

Consumer Protection & Accessibility Working Group Advisory Paper

Publication date: 12th December 2025

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This document is for those interested in the progress of the Consumer Consent Solution as being designed and delivered by the Retail Energy Code Company ('RECCo') following the Ofgem decision. It follows the initial working groups set up from that decision and explains the advice given by the experts in those groups to RECCo as to what the solution should and could entail, and will feed into RECCo's Design Consultation, published in Q1 2026. This paper can and should be read in conjunction papers released from the other two Working Groups; Implementation and Governance, and Technical Design and Security.

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Executive summary

The Consumer Consent solution ('the solution') is being designed with consumer-centric principles in mind: robust governance, a proven trust framework, and the ability for consumers to withdraw consent in near real time. These features are essential to ensuring the solution is secure, transparent, and responsive to consumer needs.

Ofgem has tasked RECCo with leading further consultation with the sector to finalise the solution's design with clear protections in place for the consumer, ensuring it delivers enduring value for both consumers and the energy sector.

During Ofgem's time as the chair for the Consumer Protection and Accessibility working group, working group members have provided clear guidance to ensure the Consent Solution prioritises consumer protection while remaining inclusive, equitable, and user-friendly. Key recommendations from members emphasised the importance of transparency in how consumer data will be processed, and the need to simplify the user experience to minimise confusion. The use of plain English and strong editorial oversight was strongly encouraged to prevent misleading or ambiguous messaging.

Robust accountability for third-party intermediaries emerged as a significant concern, with members highlighting the need for consumers to clearly understand available forms of redress if issues arise. Members also stressed the importance of ensuring the solution is accessible to all, with no cohort excluded, and called for a clear pathway to achieve this.

Members agreed that the solution should accurately represent real data flows, including those that do not rely on consent (such as contractual or legally required flows), with specific exceptions such as the prevention and detection of crime. They discussed how the solution should support redress and enforcement when consent is not upheld. Emphasising the importance of building trust and ensuring clear mechanisms for redress.

Clear, consistent, and tested consent language was considered essential—particularly in distinguishing between one-off and enduring consent. Additionally, members recommended an awareness campaign, that goes further than just consumers, and direct businesses but with consumer advocacy groups and those in support roles like local authorities, focusing on the solution's benefits, trustworthiness, and consumer empowerment, rather than marketing or sales. It was noted that most consumers will not have reason use the consent solution on its own. Adoption depends on delivering clear, simple messages at the right time when consumers interact with the energy system

This paper presents the group's outputs and recommendations, which centre on four core areas: consumer protections, accessibility and inclusivity, language and cultural inclusion, and consumer adoption.

1. Key Critical Issues

Section summary

Ahead of deploying the Consumer Consent Solution, Ofgem engaged with industry and stakeholders through creating three Working Groups to gather input on implementation, governance, consumer protection, and technical design. This paper outlines the Consumer Protection and Accessibility (CPA) group's contributions, aimed at safeguarding consumer rights and ensuring the CCS solution is inclusive, equitable, trustworthy, and user-friendly.

This section covers the most important issues uncovered in the CPA Working Group. We have discussed the critical paths to delivery for the Consumer Consent Solution and believe that the following are the most important issues for the design of the solution to encompass.

Protecting Consumers

Potential sub-optimal outcomes

- 1.1 Protecting consumer rights is central to the development of the Consent Solution and consumer protection and trust must be at the heart of all decision making regarding the effective design and deployment of the Consent Solution. The group's advice will help to safeguard consumer rights while ensuring the solution is inclusive, equitable, and user-friendly. Clear, system-wide consent processes will empower consumers to control their data, reduce participation barriers, and support a fair, inclusive energy transition.
- 1.2 Another critical point for engagement is that the design of the solution be as low friction as is possible while maintaining legal integrity and security of the design of the solution.
- 1.3 The solution establishes a consistent and transparent approach to using consent as a lawful basis under UK GDPR, reducing friction and enabling innovation. The solution will incorporate clear guidance on privacy, the right of redress, and the right for consumers to access data held within the solution, ensuring alignment with existing legislation and strengthening trust in data practices.

Accessibility and Inclusivity

Potential sub-optimal outcomes

- 1.4 The experts for this working group came from consumer advocacy groups, charities, suppliers, and third parties. They identified barriers faced by those with

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disabilities, additional needs, or limited digital proficiency—identifying practical ways to remove these barriers and make the solution inclusive and accessible. The process should be accessible for all and not leave the digitally excluded behind.

