

Service Area: Midlands Net Zero Hub
Directorate: Carbon Reduction, Energy and Sustainability

April 2023

The Midlands Net Zero Hub (**MNZH**) as part of Nottingham City Council is leading on the regional delivery of a project called Home Upgrade Grant Phase 2 (HUG 2).

HUG 2 is a national government scheme funded by the Department for Energy Security and Net Zero (the **Department**) which awards grants to Local Authorities for energy efficiency and clean heating upgrades in owner occupied and private rented sector fuel-poor homes off the gas grid. It will provide energy efficiency upgrades and low carbon heating via local authority funding, to households in England that are low income, are off the gas grid or have an Energy Performance Certificate (EPC) between D and G

The following organisations are separate data controllers who are processing your personal data under this scheme:

- MNZH will use your data for funding compliance and reporting on the Scheme to the Department
- Coventry City Council will collect and use your data for funding compliance and reporting on the Scheme to the Department
- Act on Energy, if used by your local authority, will collect your data in order to confirm eligibility for the Scheme, provide customer support and advice about energy efficiency, and if eligible, refer your details into the relevant local authority scheme to enable a survey and installation to take place.

When we process personal information relating to you, we will only do so when it is necessary and where we have a lawful reason to do so. We will use the information provided by you for a number of reasons, depending on the service or reasons for interacting with you. When we process your personal information, we will comply with data protection legislation and enable you to exercise your rights contained within the legislation.

What personal information will the data controllers process?

- **Your Home addresses** if you are applying, or being referred, for installation of a measure
- **Your contact details** - and owners (if different) including if you are offered an installation but who do not accept.

- **Eligibility and funding** - details about how and why you were identified by your Local Authority for participation in HUG 2 and details about any financial contributions you have made towards the cost of the installation, including benefit eligibility and details of any additional funding used to support the installations, for example from the owners, landlords or other third parties.
- **Measures installed** - details of the energy efficiency measures or low carbon heating system installed, including type, size and cost.
- **Property heating scores** - pre- and post-installation property SAP or RdSAP assessments with scores.
- **Details of installers** in relation to each installation of a HUG 2 measure, including your contact details and any relevant accreditation or registration information

Lawful basis for processing

The basis under which we use your personal information for the purposes of administering the Scheme is that this is necessary for the performance of a task carried out in the public interest by the Council or in the exercise of official authority vested in the Council.

Will my information be shared with other organisations or used for other purposes?

The data controllers will only share your personal information with other departments within their organisations and with other organisations when it is necessary to provide the services to you, and when we have a lawful reason to do so. The data controllers may also share your information when we are obliged to by law.

In relation to the Scheme, the data controllers will share your personal information with each other and with the following organisations:

- The Department
- Customer Journey Support
- Installers or assessors of energy efficiency measures appointed by your Local Authority

The information provided by you may also be used for the purpose of any other function carried out by the Council. This may include sharing your information across the Council, or with external organisations. Information about these functions and the legal basis on which information is used for them can be found at <http://www.nottinghamcity.gov.uk/privacy-statement/>

The information will only be used for another purpose where it is lawful to do so.

Do I have to provide the information?

You are **not** obliged by statute to provide the information that is specified here. However, if you do not provide the information we will not be able to assess you for eligibility or administer the Scheme to your property.

How long will the Council retain the data for?

Some of the information that you have provided will be kept for 25 years. This is in order for the Department to detect instances of fraud.

The Council publish an Information Asset Register (IAR), this will outline the retention periods for the personal data we process. You can find this IAR on our website <https://geoserver.nottinghamcity.gov.uk/information-asset-register/>

Information Rights

The UK General Data Protection Regulation provides for the following rights as prescribed by the legislation:

- A right to request a copy of your information
- A right to request rectification of inaccurate personal data
- A right to request erasure of your data known as ‘the right to be forgotten’
- A right to in certain circumstances to request restriction of processing
- A right in certain circumstances to request portability of your data to another provider
- A right to object to processing of data in certain circumstances
- A right regarding automated decision making including profiling

However, the data controllers can restrict the above rights in certain circumstances for example to avoid obstructing an investigation, avoid prejudicing the prevention, detection, investigation or prosecution of criminal penalties or to protect the rights and freedoms of others.

Data Protection Officer

Midland Net Zero Hub (part of Nottingham City Council)

The Data Protection Officer is Naomi Matthews. You can contact the data protection officer at:

Loxley House,
Station Street,
Nottingham,
NG2 3NG

or at data.protectionofficer@nottinghamcity.gov.uk .

Data Protection Officer

Coventry City Council

The Data Protection Officer is Adrian West. You can contact the data protection officer at:

dpoteam@coventry.gov.uk

Act on Energy

The Data Protection Officer is Rachel Jones. You can contact the data protection officer at:

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

Or at: rachel@actonenergy.org.uk

Information Commissioner's Office

The Information Commissioner's Office (ICO) website provides guidance on data protection and privacy matters, you can visit the website at www.ico.org.uk. You also have the right to complain to the ICO if you consider that the Council have processed your personal data incorrectly or that we have breached our obligations to you. You can contact the ICO at:

Wycliffe House,
Water Lane
Wilmslow,
Cheshire
SK95AF

www.ico.org.uk

Further Information

For more information about these rights please refer to our detailed privacy statement at <https://www.nottinghamcity.gov.uk/privacy-statement> .

