

# Warmer Homes privacy notice

## Key information

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## 1. Who we are and what we do

The Greater London Authority or GLA – also known as City Hall – is London’s regional government and the home of the Mayor of London, the London Assembly and the staff who support them.

## 2. Why we are providing you with this notice

This notice explains how the GLA uses your personal information when you apply (or someone in your household or your landlord applies) to the Warm Homes Local Grant programme.

This privacy notice also explains how your personal information may be used if your household is contacted as part of the Warm Homes Local Grant (WH:LG) Data?Led Pilot, a project designed to proactively identify households that may be eligible for WH:LG before an application is made. The data that is being used to identify your household is publicly available within the London Building Stock Model 2 data, Energy Performance Certificate data and Warm Home Local Grant Eligible post code data. These data sets are matched together and then filtered to select properties that from the data are likely to be eligible for WH:LG.

Please also read any other privacy notices that we give or make available to you, including the [GLA Privacy Policy](#) and [Your Privacy Rights](#) as these contain additional important information about how we use and process your personal information and how you can exercise your data protection rights.

### **3. Warmer Homes London (WHL) and Warm Homes Local Grant (WH:LG) programme**

When you apply for the WH:LG programme, we will check (and let you know) if you and or the property (as a homeowner, landlord or private tenant, as applicable) are eligible for funding under the WH:LG programme for heating, insulation, ventilation improvements and energy efficiency measures, for example solar panels, heat pumps or insulation.

In addition to processing information provided through WH:LG applications, the GLA is carrying out a WH:LG Data?Led Pilot with the Royal Borough of Kensington and Chelsea (RBKC).

The pilot identifies households who may be eligible for WH:LG by combining publicly available property data. Households identified through this process may receive a letter from the GLA inviting them to apply for WH:LG.

Taking part in the pilot does not affect eligibility decisions, which are only made once a resident submits an application through the WH:LG portal.

### **4. How your personal information will be shared**

If you apply for the WH:LG Programme, your personal information (and, if relevant, that of anyone else named or referred to in your application) may be shared with the following organisations/types of organisation in order to provide services to you:

- **Government, Statutory and Regulatory Bodies** including:
  - **Department for Energy Security and Net Zero (DESNZ)** –as the funders of the programme, DESNZ processes your data to deliver, administer and evaluate the scheme, as well as for statistical, research and fraud prevention services. They have asked us to provide you with their Privacy Notice when you make an application
  - **Ofgem** – administers the Energy Company Obligation (“ECO”) scheme on behalf of the Government
  - **Relevant local authorities** – check your eligibility for services and for other funding, for example, the Disabled Facilities Grant, and for reporting purposes

- **Other governmental departments, statutory and regulatory bodies** such as the Information Commissioner's Office and Her Majesty's Revenue and Customs
- **Our WH:LG programme partners**, who work with us to assess your eligibility for the programme and to manage and deliver services to you. You can find out more about our current partners in the Section "How we work jointly with our partners" below
- **Your energy supplier(s)** – may provide funding for the work through the ECO
- **Inspectors** - visit your property to check on the quality of the work
- **Certification bodies** (for example, Gas Safe and MCS Register) – for verification and compliance purposes
- **Charities or other organisations/funding providers** – may be able to offer additional funding to you
- **The Energy Saving Trust** – submits information to the Department of Works and Pensions, which provides a yes or no answer as to whether any benefits you receive make you eligible for additional grant funding
- **Companies that provide guarantees for any work**, including product manufacturers.

We also ask third party service providers to carry out certain business functions for us. These include:

- providers of survey and installation services
- IT support, cloud platform and data hosting providers who help us with the operation of our websites, mobile applications, data rooms, document and workflow management systems and other systems and applications
- marketing service providers, including companies who send out surveys and marketing communications on our behalf
- companies that check and validate information for us, including information about your home's EPC rating, landlord's details (if applicable) and your benefits entitlements
- professional advisors or consultants.

The GLA may be required to share your personal information with the police and other law enforcement agencies for the purposes of crime prevention or detection, to comply with a legal obligation, to prevent fraud or another crime, to enforce a contract or to protect the rights, property or safety of our employees, applicants to the WH:LG programme or members of the public. If we are asked to disclose your information, we ask the requesting organisation to demonstrate that the data will assist in the prevention or detection of crime, or that the GLA is legally obliged to disclose it.

#### **Additional sharing required for the Data?Led Pilot:**

#### **Print and mail house (Data Processor for the GLA)**

Print and mail house is contracted to print and send letters to households identified through the pilot. Xerox receives only:

- name
- postal address

Print and mail house does not make decisions, retains personal data for a maximum of 60 days, and must delete it under the GLA's instructions.

