

Consumer Consent Solution Webinar

Enabling trusted, consistent consumer consent in the energy sector

Join at slido.com
#2933962



8 December 2025

Your Speakers



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Stakeholder Engagement
Manager



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Consumer Consent
Project Manager



Matt White
Consumer Consent
Product Owner

Housekeeping

- Please ensure that cameras and microphones remain switched off during the speaker sessions.
- We encourage you to submit questions throughout the event using the Q&A function. You are also welcome to use the 'Raise Hand' feature in Teams, though we will have a dedicated Q&A section later in the session.
- We will be launching Slido—please use the QR code below to take part in our interactive session later in the webinar.
- As a polite reminder, please keep all questions relevant to the session and avoid referencing other organisations.
- Finally, please note that the meeting is being recorded. The recording and slides will be made available on our website, following the session

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Our focus today

Aims:

- Discover how CCS fits into the broader energy system and RECCo's delivery role
- Share the latest update on our progress and what we've been working on so far
- An overview of the consumer consent solution and what RECCo intends to deliver
- Take part in an interactive session on consumer adoption and implementation
- Learn more about how you can get involved in progress throughout the programme.

Objective

Hear your insight and feedback.

Agenda

01 Welcome

02 Introduction: Why Consumer Consent Matters (Ofgem)

03 What is Consumer Consent – How it fits into the REC

04 Programme update: what's we've achieved so far

05 Minimum Marketable Product (MMP)

06 Interactive Session- using slido.

07 Q&A

08

- What's Next for Consumer Consent- where & how you can get involved
- Close

Why consumer consent matters now

Ofgem

Marzia Zafar | Deputy Director for Strategy & Decarbonisation



Consumer Consent Solution

In the broader energy data ecosystem

Tracy Hardy | Head of Portfolio Management

Consumer Consent Programme

What is Consumer Consent?

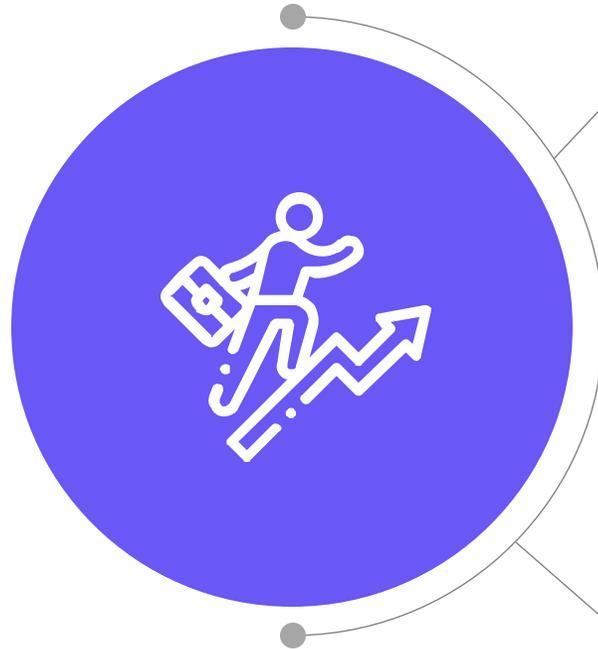
- Consumer Consent will deliver a **new, secure digital solution empowering energy consumers to control who can access their energy data.**
- It will **enable people to easily grant, manage, review & revoke consent**, supporting transparency, consumer choice, and data protection across the retail energy market.
- This service will underpin a supplier licence obligation for **recording consent consistently across the sector.**

Why RECCo & the Retail Energy Code (REC)?

RECCo's Role

RECCo has already taken a leading role in shaping Consumer Consent thinking.

The approach aligns strongly with **RECCo's Data & Digitalisation Strategy**.



Alignment with REC Objectives & Mission

- **Ensure customers' interests and data are protected**
- **Deliver positive consumer outcomes**

The REC is the most suitable code to govern a centralised Consumer Consent mechanism.

Retail Energy Code (REC)

Sets out the rules and processes that underpin the retail energy market.

Ofgem has determined that Consumer Consent should sit within the REC because it's the most appropriate place for consistent governance, as a code that supports positive consumer outcomes.

Clear accountability & effective oversight

Positioning Consumer Consent within the REC ensures transparency, responsibility, and alignment with established industry processes.

