

**Service Area: Carbon Reduction Projects and Policy  
Directorate: Environment and Sustainability**

**April 2023**

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Nottingham's **Home Upgrade Grant 2 (HUG 2)** is operated by Nottingham City Council, who are the data controllers for the personal data (or personal information) that we process about you. 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. This privacy notice is made under the transparency requirements under articles 12, 13 and 14 of the UK General Data Protection Regulation (UK GDPR).

The funding for the scheme is from the Department for Energy Security and Net Zero (DESNZ), they are also data controllers for the information that is processed and shared in relation to HUG 2.

We will use the information provided by you for a number of reasons, depending on the reason we are interacting with you. We may be engaging with you when you are a customer (who is receiving work on their property), or as a contracted installer (who has been instructed by the Council to conduct work in accordance with the scheme).

The purposes for which we are processing your personal data is to:

- Support the delivery and administration of HUG 2;
- To enable the Council to conduct any necessary eligibility assessments;
- To enable the Council to calculate any expected energy, carbon or cost savings expected to be delivered at various points during the installation;
- Enable the Council to conduct procurement activities to ensure that installers can be instructed to conduct the work;

- To monitor and report on any funds that are spent or work conducted and to report against the objectives of the project;
- To protect and account for the spending of public funds; and
- To assist DESNZ in 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.
- To assist DESNZ in further statistical analysis, research and fraud prevention, which may require linking of your data to other datasets held by DESNZ.

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 Council process?**

The information that we collect about you to fulfil the purposes, objectives, or to deliver the services outlined above relates to your:

#### **When you are a customer:**

- 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
- Address and details of property offered, but not receiving, the HUG 2 installation(s)
- Your name
- Household income, where required, and any other scheme eligibility information
- 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 (optional)

- Phone number

### **When you are an installer**

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

### **Lawful basis for processing**

The basis under which we use your personal information for these purposes 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**. These tasks include:

- The Council conducting activities as a local authority under the Local Government Act 200 and Localism Act 2011;
- Nottingham City Council securing funding and delivering a scheme which fulfils Council Plan objectives relating to reduction of Fuel Poverty and Carbon Emissions in Nottingham; specifically 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), including off-gas grid homes. Funding is provided to Local Authorities who engage consumers and manage the delivery of installations in homes.

- DESNZ Secretary of State to carry out his functions in relation to fuel poverty as set out under the Warm Homes and Energy Conservation Act 2000 and the Fuel Poverty (England) Regulations 2014; and
- DESNZ and the Council are to carry out their functions as regards effectively managing the spending of public funding, including DESNZ being able to review how and where the HUG 2 funding is spent, including decisions as to whether further tranches of funding should be provided to the Authority as well as assessing whether the funding has achieved its objectives.

The basis under which your personal data may be processed under this scheme is also because it is **necessary for the performance of a contract to which you are a party**. This includes the processing activities involved in procurement exercises and contracting installers to conduct work on the Council's behalf.

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

The Council will only share your personal information with other departments within the Council, 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 Council may also share your information when we are obliged to by law.

In relation to this service, the Council will share your personal information with:

- Installers procured by the Council
- The Department for Energy Security and Net Zero (DESNZ);
- Ofgem and delivery partners of central and local government home energy schemes such as the Energy Company Obligation and Renewable Heat Incentive
- 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.

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 some of the information that is specified here. However, without the required information, the Council will not be able to deliver the services relating to the scheme.

### **How long will the Council retain the data for?**

The information that you have provided will be kept for:

- 10 Years by the Council, following closure of the scheme
- 25 years by DESNZ, following closure of the scheme.

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, Nottingham City Council 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**

The Data Protection Officer at Nottingham City Council 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](mailto:data.protectionofficer@nottinghamcity.gov.uk) .

You can contact the DESNZ Data Protection Officer at:

DESNZ Data Protection Officer  
Department for Energy Security and Net Zero1 Victoria Street  
London  
SW1H 0ET

Email: [dataprotection@beis.gov.uk](mailto:dataprotection@beis.gov.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](http://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

[casework@ico.org.uk](mailto:casework@ico.org.uk)

[www.ico.org.uk](http://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> .