GDPR Data Protection Policy

Policy Statement

The Lenches Pre-school collects and processes personal data relating to children aged 2-4 years, their parents/guardians, staff, and visitors. This policy outlines our commitment to complying with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Given the vulnerable nature of early years children, we treat their sensitive personal, medical, and safeguarding data with the highest standard of security and confidentiality.

Lawful Basis for Processing Data

We rely on specific legal grounds under the UK GDPR to process data:

Lawful Basis (UK GDPR)	Applied Pre-school Context
Legal Obligation	Fulfilling statutory obligations under the EYFS framework, Education Act, and local authority agreements
Contractual Necessity	Administering the childcare agreement, managing fees, and keeping emergency contact information up to date
Vital Interests	Sharing critical medical or allergy info with emergency healthcare providers if a child's life is at risk
Consent	Acquiring explicit, opt-in parental consent to promotional photography, social media, and voluntary local trips.

Data Inventory & Retention Periods

In line with the minimisation and storage limitation principles, we keep data only as long as legally mandated or functionally required.

Data Category	Specific Examples	Retention Period

Child Core Identity	Name, date of birth, address, local authority funding codes	6 years after leaving
Parent/Guardian Info	Names, contact numbers, emails, emergency contact sequences	6 years after the child leaves preschool
Medical & Dietary	Allergy profiles, medication administration logs, dietary bans	Until the child reaches age 25
Safeguarding/Child protection	Welfare reports, multi-agency documentation, incident logs	Until the child reaches age 25
Learning Progressions	EYFS learning journals, observations, development tracking	Handed over to the parents or primary school upon exit, digital files deleted within 30 days

Technical & Physical Security Codes

The Lenches Pre-school implements strict safeguards to protect child and family data:

- Physical security: Hardcopy files (safeguarding folders, enrolment profiles, medication sheets) are stored exclusively in a secure, fireproof, double locled cabinet accessible only to authorised management staff.
- Digital Security: All computers and local tablets used for EYFS tracking use individual user accounts, strong unique passwords, and end-to-end encrypted preschool management software. Devices are restricted from downloading or exporting raw personal data.
- Media Handling: Staff may only capture childrens progress images on dedicated preschool-owned tablets. Personal martphones or camera are strictly prohibited on site.

Parental and Data Subject Rights

Parents hold legal privacy rights on behalf of their children aged 2-4 years. These rights include:

- Subject Access Request (SAR): Parents can request a copy of all processed personal records. The preschool will respond free of charge within 30 days.
- Right to Rectification: Parents have the right to request immediate corrections to inaccurate or incomplete addresses, medical statuses or phone listings.
- Right to Erasure: Parents can request data deletion when processing relies strictly on consent (e.g. opting out of marketing images or optional online portals)

Data Breaches & Compliance Oversight

If a data leak or security breach occurs that endangers individual privacy rights, the preschool management will notify the UK Information Commissioner's Office (ICO) within 72 hours of identification, as required by law. For any questions, data access requests, or privacy concerns, please contact our manager.

This policy was adopted at a meeting of	The Lenches Pre-school
Reviewed and Amended	November 2026
Signed on behalf of management	E Dyer
Signed on behalf of committee	D Percival

Food Hygiene

Policy Statement

At The Lenches Pre-school we provide food for children at snack time. We recognise we have a responsibility and duty of care when dealing with the preparation and serving of food. We aim to ensure that our setting is suitable, clean and safe for children to be cared for, where they can grow and learn. We aim to meet all statutory requirements for food safety and fulfil the criteria for meeting the relevant early year's foundation stage welfare requirements.

Procedures

- The person in charge and the persons responsible for food preparation understand the principles of good hygiene practices. The basis for this is risk assessment as is applying to the purchase, storage, preparation and serving of food to prevent growth of bacteria and food contamination.
- At least one designated member of staff at The Lenches Preschool has an in-date Food Hygiene Certificate.
- The person responsible for food preparation and serving ensures food is stored at correct temperatures and is checked to ensure it is in-date and not subject to contamination by pests, rodents or mould.
- Packed lunches are stored on a lunch box rack in a reception area.
- Food preparation areas are cleaned before use as well as after use.
- There are separate facilities for handwashing and for washing up.
- All surfaces are clean and non-porous.
- All utensils, crockery etc. are clean and stored appropriately.
- Waste food is disposed of daily.
- Cleaning materials and other dangerous materials are stored out of children's reach.
- Children do not have unsupervised access to the kitchen.

When children take part in cooking activities, they:

- are supervised at all times
- understand the importance of hand washing and simple hygiene rules
- are kept away from hot surfaces and hot water
- do not have unsupervised access to electrical equipment such as blenders etc.

Reporting of food poisoning

- Food poisoning can occur for a number of reasons; not all cases of sickness or diarrhoea are as a result of food poisoning and not all cases of sickness or diarrhoea are reportable.
- Where children and/or adults have been diagnosed by a GP or hospital doctor to be suffering from food poisoning and where it seems possible that the source of the outbreak is within the setting, the manager will contact the Environmental Health Department and the Health Protection Agency, to report the outbreak and will comply with any investigation.
- If the food poisoning is identified as a notifiable disease under the Public Health (Infectious Diseases) Regulations 1988 the setting will report the matter to Ofsted.