It matters to everyone: This approach supports suppliers, Energy Data Providers (EDPs), Authorised Third Parties (ATPs), innovators, regulators, and most importantly consumers.

Inconsistent consent...

MRC Copinion and Brain Sciences Ltd

Principal investigator: _____
Project reference number: _____
MRC/PSYC code: _____
Form ID: _____

INFORMED CONSENT
(THIS FORM MUST BE COMPLETED PRIOR TO THE TEST)

Notes of participant

I confirm that I have read the CSEAS Guide for volunteers, understand the purpose of the study, and have provided to you for the above study and have had the opportunity to ask questions.

I understand that my participation is voluntary and that I am free to withdraw at any time, without giving a reason, without my withdrawal or non-participation being affected.

I understand that there is no obligation for me to participate in this study and that my participation is voluntary.

I understand that, where the MRC is the sponsor, there are no data retention arrangements in place for my data, and that the MRC is not responsible for any data retention arrangements in place.

I understand that the data generated from this study will be used for research purposes and that I will have access to the data generated from this study.

I understand that the research data, which will be anonymized (not linked to me), may be shared with others.

I have read the above, been myself and I agree to take part in the study.

SIGNATURE OF VOLUNTEER
Signature: _____
Name in block capitals: _____ Date: _____

SIGNATURE OF RESEARCHER
Signature: _____ Date: _____

MRC Copinion and Brain Sciences Ltd
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Privacy

Can we collect the following data that personally identifies you:

- (item or type of data collected), which we collect to (summary of purpose):
- (more details of data collected)

If you choose not to allow us to collect your personal data (description of impact)

Full details about the personal data we collect and what we do with it are provided in our [Privacy Policy](#).

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We don't want you to miss out on special offers, coupons, vouchers or other promotions that we think would interest you. Remember, you can opt out at any time.

Yes please - I want to receive offers or promotions from across Tesco Group* by email, text message, phone or post.

Please note: You'll still get offers and promotions from Tesco Bank and Tesco Mobile if you're subscribed to their marketing unless you contact them using the details on [Contact us](#)

Please make sure you read our [terms and conditions](#) because you're agreeing to them by creating a Tesco account.

It's also worth reading our [privacy and cookies policy](#) so you understand how we collect and use your personal data.

GDPR CONSENT FORM

Your privacy is important to the CSEAS. We want to engage with clients of the Service in a way which is in line with the Data Protection Act 1988 - 2018 and the EU General Data Protection Regulation (2016/679) (GDPR).

We need your consent to process your Personal and Special Category Personal Data. If you wish to engage with the CSEAS, please sign the consent below.

Please refer to our attached GDPR Statement for information on how and why we process your personal data. This statement is also available on our website www.mrcpsi.ac.uk

I agree to engage with the CSEAS. I note that the CSEAS will process my data and hold a record of my interactions with the Service in accordance with the CSEAS GDPR statement.

Signed: _____ Date: _____

Print Name: _____

Data Protection

The law has changed and we need your express consent to process the personal data you provide to your agency, for the purpose of processing your timesheets.

Do you consent to us processing your personal data for the purposes of processing your timesheets?