## **5. How we work with our partners**

We work closely with our partners, Sureserve Group Limited, trading as Everwarm, [HeatFlex](#) and [Smarter ECO Solutions | CT Eco](#) to deliver the WH:LG services to you.

Sureserve manages all home surveys and installations for the WH:LG programme. They also provide a dedicated contact who helps explain what improvements are most suitable and ensure that work is carried out to a high standard. Note that other companies may provide survey and installation services on Sureserve's behalf.

HeatFlex and Smarter ECO Solutions | CT Eco processes ECO Flex eligibility for the WH:LG programme (based on criteria we provide to them).

For the WH:LG Data?Led Pilot, the GLA works with RBKC, LOTI, Bloomberg Associates and Xerox.

Only Xerox process personal data for the Data-led Pilot.

## **6. What personal information will we collect and process?**

We collect and process the personal information you provide to us when you make an application to us by completing the online application form and submit supporting documentation, as well as any information you provide to us when you call or email us about the WH:LG programme. We also process information provided in relation to previous grants.

In particular, you should be aware that we collect personal information which is necessary for us to administer the WH:LG programme, including:

- your name, contact details and address and if you are an owner/occupier, landlord or tenant
- relevant details of household members and (if relevant) your landlord
- your marital/relationship status
- your and other household members':
  - age
  - health conditions
  - pregnancy
  - ethnic and racial origin
- national insurance number
- child benefit number (if applicable)
- income/household income and qualifying benefits information
- details about your home, heating supply and its energy efficiency
- if your home is a HMO
- details of services recommended/provided
- your signed approval for services
- cost of and charges for installation of services, including your financial contribution.

We may also contact you to request copies of:

- a council tax or utility bill
- your tenancy agreement (if relevant)
- a mortgage statement (if relevant)
- proof of income (payslips or P60 form).

For households contacted as part of the pilot, we may process:

- residential address
- property characteristics (e.g., EPC rating, local building stock model characteristics, deprivation index) linked to your address.

## **7. Providing personal information to us and keeping it up to date**

We recommend that you complete the application as fully and comprehensively as possible. If you do not provide all the personal information we request as part of your WH:LG application form, we may not be able to work out if you are eligible for services and benefits. Where we don't need your personal data, we will make this clear, for instance we will explain if any data fields in our application are optional and can be left blank.

If any of the personal information you have given to us changes, such as your contact details, please inform us without delay by contacting Warmer Homes London at:

[enquiries@warmerhomeslondon.com](mailto:enquiries@warmerhomeslondon.com)

Free Phone: +44 (0)800 029 3576

If you provide us with personal information about other household/family members and/or about your landlord or tenant (as applicable) as part of your application for the WH:LG programme or when you communicate with us about the programme, we would be grateful if you could bring this notice to their attention so that they understand how and why we will process their personal information.

Households contacted through the Data?Led Pilot do not need to submit any information to the GLA unless they choose to apply for WH:LG.

All initial data used in the pilot comes from publicly available datasets or existing borough records.

## **8. What do we use this personal information for?**

We use this information for the following purposes and on the lawful bases as set out below.

In most cases, our handling of your personal information will be necessary for the delivery of our public functions. In other words, when we use personal information we do so to deliver better public services to Londoners as individuals and as a whole.

Please note that we may need to cross-refer the information you provide to us as part of this application with other information we hold, or our partners hold, about you, including your prior applications to us under this and other GLA and central government schemes. This is to ensure that you receive the assistance for which you are eligible and to monitor for fraud.

### **8.1 Information provided in your application form**

## **Personal information**

Information provided in your application form and supporting documentation and when you call and/or email us about the WH:LG programme, together with information provided in relation to previous grants.

### **Use**

- to assess your eligibility for the programme
- to check if you have applied for the programme/other GLA programmes in the past
- to assess your eligibility for other services, including those offered by DESNZ (and refer you to such services)
- to administer, evaluate and audit the programme
- for research and statistical purposes
- to prepare reports relating to delivery of the WH:LG Programme and share these with DESNZ and other partners
- to monitor for fraud and provide information relating to fraudulent activity to DESNZ and other partners on an ad hoc basis
- to anonymise the data (see below).

We use the additional personal information described above to:

- identify households likely to be eligible for WH:LG
- send targeted scheme communication encouraging eligible households to apply
- evaluate and audit the pilot, using aggregated non-personal data
- prevent fraud and ensure that public resources are used appropriately.

For verifying receipt of means tested benefits, your name, address, date of birth, UPRN will be collected and shared with DESNZ, their appointed contractors, and Department for Work and Pensions (DWP).

