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**LONDON BOROUGH OF LEWISHAM SUMMER HOLIDAY ACTIVITIES AND FOOD PROVISION PROGRAMME 2021**

**Supporting information**

**Summer 2021**

# Introduction

* 1. The school holidays can be a pressure point for some families because of increased costs (such as food and childcare) and reduced household incomes. For some children, this can lead to a holiday experience gap - with children from disadvantaged backgrounds less likely to access organised out-of-school activities; more likely to experience ‘unhealthy holidays’ in terms of nutrition and physical health; and more likely to experience social isolation.
	2. London Borough Lewisham has been awarded funding by the Department of Education (DfE) to co-ordinate a local [Holiday Activities and Food Programme](https://www.gov.uk/government/publications/holiday-activities-and-food-programme/holiday-activities-and-food-programme-2021) (HAF) in 2021.
	3. The programme will provide free activities and healthy food for school children and young people (aged 4-16 years) eligible for and in receipt of benefit related Free School Meals (FSM) during summer and Christmas school holidays.
	4. The outcomes the programme aims to achieve are that children and young people who attend provision will:
	+ Eat more healthily over the school holidays;
	+ Be more active during the school holidays;
	+ Take part in engaging and enriching activities which support the development of resilience, characters and wellbeing along with their wider education attainment;
	+ Be safe and not to be socially isolated;
	+ Have a great knowledge of health nutrition; and
	+ Be more engaged with school and other local services.
	1. To achieve these outcomes, London Borough of Lewisham are looking to award funding to a wide range of providers in Lewisham, including schools, voluntary, faith and community organisations, and other local and regional organisations and charities who can meet the aims and outcomes of the programme.
	2. London Borough of Lewisham are seeking to ensure that children across the borough have access to this programme, and will be looking for providers who can deliver in specific wards/ for specific communities as well as providers who can deliver borough-wide.
	3. Providers will need to meet the delivery requirements of the DfE in the areas of food, activities, physical activity, nutrition education, SEND provision, signposting and referrals, as laid out in the Supporting Information document.
	4. London Borough of Lewisham will be awarding funding for summer provision through a grant programme, with approximately £700,000 available across the borough. Our vision is for an accessible and inclusive offer of provision for all school-age FSM-eligible children in the area.

# Programme Overview

* 1. This document outlines the programme specification and criteria for potential delivery partners.
	2. London Borough of Lewisham intend to run a wide variety of provision across Lewisham; with both existing and newly recruited holiday programmes supporting its delivery. These will be in a wide range of settings and will be appropriate for age ranges 4 to 18 years (4 to 24 years if open to young people with SEND requirements).

* 1. London Borough of Lewisham will ensure the programme provides a wide range of activities, including food education and nutritional support for children and families, activities encouraging healthy lifestyles, plus a wide range of physical activities, which will engage families as well as young people.
	2. Through the delivery of the HAF programme, London Borough of Lewisham aim to ensure delivery across the borough, and particularly in areas of high deprivation.
	3. Ideally, London Borough of Lewisham would want to fund provision which can offer, as a minimum, 4 hours of provision a day, for 4 days a week and for 4 weeks of the summer holiday. However, we understand that this may be aspirational for some holiday providers and therefore we will consider bids for funding from providers who cannot meet this level of provision.

# Scope of the contract

* 1. London Borough of Lewisham are aiming to award funding to a range of provisions delivered within accessible settings across the borough to ensure there is geographical spread and particularly within areas of need as determined by FSM eligibility.
	2. The programme and funding is for school aged children and young people (4-16 years) who attend school and are eligible for and in receipt of benefits related FSM.
	3. The programme will need to meet the required DfE standards, specifically around the provision of food and activities - outlined in section 5.
	4. Where a provider does not meet detailed or mandatory requirements in section 5 at the point of application, they should set out how they will meet them prior to delivery. Support may be possible to help achieve these requirements ahead of programme delivery.
	5. The programme must operate during the Summer School holidays. The hours of operation can be flexible, but the aim is to deliver four hours per day for four days of the week, across four weeks of the holidays. This can include weekend provision.
	6. The aim is that each registered child or young person have access to a free place. This is to ensure the service is equitable to all eligible children and young people. However, each participant must be signposted to existing free holiday provision across the borough including holiday meals and existing services.
	7. A free place for the summer programme is defined by DfE as at least four hours a day, four days a week over four weeks.
	8. Providers should liaise directly with key organisations, schools and community groups to engage them in service delivery, either as a partner, host venue or to recruit participants to the service.
	9. The programmes should be flexible and responsive to changing needs and participant feedback.