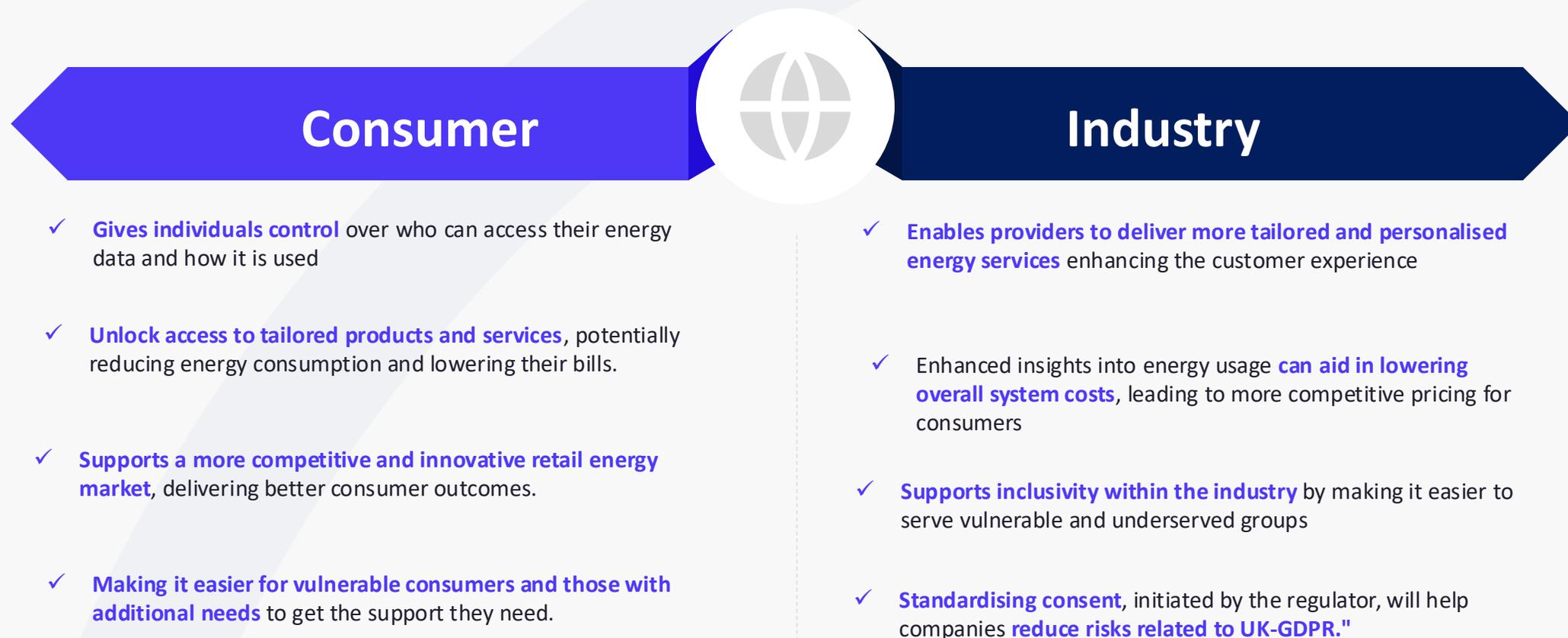
You can withdraw your consent at any time by visiting your [Manage Identity & Data](#) page.



Delivering Consumer Consent is a **key step toward achieving Clean Power 2030 and beyond.**

As energy data plays an increasingly vital role in delivering more tailored and innovative retail services, inconsistent consent management has introduced unnecessary friction for consumers and created barriers for trusted third parties.

A streamlined, consistent approach to consumer consent can unlock the following benefits;



Why Interoperability Matters

The Consumer Consent Programme aims to create a **consistent trust framework** that can be recognised across platforms and use cases, enabling seamless data sharing while safeguarding consumers.

Market-wide Half-Hourly Settlement

Consumer Consent supports granular data sharing to enable accurate settlements

It ensures suppliers & agents access data only with appropriate consent, in line with settlement reforms



Smart Secure Electricity System- Tariff Interoperability

Consumer Consent underpins standardised sharing of tariff-related data, particularly for smart & time-of-use tariffs.

Empowers consumers to switch providers & tariffs with clear control over their data.



Smart Data Repository

Consumer Consent provides the consent layer for historical smart meter data access by authorised parties

Ensures access aligns with consumer expectations and is recoverable in near real time.



Consumer Consent Solution

Data Sharing Infrastructure

Consumers give consent once, and it's recognised across all connected services, i.e. Suppliers, flexibility markets through the DSI

The consent rules by CCS (who can access what, and why) are built into DSI's systems, i.e. access controls & audit logs.



Smart DCC

Consumer Consent will work alongside existing DCC privacy controls.

Enables real-time consent verification when accessing meter data via the existing DCC infrastructure and process (SEC Other User route)



Flexibility Market Asset Register

Supports consent for behind-the-meter asset data sharing, such as batteries or EV's

Ensures a trusted mechanism for consumers to opt into flexibility markets without redundant consent journeys.





