Destroy expired records.

<b>Other Records</b>			
<b><i>Record Name</i></b>	<b><i>Description</i></b>	<b><i>Retention Period</i></b>	<b><i>Archival Action (when the retention period expires)</i></b>
Board Lists	A list of all applications compiled for the Board is held in electronic form (Spreadsheet Format),  consisting mainly of Personal Details, Object of the Application, and a record of the Board Approval or Refusal, including the grant amount.	Three (3) years.	Not required for permanent preservation by the NAM. Destroy expired records.

## 2.2 Vehicle Road License Exemption Scheme

<b>Applicant File</b>			
<b><i>Records/Documents held in the File</i></b>	<b><i>Categories of Personal Data</i></b>	<b><i>Retention Period</i></b>	<b><i>Archival Action (when the retention period expires)</i></b>
Application including a copy of the EU Disability Card, Medical Certificates, Driving Licence, the Vehicle Road Licence and the Vehicle Logbook, Therapist Appointment Letter, Professional Report, STILC Report, Referral to the Review Board (Ministry of Finance), Decision Letter of the Review Board, Modification Contract, Disposal Form,	Personal Details, Contact Details, Driving Licence Details, Disability and Health Data, Professional Assessment and Opinion, Decision, and other information specific to the case.	Three (3) years from the death of the applicant.	A random sample of one (1) % yearly to be transferred to NAM. Destroy remaining expired records.

Correspondence, and other documents that may be necessary in the Specific Case			
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Profile on the PAS Database			
<i><b>Records held in the Database</b></i>	<i><b>Categories of Personal Data</b></i>	<i><b>Retention Period</b></i>	<i><b>Archival Action (when the retention period expires)</b></i>
Applicant Profile, records of Applications, Medical Certificates, Professional Reports and Assessments, Application Outcome, Payment record	Personal Details, Contact Details, Basic Disability and Health Data, Basic Professional Assessment and Opinion Data and other information specific to the case	Three (3) years from the death of the applicant.	Not required for permanent preservation by the NAM. Destroy expired records.

### 2.3 Vehicle Registration Tax Exemption Scheme

Applicant File			
<i><b>Records/Documents held in the File</b></i>	<i><b>Categories of Personal Data</b></i>	<i><b>Retention Period</b></i>	<i><b>Archival Action (when the retention period expires)</b></i>
Application including a copy of the EU Disability Card and of the Driving Licence, Medical Certificate, Therapist Appointment Letter, Therapist Report, STILC Report (where applicable), Referral to the Review Board (Ministry of Finance),	Personal Details, Contact Details, Driving Licence Details, Disability and Health Data, Professional Assessment and Opinion, Decision and other information specific to the case	Refused Applications - 3 Years from Application  Approved Applications - 3 Years from Payment	A random sample of one (1) % is to be transferred to NAM. Destroy remaining expired records.

Decision Letter of the Review Board, Deposit Receipts, Modification Contract (where applicable), Disposal Form (where applicable), Correspondence and other documents that may be necessary in the Specific Case			
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Profile on the PAS Database			
<i>Records held in the Database</i>	<i>Categories of Personal Data</i>	<i>Retention Period</i>	<i>Archival Action (when retention period expires)</i>
Applicant Profile, records of Applications, Medical Certificates, Professional Reports and Assessments, Application Outcome, Payment record	Personal Details, Contact Details, Basic Disability and Health Data, Basic Professional Assessment and Opinion Data and other information specific to the case	Three (3) years from the death of the applicant.	Not required for permanent preservation by the NAM. Destroy expired records.

### 3. Customer Care

Helpline Ticketing System			
<i>Records held in the System</i>	<i>Categories of Personal Data</i>	<i>Retention Period</i>	<i>Archival Action (when the retention period expires)</i>
Registration of the call and its follow-up	Personal Details, Contact Details, Ticket Reference, Subject of the Call and Status.	Invalid Calls: One (1) year from closure of ticket.  Other Calls: Two (2) years from closure of ticket.	A random sample of one (1) % yearly to be transferred to NAM. Destroy remaining expired records.
SUPPORT Mailbox			
<i>Record Name</i>	<i>Description</i>	<i>Retention Period</i>	<i>Archival Action (when the retention period expires)</i>
SUPPORT Generic Mailbox	This refers to emails received at the generic email address of the agency, including queries from external parties, including the public, potential and current service users, and their relatives, as well as the forwarded messages submitted through the contact form on the agency website.	Three (3) years from the last correspondence.	Not required for permanent preservation by the NAM. Destroy expired records.