# Contingency plans

* 1. London Borough of Lewisham anticipate that the programme will be delivered face to face. However, in light of the current situation related to Covid-19 it is crucial to consider how this programme would run and meet the programme aims if social distancing or restrictions remain in place.
	2. Should the current restrictions not be lifted as planned, or other restrictions come into play, London Borough of Lewisham would prioritise the distribution of food to families who would otherwise be in receipt of free school meals, or who are in significant need.
	3. London Borough of Lewisham expect providers to consider their own contingency plans should the regulations around Covid-19 change and how elements of the HAF programme could be delivered- including activities, nutritional information, physical exercise, enriching activities, and signposting/referrals.
	4. London Borough of Lewisham require every provider to outline their contingency plans in the application form.

# Delivery criteria

* 1. London Borough of Lewisham want children who attend this provision to:
* eat more healthily over the summer holidays;
* be more active over the summer holidays;
* take part in engaging and enriching activities which support the development of resilience, character and wellbeing and other overall educational attainment;
* be safe and not to be socially isolated;
* have greater knowledge of health and nutrition; and
* be more engaged with school and other local services and to have greater knowledge and awareness of local free holiday provision.
	1. Potential providers are be required to submit details for their full programme, including food provision (menus) and preparation plans, prior to the beginning of the summer holiday.
	2. More information is detailed below relating to the objectives and standards of the programme, which need to be met by each provision.

## Programme Delivery

* 1. **Hours of Service/Delivery**: Programmes will be delivered during the Summer school holiday period. The programmes must be delivered for a minimum of four hours per day at no cost to the child. Hours of operation can be flexible depending upon the programme provided for example mornings, evenings or weekends but the minimum of four hours each day must be delivered.
	2. **Physical Activity**: Activities must meet the [Physical Activity Guidelines](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/832861/2-physical-activity-for-children-and-young-people-5-to-18-years.pdf) on a daily basis. Children and young people should engage in structured physical activity for an average of at least 60 minutes per day, each time they attend. This can include all forms of activity such as physical education, play and sports.
	3. **Enriching Activities:** programmesmust provide age-appropriate, fun and enriching activities which will offer children the opportunities to develop new skills or knowledge, or to try out new experiences. This could include creative activities such as putting on a play, junk modelling, drumming workshops; or experiences such as a nature walk, visiting a city farm etc. Applicants should set out how they can deliver a varied mix of fun and enriching activities which are age-appropriate.
	4. **Food Skills and Nutrition:** programmes must include an element of food skills and nutritional education for children each day aimed at improving their knowledge and awareness of healthy eating. These do not need to be formal learning activities and could, for example, include activities such as getting children involved in food preparation and cooking; growing fruit and vegetables, and taste tests.
	5. Weekly sessions on nutrition and food education should be provided to families. This will target parents, carers and siblings. These sessions should help parents, carers or other family members source, prepare and cook nutritious and low-cost food in a stigma-free and fun way. They are as much about connecting the community as they are about instilling confidence in cooking.
	6. For organisations that are unable to provide nutritional and food education for families, London Borough of Lewisham will work to partner you with services that are available to deliver do this.

## Eligibility & Recruitment

* 1. The focus of the programme is on resident, school aged (4-16years) children and young people who attend school and are eligible for and in receipt of benefits related FSM.
	2. To ensure the majority of children attending are eligible for FSM, the advertising of programmes should be appropriately targeted and marketed.
	3. The expectation is that the provider will facilitate the recruitment and registration of places for their own programmes. The provider will be responsible for ensuring children, young people and their families know how to access the programme once they are confirmed on the programme. Recruitment will be supported by the overarching Lewisham HAF programme communications strategy.