- 1.5 Considerable discussion was held around how prescriptive to be in the rules surrounding the User Experience (UX) requirements. The Working Group is of the view that RECCo, as delivery body, can and should be detailed and specific in the limits and requirements of the UX which can be deployed by users of the Consent Solution, to standardise consumer experience and to ensure accessibility.
- 1.6 Members emphasised the importance of ensuring that the Consent Solution provides a comprehensive view of all third-party consents, rather than limiting visibility to those parties that have opted to use the tool. We agree this is a critical step toward building trust and transparency. However, we do not expect this functionality to be included in the MMP instead, it will be expected in future iterations.

Language and Cultural Inclusion

Potential sub-optimal outcomes

- 1.7 In the development of the Consent Solution, it was important to define where and how language and cultural inclusion should be addressed in User Experience design. (UX). We asked members to consider whether to set standards or use templates to guide language use. All user-facing content—including User Interface text, specifications, agreements, and documentation—should be clear, concise, and as non-technical as possible.
- 1.8 It is important that we consider existing standards and guidance beyond the energy sector. Members recommended further reading and direction for RECCo to enhance accessibility and usability for consumers.¹²³
- 1.9 Complex or lengthy language can hinder understanding, especially for users with cognitive impairments or those whose English is their second language. We asked members to consider how effectively we can use simple, straightforward language to improve accessibility and help users navigate and engage with the solution more effectively.

Consumer Adoption of the Solution

- 1.10 Consumer adoption of the Consent Solution cannot be assumed. A strategic campaign is essential to build awareness, trust, and understanding of the value

¹ [Readability - Home Office User-Centred Design Manual](#)

² [Content design: planning, writing and managing content - Writing for GOV.UK - Guidance - GOV.UK](#)

³ [Flesch Reading Ease and the Flesch Kincaid Grade Level – Readable](#)

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exchange that encourages users to engage with the solution. We must establish a strong foundation, through targeted information campaigns, communications, and engagement, that supports and encourages uptake to use the Consent Solution.

- 1.11 We asked members to offer advice on how best to achieve this. Members of the working group consider this stage of the development sufficiently important for additional spending to be authorised to support the widespread understanding, trust, and adoption of the Consent Solution.
- 1.12 Members stated consumer communication should focus on building trust in energy data sharing rather than simply driving adoption. This requires integrating clear, simple messages into consumer interactions with the energy system, supported by evidence-based research and testing to identify effective touchpoints. The approach must be ongoing to reach new households and adapt to changing circumstances. Leveraging trusted messengers and existing communication channels is essential, alongside ensuring transparency of data flows to reinforce confidence.

2. Proposed mitigations

Section summary

Members agreed the system should work across different sectors and be easy for everyone to use, especially people who are not confident with digital tools or are from vulnerable groups. Across all working groups, there was strong support for a design that puts consumers first, making the process simple, fair, and empowering. Clear, tested language and a distinction between one-time and ongoing consent were seen as essential for building trust.

This section covers the critical steps members recommended to mitigate the issues identified in the CPA Working Group. We have discussed the critical paths to delivery for the Consumer Consent Solution, and believe that the following are the most important issues for the design of the eventual Solution to encompass;

- Protecting Consumer Rights
- Accessibility
- Language and Inclusion
- Consumer Adoption to use the Consent Solution

Protecting Consumers

Potential sub-optimal outcomes

- 2.1 Members raised important questions about how the new consent solution would interact with existing legal frameworks such as the SEC Section I, Supply SLC47 and UK GDPR. Members emphasised the need for clarity around governance, specifically, who would be responsible for overseeing the system, ensuring compliance, and resolving disputes. Ethical considerations were also discussed, particularly in relation to how consent would be obtained and managed in complex energy ecosystems involving brokers, aggregators, and emerging technologies.
- 2.2 A member emphasised meaningful consent, transparency, and going beyond the Information Commissioner's Office (ICO) minimums to prevent consumer harm and highlight the importance of trust and clarity.

Mitigations

- 2.3 Members raised concerns about whether the data flows for the Solution should show what should happen or what is actually happening. It was confirmed that it should reflect actual data flows, including non-consent flows (e.g., contractual or mandated), with exceptions such as crime prevention. Members explored the solution's role in redress and enforcement when consent fails. Members prioritised trust and the need for clear redress mechanisms.

