



## ***Data Protection Policy for Scalp Scanning Services in State Schools***

The General Data Protection Regulation (EU) 2016/679 (GDPR) and the Data Protection Act (Cap 586) regulate the processing of personal data whether held electronically or in manual form. The National School Support Services (NSSS) is set to fully comply with the Data Protection Principles as set out in such data protection legislation.

### **Purposes for collecting data**

The NSSS collects and processes information to carry out its obligations in accordance with present legislation. In order to provide Scalp Scanning services in State Schools, data is processed in accordance with Data Protection Legislation, the Education Act (Cap. 605) and National Minimum Conditions for All Schools Regulations (S.L 605.02).

### **Recipients of data**

Personal Information is accessed by the employees who are assigned to carry out the functions of the NSSS together with the School Headmasters. Personal Data will be disclosed to the contractor who will be providing the service of scalp scanning in all state-schools. Disclosure can also be made to third parties but only as authorized by law.

### **Your rights**

You are entitled to know, free of charge, what type of information the NSSS hold and process about you and why, who has access to it, how it is held and kept up to date, for how long it is kept, and what they are doing to comply with data protection legislation.

The GDPR establishes a formal procedure for dealing with data subject access requests. All data subjects have the right to access any personal information kept about them by the NSSS and the contractor, either on computer or in manual files. Requests for access to personal information by data subjects are to be made in writing and sent to the Director of the NSSS. Your identification details such as ID number, name and surname have to be submitted with the request for access. In case we encounter identification difficulties, you may be required to present an identification document.

The NSSS aims to comply as quickly as possible with requests for access to personal information and will ensure that it is provided within a reasonable timeframe and in any case not later than one month from receipt of request, unless there is good reason for delay. When a request for access cannot be met within a reasonable time, the reason will be explained in writing to the data subject making the request. Should there be any data breaches, the data subject will be informed accordingly.

All data subjects have the right to request that their information is not used or is amended if it results to be incorrect.

These rights may be restricted, if applicable, as per Data Protection Legislation.

In case you are not satisfied with the outcome of your access request, you may refer a complaint to the Information and Data Protection Commissioner, whose contact details are provided below.

**Retention Policy**

Your personal data is processed through legal obligation - Education Act (Cap. 605) and National Minimum Conditions for All Schools Regulations (S.L 605.02).

The following schedule outlines the retention requirements for the various categories of documentation within the NSSS in relation to the Scalp Scanning services in State Schools:

Category of Document	Retention Period	Justification
Overall Report - List of Students that Need to Enter Back to School Certified Clean	1 year from the date of the report.	Reports need to be stored for this period so that if there is continuous reinfection, College social workers can be roped in so that work with the respective families can be carried out which require rigorous cleansing of the scalp of different family members.
Follow-Ups Attendance Sheet	1 year from the date of the report.	Reports need to be stored for this period so that if there is continuous reinfection, College social workers can be roped in so that work with the respective families can be carried out which require rigorous cleansing of the scalp of different family members.
Certified Clean / Need Further Treatment Report	1 year from the date of the report.	Reports need to be stored for this period so that if there is continuous reinfection, College social workers can be roped in so that work with the respective families can be carried out which require rigorous cleansing of the scalp of different family members.

Data that needs to be destroyed after the noted timeframes will be disposed of in an efficient manner ensuring that such information is no longer available within the NSSS. Upon termination or expiry of the contract, the data controller will request the contractor to provide a statement confirming that personal data processed and stored under this contract has been destroyed.

The Data Protection Officer may be contacted on [dpo.meyr@gov.mt](mailto:dpo.meyr@gov.mt) or by telephone

**Director National School Support Services**

The NSSS Data Controller may be contacted at:

Director Educational Services  
National School Support Services  
Fra Gaetano Pace Forno Street  
Hamrun

Telephone number: 2598-3421

Email Address: [nationalschoolsupportservices.meds@gov.mt](mailto:nationalschoolsupportservices.meds@gov.mt)

**The Information and Data Protection Commissioner**

The Information and Data Protection Commissioner may be contacted at:

Level 2, Airways House,  
High Street,

Sliema SLM 1549

Telephone: 23287100

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