## Food

* 1. At least one meal a day must be provided, and all food provided (including snacks) must meet the [School Food Standards](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/847621/School-Food-Standards-Guidance-FINAL-V3.pdf).
	2. Our expectation is that most food served by providers will be hot, however, London Borough of Lewisham acknowledge that there will be occasions when this is not possible and that a cold alternative should be used.
	3. All food provided as part of the programme must comply with regulations on food preparations and consider allergies, dietary requirements and preferences as well as any religious or cultural requirements for food.
	4. For organisations that are unable to produce hot, nutritious food onsite every day, London Borough of Lewisham will work to partner you with services that are available to deliver freshly prepared food which meets school food standards.

## Food safety requirements

* 1. There are a number of food safety checks for providers to complete in order to deliver the food element of the programme. There will be some variability depending on whether you prepare your own food, or purchase ready-made meals from a partner. However, these requirements will ensure that all food is served safely. All providers regardless of preparing or sourcing the food must:
* Register with the London Borough of Lewisham as a food business by completing the [Food Business Registration form](https://lewisham.gov.uk/myservices/business/food-safety/food-business-registration).
* Have one dedicated supervisor with respect to food safety. This member of staff must be fully trained in food hygiene and allergens.
* Ensure that all other staff and volunteers are trained and/ or supervised and instructed in food hygiene appropriate to the activity they are carrying out.
* Have a minimum of two staff with Level 2 food hygiene training, this must be completed prior to the programme starting. At least one of these staff must be on site during food production and service during programme delivery.
* Have a minimum of two staff with completed [Food Standards Agency allergen training](https://allergytraining.food.gov.uk/) prior to the programme starting.
* Ensure any venue being used has suitable facilities for the provision of a holiday programme and adjust their offer accordingly (for example, sourcing ready-made meals rather than preparing onsite if you don’t have appropriate kitchen facilities).
* Ensure information on allergens and ingredients is available at every programme.
* Ensure that cultural food is handled correctly.
* Adhere to all Covid-19 regulations with respect to all food safety [Covid 19 regulations](https://food.gov.uk/business-guidance/adapting-food-manufacturing-operations-during-covid-19).

**In addition, the provider that is preparing the food must:**

* Have a Food Hygiene Rating Score of four or five.
* Have a completed food safety management system in place. [Safer food, better business for caterers | Food Standards Agency](https://food.gov.uk/business-guidance/safer-food-better-business-for-caterers).
	1. **Sustainability**: The provider will adhere to the Good Food Lewisham guidelines around sustainability. The provider will aim to minimise waste and maximise recycling. There will be a small amount of food waste and all disposables should be biodegradable/ recyclable or from recycled sources.

## Equipment

* 1. The Provider is responsible for sourcing and maintaining all equipment necessary to deliver this service. This will include physical activity equipment, arts and crafts materials, food for cooking and nutrition education sessions. The provider is responsible for providing all crockery, serving dishes and disposables for the serving and preparation of food where applicable. A small amount of funding will be available to all providers – if required - in addition to the core funding to assist with purchasing equipment such as fridges, freezers, ovens, personal protective equipment (PPE), first aid supplies etc.

## SEND Requirements

* 1. London Borough of Lewisham intend to ensure holiday provision meets the needs of children who have SEND.
	2. Each provider must be able to provide targeted SEND support for children with special educational needs and / or disabilities within their universal provision offers. Some providers will additionally offer specialist services for which there will be a different amount funding available, outlined in Table 1. This is separate funding to the short breaks programme. Entitled children and young people should be able to access both short breaks and HAF.
	3. In addition, London Borough of Lewisham may be able to cover ‘top-up’ funding to cover specialist training/support to support SEND children at generalist provision locations.

## Venue

* 1. Providers should secure an accessible and appropriate venue within the London Borough of Lewisham in which to deliver their program prior to the contracted start date of the service. As part of quality assurance London Borough Lewisham commissioners reserve the right to visit proposed activity bases as part of the application process. Successful providers will be asked to share details of venue leasing arrangements with commissioners at clarification and evaluation meetings.

## Ofsted

* 1. Where Ofsted registration is required, London Borough of Lewisham expect it to be in place - where it is not compulsory, ideally London Borough of Lewisham would like you to be on the Voluntary register, if you are not already. If you would like to find out more about registration then please let us know.

