Consultation Response Form **Consumer Consent Solution (CCS)**

**Design Consultation**

**Published** 11 February 2026

A white curved object with a black line

AI-generated content may be incorrect.**Response Deadline** 25 March 2026

A black and purple logo

Description automatically generated

**Link to the Consultation**

[View the Consumer Consent Solution Design Consultation here.](https://retailenergycode.co.uk/alt/wp-content/uploads/2026/02/Consumer-Consent-Solution-Design-Consultation.pdf)

**How to Respond**

Please complete this document and send your responses to [consumerconsent@retailenergycode.co.uk](mailto:consumerconsent@retailenergycode.co.uk)   
Where possible, we kindly request that responses are submitted as a Word (.docx) document.   
**Please be assured that your responses will not be edited or amended in any way**.

We’ve asked for your feedback in each of the questions throughout. Please respond to each one as fully as you can.

We will publish non-confidential responses on our website at <https://retailenergycode.co.uk/consultations/>

**Your response, data and confidentiality**

Responses can be submitted in one of three ways:

* **Non-confidential** – the full response along with the submitting organisation’s name and category will be published; or
* **Confidential** – responses will only be shared with RECCo and its CCS project team, the REC Code Manager and the Authority (where relevant). We will respect this request for confidentiality, subject to any obligations upon us to disclose information. Confidential responses will not be published, and details will not be referenced in any consultation summary report(s) or subsequent REC Change Proposal documentation; or
* **Anonymous** – the full response will be published, but the submitting organisation’s name will be omitted (the organisation category will still be published). Details of the response may be referenced in any consultation summary report(s) or subsequent REC Change Proposal documentation, and the organisation name will be shared with RECCo and its CCS project team, the REC Code Manager, and the Authority (where relevant).

If you submit a non-confidential response but wish to keep part of your response confidential or anonymous, please clearly mark those sections as “confidential” or “anonymous” as appropriate.

All responses will be treated as non-confidential unless otherwise indicated.

RECCo recommends submitting only financial or commercially sensitive information as confidential, and using anonymous for other cases where the submitting organisation does not wish to be identified. This approach ensures that response details can be included in any consultation summary report(s) and that RECCo’s comments on the responses can be published.

**Respondent Details**

|  |  |
| --- | --- |
| **NAME** | [RespondentName] |
| **ORGANISATION** | [Organisation] |
| **ORGANISATION CATEGORY** | [OrgCategory] |
| **E-MAIL ADDRESS** | [e-mail] |
| **RESPONSE CONFIDENTIALITY** | Non-confidential (recommended) |

**Questions**

**Scope of the CCS**

|  |  |
| --- | --- |
| **Q1** | Do you agree with the proposed MMP scope, including the core functional components and the inclusion of SEC Other Users and the BSC SDR? |
| [Q1 Response] | |
| **Q2** | Do you have any comments on the assumption that SEC Other Users would not need to migrate existing consents to the CCS and would instead move to using the CCS as existing consents are renewed? |
| [Q2 Response] | |

**REC Policy Positions**

|  |  |
| --- | --- |
| **Q3** | Do you agree with the position that consent for access to half-hourly metered data should be provided by the occupier rather than the bill payer, where these are different individuals?  If not, please provide your rationale. |
| [Q3 Response] | |
| **Q4** | Do you agree with the position that for multi-occupancy households, a ‘lead occupant’ may provide consent on behalf of other occupants only where they confirm they have the authority to do so and have obtained agreement from all other adult occupants?  If not, please provide your rationale. |
| [Q4 Response] | |
| **Q5** | Do you agree with the proposed approach and standard for identity verification?  *If not, please provide your rationale.* |
| [Q5 Response] | |
| **Q6** | Do you agree with the position that consumers should have the option to establish an account with the CCS or grant consent via the ‘guest’ approach?  If not, please provide your rationale. |
| [Q6 Response] | |
| **Q7** | Do you agree that consumers should have the option to revoke or renew consent directly with the relevant ATP or via their CCS account?  If not, please provide your rationale. |
| [Q7 Response] | |
| **Q8** | Do you agree with our position that EDPs should explicitly check that active consent is in place within the CCS each time they share data with an ATP?  If not, please provide your rationale. |
| [Q8 Response] | |
| **Q9** | Do you agree that if the CCS is unavailable, the EDP should continue to share data unless the CCS outage extends for a significant period of time?  If not, please provide your rationale. |
| [Q9 Response] | |
| **Q10** | Do you agree that the FAPI 2.0 standard should be adopted for the CCS, which includes use of mTLS for all data sharing?  If not, please provide your rationale. |
| [Q10 Response] | |

