



Policy on Student Records and Retention

College of Remote and Offshore Medicine

Date: 1st March 2025

Version: 1.0

Prepared by: Csaba Dioszeghy, Fenella Corrick

Approved by: John R Clark Executive Dean





1. Introduction

The College recognises its responsibilities to adhere to the European Union's General Protection Regulation (Regulation (EU) 2016/679) ("GDPR") and guidance issued by the Malta Information and Data Protection Commissioner (<https://idpc.org.mt/>) with respect to the management of student records.

This policy sets out the proper process and procedures for ensuring all student records are kept secure and their retention is sufficient but does not exceed what is necessary for governance and student access to their information on academic performance.

2. Management and retention of personal data

• Data retention schedules:

- The retention of data is scheduled according to the principle of retaining for as long as is necessary and not longer, in accordance with legislative and regulatory requirements
- Three schedules are recognised:
 - In keeping with student, employer, Maltese Government and members of the public expectations, some data should be retained permanently, namely: a core record of student names, modules, qualifications studied, and qualification outcomes
 - Some records and data will need to be retained for as long as a student might continue to study with the College and will be stored for the 'life of the student', taken as 120 years from date of birth
 - All other data must either:



- Be kept for six years after a student has completed or withdrawn from their programme of studies with the College. This will be applied to all records of fee payment, student registration, and related data.

or

- Be stored outside the student record system for long-term with anonymisation in line with GDPR. This will be applied to data required for management, development and research.

3. Data-sharing with third parties

- **Data-sharing with third parties:**

- The College may occasionally share its personal data with third parties and may also receive personal data from other organisations.
- When a third party acts on the College's instructions (e.g., outsourced services, consultancy projects, technology support, or market research), the College remains the data controller, and the third party must follow the College's data-retention and security policies and comply with GDPR.
- For research-related projects using personal data, contracts typically require market-research providers to delete the data once the project ends.
- For other research projects (such as externally funded work or doctoral research), data must be managed and archived according to College and funder requirements and GDPR or equivalent laws.



4. Responsible persons

- The College Dean serves as the Information Owner and is overall accountable for implementation and adherence to this policy.
- The College Registrar is responsible for management of student records.
- The Heads of Programme are responsible for the admission of students and associated data.

5. Monitoring and review

- The College's Student Records and Retention Policy and procedures are continuously reviewed by the Registrar to ensure they remain effective. Any weaknesses in the student records system are reported immediately to the Dean and addressed without delay. A formal review of the policy and its compliance takes place every three years

Approval Date: 1st March 2025

Review Date: 1st March 2028

Approved By: John C Clark, Executive Dean