## Equality

* 1. The Provider will demonstrate a commitment to promote equality and value diversity in all activities. All parents, carers, children and young people will be afforded equal access to the Service, regardless of background or circumstances, including: ethnicity and race, special educational needs and disabilities, home learners, service families and travelling families.
	2. Services will be culturally sensitive and inclusive. As part of evidencing whether services achieve these aims, we will monitor take up of services by demography and residence.
	3. It is the responsibility of the Provider to comply with all current equality legislation and ensure it implements any new equality legislation as it becomes statute and actively meet the requirements of the Equality Duties:
* Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act.
* Advance equality of opportunity between people who share a protected characteristic and those who do not.
* Foster good relations between people who share a protected characteristic and those who do not.

## Covid 19

* 1. The Provider is responsible for ensuring they adhere to the Covid-19 regulations set out by the Government and their registered governing body. Expectations include:
* Covid-19 Risk Assessments must be undertaken.
* Providers must ensure that all staff are tested twice weekly using lateral flow tests (LFT) in line with government guidance.
* All providers must ensure high quality test and trace practices are in place.

Due to restrictions of the COVID-19 pandemic, accessing community provisions may not be possible and is dependent on the latest government guidance. As such, London Borough of Lewisham aim to work flexibly with providers on how programmes are delivered, and can support any contingency planning where necessary.

Providers are asked that when submitting their applications for HAF Summer 2021, reference is made to how services will be adaptive should the impact of COVID-19 be extended or should there be new government restrictions put in place prior to delivery.

## Data Protection, Consent and Confidentiality

* 1. The provider will ensure that all aspects of the service delivery and practice are compliant to relevant Data Protection legislation and regulations including the General Data Protection Regulation (May 2018).

## Staffing and volunteers

* 1. All members of staff and volunteers must have evidence of an up-to-date DBS check. The service may need to recruit volunteers to support the delivery of this programme but should not be wholly reliant on them. Staff will ensure that best practice is followed in relation to safeguarding children and adults. For more information visit [www.disclosuresdbs.co.uk](http://www.disclosuresdbs.co.uk)

## London Living Wage

* 1. The provider will pay London Living Wage. London Borough Lewisham is an Accredited Living Wage employer and is therefore committed to paying the London Living Wage to all

## Safeguarding

* 1. The provider will be required to have in place safeguarding arrangements that reflect the importance of safeguarding and promote the welfare of children and vulnerable adults. This would include:
* Arrangements which set out clearly the processes for sharing information, with other professionals in compliance with Working Together, London Child Protection procedures and Lewisham Safeguarding Children Partnership guidance and procedures.
* A designated named person/s for safeguarding who has completed safeguarding information training as a minimum.
* A comprehensive understanding of the latest London Borough Lewisham Social Care Threshold guidance and any other relevant Guidance and its application to the Service.
* Safer recruitment practices & policy
* Staff should receive safeguarding training that is appropriate to their role, this includes volunteers.
* Ensuring that all staff are aware of their responsibilities to take action to keep children and adults safe. This includes carrying out their duties in a way that is consistent with legislation, national guidance and the Lewisham Safeguarding Children Partnership and Safeguarding Adults Board Procedures.
* A clear line of accountability for the provision of services designed to safeguard and promote the welfare of children.
* Clear whistleblowing procedures which are regularly reviewed as well as a culture that enables issues about safeguarding and promoting the welfare of children and vulnerable adults to be addressed.
* Clear policies, in line with those from the Lewisham Safeguarding Children Partnership for dealing with allegations against people who work with children, must be in place and regularly reviewed. Such policies should make a clear distinction between an allegation, a concern about the quality of care or practice or a complaint.
* Did Not Attend Guidelines / Child not brought /Contact Policies and Procedures to help staff follow up those children and families who do not attend appointments or fail to engage.
* The Provider will ensure that the correct ratios of children: adult are adhered to and a minimum of two staff are on site at all times.

# Funding

* 1. London Borough Lewisham have provided indicative costs per place. These are set out below:
* Universal provision for children eligible for FSM - £15 per session
* Specialist SEND Primary Provision\* for children eligible for FSM - £35 per session
* Specialist SEND Secondary Provision\* for children eligible for FSM - £50 per session
* Equipment grant – £250 per programme
	1. SEND specialist funding will apply to those children and young people who have significant levels of need requiring specialist interventions and high level of support. They will be in receipt of an EHCP.
	2. Equipment grants will be available per programme. The equipment grants can be used for purchasing equipment for the programme such as catering equipment, crockery or sports equipment.
	3. You **must not** make any commitment to spend to grant funding until you have been officially notified of the outcome of your application.
	4. 50% of funding will be made when awards are made and service level agreements agreed. The remaining 50% payment will be made on the completion of the programme and submission of attendance and performance data, and will cover the targets met. The final payment will not include targets not met, or funding not spent.

