

# Privacy Notice- Warm Homes Local Grant (WHLG)

## Document information

Version: 1.0

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This notice sets out 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).

This notice relates to data collected under the Warm Homes Local Grant (WHLG) operated by Worcestershire County Council, which is funded by the Warm Homes Local Grant run by the Department for Energy Security and Net Zero.

## YOUR DATA

We will process the following personal data:

Customers:

- Address and details of property receiving the WHLG installation(s)
- Details about the WHLG installation(s) installed at the property, including type, size and cost
- Contact address (if not the property receiving the WHLG installation(s))
- Address and details of property offered, but not receiving, the WHLG installation(s)
- Your name
- Household income and any other scheme eligibility information including benefits checks and evidence of council tax discounts
- Health conditions that make you vulnerable to cold, damp or mould conditions
- Any financial contribution you have made towards the WHLG 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

- Email address

- Phone number

#### Installers:

- Your name

- Relevant accreditation and registration information

- Contact address

- Email address

- Phone number

- Details of WHLG installations delivered

- Whether directly contracted or sub-contracted by LA to install WHLG installations

- The number of employees in your organisation

#### Purpose

The purpose(s) for which we are processing your personal data is to support the delivery and administration of the Warm Homes Local Grant (together the Scheme).

Delivery and administration of the Scheme may require linking of your data to other data sets held by Worcestershire County Council, Malvern Hills District Council, Worcester City Council, Wychavon District Council, land registry or the Department for Energy Security and Net Zero (DESNZ)

DESNZ will be conducting an evaluation of the Scheme. This may include you being contacted to take part in further research. 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.

Your data may also be used for statistical, research and fraud prevention purposes.

### [Legal basis of processing](#)

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 based on legislation. For this scheme that means:

The specific public task is the delivery, administration and evaluation of, as well as statistical, research and fraud prevention purposes relating to, the Scheme, 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). Funding is provided to Local Authorities who engage consumers and manage the delivery of installations in homes.

**Consent:** Use of your personal data to contact you to take part in further research will be subject to your consent. Worcestershire County Council will ask you if you consent to be contacted and pass your details to DESNZ for this purpose if you agree. They 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 them.

### [Recipients](#)

Your personal data will be shared with:

- Contractor and their subcontractors including the installer, retrofit roles consultant, Principal Designer and in some cases the clerk of works.
- Act on Energy who will support you to complete your application for the funding and check your eligibility

- 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

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

Information will be shared securely using SharePoint or email to specific domains recognised by the Council.

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.

As your personal data will be stored on our IT infrastructure.

Personal data shared with DESNZ will be stored on their IT infrastructure and will therefore also be shared with their data processors Microsoft and Amazon Web Services.

Personal data shared with the contractor will be stored on their IT infrastructure

#### Retention

Your personal data will be stored securely by us for a maximum period

- 10 years by Worcestershire County Council
- Your personal data will be stored securely by DESNZ for a maximum period of 25 years following the close of the Scheme. DESNZ may choose to store anonymised data beyond this period. Please see [DESNZ's privacy policy](#) for details of how they use and manage your data.

#### Automated decision making

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

## YOUR RIGHTS

You have the right to request information about how your personal data are processed, and to request a copy of that personal data.

You have the right to request that any inaccuracies in your personal data are rectified without delay.

You have the right to request that any incomplete personal data are completed, including by means of a supplementary statement.

You have the right to request that your personal data are erased if there is no longer a justification for them to be processed. 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.

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

## HOW TO MAKE A REQUEST

If you wish to make a request associated with any of the rights listed above, contact [dataprotection@worcestershire.gov.uk](mailto:dataprotection@worcestershire.gov.uk) or DESNZ using the contact details at the bottom of this notice.

## INTERNATIONAL TRANSFERS

Your personal data will not be processed outside the UK.

As personal data shared with DESNZ will be stored on their IT infrastructure and shared with their data processors Microsoft and Amazon Web Services. Please contact DESNZ for details of how they protect your data.

## 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 (at the email address below). If 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.

## CONTACT DETAILS

The data controllers for your personal data are Midlands Net Zero Hub (part of Nottingham City Council), Worcestershire County Council, Malvern Hills District Council, Worcester City Council, Wychavon District Council, Act on Energy and the Department for Energy Security and Net Zero (DESNZ).

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](mailto: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](mailto:dataprotection@worcestershire.gov.uk)

Malvern Hills District Council

You can contact the data protection officer at:

Council House,  
Avenue Road,  
Malvern, WR14 3AF

Email: [SAR@malvern hills.gov.uk](mailto:SAR@malvern hills.gov.uk)

Worcester City Council

You can contact the data protection officer at:

Data Protection Officer  
Worcester City Council  
The Guildhall  
High Street  
Worcester  
WR1 2EY

Email: [data.protection@worcester.gov.uk](mailto:data.protection@worcester.gov.uk)

Tel: 01905 722233

Wychavon District Council

You can contact the data protection officer at:

Civic Centre  
Queen Elizabeth Drive  
Persore  
WR10 1PT

Email: [sar@wychavon.gov.uk](mailto: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](mailto:administration@actonenergy.org.uk)

Department for Energy Security and Net Zero

You can contact the DESNZ Data Protection Officer at:

Department for Energy Security and Net Zero  
3-8 Whitehall Place  
London  
SW1A 2EG

Email: [dataprotection@energysecurity.gov.uk](mailto:dataprotection@energysecurity.gov.uk)