## 4. Human Resources

To manage its human resources, the agency processes various categories of personal data in multiple files, documents, or electronic and physical records. The tables below contain a comprehensive list of the documents or records held by the agency involving personal data for human resourcing management purposes.

Records in the Human Resources Management System			
<i>Type of Information/Record</i>	<i>Categories of Personal Data</i>	<i>Retention Period</i>	<i>Archival Action (when the retention period expires)</i>
Personal details	Personal Details, Social Security Number and Academic Level Information	These records are retained in conformity with the Data Protection Public Administration Human Resources Corporate Procedures. The Research & Personnel Systems Directorate has issued these rules and may be accessed <a href="#">here</a> .	
Employment Details	Employment Commencement and Termination Dates, Employment Type, Tax Profile, Work Schedule, and Grade		
Payment Details	Bank Account Details, Payroll Frequency and Basic Pay		
Organisation details	Department, Section and Cost Centre Information		
Contact Details	Work and Personal Contact Details		
Emergency Contact Details	Next of Kin and Relationship Information, and Contact Number		

Remarks	Any movements or changes in Names or Status	
Leave Details	Leave Entitlement and Utilisation Record	
Attendance Details	Employee Type and Target Attendance details (will be activated soon)	

Personal Files (Dossiers)			
<i>Type of Records/Documents held in the File</i>	<i>Categories of Personal Data</i>	<i>Retention Period</i>	<i>Archival Action (when the retention period expires)</i>
CV, Application Form, Certificates	Personal Details, Contact Details, Educational and Work History, Academic and Training Record Information, Disability Data, and other information that the employee includes with the application for employment	These records are retained in accordance with the Data Protection Public Administration Human Resources Corporate Procedures. The Research & Personnel Systems Directorate issued these rules, which may be accessed <a href="#">here</a> .	
Contract	Personal Details, Work Conditions, and other information related to the engagement		
Recruitment and Progression Documents	Personal Details, records related to the initial employment conditions, and records of career		



	progressions and promotions	
Training and Certificates	Personal Details, Training and Courses Applications, Attendance Information, and other information related to training, courses and certificates obtained through work training or continuous development programmes or courses	
Correspondence	Records of relevant correspondence between the department and the employee	
Job Description	Details of the roles and duties assigned to the employee	
Applications for Parental Leave	Personal Details, Work and Department/Unit Information and Reasons	
Application to Perform Private/Part-Time Work	Personal Details, Work or Activity Details	
Applications for Work-Life Balance Measures (Such as Applications to Work on Reduced	Personal Details, Reasons, Working Times, and Benefits Information	

Hours, Flexitime, or Telework)		
Performance Reviews, Appraisal Reports, Performance Improvement Plans and Meetings of Concern	Personal Details, Service and Performance Information, and details of meetings on specific issues related to performance at work.	

Records Related to Discipline			
<i><b>Record Name</b></i>	<i><b>Description</b></i>	<i><b>Retention Period</b></i>	<i><b>Archival Action (when the retention period expires)</b></i>
Performance Concerns Meeting Records	Records of meetings held between an employee and the supervisor to discuss employee performance concerns and any action taken.	One (1) year.	Not required for permanent preservation by the NAM. Destroy expired records.
Verbal Warnings	Records of Verbal Warnings issued due to breach of discipline, including the reasons.	Six (6) Months	Not required for permanent preservation by the NAM. Destroy expired records.
Written Warnings	Written warnings, including the reasons, are issued due to a breach of discipline.	One (1) year.	Not required for permanent preservation by the NAM. Destroy expired records.