# Application and Evaluation process

* 1. Applicants should complete the online application form with as much detail and accuracy as possible.
	2. London Borough of Lewisham will fund:
* Registered charities
* Voluntary, community or faith organisations
* Companies limited by guarantee
* Community Interest Companies
* Social enterprises
* Schools
* Parent Teacher Friends Association
	1. Joint bids between partners and consortium bids are also welcome.
	2. London Borough of Lewisham will not fund
	+ Individuals
	+ Projects and activities that will not meet the criteria for HAF
	+ Activities that have already taken place (London Borough of Lewisham do not fund projects retrospectively)
	+ Activities which promote a particular political, religious or extremist view
	+ Activities placed in a formal education setting as part of the core curriculum.
	+ Finance related to core running costs, loan repayments, budget deficits or endowments.
	+ Fundraising events, activities for private gain, or that result in profit being made.
	1. All applicants must be applying for a project that will take place within the London Borough of Lewisham and/or involve and benefit local residents.

## Timetable of Procurement

* 24th May 2021 –Applications open
* 9th June 2021 – Applications close
* 14th – 18th June – Evaluation and Award
* 21st June – 16th July 2021 – Mobilisation meetings and support
* From 26th July 2021 – First day of programme delivery
* From 26th July 2021 – Programme visits/contract management
* 31st August 2021 – Last day of programme delivery
* 13th September 2021 - End of programme data return

* 1. **The evaluation process will be carried out in three stages:**

**Stage 1: Evaluation panel members will read all applications, map out provision looking at geography and spread of provision in relation to ages, and HAF requirements and standards.**

**Stage 2: The evaluation questions will be assessed and scored by the evaluation panel (quality evaluation)**

**Stage 3: The pricing element will be assessed and scored by the evaluation panel (pricing evaluation)**

* 1. London Borough of Lewisham will evaluate on the following basis:
1. Quality (50%)
2. Financial (50%)
	1. Any submissions that do not meet the minimum score in both price and quality evaluations will not be considered.
	2. Where there are multiple applications in the same geographical location and for the same age range of children and young people, then the applicant with the greatest experience and highest scores from stages 2 and 3 will be awarded a grant.

## Quality evaluation

* 1. London Borough of Lewisham requires answers to evaluation questions to be given so an evaluation process can be completed. This is how London Borough of Lewisham will assess the quality the successful organisations are going to provide.
	2. It is important that the answers you provide are clear, concise and detailed in full. Explain your methodologies, processes, and time frames and cost calculations, where appropriate.
	3. The questions cover these main areas:

MS1 Enriching Activities

MS2 Working with children and young people

MS3 Recruitment & Promotion

MS4 Covid-19 Implications

Failure to answer a question will result in your tender bid being deemed non-compliant.

All evaluation questions are weighted equally

Scoring of the quality evaluation will be on the following basis:

|  |  |  |  |
| --- | --- | --- | --- |
| **Rating** | **Score** | **Level** | **Standard** |
| **FAIL** |  0 | Non-existent | Proposal absent.The response is deemed unacceptable. |
|  1 | Inadequate | Proposal contains significant shortcomings and/or is inconsistent or in conflict with other proposals.The response is deemed unacceptable. |
|  2 | Very poor | Proposal contains many shortcomings and/or is inconsistent or in conflict with other proposals.The response is deemed unacceptable. |
|  3 | Poor | Proposal falls well short of achieving expected standard in a number of identifiable respects.The response is deemed unacceptable. |
|  4 | Weak | Proposal falls just short of achieving expected standard in a number of identifiable respects.The response is deemed unacceptable. |
| **PASS** |  5 | Barely adequate | Proposal just meets the required standards in nearly all major aspects, but is lacking or inconsistent in others.**Note:** a barely adequate response may include some strong reservations. |
|  6 | Adequate | Proposal meets the required standards in all major aspects but is lacking or inconsistent in other areas.It confirms that the provider can deliver the requirements through evidence of relevant ability, understanding, skills, resources and quality measures.**Note:** an adequate response may include some reservations. |
|  7 | Good | Proposal meets the required standard in all major aspects but lacks detail in some areas.**Note:** a good response may include minor reservations. |
|  8 | Very good | Proposal meets the required standard in all aspects. **Note:** a very good response may include a small number of minor reservations.  |
|  9 | Excellent | Proposal meets and exceeds in some areas. It builds a level of confidence that the provider can deliver the requirements through evidence of relevant ability, understanding, skills, resources and quality measures.**Note:** an excellent response should not include any major reservations.  |
|  10 | Perfect | Proposal meets and exceeds in all areas. It builds a high level of confidence that the provider can deliver the requirements through evidence of relevant ability, understanding, skills, resources and quality measures;**Note:** a perfect response should not include any major or minor reservations. |

