



ECO4/GBIS FLEX PRIVACY NOTICE

Ceredigion County Council has a duty to improve the health and well-being of the population it serves. This includes the objective to reduce fuel poverty across Ceredigion. One of the ways the Council does this is through working with delivery partners under ECO4/GBIS Flex to help improve the least energy efficient housing stock occupied by low income, vulnerable and fuel poor households.

The Council will handle all personal data processed for ECO4/GBIS Flex in accordance with the requirements of all applicable data protection and privacy legislation in force from time to time in the UK including the UK GDPR, the Data Protection Act 2018 (and regulations made thereunder) and the Privacy and Electronic Communications Regulations 2003 (SI 2003/2426) as amended. This privacy notice explains how personal data is used and stored by the Council in relation to ECO4/GBIS Flex. The Council's general Privacy Notice can be viewed here <https://www.ceredigion.gov.uk/your-council/data-protection-freedom-of-information/data-protection/privacy-notice/>

What is personal data?

Personal data means any information that relates to an identified or identifiable living individual.

What is special category data?

Special category data is personal data that needs more protection because it is sensitive. In the case of the ECO4/GBIS Flex, special category data refers to the information concerning the health of the identified or identifiable living individual.

The purposes for which we use your personal data – why we collect it?

The information we collect about you will be used for the purpose(s) of:

- **Assistance to access funding available for energy efficiency measures to improve the energy performance of your home via ECO4/GBIS Flex funding (for example, heating upgrades and insulation).**
- **Referral of eligible households for support under the above-mentioned scheme.**
- **Assessment of household occupant(s) eligibility for the ECO4/GBIS Flex.**

The lawful basis for the processing of your information is:

Processing is necessary under UKGDPR Article 6(1)(e) Processing is necessary to perform a task in the public interest.

Where Special Category data is processed, the lawful basis is Article 9 (2) g) reasons of substantial public interest (legislation as below). The substantial public interest processing conditions are 6) statutory and government purposes.

Electricity and Gas (Energy Company Obligation) Order 2022
Warm Homes and Energy Conservation Act 2000
Digital Economy Act 2017 S 35

What if you do not provide personal data?

If you do not give us the information we need when we ask for it, this may result in the Local Authority being unable to assess your application for support under the ECO4/GBIS Flex programme.

What type of information do we use?

We collect the following types of personal data about you to deliver this service (all or some of this information will be collected as part of your application depending on your circumstances and intended eligibility route). For ECO4/GBIS Flex Ofgem (the Office of Gas and Electricity Markets) requires 'Declaration' of eligibility for applicants to include name and address of householder along with relevant Category of compliance for ECO4/GBIS Flex. Information is required to determine eligibility based on the ranges of scheme criteria:

- **Contact information** – name, address, telephone number, email address.
- **Category of eligibility** (for example, date of birth/age, income, council tax, health information to highlight vulnerability to living in a cold home, free school meals, a household defined by Council as vulnerable in a published scheme, etc.).
- **Household composition** – number of adults, children and occupants 65 years of age and over residing in the household.
- **Priority status of household** (i.e., a resident with a terminal illness may need works done as a priority).
- **Financial details/evidence of income and eligibility for free school meals, council tax rebate, and means tested benefits.**
- **Health information for cold related illnesses** relevant to the eligibility of the scheme/s.
- **Evaluation and monitoring of overall total scheme outcomes**, which may include address level data for carbon savings, financial savings and any investment levels. This is for the Council's monitoring and auditing purposes and to prevent double counting.

Evidence/documents indicating/substantiating the above for scheme eligibility purposes will be shared between the Council, the ECO4 Flex provider/installer and Ofgem.

Do we use information received from other sources?

