



Course Participants' Records Policy

Version 1.5

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1. Purpose

- 1.1. To define course participants' records, establish parameters for appropriate use of said records, establish course participants' rights relative to education and other course participants' records, and ensure compliance with applicable laws and regulations.
- 1.2. The objective of this policy is to maintain these records:
 - Accurately
 - Securely
 - In a timely manner
 - So that they meet the requirements of the GDPR, NAA, FOIA and any other relevant legislation.

2. Scope

- 2.1. This policy applies to:
 - All administrative and academic staff who record information/data in the IfE's course participant's academic record.
 - All course participants in relation to their responsibility to maintain their contact details and to complete their online enrolment for each relevant tutoring/teaching period.

3. Course Participant Records

- 3.1. Details pertinent to course participants are obtained from them at the time of their application and subsequent enrolments updates are uploaded onto IfE's portal.
- 3.2. Electronic academic records are maintained for all course participants enrolled at the IfE.
- 3.3. Historic documents are electronically stored on the portal as per the [Records Retention Schedule](#).
- 3.4. A course participant's academic record includes the compilation of the final results for every enrolled unit across all courses, periods of attendance and the dates of course completion or discontinuance, award conferral and graduation.

4. Storage of Records

- 4.1. All records are kept in an electronic format in the IfE's portal. Electronic records are backed up regularly on Microsoft One Drive and external hard disks and stored off site.

5. Processing

- 5.1. All Employees / contractors data will be kept on record solely for internal processing by the IfE.
- 5.2. Internal processing includes any operation or series of operations the IfE may carry out on personal data:
- Collection
 - Recording
 - Organisation
 - Structuring
 - Storage
 - Retrieval
 - Consultation
 - Use
 - Disclosure
 - Dissemination

6. Data Control and Validity

- 6.1. The academic records of current and past course participants belong to the IfE.
- 6.2. The Head of Admissions (or appointed officer) is the appointed steward of all academic records and is responsible for ensuring the control, accuracy and validity of the electronic course participant data. The Head of Admissions is also responsible for ensuring the validity of the data.
- 6.3. To maintain the accuracy and validity of all data used and reported, both internally and externally, in relation to the academic programme at the IfE, only data and reports

generated from the portal are to be used. This includes, but is not limited to, data in relation to:

- Enrolment
- Class lists
- Withdrawal rates
- Completion rates
- Progress rates
- Course and unit offerings
- Number of graduates/awardees each class/year

7. Access to and Security of Records

7.1. Staff Access

7.1.1. Academic and administrative staff members of the IfE are given access to information contained in course participant records if they need to know the information in order to perform their official duties. As a general rule, only employees involved in some aspect of academic administration or course participant affairs are given access to the contents of course participant records

7.1.2. A username and personal password is required to access records in the IT system. (when this is in place)

7.2. Course Participant Access

7.2.1. Current and former course participants of the IfE have access to their own records on request in writing.

7.2.2. Course participants have the right to request that erroneous information contained in their record be corrected, and that recipients of any incorrect information be advised of the correction.

7.2.3. The IfE provides course participants with accurate and up to date information about the status and outcomes of the units and courses in which they are enrolled. This information is available to current course participants in electronic form through the IfE's portal.

7.2.4. Upon formal request to the Head of Admissions (or appointed alternative official) and payment of a fee, course participants whose fee account shows no outstanding balance may obtain an official transcript of their record of studies at the IfE. Official transcripts will be complete and unabridged. (Transcripts show the programs of study followed, courses taken, results obtained, and awards/certificates/diplomas/degrees awarded.

They may also contain the course participant's overall standing, and information on awards of distinction.) (see Appendix A for Disclosure of Education Records).

- 7.2.5. Course participants only may have access to information about their academic records or financial accounts with the IfE (i.e., no academic or financial information will be released to a third party without the course participant's written authorization), or unless the IfE is compelled to do so by law.

7.3. Third Party Access

- 7.3.1. Information about a course participant is not to be disclosed to any third party without the consent of the course participant concerned, unless required or permitted by law.
- 7.3.2. Persons outside of the IfE do not have access to the records of individual course participants unless course participants have given written permission for the release of specific records, or unless the knowledge of such information is required to be provided to agencies which are legally entitled to such information.
- 7.3.3. Information required by other education institutions for the purposes of confirming qualifications of a current or former course participants of the IfE, such as confirmation of units of study completed, participation in officially recognised activities, and scholarships received by course participants, will not be released by the IfE unless accompanied by written authorisation of the course participant.