Disciplinary Case Files	Files of disciplinary cases consisting of the charges issued, statements, evidence, reasons, and decisions.	These records are retained in conformity with the Data Protection Public Administration Human Resources Corporate Procedures. The Research & Personnel Systems Directorate has issued these rules and may be accessed <a href="#">here</a> .
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Other Records			
<i>Record Name</i>	<i>Description</i>	<i>Retention Period</i>	<i>Archival Action (when the retention period expires)</i>
Public Calls and Vacancies Applications	Application Forms, CVs, Academic and other Training or Award Certificates, and References submitted by applicants following a public call for applications given vacant posts.	These records are retained in accordance with the Data Protection Public Administration Human Resources Corporate Procedures. The Research & Personnel Systems Directorate issued these rules, which may be accessed <a href="#">here</a> .	
Attendance/Timesheets	Records of the time and hours each employee works.		
Sick Leave Certificates	Certificates issued by medical practitioners that confirm the employee is unfit for work due to sickness or health reasons.		
Vacation Leave Applications	Applications submitted by employees to avail themselves of vacation leave and relative approval or rejection.		
Overtime Requests	Requests for employees to work extra hours		

	include the reasons for, date, and time of overtime.	
Supervision Forms and Records	Notes of confidential meetings between an employee and a supervisor on matters that require attention or for which the employee needs support or assistance, and records of the number of meetings.	
Staff Rosters	Schedules of work times, shifts, and staff tasks are issued by the respective department, section, or unit where the staff is assigned.	

## 5. Quality Audit, Research, and Innovation

The Quality Audit, Research, and Innovation Department (QARI) manages quality assurance, service auditing, risk management, compliance, GDPR, research, policy development, stakeholder engagement, and reporting. This department conducts quality audits, oversees risk and management using international standards, ensures compliance with legal frameworks and relevant standards, mediates with external bodies, and drives research for innovative service and project development. It also facilitates stakeholder committees for collaborative discussions (for service users, relatives, and NGOs within the disability sector) and handles external reporting requirements. In addition to this, the Department coordinates policy development efforts, data protection, and whistleblower reporting and resolution.

All data processed by QARI is securely stored digitally on SharePoint, with access strictly controlled, ensuring it is available only to the assigned department members based on their specific needs. The department manager holds full access rights, and sharing data beyond the department is strictly on a 'need-to-know' basis in particular cases or when legally

required. Importantly, no communication from the department will contain any personally identifiable details of individuals unless the data subject's explicit consent is obtained or when legally required.

The tables below demonstrate the type of records and documents that are created or held in the execution of the functions carried out by the QARI, the categories of personal data that may be contained in such records and documents, and the respective retention periods.

<b>Records Related to Consultative Committees</b>			
<b><i>Record Name</i></b>	<b><i>Description</i></b>	<b><i>Retention Period</i></b>	<b><i>Archival Action (when the retention period expires)</i></b>
List of Consultative Committee Members	This refers to the list of consultative committee members, service users, and relatives, which consists of personal details and contact information held in electronic form (spreadsheet).	Name and Surname – Retained permanently for historical purposes.  Any other personal data – until the recomposition of the committees.	Not required for permanent preservation by the NAM. Destroy expired records.
Correspondence and other records related to specific issues	Includes all personal data collected when dealing with the organisation and coordination of meetings, including notes for the minutes and other correspondence (mainly emails) or information related to specific issues (Word Document Format).	Until the conclusion of the issue or minutes.	Not required for permanent preservation by the NAM. Destroy expired records.

Records Related to Policy Development and Review			
<i>Record Name</i>	<i>Description</i>	<i>Retention Period</i>	<i>Archival Action (when the retention period expires)</i>
Working and Focus Group Lists	This refers to the list of participants in policy focus groups, including personal and contact details, and their respective roles held in electronic form (Spreadsheet).	Until the conclusion of the specific focus group task.	Not required for permanent preservation by the NAM. <b>Destroy expired records.</b>
Correspondence and other records related to specific issues	This includes all personal data collected when dealing with the organisation and coordination of sessions, including notes for the minutes, opinions expressed, and other correspondence (mainly emails) or information related to specific issues (Word Document Format).	Until the conclusion of the particular focus group task.	Not required for permanent preservation by the NAM. Destroy expired records.

Records Related to Research			
<i>Record Name</i>	<i>Description</i>	<i>Retention Period</i>	<i>Archival Action (when the retention period expires)</i>
External Applications	Refers to applications from academic students, external researchers, and entities through the published electronic forms, applications by	Rejected or Dropped Applications – One (1) year.	A random sample of one (1) % yearly to be transferred to NAM. Destroy remaining expired records.

	email and related correspondence.	Conditionally Approved Applications – Two (2) years.  Approved Applications – Five (5) years from Approval.	
Participants Lists	The list of participants for in-house research projects or focus groups, consisting of personal details and contact details, and the originating service, held in electronic form (Spreadsheet).	Retained until completion or finalisation of the project unless agreed otherwise.	Not required for permanent preservation by the NAM. Destroy expired records.