Programme journey to date

Michael Walsh | Consumer Consent Project Manager

Meet the team

The current project team



Pete Davies
Executive Sponsor



Tracy Hardy
SRO



Michael Walsh
Project Manager



Vicky Brown
PMO



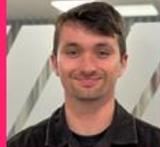
Matt White
Product Owner



Teresa Thompson
Stakeholder
Engagement Mgr



Nathan Gould
Enterprise Architect



George Roberts
Technical Architect



Chris Stock
Lead Business
Analyst



Eva Von-Schaxmann
Business Analyst



Ann Perry
Market Design Lead



Sarah Jones
Regulatory
Compliance



Alex Kunwar
Security Analyst

Project SME's

Ray Newton
Commercial



Alison Nickson
InfoSec & Data
Protection



Hemant Mistry
UX Lead



CoCo
Commercial Lead



Journey to Date:

Delivery Body (29th April '25)

- RECCo confirmed as Delivery Body for Consumer Consent by Ofgem
- Project Mobilisation initiated

Mobilisation (May-Aug '25)

- Project team recruitment and onboarding
- Established foundational governance, controls and ways of working
- Development & iteration of the critical path and high-level timescales to initial launch
- Established 3 x Working Groups
- Established central hub for Consumer Consent on REC Portal
- Built close engagement with partners and related initiatives (e.g. SDR, FMAR etc.)

Procurement

- Finalised sourcing approach, procurement strategy & plan
- Completed Market Testing activity on procurement Lots
- Procured and onboarded Trust Framework advisory partner
- Procured and onboarded User Experience partner
- Procured and completed Functional Prototypes for technical solution options

Discovery & Design

- Analysed and assessed capabilities & feasibility
- Iterated and refined high-level requirements
- Ongoing evolution of Minimum Marketable Product (MMP) scope and key features
- Engaged with Working Groups & currently reviewing advisory papers
- Developed consultation strawman and commenced drafting

Consumer Consent Programme

High-level timeframes (indicative)

Complete	Q4 2025	Q1 2026		Q1 2027	2027+
<p>✓ Mobilisation Onboard project team, establish governance & stand-up working groups</p> <p>Pre-core procurement, starting with Market Testing</p>	<p>✓ Ofgem finalise & publish Impact Assessment</p>	<p>Design Consultation - Trust Framework - UX & Access - Technical</p>	<p>Design, Test & Development of MMP (Minimum Marketable Product)</p>	<p>Launch Consumer Consent MMP</p>	<p>MMP Optimisation</p> <p>Ongoing evolution & development</p>
<p>✓ Feed content and data into Ofgem-led CC Impact Assessment</p>	<p>CC Working Group Advisory Reports drafted & published</p> <p>✓ Procurement activity for Tech Prototypes, UX, and Programme Assurance Body partners</p>	<p>Governance Framework</p> <p>Procurement activity for Tech Partner</p>	<p>Data User & Data Provider integration with technical solution</p> <p>Governance Change Process (Code / Regulatory)</p>		

Consumer Consent Industry Working Groups

To ensure the programme benefits from industry insight and meets the diverse needs of our stakeholders, Ofgem has established three dedicated Industry Working Groups. These will play an advisory role by informing our decision-making throughout the consultation and design process. These working groups will be essential in helping RECCo develop a solution that balances **consumer empowerment**, **industry practicality**, and **regulatory assurance**.

Three Working Groups	Security, Technical & Design Secure Scalable User-first	Implementation & Governance Structured Timely Compliant	Consumer Protection & Accessibility Inclusive Equitable Accessible
Aim & Scope	<ul style="list-style-type: none">• Explore security and technical design options• Includes key issues and risks	<ul style="list-style-type: none">• Define governance roles and responsibilities• Shape delivery and implementation plans	<ul style="list-style-type: none">• Focus on usability, accessibility, and protecting consumer interests
Key Advisory Role	<ul style="list-style-type: none">• Advise on the data model and technical design• Ensure robust data privacy and cybersecurity protections	<ul style="list-style-type: none">• Guide governance• Advise the delivery body on cost-effective, timely implementation	<ul style="list-style-type: none">• Ensure strong consumer focus by safeguarding rights and promoting an inclusive, equitable, and user-friendly solution

Final reports will be published before Christmas on RECCo website



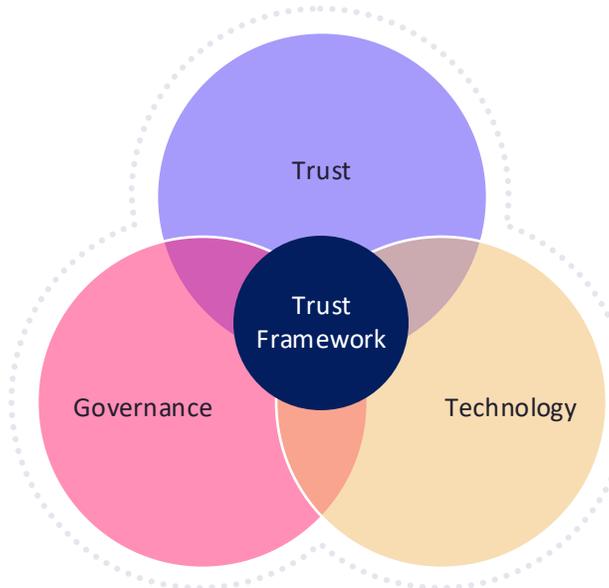
Minimum Marketable Product (MMP)