### **Lawful basis**

- Under the data protection law, we are required to rely on one or more valid lawful bases to process personal data. This will vary depending on how we engage with you.

## **8.2 Special category data**

For personal information that is special category or sensitive data as defined within the data protection law, we are required to identify special condition or conditions in order to process this type of data.

### **Health conditions, pregnancy: use**

- to assess your eligibility for the programme
- to assess your eligibility for other services, including those offered by DESNZ (and refer you to such services)

- to administer, evaluate and audit the programme
- for research and statistical purposes
- to prepare reports relating to delivery of the WH:LG Programme and share anonymised health data with DESNZ and other partners
- to anonymise the data (see below)

### **Racial and ethnic origin: use**

- for equal opportunities monitoring purposes
- to anonymise the data (see below)

### **Lawful basis**

- necessary for the performance of a task in the public interest.
- necessary for reasons of substantial public interest.

## **9. Anonymising your personal information**

We may anonymise your personal information where appropriate. This is to protect your privacy and means that you will no longer be identified or identifiable from the information. We do this so that we can carry out statistical and other research and analysis of applications to the programme, our services and our performance and produce reports of such research and analysis. We may share this data with our partners, including DESNZ, which data includes aggregated data evaluating the Warmer 3 programmes and assessing our progress and performance against key performance indicators (KPIs).

Data used to evaluate the pilot will be anonymised and aggregated so individuals cannot be identified.

## **10. Protecting your personal information**

Your trust is very important to us and we are strongly committed to keeping your personal data safe. We will take all necessary measures to ensure your personal information is properly protected and secured. This includes having appropriate technical and organisational arrangements to secure your information.

## **11. Transferring your data outside the UK**

If any of our processing activities require your personal data to be transferred outside the United Kingdom, we will only make that transfer if:

- the country to which the personal data is to be transferred ensures an adequate level of protection for personal data; or
- we have put in place appropriate safeguards to protect your personal data in accordance with data protection law, such as an appropriate contract with the recipient. Please contact our Data Protection

Officer at [data.protection@london.gov.uk](mailto:data.protection@london.gov.uk) if you wish to obtain a copy of these.

## 12. How long we keep your personal information for

We will only retain your personal data for a limited period and only for as long as is necessary for our purposes as described in this privacy notice. Generally, this will be for a period of two years after the WH:LG programme has terminated.

However, we may keep your personal information for longer if it is necessary in connection with both our and your legal rights and obligations. This may mean that we keep some types of personal data for a limited additional period.

The length of this period will depend on a number of factors, including:

- any laws or regulations that we are required to follow
- whether we are in a legal or other type of dispute with each other or any third party
- the type of information that we hold about you, and/or
- whether we are asked by you or another regulatory authority to keep your personal data for a valid reason.

Please note that we will keep basic details of your application to us for a longer period of two years after the WH:LG programme has terminated in order to check if you have made prior applications to us for this or other programmes (which may affect your eligibility for grants and/or other assistance) and to monitor for fraud.

### Additional retention for the Data?Led Pilot

- GLA: until 31 March 2028
- RBKC: until 31 March 2028
- Print and mail house:
  - physical letter artefacts deleted within 30 days
  - name/address data deleted within 60 days
  - aggregated, non?personal evidence of mail?out may be retained.

### Additional retention for the Department of Work and Pensions benefits checker

The DWP will delete personal data pertaining to benefit eligibility checks within one month of receiving the results.

## 13. Your rights to your personal information

Please see the details of [your data protection rights](#).

If you exercise your data protection right of rectification, erasure, objection and/or restriction of processing, we will let DESNZ know that you have exercised this right/these rights.

If you contact us to make a request for access to your personal data (known as a subject access request) or to exercise another of your rights under data protection law, we may need to share this information with our service partners, in accordance with our legal rights and obligations. Depending on the personal information you have requested and to ensure that the appropriate organisation responds to your request, you may receive a response from one of these partners instead of the GLA.

## **14. Contacting us**

If you have any questions about this notice or our use of your personal information, please contact us.

Details of [how to contact us](#) are set out and includes details of our Data Protection Officer.

You are also entitled to raise a concern with the [Information Commissioner's Office \(ICO\)](#), the UK's independent body set up to uphold information rights.

## **15. Changes to our privacy notice**

We may need to update this privacy notice every so often. The 'last updated' date on this page will also change. Any changes to this privacy notice will apply to you and your data immediately, so please check back here regularly.

If these changes directly affect how your personal data is processed, we will take reasonable steps to let you know.

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