Records Related to Quality Assurance and Service Audits			
<i>Record Name</i>	<i>Description</i>	<i>Retention Period</i>	<i>Archival Action (when the retention period expires)</i>
Meeting or Interview Minutes	These are minutes of meetings or interviews with stakeholders during the audit process.	One (1) year or until the audit report has been finalised, whichever is the earliest.	Not required for permanent preservation by the NAM. Destroy expired records.
Recordings	This refers to audio recordings of meetings held during the audit process.	One (1) year or until the minutes are formulated and the audit report has been finalised,	Not required for permanent preservation by the NAM. Destroy expired records.

		whichever is the earliest.	
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Records Related to Risk Management			
<i>Record Name</i>	<i>Description</i>	<i>Retention Period</i>	<i>Archival Action (when the retention period expires)</i>
Meeting or Interview Minutes	These are minutes of meetings or interviews with stakeholders during risk assessment and management.	One (1) year or until the risk register has been updated, whichever is the earliest.	Not required for permanent preservation by the NAM. Destroy expired records.
Recordings	This refers to audio recordings of meetings while assessing and managing specific risks.	One (1) year or until the minutes are formulated and the risk register has been updated, whichever is the earliest.	Not required for permanent preservation by the NAM. Destroy expired records.

Records Related to Whistleblower Reporting			
<i>Record Name</i>	<i>Description</i>	<i>Retention Period</i>	<i>Archival Action (when the retention period expires)</i>
Report Receipt Record	It contains initial details of the report submission, including the following: Unique reference number, Date of receipt, Method of submission (e.g., email, phone, in-person), Whistleblower's contact information (if	Retain for at least five (5) years or for the duration necessary to comply with relevant legal and	Not required for permanent preservation by the NAM. Destroy expired records.



	provided), and a report summary.	administrative requirements.	
Acknowledgement of Receipt	Documentation of acknowledgement sent to the whistleblower, including date of acknowledgement, method of acknowledgement (e.g., letter, email), unique reference number, and Confirmation of receipt details.	Retain for at least five (5) years or for the duration necessary to comply with relevant legal and administrative requirements.	Not required for permanent preservation by the NAM. Destroy expired records.
Follow-Up and Investigation Log	Detailed log of follow-up actions and investigation process, including dates of follow-up actions, details of actions taken (e.g., meetings, investigations), names of individuals involved in follow-up and investigation, a summary of findings and decisions made, unique reference number, and the communication records with the whistleblower.	Retain for at least five (5) years following the closure of the case or for the duration necessary to comply with relevant legal and administrative requirements.	Not required for permanent preservation by the NAM. Destroy expired records.
Record of Communication and Feedback	All communication exchanged with the whistleblower, including feedback provided, communication dates, method of communication (e.g., email, phone call), the content of the communication and	Retain for at least five (5) years following the closure of the case or for the duration necessary to comply with relevant legal and	Not required for permanent preservation by the NAM. Destroy expired records.

	unique reference number.	administrative requirements.	
Final Outcome Report	Final report detailing the outcome of the investigation, unique reference number, summary of findings, conclusions and recommendations, final actions taken, and communication of the outcome to the whistleblower.	Retain for at least five (5) years following the closure of the case or for the duration necessary to comply with relevant legal and administrative requirements.	Not required for permanent preservation by the NAM. Destroy expired records.
Confidential Records of Witnesses and Victims	Detailed records of any witnesses or victims involved, including names and contact information of witnesses or victims, statements or testimonies provided, unique reference number linked to the case, and protection measures applied (if any).	Retain for at least five (5) years following the closure of the case or for the duration necessary to comply with relevant legal and administrative requirements.	Not required for permanent preservation by the NAM. Destroy expired records.

## 6. Finance and Procurement

### 6.1 ICL Finance

The Independent Community Living section within the Finance Department is responsible for verifying and processing payments for the services received by service users funded through the ICL funding scheme.