Matt White | Consumer Consent Product Owner

Consumer Consent Solution Key Considerations

A Trust Framework that provides a structured approach for managing consumer consent, ensuring data sharing happens securely through existing and new data sharing arrangements.

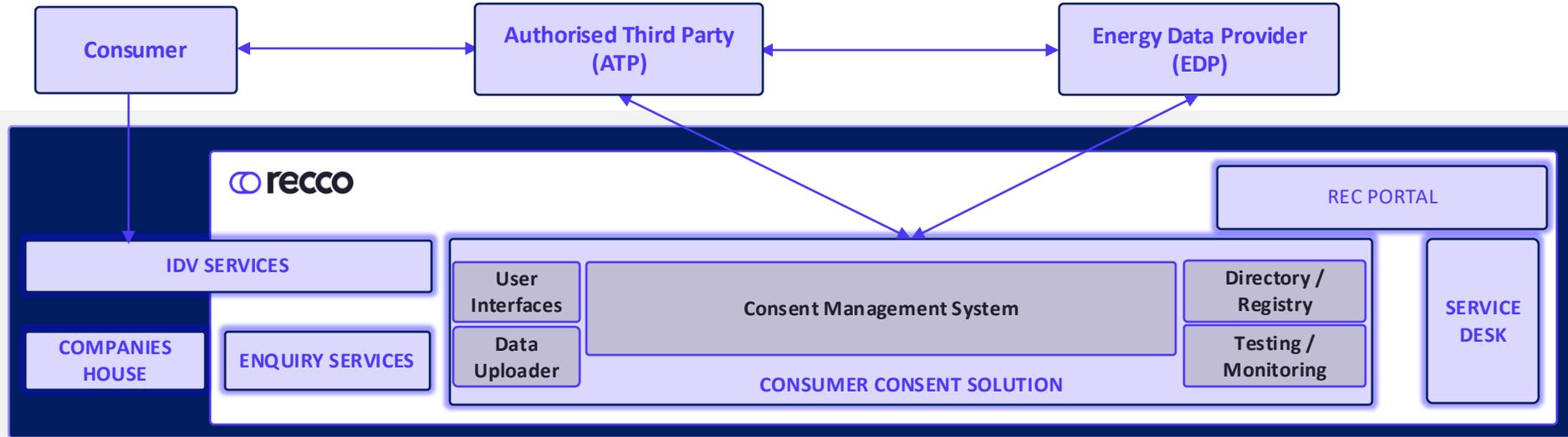
Creates confidence for consumers and participants by embedding transparency, accountability, and clear trust-building measures including through Customer Experience Guidelines setting high standards for implementors.



Delivers robust, scalable tools that enable secure consent management, underpinned by strong trust and governance, using an off-the-shelf procurement approach for efficiency, speed and cost management.

Uses REC's established governance model to simplify participation for existing participants, maintain compliance through familiar processes, and keep consumer protections central to every decision.

High-level View of CCS Components



CONSUMER CONSENT SOLUTION				
Consumer-focused User Interfaces for consumers, ecosystem participants and RECCo for management	A Trust Framework Directory / Registry for organisations to publish datasets and API details for discovery and data sharing	Consent Management System to store consent records and enable data exchange with certificates and tokens/credentials	Testing and Monitoring functionality to ensure industry-wide compliance and API uptime	Data Uploader functionality to enable migration of pre-existing consents into solution effectively (beyond MMP)
IDV SERVICES	COMPANIES HOUSE (UKGOV)	ENQUIRY SERVICES	SERVICE DESK	REC PORTAL
A CCS ID&V service will be selected, but we will also look to integrate and federate with external ID&V services	Companies House will be used to validate business and/or micro-businesses (beyond MMP)	Enquiry Services will be used to 'Match' and validate addresses provided by consumers with MPxNs	A Service Desk will be included to support industry, which may be part of the CCS or a separate component delivered by RECCo	REC Digital Services will be the main frontend for industry, streamlining accreditation and onboarding

Please note, we are still defining our solution. This view should not be seen as a solution design however as an illustration based on our current thinking.

