

Community, Inclusion, and Services Directorate

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 *Community, Inclusion, and Services Directorate* 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 Community, Inclusion, and Services Directorate are the following:

Processing Operation	Legal Basis for processing	Purposes of Processing
Management of community support services	Art. 6(1)(e); Art. 9(2)(g) where special category data is processed	To assess eligibility, provide community support and social inclusion services.
Administration of social inclusion programmes	Art. 6(1)(e)	To administer participation in Government programmes and initiatives.
Processing applications for services	Art. 6(1)(c) and Art. 6(1)(e)	To assess applications, determine eligibility and communicate decisions.
Management of complaints and enquiries	Art. 6(1)(e)	To investigate, respond to and resolve enquiries and complaints.
Management of grants and funding schemes	Art. 6(1)(c); Art. 6(1)(e)	To administer grants, monitor compliance and process payments.
Procurement and contract management	Art. 6(1)(c)	To manage procurement procedures and contractual obligations.
Human resources administration	Art. 6(1)(b); Art. 6(1)(c)	To administer recruitment, employment and payroll processes.
Financial management and auditing	Art. 6(1)(c)	To comply with financial regulations, accounting and audit requirements.

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
Name, surname, ID card number, address, telephone number, email address	Health information, where relevant to service provision	Data subject
Household and family information	Disability information	Data subject
Employment details	Social care information	Data subject; relevant public authorities
Financial information and bank details	None, unless required for a specific service	Data subject
Application records and correspondence	None	Data subject; other Government entities where authorised by law

Automated individual decision-making, including profiling

The Community, Inclusion, and Services Directorate does not carry out automated individual decision-making, including profiling, within the meaning of Article 22 of the GDPR.

Recipients of Personal Data

Personal data may be disclosed, where necessary and lawful, to authorised officers within the Community, Inclusion, and Services Directorate; other Government departments, entities, agencies, and public authorities; service providers engaged by the Directorate; auditors; legal advisers; regulatory or supervisory authorities; law enforcement authorities; and any other third party where disclosure is required or authorised by law. Such disclosure shall only take place for legitimate administrative, operational, legal, audit, accountability, or service-delivery purposes.

Transfer of Personal Data outside the European Union (EU)

The Community, Inclusion, and Services Directorate does not transfer personal data outside the European Union. Should any such transfer become necessary, it shall only take place in accordance with the conditions and safeguards laid down in the GDPR.

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 be made in writing and sent to the Data Protection Officer of the Community, Inclusion, and Services Directorate. 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 Community, Inclusion, and Services Directorate 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 Community, Inclusion, and Services Directorate.

Category of Document	Retention Period	Justification
Service applications	Five (5) years from final decision or closure of the application, unless a longer period is required by law or an	Administrative and legal requirements

	applicable approved retention schedule.	
Client case files	Ten (10) years from closure of the case file, unless ongoing service, legal, audit, safeguarding, or archival requirements justify a longer retention period.	Service delivery, accountability and legal obligations
Financial records	Ten (10) years from the end of the relevant financial year, unless otherwise required for audit, investigation, or public finance purposes.	Public Finance Management and audit requirements
Procurement records	Ten (10) years from completion, termination, or expiry of the procurement procedure or contract, unless a longer period is required for audit, legal, or funding purposes.	Procurement legislation and audit requirements
HR records	Until the employee reaches seventy-five (75) years of age, unless pending issues, legal obligations, or archival requirements justify longer retention.	Employment legislation
Complaints and enquiries	Five (5) years from closure of the complaint or enquiry, unless further action, legal proceedings, audit requirements, or safeguarding considerations require longer retention.	Administrative purposes and complaint handling

Data that needs to be deleted after the established timeframes will be destroyed in a secure manner to ensure that such information is no longer processed within the Community, Inclusion, and Services Directorate.

The Data Protection Officer

The Data Protection Officer may be contacted on:

Ministry for Gozo, St. Francis Square, Victoria, Gozo, VCT 1335

Telephone: +356 2215 6400

Email: dpooperations.mfg@gov.mt

The Data Controller

Community, Inclusion, and Services Directorate may be contacted at:
Ministry for Gozo,
St. Francis Square,
Victoria, Gozo, VCT 1335
Telephone: +356 2210 0265
Email: services.mfg@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>