This policy was adopted at a meeting of	The Lenches Pre-school
Reviewed and Amended	March 2026
Signed on behalf of management	E Dyer
Signed on behalf of committee	D Percival

Food Allergies and Intolerances

Policy Statement

Allergy and intolerance to foods are significant health issues in the UK. Around 1-2% of adults and 5-8% of children in the UK have a food allergy, with up to 1 in 55 children having a peanut allergy. An estimated 1 in 100 people have coeliac disease, an autoimmune response to gluten proteins found in a number of cereals. In addition, some people need to avoid certain foods because of a food intolerance. There are up to ten recognised deaths from food allergies in the UK every year.

It is a legal requirement to inform our parents/families and children of any allergenic ingredients in any food or drink that we supply. It is not adequate to say that foods 'may contain' allergens or be none specific about the allergenic ingredients in the food/drink we serve.

Parents must inform the setting of any allergies and or food intolerances.

Allergen

An allergen is a substance that reacts with the body's immune system and causes an allergic reaction, for example nuts.

Allergy

Food allergy is an abnormal response to a food triggered by a body's immune system. There are several types of immune responses to food. The response may be mild, or in rare cases it can be associated with the severe and life-threatening reaction called anaphylaxis. When someone has an allergy, they can have many different physical reactions when they are exposed to allergens. The type of reaction and the severity of it depends on the individual and the severity of their allergy. Very small amounts of some allergens, such as nuts, can cause severe adverse reactions including potentially fatal anaphylactic shock.

Food Intolerance

Food intolerance is not so clear cut and although not life threatening, it can and often does, make the sufferer feel extremely unwell and can have a major impact on working and social life. Symptoms can affect different people in different ways but usually last for many hours or days depending on the symptoms.

There are **14 major allergens which need to be declared when used as ingredients**. The following list tells you what these allergens are and provides some examples of foods where they may be found:

Celery - This includes celery stalks, leaves and seeds and celeriac. It is often found in celery salt, salads, some meat products, soups and stock cubes.

Cereals (containing gluten) - This includes wheat (such as spelt and Khorasan wheat/Kamut), rye, barley and oats. It is often found in foods containing flour, such as some baking powders, batter, breadcrumbs, bread, cakes, couscous, meat products, pasta, pastry, sauces, soups and foods dusted with flour. The cereal will need to be declared. However, it is up to you if you want to declare the presence of gluten with this.

Crustaceans - This includes crabs, lobster, prawns and scampi. It is often found in shrimp paste used in Thai curries or salads.

Eggs - This is often found in cakes, some meat products, mayonnaise, mousses, pasta, quiche, sauces and foods brushed or glazed with egg.

Fish - This is often found in some fish sauces, pizzas, relishes, salad dressings, stock cubes and in Worcestershire sauce.

Lupin - This includes lupin seeds and flour and can be found in some types of bread, pastries and pasta.

Milk - This is found in butter, cheese, cream, milk powders and yoghurt. It is often used in foods glazed with milk, powdered soups and sauces.

Molluscs - This includes mussels, land snails, squid and whelks. It is often found in oyster sauce or as an ingredient in fish stews.

Mustard - This includes liquid mustard, mustard powder and mustard seeds. It is often found in breads, curries, marinades, meat products, salad dressing, sauces and soups.

Nuts - This includes almonds, hazelnuts, walnuts, cashews, pecan nuts, Brazil nuts, pistachio nuts, macadamia or Queensland nuts. These can be found in breads, biscuits, crackers, desserts, ice cream, marzipan (almond paste), nut oils and sauces. Ground, crushed or flaked almonds are often used in Asian dishes such as curries or stir fries.

Peanuts - This can be found in biscuits, cakes, curries, desserts and sauces such as for satay. It is also found in groundnut oil and peanut flour.

Sesame seeds - This can be found in bread, breadsticks, houmous, sesame oil and tahini (sesame paste).

Soya - This can be found in beancurd, edamame beans, miso paste, textured soya protein, soya flour or tofu. It is often used in some desserts, ice cream, meat products, sauces and vegetarian products.

Sulphur Dioxide - This is often used as a preservative in dried fruit, meat products, soft drinks and vegetables as well as in wine and beer. There are a few exceptions where an

allergenic ingredient does not have to be declared e.g. wine and wine fining agents derived from egg and milk and found at a limit of detection 0.25mg per litre.

Cross-contamination

Sometimes traces of allergens can get into products unintentionally during the manufacturing process or during transport or storage. This is called 'cross-contamination'. Ideally, you should prevent this from happening but in some circumstances, this may not be possible. Use allergen labelling, for example 'may contain' type statements.

