

# Annex C: Design Principles

## Design Principles

- **Value For Money** – Developing the CCS in the most cost-effective way is a core principle of the overall CCS project and is already captured within RECCo's standard procurement principles<sup>1</sup>. We therefore do not believe this needs to be added as a specific design principle for the CCS.
- **Effective Competition and Level Playing Field** – We recognise the views of consultation respondents that competition impacts should be explicitly recognised within the design principles. We also note that the REC includes an objective to promote effective competition and create a level playing field among market participants. We therefore propose the addition of a new design principle to cover effective competition. In addressing this design principle, we will ensure that the CCS enables fair access to data, prevents anti-competitive practices, and encourages innovation, which will in turn enable consumers to benefit from a dynamic, competitive energy market.
- **Collaborative Fairness** – We believe the new design principle promoting effective competition should address the concerns raised by respondents regarding fairness. In addition, as responsibility for managing the Consumer Consent Working Groups transitions from Ofgem to RECCo, we will ensure a collaborative approach is followed, with a strong focus on stakeholder engagement through the working groups and wider engagement to ensure the CCS balances the needs of different organisations.
- **Privacy by Design** – We will ensure that the CCS complies with GDPR principles for consent, with data privacy driving all elements of the design. To recognise that these principles are not limited to the need for transparency and clarity of information, we propose amending the original design principle of 'Transparent and Informative' to 'Privacy by Design' to reflect the full extent of GDPR considerations.
- **Consistency** – We recognise that one of the key benefits of a centralised CCS is the replacement of existing fragmented and inconsistent approaches to consent management, delivering a consistent approach to consumer engagement. This is a key driver for the development of the CEGs, which aim to build consumer confidence that their data is handled fairly and securely by introducing a robust and consistent approach to consumer interactions. We therefore agree that consistency should be added as a CCS design principle.
- **Minimising Scope** – We believe a principle focused on minimising the scope of the CCS would conflict with Ofgem's proposed design principle that the CCS should be flexible and scalable. We do not believe it would be appropriate for the CCS to be designed in a way that minimises its scope. Instead, we are focusing on ensuring that the CCS design is sufficiently flexible to enable future enhancements, allowing the scope to expand over and support broader data access to benefit consumers. We do, however, recognise the need to carefully manage the future roadmap to ensure enhancements are introduced at the most appropriate time. This is covered further in Section 9 of the consultation.

## Application of CCS Design Principles to User Experience

- **Simple and Low Friction:** In a user experience context, this principle is applied by ensuring that consent journeys are proportionate, clear, and do not introduce unnecessary steps or complexity for consumers. Consent interactions should be easy to complete while still providing the information required to support informed decision-making and appropriate safeguards. UX standards will focus on minimising avoidable friction at CCS interaction points, while recognising that positive friction may be necessary to support trust and data protection.

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<sup>1</sup> [RECCo Procurement Principles](#)

- **Interoperable:** This principle is applied by ensuring that consumers encounter consistent and recognisable consent interactions wherever the CCS is used, even when services are delivered by different organisations. From a UX perspective, interoperability supports familiarity, reduces confusion, and enables consumers to transfer understanding between services. Minimum UX standards will define common components of the consent journey and interaction expectations at CCS touchpoints to support this consistency.
- **Agile, Flexible, and Scalable:** The UX Framework applies this principle by defining minimum standards that support delivery of the MMP, while remaining adaptable to future expansion of CCS capability and scope. UX standards and guidance will be developed iteratively, allowing refinement as the CCS ecosystem matures and additional evidence is gathered. This ensures that early UX decisions do not constrain future functionality, channels, or user needs.
- **Privacy by Design:** Privacy by Design is reflected in the user experience by ensuring that consent interactions clearly explain what data is being shared, with whom, and for what purpose at the point of consent. UX standards support transparency, comprehension, and informed choice, rather than reliance on legalistic language or hidden information. UX considerations also include how privacy-related information is presented and how consumers can understand and manage their consent over time.
- **Inclusive by Design:** This principle underpins the CCS UX Framework. Consent journeys must be accessible and inclusive for a wide range of consumers, including those with accessibility needs, lower digital confidence, or reliance on assisted support. UX standards will account for delivery across digital and assisted channels and ensure that CCS interaction points do not exclude or disadvantage particular user groups.
- **Secure by Design:** Secure by Design is applied in the UX by ensuring that consumers can recognise when they are interacting with a legitimate, governed CCS consent process and can have confidence that their data is protected. User experience standards will support clear trust signals, reassurance, and consistency without creating unnecessary complexity or concern. This includes helping consumers understand that appropriate safeguards are in place, even where underlying security controls are not visible.
- **Consistency:** Consistency is a core driver of the CCS. It is reflected in the UX Framework through the definition of minimum experience standards at CCS interaction points. Regardless of which organisation delivers a service, consumers should encounter predictable, familiar consent interactions that behave consistently. The CEGs will support this by setting clear guardrails for how consent is presented, managed, and communicated wherever the CCS is used.