8. Information on current Course Participants

- 8.1. The IfE's Admissions staff, Course Coordinators, Lecturers and Centre Administrator enter and update information on the portal, according to their level of access.
- 8.2. Information kept on record includes:
- Initial application information, together with all documentation requested and produced during the application process;
 - Signed or confirmed declarations associated with application and enrolment processes;
 - Letter of offer;
 - Acceptance or rejection of offer;
 - Copy of electronic Confirmation of Enrolment;
 - Personal details (e.g.: names, birth date, contact details, emergency contact details, citizenship, ID card or visa for international course participants, health insurance details for international course participants etc.);

- Enrolment information (e.g. course and unit enrolment);
- Academic progress information (e.g. grades, academic status, enrolment)
- Letters and e-mails pertaining to advanced standing, and academic progress at the IfE;
- Academic Support or Counselling recommendations and outcomes;
- Forms submitted regarding unit/course withdrawal or course changes.

9. Request for letter of reference/recommendation from the IfE

9.1. Course participants who request letters of reference or recommendation from the IfE need to do so in writing by send an email to the Head of Admissions on ife.admissions@ilearn.edu.mt. Such letters or statements are most effective if they contain specific information about the course participants' academic or work performance; this type of information is considered 'non-directory' information and cannot be released without the written consent of the course participant, according to the GDPR (2018) and the IfE's Course Participants' Records Policy.

9.2. A course participant request authorizing release of non-directory information should contain the following:

- What information is to be released (be as specific as possible)
- To whom the information is to be released (name, address)
- The purpose of the release of the information (application for a specific job or admission to a course, for example)

10. Projects

10.1. Any data required in the implementation of a project needs to be retained according to the regulations stipulated by the funding body.

11. Data Breach

11.1. All confidentiality breaches, near misses or breaches of this policy will be reported as an incident to the Data Protection Commissioner within 72 hours by an email, ccing the IfE's Data Protection Controller on ife.dp@ilearn.edu.mt.

11.2. The notification to the Commissioner will include:

- a description of the breach,
 - the number of affected data subjects,
 - the categories of data affected,
 - the name and contact of the Data Protection Officer ('DPO'),
 - the likely consequences of the breach
 - and the measures taken by the controller to remedy/ mitigate the breach.
- 11.3. Following a full and proper investigation, any breaches of confidentiality identified will be treated as a disciplinary issue.

12. Data Disposal

12.1. Records are not retained by the IfE beyond their retention periods as per the [Records' Retention Schedule](#), unless valid reasons for their continued retention are provided. Disposal of records pursuant to this policy should occur regardless of the medium on which records appear or their location.

12.2. As a general rule, records may be disposed of if:

- They have outlived their retention period, and
- Continued preservation is not required per a current document hold.

12.3. The IfE's records are reviewed periodically.

13. Complaints

13.1. A course participant alleging that the IfE has not complied with the [Data Protection Act \(Cap 586\)](#) may file a course participant grievance in accordance with [Course Participants' Grievance Policy and Procedures](#) or submit a written complaint to the:

Information and Data Protection Commissioner
Level 2, Airways House
High Street
Sliema SLM 1549
Malta

14. Related Documents

- [Chapter 477 NAA - National Archives Act](#)
- [Chapter 586 DPA - Data Protection Act](#)
- [Chapter 496 FOIA - Freedom of Information Act](#)
- [Course Participants' Grievance Policy](#)
- [General Data Protection Regulation \(GDPR\) \(EU\) 2016/679](#)
- [Teaching, Learning & Assessment Policy and Procedures](#)
- [Records' Retention Schedule](#)

15. Version history

Originator	Version	Date	Changes Done
QA Department	1.0	10/04/2018	Initial Release
QA Department	1.1	3/03/2019	Updated article 4
QA Department	1.2	18/9/2019	Updated article 9 and 10
QA Department	1.3	9/1/2020	Updated article 3, 4 and 6.
QA Department	1.4	22/09/2021	Updated article 9, 11, 14 and removed Annex A (Records Retention Schedule) and it has been placed in a separate document.
QA Department	1.5	30/04/2024	Updated links

Appendix A: Disclosure of Education Records

The IfE will not disclose education records or the personally identifiable information contained therein unless permitted by the GDPR (2018) and under the following circumstances:

1. **Prior Written Consent** - The IfE will provide the education records or personally identifiable information contained therein if the course participant provides prior written consent that the information may be disclosed. The consent must:
 - Specify the records that may be disclosed;
 - State the purpose for the disclosure;
 - Identify to whom the disclosure is to be made; and
 - Be signed and dated by the course participant.
2. **Directory Information**
 - i. The IfE designates the following categories of information as directory information:
 - Name;
 - Major field of study;
 - Dates of attendance;
 - Degrees and awards received;
 - Previous educational institution most recently attended; and
 - Birth Date
 - ii. Directory information may be disclosed in the absence of consent unless the course participant files a written notice, within three weeks of the first day in which the course participant is enrolled, informing the IfE not to disclose any or all of the categories.