MMP to Future Scope

Context:

Consumer Consent Solution (CCS) will be implemented in multiple phases. The first phase delivers a Minimum Marketable Product (MMP) that supports integration with SEC Other Users and/or the Smart Data Repository. This will be a functioning solution providing the core elements with following enhancements for additional capabilities. The CCS will be capable of future scope implementations to increase its usability for additional and new energy sector data sharing where the energy consumer is at the center of the need for accessing their data.

Minimum Marketable Product (MMP)

- Deliver a core framework for capturing and managing consumer consent.
- Support early priority use cases within a clearly defined scope.
- Build confidence among consumers and participants through strong assurance and governance.

MMP Enhancements and 'fast followers'

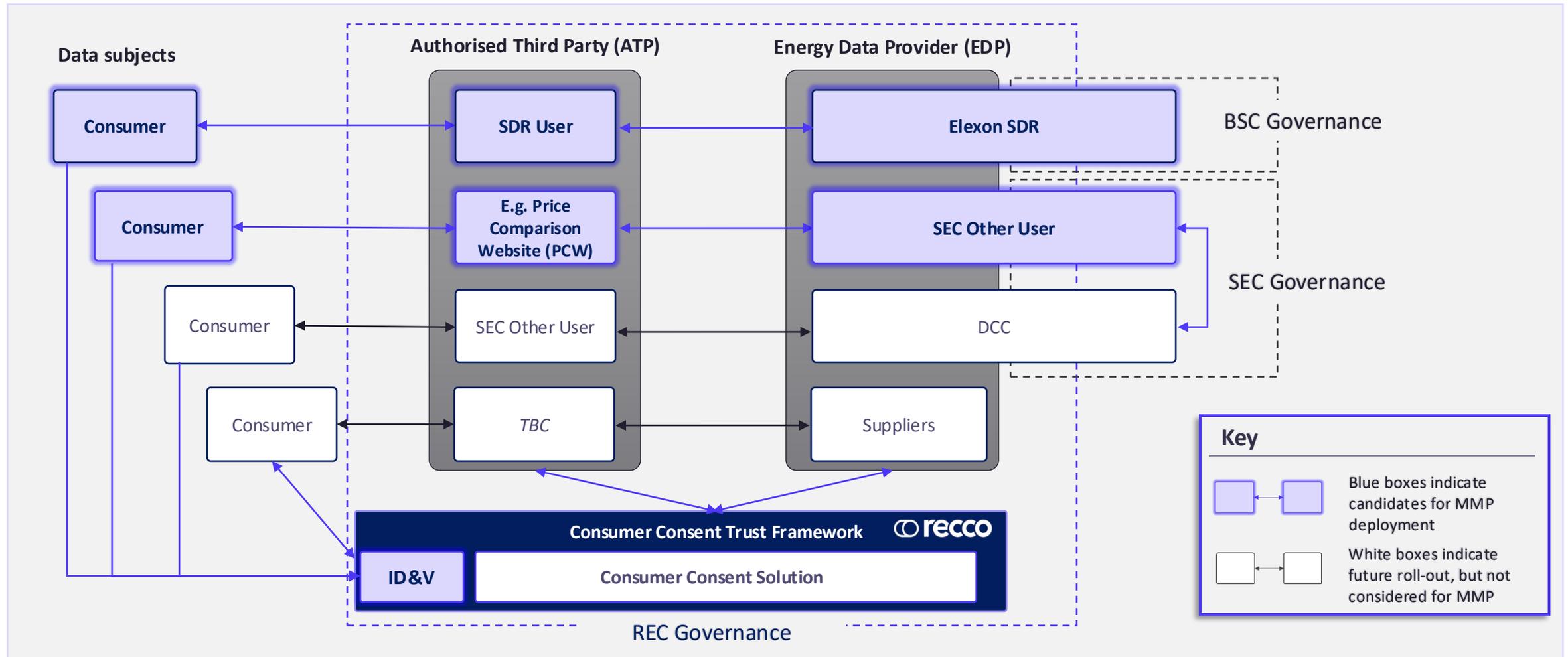
- Implement additional features to improve usability of the solution
- Add more consumer journeys with a focus on inclusivity and accessibility
- Improve awareness campaigns and knowledge sharing for adopters
- Drive to become the 'one truth' view of consumer consented energy data sharing

Future Scope

- Incrementally onboard additional datasets and user types.
- Extend coverage beyond initial use cases into broader energy data contexts.
- Maintain flexibility to adapt to future policy or regulatory requirements.