Service User File in CMS contains all the information about the user and the service provided from the commencement of the service until its termination. All records are necessary for the

processing of service-related payments and to ensure accountability of all the parties involved. In addition to the service user's data, the file may contain information about the parents, guardians, relatives, and the service provider/carer.

The Service User File is held in electronic form in the Case Management System, and its content may only be accessed by the agency's ICL team staff for service provision purposes. The Finance Section keeps the records sent to provide the payments in line with the Finance Section Policy.

The contract and a copy of the ID Card of the person who signed the contract are kept in the service user's physical file (paper-based) for legal reasons. Generally, these documents are signed by the service user, parents, guardians, relatives, or third parties, as the case may be, or the documents that contain information collected for the commencement of the service and the payments.

<b>Service User Files</b>			
<b><i>Type of Records/Documents held in the File</i></b>	<b><i>Categories of Personal Data</i></b>	<b><i>Retention Period</i></b>	<b><i>Archival Action (when the retention period expires)</i></b>
Data of service users:  ICL Report, Bank Account Details, Bank Account Details, Payee Consent Form & copy of ID Cards of all related parties	Identification details, Family information, financial details, Disability data, Health data, Bank details, Service records and related payments	Records necessary to create the profile of the service users and the generated reports are all kept with the first claim, which is processed for payment. It is suggested that the first payment claim is kept for three (3) years from the Termination of the Service.	Not required for permanent preservation by the NAM. Destroy expired records.
Data of Service Provider/Carer:  Monthly Payment Declaration (Receipt), Sign-In & Sign-Out Form, Invoice, claim	Identification details, Service records and related payments	Payment supporting documentation – Three (3) years from creation.	

sheet & front Sheet generated from CMS			
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## 6.2 Other Records

<b>Record Name</b>	<b>Description</b>	<b>Retention Period</b>	<b>Archival Action (when the retention period expires)</b>
Procurement Files (Tenders, Calls for Quotations, Requests for Quotations and Direct Orders), Contracts, Performance Guarantees, and Insurance documents.	These are files containing all documentation generated for and during the procurement of goods, works, and services, including all the documents submitted by bidders or contractors, such as Curriculum Vitae, Certificates, lists of key experts and employees, insurance certificates, and licenses or permits. We also retain the contracts resulting from the tendering processes.	Ten (10) years from the procurement process's conclusion or the contract's termination or expiration, whichever is the latest.	<p><b>Quotations</b> - €10,000 or less: Not required by the NAM for permanent preservation.</p> <p>Tenders - €10,000 or more: A random sample of one (1) % to be transferred to NAM.</p> <p>Direct Orders - €10,000 or less: A random sample of one (1) % to be transferred to NAM.</p> <p>Direct Orders - €10,000 or more: Transfer to NAM for permanent preservation.</p>

service user Pensions Management	These are records related to the transactions and management of the 40% apportionment of the pensions entrusted to the agency of the service users benefitting from the Residential Services.	Receipts – Three (3) years  Any Other Record - Ten (10) years	Not required for permanent preservation by the NAM. Destroy expired records.
Payments / Accounting	Remittance is attached to each payment document, together with the endorsed invoice & PO, evaluation, quotes, and other related documents.	Ten (10) years	Not required for permanent preservation by the NAM. Destroy expired records.
Management Payroll	Documents related to payroll, reimbursed expenses, Performance Bonus workings, arrears workings (if any), and employment contract.	Ten (10) years	Apply Retention Policy for Human Resources documents issued by the Office of the Prime Minister.
Bank Related documents	Bank Statements, Bank applications, and resolutions that are sent to the bank.	Ten (10) years	Not required for permanent preservation by the NAM. Destroy expired records.

## 7. Management and Administration

<b><i>Record Name</i></b>	<b><i>Description</i></b>	<b><i>Retention Period</i></b>	<b><i>Archival Action (when the retention period expires)</i></b>
Senior Management Meetings Minutes	These are minutes of official meetings held by the Chief Executive Officer with the agency's directors on any matter related to the management and administration of the agency.	25 years	Transfer all the records to the National Archives for permanent preservation.
Services Management Meetings Minutes	These are minutes of official meetings held by the Directors responsible for the Services with the Service Managers on any matter related to the management and administration of the Services.	25 years	Transfer all the records to the National Archives for permanent preservation.