

Warm Homes Local Grant: Privacy Notice for Installers, Householders and Landlords

This notice sets out how Three Rivers District Council and Watford Borough Council will use your personal data relating to the Warm Homes Local Grant (WH:LG, or 'the Scheme') 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 led by Watford Borough Council in partnership with Three Rivers District Council which is funded by the Scheme.

1. Your Data

Three Rivers District Council and Watford Borough Council will process personal data relating to end-users (householders and landlords) and relating to installers. Further detail on this data is outlined below:

Householders and landlords expressing an interest for, or receiving energy performance or low-carbon heating installations under the Scheme:

- Postal address and details of the property (including characteristics) expressing interest for, or receiving the energy performance 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, date of installation and installer details
- Scheme allocated grant amount and any financial contribution you or others have made towards the installation(s) under the Scheme
- Lodgement certificate number, lodgement date, installations details from TrustMark and the Microgeneration Certification 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 number, property type and characteristics
- Information of the property from Energy Performance Certificate such as the property rating, banding, features, floor area from any EPC Certificate recorded. Additional fields may be processed such as assessor details, assessment date, heating, lighting and other related information
- Information of previous access to government grant schemes
- Your name, contact postal address, email address and (optional) phone number • Other details for the purposes of fraud, error and non-compliance relating to dates, value of risk, information regarding the property, relevant installers etc.

Installers:

- Your name, contact business address, email address and phone number
- Trustmark/MCS accreditation details or other relevant certification information, including other low carbon heating certification
- 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

Your personal data may also be obtained from Trustmark, from Ofgem, from government departments and from other organisations administering central or local government schemes that support energy performance or low-carbon heating measures.

2. Purpose

The purposes for which your personal data will be processed includes:

- To support the delivery and administration of WH:LG including the assessment of expressions of interest, monitoring the use of funding, creating records of installations, and linking with other datasets held by third parties;
- The prevention and detection of any fraud, error and non-compliance under WH:LG and other schemes. This can include, but is not limited to, debt recovery, prosecution and independent assurance review/audit activity to understand fraud, error and non-compliance exposure and how to reduce it for future and current schemes.
- To support an assessment of WH:LG performance and whether the Scheme has achieved its objectives
- To support an evaluation of the Scheme. This may include you being contacted by DESNZ and/or its appointed contractors 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 review and develop Government policy, research, evaluation, and service delivery and for statistical, audit, and fraud, error, non-compliance prevention and detection purposes. This may include linking Personal Data with other data sources, and may include sharing data with third parties such as RISE (a contracted service used to support the effective delivery of government energy efficiency funding).
- To keep beneficiaries of government grant schemes informed about future government energy efficiency support that becomes available, as relevant, as well as relevant advice and information about energy efficiency measures. This may include you being contacted by DESNZ and/or its appointed contractors to draw your attention to relevant information and resources.

3. Legal basis of processing

The legal basis for processing your personal data provided under Article 6 of the UK GDPR is 1(e) 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.

4. Recipients

Your personal data will be shared with:

- Our contracted providers and delivery partners supporting the administration and delivery of the Scheme
- DESNZ and DESNZ appointed contracted providers (including the Scheme Delivery Partner, Technical Assistance Facility (TAF), for delivery, administration, audit and evaluation of the Scheme, statistical, research and fraud, error and non-compliance prevention and detection purposes.
- Other Government Departments
- Appointed scheme administrators such as Local authorities (and their delivery partners if necessary) Devolved administrations, their local authorities (and their delivery partners if necessary)
- Other organisations administering/supporting with the administration of central and local government schemes that support energy performance or low carbon heating measures, such as energy suppliers, Ofgem, TrustMark, Microgeneration Certification Scheme
- We may share your data if we are required to do so by law, for example by court order to prevent fraud or other crime.

For further information about how DESNZ process data for the WH:LG can be found here:

<https://www.gov.uk/government/organisations/department-for-energy-security-and-net-zero/about/personal-information-charter>

Further information about how DESNZ process data for Fraud and Error please see the DESNZ Fraud and Error Privacy Notice for further details: <https://www.gov.uk/government/publications/using-home-retrofit-scheme-data-to-manage-fraud-and-error-privacy-notice/using-home-retrofit-scheme-data-to-manage-fraud-error-and-non-compliance-privacy-notice>

5. Retention

Your personal data will be retained as follows:

- Your personal data will be retained for up to 8 years after the end of the funding period for the purposes noted. To note, other parties with access to this data (e.g. DESNZ) have separate data retention policies – please see the DESNZ WH:LG Privacy Notice for further details.

6. International Transfers

Your personal data will be processed in the UK.

7. 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 where it is processed for direct marketing purposes.
- You have the right to object to the processing of your personal data. To exercise your rights please contact the Data Protection Officer using the contact details below.

8. Contact details

You can contact the Data Protection Officer at Watford Borough Council at Town Hall, Hempstead Road, Watford, WD17 3EX or data.protection@watford.gov.uk

If you are unhappy with the way we have handled your personal data, please write to the department's Data Protection Officer in the first instance using the contact details above.

9. 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

Telephone: 0303 123 1113

Email: casework@ico.org.uk

Contact form: <https://ico.org.uk/make-a-complaint/data-protection-complaints>

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

10. Updates to this notice

If this privacy notice changes in any way, we will place an updated version on this page. Regularly reviewing this page ensures you are always aware of what information we collect, how we use it, and under what circumstances we will share it with other parties. The 'last updated' date at the bottom of this page will also change. If these changes affect how your personal data is processed, we will take reasonable steps to let you know.

Last updated: March 2025