



## Wellbeing Services Data Protection Policy

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 Wellbeing Services 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 Wellbeing Services are the following:

Processing Operation	Legal Basis for processing	Purposes of Processing
Educational Psycho-Social Services (A)	Legal obligation (Education Act (CAP. 605))	For providing these services to students: career guidance, support for young pregnant minors, anti-bullying, anti-substance abuse, child safety, counselling, psychotherapy, and guidance.
Educational Psycho-Social Services (B)	Consent	For providing these services to students: principal/senior/education support practitioner youth work, nurture classes/learning support zones.
Scalp Scanning Services	Legal obligation (Education Act (CAP. 605))	For providing scalp scanning services to all students.

### 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:

Processing Operation	Categories of Personal Data	Special Categories of Personal Data	Source/s from where the personal data originates
Educational Psycho-Social Services (A)	Personal Details which identify the Data Subject, Family/Lifestyle/Social Circumstances.	Racial/Ethnic origin, religious/philosophical beliefs, health data, sex life/sexual orientation, genetic Data.	Data subject and/or data subject's School (depending on service and case)
Educational Psycho-Social Services (B)	Personal Details which identify the Data Subject, Family/Lifestyle/Social Circumstances.	Racial/Ethnic origin, religious/philosophical beliefs, health data, sex life/sexual orientation, genetic Data.	Data subject and/or data subject's School (depending on service and case)

Scalp Scanning Services	Personal Details which identify the Data Subject	Health Data	Data subject's school
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### Recipients of Personal Data

Personal Data will be disclosed to a number of recipients for the reasons shown below. Disclosure can also be made to third parties but only as authorised by law.

Processing Operation	Recipients of Personal Data	Reason for disclosure
Educational Psycho-Social Services (A)	<ul style="list-style-type: none"> <li>• Various health services within the Ministry for Health</li> <li>• Various services within the Ministry for Social Policy and Children's Rights</li> <li>• Various services within the Ministry for Inclusion</li> </ul>	Collaboration between professional (as and when necessary)
Educational Psycho-Social Services (B)	<ul style="list-style-type: none"> <li>• Various health services within the Ministry for Health</li> <li>• Various services within the Ministry for Social Policy and Children's Rights</li> <li>• Various services within the Ministry for Inclusion</li> </ul>	Collaboration between professional (as and when necessary)
Scalp Scanning Services	Yama Yami Ltd	Contracted service

### 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 portability of your personal data in relation to information that you have given us.
- 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 Wellbeing Services. 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 Wellbeing Services 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 Wellbeing Services Data Retention policy is available on the website <https://student-wellbeing-services.gov.mt/en/> via this [Link](#).

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 Wellbeing Services.

### **The Data Protection Officer**

The Data Protection Officer may be contacted on:

Ministry for Education, Sport, Youth, Research and Innovation  
Internal Audit and Compliance Unit  
Office of the Permanent Secretary  
Great Siege Road  
Floriana VLT 2000

Telephone: 25981305  
Email: dpo.meyr@gov.mt

### **The Data Controller**

Wellbeing Services may be contacted at:

Fra Gaetano Pace Forno Street  
Hamrun

Telephone: 25983435  
Email: wellbeing-services.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](mailto:idpc.info@idpc.org.mt)  
Website: [www.idpc.org.mt](http://www.idpc.org.mt)