

Privacy Notice for the Kinship Zones Programme Pilot

V1.0 April 2026



Kinship Zones Programme Pilot

Our core data protection obligations and commitments are set out in the [council's primary privacy notice](#) at www.bolton.gov.uk

This notice provides additional privacy information for:

- kinship carers
- children in kinship care,
- and any individuals whose personal information we process as part of the Kinship Zones Programme Pilot.

It describes how we collect, use and share personal information about you;

- In relation to the administration of the Kinship Zones Programme Pilot, including assessing eligibility, making payments, monitoring delivery, and providing information to the Department for Education (DfE) for national oversight and grant assurance.
- In relation to the independent evaluation of the pilot, managed by Foundations and conducted by Alma Economics, which may involve the use of pseudonymised monitoring data and voluntary participation in surveys or interviews.
- the types of personal information we need to process, including information the law describes as 'special' because of its sensitivity

It is important that you read this notice, together with any other privacy information we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Purpose(s)

Bolton Council collect and use personal information to administer and evaluate the Kinship Zones Programme pilot. The council is one of seven local authorities taking part in this pilot which is a government programme providing financial support to eligible kinship carers in designated Kinship Zones. The scheme aims to support children who may otherwise enter the care system and to evaluate how effectively the pilot improves outcomes for kinship families.

The Department for Education (DfE) and the Local Authority act as joint controllers for the core pilot processing, including monitoring and grant assurance. Carers must be informed that DfE may process their information for these purposes.

The programme includes an independent evaluation led by Alma Economics and managed by Foundations on behalf of DfE, using a combination of monitoring data, interviews, surveys and analysis of outcomes.

Categories of personal data

In order to carry out our activities and obligations as part of this pilot programme we process personal information in relation to:

Kinship Carers

- Name, address, email, telephone number
- Date of birth and relationship to the child
- Eligibility information (e.g., residency in a Kinship Zone)
- Bank details for allowance payments
- Evidence submitted with applications (e.g., legal orders, documentation)

Children in Kinship Care

- Name, date of birth, demographic information
- Special Guardianship Order (SGO) or Child Arrangements Order (CAO) details
- Social care case information
- Safeguarding information, including trauma indicators (children in kinship care have “often experienced trauma”).

Special Category Data (where necessary)

- Health or mental-health information
- Social-care and welfare assessment information
- Ethnicity

Criminal-Offence Data (where present in safeguarding/court documents)

- Information relating to parental offending, domestic abuse, or risks identified in court or police-linked assessments that inform whether the child “would otherwise be in care.”

Evaluation Data

- Pseudonymised outcome and monitoring data shared with the evaluator
- Voluntary survey or interview responses gathered by Alma Economics

Lawful basis for processing

The lawful bases we rely on for processing your personal data are:

Article 6(1)(e) Where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. In this instance the administering of kinship allowances, safeguarding children, and providing statutory children’s services.

Article 6(1)(c) Performing or exercising general legal obligations we must meet including statutory safeguarding duties and DfE monitoring/grant assurance requirements.

The Article 9 conditions of the UK GDPR we rely on for processing your special category data are:

Article 9(2)(h) and Schedule 1 Part 1, para. 2 DPA 2018 where it is processing social-care and welfare information needed to support children.

Article 9(2)(g) and Schedule 1 Part 2 DPA 2018 including:

- Safeguarding children or individuals at risk
- Statutory and government purposes

The Article 10 conditions we rely on for processing any criminal offence data are: For reasons of substantial public interest, including;

- Safeguarding of children or individuals at risk,
- Statutory and government purposes, and
- Legal claims/judicial capacity (where processing court orders).

Information sharing/recipients

We may share personal data with:

Department for Education (DfE)

They are the joint controller for monitoring and grant assurance and their privacy notice can be found here; [Privacy information: parents, carers and legal guardians - GOV.UK](#)

Foundations (What Works Centre for Children & Families)

Manages the evaluation on behalf of DfE and their privacy notice is available at [Privacy Policy - Foundations](#)

Alma Economics (Independent Evaluator)

Who will be undertaking an independent evaluation of the pilot. Their privacy notice can be found here: [Kinship Zones Allowance Pilot](#)

Other teams internal to the Council

Other Organisations (only where legally required)

- Courts
- Police
- Other safeguarding partners

We do not sell your information or use it for marketing.

Automated Decisions

We do not use automated decision-making or profiling to make allowance decisions. For this processing all the decisions we make about you involve human intervention and are made by trained Local Authority staff.

Data retention/criteria

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of statutory children's social care and for satisfying any future legal, accounting, or reporting requirements.

Rights of individuals

You have certain rights in relation to the council's use of your personal information.

To find out more about how these rights apply in particular circumstances, please refer to our [Guide to exercising your rights](#) which includes information about how to:

- exercise your rights
- contact our Data Protection Officer
- raise a concern with us
- make a complaint to the Information Commissioners Office (ICO)

If you wish to exercise your rights or to raise a concern about the handling of your personal information by the council, please [contact the Council's Data Protection Officer](#).

You also have the right to complain to the [Information Commissioner's Office](#) if you are unhappy about how we process your information. The ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or by telephone: 0303 123 1113

Updates to Privacy Notice

We may update or revise this Privacy Notice from time to time and provide supplementary privacy information as is necessary to the Council's current workforce. If you are reading this as a printed copy please refer to www.bolton.gov.uk for the most up to date version