To provide this service, we collect information directly from you and from the **approved ECO4 Flex provider/agent/installer** that you have used to apply for the scheme. The following types of personal data are obtained, depending on your circumstances:

- **Contact information** – name, address, telephone number, email address.
- **Category of eligibility** (for example, date of birth/age, income, council tax, health information to highlight vulnerability to living in a cold home, free school meals, a household defined by Council as vulnerable in a published scheme, etc.).
- **Household composition** – number of adults, children and occupants 65 years of age and over residing in the household.
- **Priority status of household** (i.e., a resident with a terminal illness may need works done as a priority).
- **Financial details/evidence of income and eligibility for free school meals, council tax rebate, and means tested benefits.**
- **Health information for cold related illnesses** relevant to the eligibility of the scheme/s.
- **Evaluation and monitoring of overall total scheme outcomes**, which may include address level data for carbon savings, financial savings and any investment levels. This is for the Council's monitoring and auditing purposes and to prevent double counting.

Transferring your information abroad

Your information will not be transferred outside the United Kingdom.

Who your information may be shared with (internally and externally)?

Information is required to determine eligibility based on the ranges of scheme criteria. Information is only shared that is relevant and required to each bespoke scheme/funding source. Ceredigion County Council may share your contact and personal details with funding energy suppliers, installers, and Ofgem (the administrator for the schemes). For details of how any individual or organisation will collect and process your data you should contact them directly. We may share your information with the following recipients:

Externally:

- **Ofgem (the Office of Gas and Electricity Markets):** For ECO4/GBIS Flex Ofgem requires 'Declaration' of eligibility for applicants to include name and address of householder along with relevant category of compliance for the ECO4/GBIS Flex Scheme. Ofgem will also audit the Council at periodic times and as part of their auditing process they will require evidence of household eligibility for ECO4 Flex. On this basis, the information and evidence that you provide in your application form substantiating your eligibility may be shared with Ofgem. Details of how Ofgem will collect and process your data in connection with ECO4 and GBIS are contained in the ECO4 Privacy Notice <https://www.ofgem.gov.uk/publications/eco-privacy-notice> and the GBIS Privacy Notice <https://www.ofgem.gov.uk/publications/great-british-insulation-scheme-privacy-notice> on the OFGEM website.
- **The Council's approved ECO4/GBIS Flex providers/agents/installers:** These are the companies that households must apply through to be assessed for ECO4/GBIS Flex eligibility.

There are also other specific situations where we may be required to disclose information about you, such as:

- Where the Council is required to provide the information by law.
- Where disclosing the information is required to prevent or detect a crime.
- Where disclosure is in the vital interests of the person concerned.

Internally:

Access to your information will only be made to authorised members of staff who are required to process it for the purposes outlined in this privacy notice.

Further Information

Details of safeguards – what we do with it and how long we keep it

Your data will be held within Ceredigion County Council's secure network and will not be processed outside of the UK. Your data is retained by Ceredigion County Council for the duration of ECO4/GBIS, and for a period of up to 5 years after ECO4/GBIS ends. Access to your information will only be made to authorised members of staff who are required to process it for the purposes outlined in this privacy notice.

What are my data rights?

Your personal information belongs to you and, in line with the Council's general privacy notice, you have the right to:

- Be informed of how we will process it.
- Access the information - request a copy of what we hold about you and in a commonly used electronic format if you wish (if you provided this to us electronically for automated processing, we will return it in the same way).
- Have it amended if it's incorrect or incomplete.
- Have it deleted (where we do not have a legal requirement to retain it).
- Restrict how we process it.
- To withdraw your consent.
- Raise a complaint: e.g., internally with the Local Authority and externally with the Information Commissioner's Office (ICO), the independent body that oversees data protection and the GDPR (please see below).

Complaints and Enquiries

Ceredigion County Council endeavours to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this seriously. We encourage people to bring to our attention if they believe that our collection or use of information is unfair, misleading, or inappropriate.

This privacy notice does not provide exhaustive detail of all aspects of our collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below:

Data Protection Officer
Ceredigion County Council
Canolfan Rheidol
Aberystwyth
Ceredigion
SY23 3UE
Email: data.protection@ceredigion.gov.uk

If you want to make a complaint about the way we have processed your personal information, you can contact the Information Commissioner's Office (ICO) as the statutory body which oversees data protection law: **Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF, Telephone No: 0303 123 1113, Webpage: <https://ico.org.uk/>**