* 1. Given the requirements of the programme, London Borough Lewisham require the following to be in place prior to the programme delivery period:
		+ A Healthy and Safety Policy including emergency procedures.
		+ A named, qualified first aider.
		+ Child protection / Safeguarding Policy and procedure including Safer Recruitment.
		+ DBS checks for all staff and volunteers
		+ Updated risk assessment (including covid-19 risk)
		+ Public liability insurance
		+ Equity and diversity policy
		+ Whistleblowing policy
		+ Data protection policy and procedure (GDPR)

For organisations preparing / delivering / providing food:

* + - Food Safety and Hygiene Level 2 certificate (minimum 2 staff)
		- Food Allergen Certificate (minimum 2 staff)
		- Menu that meets the School Food Standards
		- Registered as a food business.

## Pricing evaluation

* 1. **DfE funding provided as part of this grant is restricted and must be spent for the purposes of delivering this programme.**
	2. The provider will indicate the maximum number of spaces they can provide for each day of delivery. It is important that you estimate this number as accurately as possible.
	3. Please state the number of universal, primary specialist and secondary specialist places you wish to apply for in your bid.
	4. Total funding allocations should be calculated by number of spaces per day and number of days of delivery, plus any equipment grant.
	5. The scoring of the pricing element will be calculated using the following formula:

[price score = (lowest price/tendered price) x price weighting]

Worked Example:

|  |  |  |
| --- | --- | --- |
| **Tenderer** | **Price Submitted** | **Score** |
| Company A | £1,500,000.00 | 42 |
| Company B | £1,350,000.00 | 46.6 |
| Company C | £1,260,000.00 | 50 |

Company A submitted a bid of £1.5 million therefore their score is calculated as follows: (1,260,000/1,500,000) x 50 = 42

* 1. **If London Borough of Lewisham are unable to fund the full amount requested for your programme, London Borough of Lewisham may talk to you about how much London Borough of Lewisham can award from the money available**
	2. London Borough of Lewisham is not bound to accept the lowest or any submission and reserves to itself the right at its absolute discretion to accept or not accept any submission.

# Contract Period

* 1. Contracts will be awarded on July 1st and terminate on September 30th 2021

# Contract Management

* 1. Successful applicants will be required to:
* Attend a mobilisation meeting in June 2021.
* Attend a 1:1 meeting with the Programme Manager to discuss your plans and any support needed to meet the programme requirements prior to the delivery period.
* Submit data monitoring in respect of KPI outputs and DfE returns
* Participate in any monitoring and evaluation processes throughout the programme, including hub visits, interviews and case studies.
	1. **Data Collection**: All providers must collect a specific set of data throughout the programme. All data requirements and formats will be provided. All information must be stored safely in line with GDPR requirements. The following data must be collected:
	+ Registration data with key child information including a minimum set of data from each child or young person who attends prior to the programme starting. Standard registration form will be made available.
	+ Attendance data for each day of delivery. This will evidence your funding allocation.
	+ End of programme data form (online) to gather information on programme KPIs such as activities, number of meals and number of children etc.

# Other information

* 1. By submitting this data, you are allowing London Borough of Lewisham to use it and to share it with programme partners. You are also agreeing to be contacted by London Borough of Lewisham.
	2. All the data and information collected by providers should be collected in strict adherence to GDPR.