MMP vs Future Scope

The Consumer Consent Solution (CCS) ultimately supports all future consent-based data-sharing arrangements, including integrations with DCC and Suppliers. However, to meet tight MMP delivery timelines and objectives, initial support will focus on data sharing by SEC Other Users and Elexon's SDR.



Customer Experience Guidelines (CEGs)

Driving consistency and trust in the CCS



What are CEGs in Open Banking?

- Set uniform standards for customer journeys to ensure clarity, security, and trust.
- Instructs GDPR-compliant consent (informed, explicit, revocable).



Why CCS Needs CEGs

- Standardise consent journeys for all CCS ATPs.
- Embed GDPR principles: informed, freely given, specific, withdrawable.
- Protect consumers while enabling interoperability and innovation.



Key Difference for CCS

- A “one truth” view of an energy consumer’s consents, ensuring accuracy and trust across all data-sharing arrangements.



How CCS CEGs Will Be Developed

- Modelled on Open Banking CEGs, adapted for energy.
- Developed collaboratively with industry, consumer groups, and accessibility experts.

Benefits for Consumers:

- Clear, consistent journeys.
- Stronger data protection.
- Confidence in consent.

Benefits for ATPs:

- Uniform standards.
- Simplified compliance.
- Improved interoperability.

CCS Governance Framework

What is the CCS Governance Framework?

The **Consumer Consent Solution** will be underpinned by a robust governance framework setting out how Energy Data Providers (EDPs), Authorised Third Parties and Consumers interact with the arrangements.

Our current thinking is the governance framework will be defined at two levels:

- 1) The arrangements associated with the central CCS e.g. how users are accredited to participate.
- 2) The arrangements associated with individual Data Sharing Arrangements e.g. how to amend a data item within a define data set.



User Accreditation

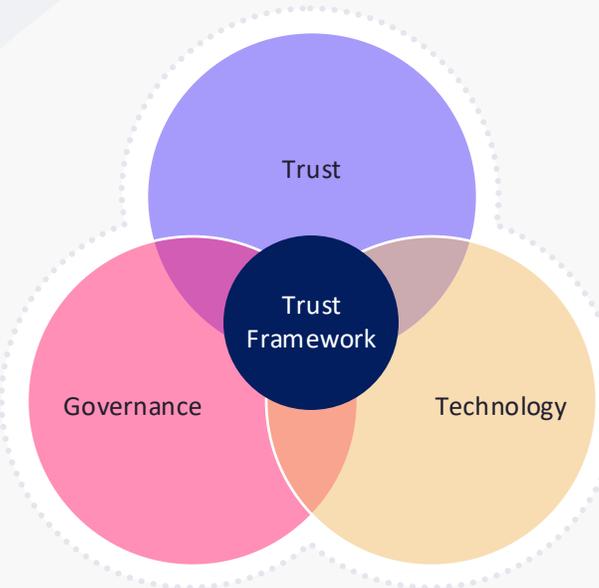
Any organisation operating as either a data provider or data user in the CCS will be required to undertake a process of accreditation. This will be made up of a verification process and a qualification process:

- Verification will confirm if an organisation onboarding to CCS is who they say they are
- The qualification will provide assurance that the organisation has robust systems and processes to meet their REC requirements.

Why the CCS requires robust accreditation

The CCS isn't just a technology solution. It's a trust framework where accredited organisations are expected to meet defined standards for managing data.

Trust is earned through transparency and accountability. Robust accreditation of participants (specifically ATPs) is a key trust builder.



Energy Data Providers (EDPs) and consumers must 'trust' that where data is shared to accredited Authorised Third Parties (ATPs), it will be managed appropriately.

Proposal to expand existing enquiry service access controls and ongoing assurance, to monitor and enforce compliance with CCS requirements and provide assurance to consumers and Energy Data Providers (EDPs).