Precautionary allergen labelling

If you think there is a real risk of a food product being affected by cross-contamination with an allergen label: 'Not suitable for someone with X allergy'

IMPORTANT: Precautionary allergen labelling should only be used following a thorough risk assessment when you think there is a real risk of allergen cross-contamination that cannot be eliminated.

- Our setting manager and deputy manager have overall management responsibility for allergens. All staff are responsible for food safety.
- **All staff attend level 2 food hygiene training**, there is always a trained member of staff on duty during opening hours.
- We have a risk assessment in place. Display notices to remind staff and parents of allergens. We communicate the risk between parents and members of staff. Staff are warned of the effect of providing the wrong information or serving food containing an ingredient that a child is allergic to (via displayed allergies list).
- Kitchen procedures are in place to prevent cross-contamination during storage and preparation of food (including the labelling of food, the cleaning of equipment and hands and the wearing of protective clothing).
- We identify children with food allergies during induction and application times (see forms). Staff should not just remove the 'offending' allergen from a prepared snack, because traces of the allergen will remain which could cause a reaction.
- All records regarding food allergens are updated as required. All foods are checked for allergenic ingredients in new or replacement ingredients, for example a delivery checklist. Staff must ensure foods containing no allergenic ingredients are sufficiently separated from food containing allergenic ingredient and, in a way, to prevent any falling food contaminating it.
- All food should be labelled in English.

- Foods served at all snack times are recorded correctly. We colour code kitchen tools for allergenic ingredients, using separate equipment utensils, storage and separate preparation area. Sterilising tablets are used to clean all spillages.
- All foods - Check ingredient labelling for allergenic ingredients.
- All staff ensure adequate hand-washing.
- Recognise the allergenic ingredients are a potential food hazard that must be effectively managed and controlled. The key measure is to ensure clear and appropriate communication of allergen hazards to parents.
- Staff must ensure that when preparing food, they make sure they know what is in the ingredients you are using.
- Be careful of cross contamination - boards, utensils, serving spoons, woks etc. Staff must thoroughly clean work surfaces and equipment, and wash hands before making food for someone with an allergy.
- We provide information if any of the regulated 14 allergenic ingredients are used in the preparation of foods we supply.

Parent responsibility

- Parents/carers must play their part and ensure the let us know any information regarding their child's dietary needs and ensure this is updated as required.
- Staff must not provide the wrong information through verbal communication.
- We ensure allergen information is correct and up to date.
- To ensure that consistent allergen information is provided staff direct queries to a nominated person(s).
- We understand the dangers to those with severe allergies. Parents can speak to a member of staff who may be able to help make an alternative.

More information and resources

Food Standards Agency website: www.food.gov.uk/allergy

The Food Information Regulations 2014:
www.legislation.gov.uk/uksi/2014/1855/contents/made

You can find out more about foods that are prepacked in the FSA leaflet:
www.food.gov.uk/multimedia/pdfs/publication/ allergy-labelling-prepacked.pdf

You can find out more about non-packaged (loose) foods in the FSA leaflet:
www.food.gov.uk/multimedia/pdfs/publication/loosefoodsleaflet.pdf

Free online allergen training can be obtained on: allergytraining.food.gov.uk DEFRA – The Food Information Regulations

Guide to compliance:
www.gov.uk/government/uploads/system/uploads/attachment_data/file/82663/consult-fic-guidance-20121116.pdf FSA

Food allergen labelling and information requirements under the EU food Information for consumers: www.food.gov.uk/multimedia/pdfs/guidance/ allergen-labelling-technical-guidance.pdf FSA

Advice on Food Allergen labelling:
www.food.gov.uk/multimedia/pdfs/publication/allergy-leaflet.pdf FSA

Gluten-free Claims advice:
www.food.gov.uk/sites/default/files/multimedia/pdfs/glutenfactsheet.pdf

For information on gluten, visit the Coeliac UK website: www.coeliac.org.uk

www.food.gov.uk/multimedia/pdfs/publication/thinkallergy.pdf

This policy was adopted at a meeting of	The Lenches Pre-school
Reviewed and Amended	April 2026
Signed on behalf of management	E Dyer
Signed on behalf of committee	D Percival

Safer Eating

Policy Statement

We aim to protect our children's health and safety, particularly regarding allergies and choking.

Procedures

- All of our staff have Paediatric first Aid training.
- Our staff eat lunch with the children to ensure they are supervised while eating.
- We obtain comprehensive information about the dietary requirements of each child prior to their first day in setting. Including weaning status and culturally appropriate food. Please see our **Food Allergies and Intolerances Policy.**
- We advise parents about choking preventative measures regard food preparation in their lunch boxes; halving fruits such as grapes & cherry tomatoes, cutting other fruit and vegetables into batons, removing stones and pits, we are a NUT FREE setting.
- The children eat sat at their chairs around tables.
- Any choking incident is reported to parents.

This policy was adopted at a meeting of	The Lenches Pre-school
Reviewed and Amended	April 2026
Signed on behalf of management	E Dyer
Signed on behalf of committee	D Percival