PN link for Act on Energy - [GDPR & Privacy Policy - Act on Energy - Energy Advice Charity](#)

Coventry City Council HUG2.0 Privacy Notice: <https://www.coventry.gov.uk/home-energy-warmth/home-upgrade-grant-hug/2>



Department for
Energy Security
& Net Zero

Annex 5: Template Privacy Notice for installers, householders and landlords

This notice sets out how the Department for Business, Energy and Industrial Strategy (BEIS) will use your personal data relating to the Home Upgrade Grant Phase 2 (HUG 2) and your rights. It is made under Articles 13 and/or 14 of the UK General Data Protection Regulation (GDPR).

This notice relates to data collected under the scheme operated by Nottingham which is funded by the BEIS HUG 2 scheme.

YOUR DATA

The data

Nottingham will share your data with BEIS, or with a contractor or organisation appointed by BEIS to act on its behalf in connection with the HUG 2 scheme (BEIS delivery partners/agents).

BEIS and/or BEIS delivery partners/agents will process the following personal data:

Householders and landlords applying for, or receiving energy efficiency or low-carbon heating installations under the Scheme:

- Postal address and details of the property applying for, or receiving the energy efficiency or low-carbon heating installation(s) under the Scheme
- Household income status, benefit receipt status, home ownership or tenure status and any other scheme eligibility information
- Details about the installation(s) applied for or installed at the property under the Scheme, including type, size and cost and installer details
- Scheme awarded grant amount and any financial contribution you or others have made towards the installation(s) under the Scheme
- Customer referral source or customer source for initial awareness of the scheme
- Other scheme participation information, such as the local authority, scheme reference number, unique property reference, property type and characteristics including EPC rating
- Information of previous access to government grant schemes
- Your name, contact postal address, email address and (optional) phone number

Installers:

- Your name, contact business address, email address and phone number
- Trustmark/MCS accreditation details and any other relevant certification information
- Business information, including name, type of business and number of employees
- Details of installations delivered under the Scheme, including type, size and cost and details of the properties at which the installations are installed
- Whether directly contracted or sub-contracted to install installations under the Scheme

Purpose

The purposes for which BEIS and/or BEIS delivery partners/agents are processing your personal data is to support the delivery and administration of the scheme. This includes the assessment of applications by the local authority for the funding of installations at the property, monitoring the use of the BEIS funding and creating a record of installations.

BEIS and its delivery partners/agents obtain your personal data from the Local Authority. Data may also be obtained from Trustmark, from Ofgem, from other government departments and from other organisations administering central or local government schemes that support energy efficiency or low-carbon heating measures.

Delivery and administration of the scheme may require linking of your data to other datasets held by BEIS and/or BEIS delivery partners/agents.

BEIS will be conducting an evaluation of the scheme. This may include you being contacted by BEIS or its delivery partners/agents 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, audit and fraud prevention purposes.

Legal basis of processing

The legal basis for processing your personal data is: **Public task**

Processing is necessary for the performance of a task carried out in the public interest. The specific public task is the delivery, administration, audit and evaluation of the Scheme, as well as statistical, research and fraud prevention purposes relating to the Scheme. HUG 2 is a government funded scheme aiming to improve the energy performance of off gas grid homes in England rated at EPC Band D, E, F or G. The Government funding is provided to Local Authorities who set up arrangements for consumer engagement and the delivery of installations in homes.

Recipients

Your personal data will be shared with:

- BEIS and its delivery partners/agents for delivery, administration, audit and evaluation of the Scheme, statistical, research and fraud prevention purposes.
- Ofgem and other organisations administering other central and local government schemes that support energy efficiency or low-carbon heating measures. This is to prevent the duplication of support or other breach of scheme rules.

Your personal data may be shared with Trustmark for the purpose of upholding installation standards under the Scheme. Your personal data may also be shared with other Government departments such as HM Treasury and the Department for Levelling Up, Housing, and Communities, 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.

Personal data shared may be stored on the BEIS's IT infrastructure and may therefore also be shared with BEIS's data processors Microsoft and Amazon Web Services. This means your data may be transferred and stored securely outside the UK or European Economic Area. Where that is the case, it will be subject to equivalent legal protection through the use of Model Contract Clauses.

Retention

Your personal data will be stored securely by BEIS for a maximum period of 25 years following the close of the scheme but not longer than required.

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.

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.

Contact details

Once your personal data has been shared with BEIS or with its delivery partners/agents, BEIS will become a data controller for that personal data. If you wish to make a request associated with any of the rights listed above and in relation to personal data shared with BEIS or with BEIS delivery partners/agents, you may contact BEIS using the following contact details.

You can contact the BEIS Data Protection Officer at:
BEIS Data Protection Officer
Department for Business, Energy, and Industrial Strategy
1 Victoria Street
London
SW1H 0ET
Email: dataprotection@beis.gov.uk

Complaints

If you consider that your personal data has been misused or mishandled, you may make a complaint 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.