

Privacy Notice:

Home Upgrade Grant Phase 2 (HUG 2)

Version 1.1, reviewed 4th October 2023

This notice is about data collected under the Home Upgrade Grant Phase 2 (HUG 2) operated by Worcestershire County Council. HUG 2 is funded by the Department for Energy Security and Net Zero (DESNZ).

HUG 2 is a government-funded scheme aiming to raise the energy efficiency of low-energy performance homes (those rated at EPC Band D, E, F or G) not connected to the mains gas grid for heating provision. Funding is provided to Local Authorities who engage consumers and manage the delivery of installations in homes.

The privacy notice covers:

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Purpose for processing

This notice explains how Worcestershire County Council will use your personal data, and your rights. It is made under Articles 13 and/or 14 of the UK General Data Protection Regulation (UK GDPR).

The purpose of collecting and processing your personal data is to support the delivery and administration of the Home Upgrade Grant Scheme Phase 2 (together the Scheme).

Personal data collected and lawful basis

We will collect and process the following personal data. Some of the data we collect will be from publicly available sources.

Personal data collected about applicants to the Scheme:

- ♦ Your name;
- ♦ Email address;
- ♦ Phone number;
- ♦ The names of everyone living in the property;

- ◆ The age ranges of adults living in the property;
- ◆ The names and ages of children living in the property;
- ◆ Address and details of property receiving the HUG 2 installation(s);
- ◆ Details about the HUG 2 installation(s) installed at the property, including type, size and cost;
- ◆ Contact address (if not the property receiving the HUG 2 installation(s));
- ◆ Address and details of property offered, but not receiving, the HUG 2 installation(s);
- ◆ Household income and any other scheme eligibility information including benefits checks and evidence of council tax discounts;
- ◆ Any financial contribution you have made towards the HUG 2 installation(s);
- ◆ Details about the expected energy, carbon and cost savings expected to be delivered by the installation, including pre- and post-installation property EPC details where appropriate.

Personal data collected about installers:

- ◆ Your name;
- ◆ Contact address;
- ◆ Email address;
- ◆ Phone number;
- ◆ Relevant accreditation and registration information;
- ◆ Details of HUG 2 installations delivered;
- ◆ Whether directly contracted or sub-contracted by Worcestershire County Council to install HUG 2 installations;
- ◆ The number of employees in your organisation.

The legal basis for processing personal data

The legal basis for processing your personal data is:

Article 6(1)(e) UK GDPR Public task: Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller.

Public task processing is necessary for the performance of a task carried out in the public interest and is based on legislation. For the Scheme, the applicable legislation is:

- ◆ Local Government Act 1972

- ◆ Localism 2011, s1
- ◆ Warm Homes and Energy Conservation Act 2000

The specific public task is the delivery, administration and evaluation of, as well as statistical, research and fraud prevention purposes relating to, the Scheme.

Research Consent

DESNZ will be conducting an evaluation of the Scheme. DESNZ may wish to contact you and request you take part in further research. Worcestershire County Council will ask you if you consent to be contacted and pass your details to DESNZ for this purpose if you agree.

Where the research involves processing of personal data in addition to that already collected for delivery of the Scheme, you will be given the opportunity to opt-in to that research at the point of contact. DESNZ will then contact you to carry out their research. If you do not agree to this, then please tell us. If you later change your mind and no longer wish to be contacted for research, then please tell us and we will inform DESNZ.

Who we may share your information with

The Data Controllers for the Scheme are:

- ◆ Worcestershire County Council;
- ◆ Bromsgrove District Council;
- ◆ Redditch Borough Council;
- ◆ Malvern Hills District Council;
- ◆ Wychavon District Council;
- ◆ Midlands Net-Zero Hub;
- ◆ Act on Energy
 - Act on Energy will support people completing an application for the funding and check the applicant's eligibility for the Scheme. They may also offer energy efficiency advice and refer applicants to other energy efficiency schemes.
- ◆ The Department for Energy Security and Net Zero (DESNZ)
 - and its contractors for delivery, administration and evaluation of the scheme, statistical, research and fraud prevention purposes.
- ◆ Ofgem and delivery partners of central and local government home energy schemes such as the Energy Company Obligation and Renewable Heat Incentive;
- ◆ HM Land Registry;

- ◆ The appointed contractors and their subcontractors including the installer, retrofit roles consultant, Principal Designer and in some cases the clerk of works.

Delivery and administration of the Scheme may require linking of your data to other data sets held by the Data Controllers.