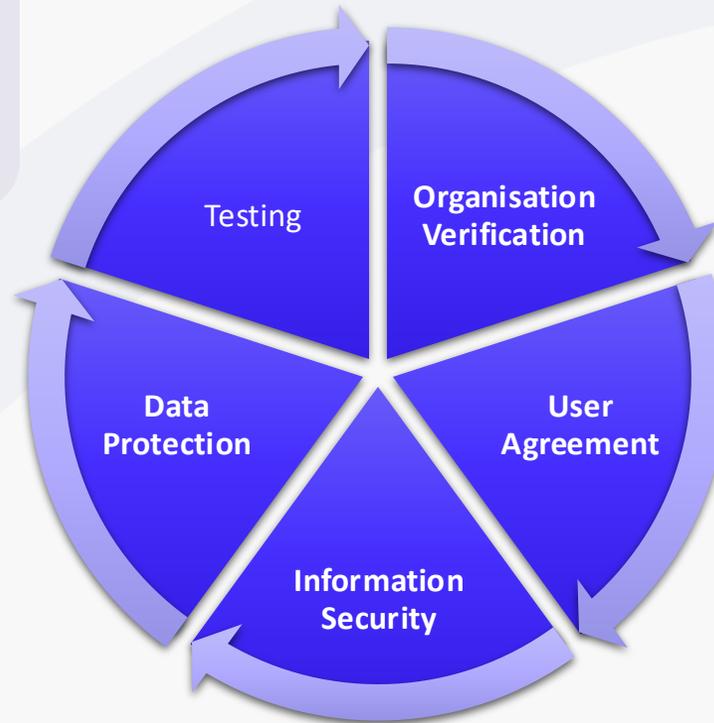
Proposed stages of CCS Accreditation

Before granting organisations' access to the CCS, they will need to demonstrate that they can integrate with the CCS and manage consumer consents.

The scope of testing requirements will be defined when the end-to-end technical solution is known.

A risk-based assessment to ensure that organisations have adequate controls to prevent data leakage or misuse and policies and procedures to facilitate compliance with data protection legislation and the REC Access Agreement.

Includes annual checks which range from simple attestations to full reassessments.



Identifying the organisation seeking access to the CCS.

Verification through Companies House checks, with manual fallback where required e.g. checks against equivalent EU register for non-UK businesses

Confirms the organisation's legitimacy and establishes the first layer of access

Based on existing Non-Party REC Service Access Agreement – provides legal commitment to confidentiality, data protection, and compliance obligations etc.

Incorporates the terms under which access may be terminated.

Minimum security requirements for CCS Users to be defined.

Considering advice from the government regarding Cyber Essential Certification: [Ministerial letter on cyber security - GOV.UK](https://www.gov.uk/government/news/ministerial-letter-on-cyber-security).

Where possible RECCo will place reliance on existing security certification / accreditation.

Interactive Session



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What do you see as the biggest opportunity offered by the Consumer Consent Solution?



Where do you see the most significant adoption or implementation challenges?



What will be most important for securing consumer buy-in?



How can RECCo best support industry awareness and readiness for CCS?

- Clarity on how existing schemes can ensure historical consent is recognised and doesn't need re-consent
- Explain the opportunities for parties using the CCS - need to see this as an enabler not a burden.
- Early demo on alignment with FMAR, SDR, any other digitalisation initiative currently being created
- Consistent engagement
- Clarity on exactly what we need to do and when - with as much notice as possible.
- Scope and dates for fast followers would be good to help plan.
- Clear and consistent information on timelines and deliverables
- Clear process for accreditation
- Show us a demo
- Regular engagement sessions
- Working group set up specifically for SEC Other Users, with early insight into potential system changes required to integrate.
- Clear list of what we need to get in order by when

When do you think your organisation will be ready to implement CCS?

For MMP (March 2027)



Soon after MMP - within 6-12mths



Post 2027



Not sure



Q&A Session

Whats Next:

Design Consultation Mid February 2026

Consumer Consent Engagement Day planned February 2026

Involved in *consumer data* and consent in the energy sector?

Let's connect.

The Consumer Consent Project is live, and we want to hear from you. Whether you have a question or concern or want to stay in the loop, our team is here to collaborate.

✉ Reach us at: consumerconsent@retailenergycode.co.uk

Your feedback plays a key role in shaping a secure, consumer-centric solution.

Consumer Consent Hub via RECCo website



Thank you