**Technical Design**

|  |  |
| --- | --- |
| **Q11** | Do you have any comments on the proposed overall solution architecture and the component descriptions? |
| [Q11 Response] | |
| **Q12** | Do you agree with the proposed approach to matching MPxN to the address?  If not, please provide your rationale. |
| [Q12 Response] | |
| **Q13** | Do you have any comments on the non-functional requirements detailed within Annex D? |
| [Q13 Response] | |
| **Q14** | Do you have any comments on the split between centralised and decentralised elements of the overall solution outlined in Annex D? |
| [Q14 Response] | |
| **Q15** | Do you have any comments on the technical diagrams and / or business process diagrams set out within Annex E? |
| [Q15 Response] | |

**UX Design**

|  |  |
| --- | --- |
| **Q16** | We have identified four groups of people who will use the consent system, each with different needs (Annex F – Behavioural Archetypes). Have we missed any important user groups? Are there any needs we haven't considered for any of these groups?  If yes to either, please tell us what's missing and why it matters. |
| [Q16 Response] | |
| **Q17** | Do the proposed inclusion requirements adequately address the needs of vulnerable customers, digitally disadvantaged consumers, and consumers with limited English proficiency (Annex F – Accessibility and device constraints)? If not, what additional requirements should be included? |
| [Q17 Response] | |
| **Q18** | Do you agree that consumers need to know who is requesting consent, what data they want, and for how long? If not, what's missing? Is there a risk of information overload? |
| [Q18 Response] | |
| **Q19** | Where should additional verification steps or friction be introduced to protect consumers? Where might such steps create disproportionate barriers? (Refer to figures 7–10: User journey stage) |
| [Q19 Response] | |
| **Q20** | Do you agree that showing consumers which organisations hold consent, what data is shared, when consent was granted, and when it expires provides adequate visibility? If not, what's missing? What limitations should be communicated to manage expectations? |
| [Q20 Response] | |
| **Q21** | Do you agree that consumers need to understand which services will be affected, what happens to their data, how long changes take, and whether revocation is reversible? If not, what's missing? Is there a risk of information overload at the point of revocation? |
| [Q21 Response] | |
| **Q22** | Do you agree that assisted journeys should enable consumers to grant consent, review active consents, revoke consent, and receive the same information as digital users? If not, what additional outcomes are needed to achieve equivalence? |
| [Q22 Response] | |
| **Q23** | For consumers who are unable or choose not to use digital services, what outcomes should an assisted or alternative consent service journey deliver to be considered fair and equivalent? |
| [Q23 Response] | |

**Governance Design**

|  |  |
| --- | --- |
| **Q24** | Do you have any comments on the proposed REC drafting approach, including the creation of a new REC CCS Arrangements Schedule, a new CCS Service Definition, the Customer Experience Guidelines, consequential changes to existing REC artefacts, and the new CCS API Technical Specification? |
| [Q24 Response] | |
| **Q25** | Do you agree with the proposed initial funding model, including the ability for the cost of qualification and breach investigation activities to be recovered from the individual organisations?  If not, please provide your rationale. |
| [Q25 Response] | |
| **Q26** | Do you agree with the proposed CCS Accreditation model?  If not, please provide your rationale. |
| [Q26 Response] | |
| **Q27** | Do you agree that a minimum standard should be set whereby all CCS Users should be Cyber Essentials Plus certified or ISO 27001 accredited?  If not, please provide your rationale. |
| [Q27 Response] | |
| **Q28** | Do you have any comments on the application of the existing REC change process to cover management of the CCS arrangements? |
| [Q28 Response] | |
| **Q29** | Do you have any comments on applying the existing REC performance assurance framework to cover assurance of the CCS arrangements? |
| [Q29 Response] | |
| **Q30** | Do you have any comments on the proposed issue/dispute resolution paths defined for the management of CCS issues? |
| [Q30 Response] | |

**Product Roadmap**

|  |  |
| --- | --- |
| **Q31** | Do you have any comments on the approach to defining the future roadmap within the consultation or the content of the draft roadmap in Annex G? |
| [Q31 Response] | |

**Additional Comments**

|  |  |
| --- | --- |
| **Q32** | Please provide details of any additional issues you feel have not been adequately captured within the consultation document. |
| [Q32 Response] | |

**Thank you   
for responding**

A white curved object with a black line

AI-generated content may be incorrect.Your response is greatly appreciated.

If you have any questions or   
want to keep up to date with our  
latest news, please contact us below.

[A blue and black email icon

AI-generated content may be incorrect.](mailto:info@retailenergycode.co.uk)[A blue rectangle with a black background

AI-generated content may be incorrect.](https://uk.linkedin.com/company/the-retail-energy-code-company)

retailenergycode.co.uk

LinkedIn

[A blue arrow in a square

AI-generated content may be incorrect.](https://www.retailenergycode.co.uk/)

consumerconsent@retailenergycode.co.uk