Your personal data may also be shared with other Government departments where necessary.

We may share your data if we are required to do so by law, for example by court order or to prevent fraud or other crime.

Your personal data will be stored on Worcestershire County Council's IT infrastructure and the IT infrastructure of those parties named in this privacy notice.

Automated decision making

Your personal data will not be subject to automated decision making by Worcestershire County Council.

International transfers

If your personal information is transferred outside the United Kingdom or the European Economic Area (EEA) by Worcestershire County Council for processing or storage purposes, Worcestershire County Council will ensure that safeguards are in place to protect it to at least the standard applied within the EEA.

How long we will hold your information

Your personal data will be stored securely for a maximum period:

- ◆ 10 years by:
 - Worcestershire County Council
 - Bromsgrove District Council
 - Redditch Borough Council
 - Malvern Hills District Council
 - Wychavon District Council
 - Midlands Net-Zero Hub
 - Act on Energy
 - the appointed contractors
- ◆ 25 years of following the close of the Scheme:

- DESNZ who may choose to store anonymised data beyond this period. Please see the [DESNZ privacy policy](#) for details of how they use and manage your data.

Your information rights

You are entitled to a copy, or a description, of the personal data Worcestershire County Council hold that relates to you, subject to lawful restrictions. Please go to our [Make a Data Protection Request webpage](#) to find out how to make a request.

You may be entitled to rectification, restriction, objection, and erasure of your personal information depending on the service and legal basis. We are unlikely to be able to erase your data if you have been awarded a grant as this will be needed to comply with the grant conditions with DESNZ.

You have the right in certain circumstances (for example, where accuracy is contested) to request that the processing of your personal data is restricted.

You have the right to object to the processing of your personal data where it is processed for direct marketing purposes.

You have the right to object to the processing of your personal data.

When processing is based on your consent, you have the right to withdraw consent to the processing of your personal data at any time. For the Scheme, your consent is only required for further research purposes as detailed above.

Please see our overarching [Privacy Notice](#) for further contact details or if you have a complaint about your information rights.

Contact details

The Data Controllers for your personal data are Midlands Net Zero Hub (part of Nottingham City Council), Worcestershire County Council, Bromsgrove District Council, Malvern Hills District Council, Redditch Borough Council, Wychavon District Council, Act on Energy and the Department for Energy Security and Net Zero (DESNZ). The contact details for each of these organisations is given below.

Midland Net Zero Hub (part of Nottingham City Council)

You can contact the data protection officer at:

Loxley House,
Station Street,
Nottingham,
NG2 3NG

Email: data.protectionofficer@nottinghamcity.gov.uk

Worcestershire County Council

You can contact the data protection officer at:

County Hall,
Spetchley Road,
Worcester,
WR5 2NP

Email: dataprotection@worcestershire.gov.uk

Bromsgrove District Council

You can contact the data protection officer at:

Town Hall,
Walter Stranz Square,
Redditch,
B98 8AH

Email: information.management@bromsgroveandredditch.gov.uk

Malvern Hills District Council

You can contact the data protection officer at:

Council House,
Avenue Road,
Malvern,
WR14 3AF

Email: SAR@malvernhills.gov.uk

Redditch Borough Council

You can contact the data protection officer at:

Town Hall,
Walter Stranz Square,
Redditch,
B98 8AH

Email: information.management@bromsgroveandredditch.gov.uk

Wychavon District Council

You can contact the data protection officer at:

Civic Centre,
Queen Elizabeth Drive,
Pershore,
WR10 1PT

Email: SAR@wychavon.gov.uk

Act on Energy

You can contact the data protection officer at:

Unit 2 Lauriston Business Park,
Pitchill, Salford Priors,
Warwickshire,
WR11 8SN

Email: administration@actonenergy.org.uk

Department for Energy Security and Net Zero

You can contact the DESNZ Data Protection Officer at:

DESNZ Data Protection Officer
Department for Energy Security and Net Zero,
1 Victoria Street,
London,
SW1H 0ET

Email: dataprotection@desnz.gov.uk

Complaints

If you consider that your personal data has been misused or mishandled, you may make a complaint to the Data Protection Officer at Worcestershire County Council in the first instance. If you are not satisfied with the response you can complain to the Information Commissioner, who is an independent regulator. The Information Commissioner can be contacted at:

Information Commissioner's Office

Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF

0303 123 1113

Email: casework@ico.org.uk

Any complaint to the Information Commissioner is without prejudice to your right to seek redress through the courts.