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- 2.4 The group agreed that transparency and visibility of data flows are essential to building trust. Consumers should be able to see all data flows, not just those requiring consent. Some members emphasised that even consumers who never actively use the platform benefit from knowing it exists. This reassurance effect is a key value proposition. They added that the solution should be positioned as a “data dashboard”, a place where consumers can view and manage how their energy data is shared, similar to how people manage cookies or privacy settings online.
- 2.5 A member highlighted that third parties, including consumer advocates, can help build trust by explaining how the consent solution works—provided it delivers transparency and control. This reassurance, offered through their existing energy advice channels, is an essential part of fostering confidence in the system.
- 2.6 A member recommended robust assurance processes for aggregators and asked that the trust framework will include assurance mechanisms to ensure aggregators act within the scope of consumer consent.
- 2.7 A member asked how the framework would go beyond UK GDPR to build genuine consumer trust. Members responded that the trust framework will ensure compliance among data handlers. RECCo stated Consumer trust will be addressed separately through UX design, transparency, and engagement with consumer groups. Members viewed it as imperative to set rules and standards for consent seekers and data users in communicating with consumers, to prevent undue pressure on consumers through messaging. RECCo confirmed these are being considered, especially in technical design and risk appetite discussions.

Accessibility and Inclusivity

Potential sub-optimal outcomes

- 2.8 Members emphasised the importance of ensuring that the consent solution is interoperable across different sectors. A “tell us once” approach, where consent, once given, can be recognised and acted upon by multiple organisations, would be particularly valuable. For example, if an individual has disclosed vulnerabilities, it would be beneficial for other utility providers, such as water or telecommunications companies, to be aware of this and respond appropriately with the user’s consent.
- 2.9 Members stated that a fragmented approach, where each sector develops its own consent mechanism, could undermine consumer confidence and create unnecessary complexity. Instead, they advocated for a coordinated, cross-sector approach that aligns with broader digitalisation and data-sharing initiatives.
- 2.10 Several contributors emphasised the importance of designing the consent solution to be inclusive of all consumers, especially those who are digitally

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excluded, who have limited digital literacy, or are from vulnerable communities.⁴ Participants highlighted the need for alternative user journeys that accommodate people who may not be the primary bill payer, who live in social housing, or are in houses of multiple occupancy. There was also concern that smaller organisations and charities should be able to engage with the system without facing disproportionate barriers.

- 2.11 A solution must not be only inclusive but accessible for all. A member stated accessible design removes barriers for legally defined groups, such as people with disabilities, while inclusive design aims to serve a broad audience. One solution cannot meet all needs, so accessibility adaptations may still be required. The consent solution must keep its core purpose—transparency and control—rather than becoming a universal tool for industry. It should offer layered options: simple, easy-to-use information for most users and detailed content for those who want it, ensuring everyone can access energy services.⁵
- 2.12 Members across all working groups stressed the importance of designing a consumer-centric solution. Participants had consistently emphasised the need for the consent journey to be intuitive, inclusive, and empowering for all users. Additionally, there was a shared view that delivery must be realistic, avoid duplication, and draw on lessons learned from other sectors. Governance and regulatory structure were also highlighted as areas requiring further development.
- 2.13 Members emphasised that the solution must be implemented promptly, achieving full adoption well before the 2030 Flex targets. Ideally, by that time, it should also encompass additional data sets such as export data, tariffs, and asset data.

Mitigations

- 2.14 Members recommended that provisions be made for digitally excluded Consumers. RECCo acknowledged the importance of inclusivity and discussed the need for alternative user journeys, including in-person verification, support through advice services, and simplified interfaces for those with limited digital access.
- 2.15 A member asked how Identity and Verification (ID&V) would be managed for non-digital natives, noting that many digitally excluded users are comfortable using WhatsApp but may struggle with websites or email. The suggestion to use WhatsApp as an alternative communication channel was welcomed by members, as it aligns with the preferences and capabilities of many consumer groups.
- 2.16 Following working group advice, RECCo is procuring a specialist User Experience (UX) partner to support user testing and design validation. Testing will include

⁴ [Digital-Exclusion-September-2025.pdf](#)

⁵ [Inclusive Design: 8 Core Principles to Abide By](#)

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non-digital users and diverse consumer groups, with input from service providers. The team also expressed openness to collaborating with organisations that support digitally excluded users, to help map real-world use cases and test integration scenarios. Members agreed that prioritising the inclusion of digitally excluded users is essential in this process

- 2.17 The group explored the potential for integrating existing Know Your Customer (KYC) processes into the Identity and Verification (ID&V) framework. It was noted that this would likely be governed by the trust framework, under which only accredited parties would be permitted to contribute verified identity data. Members acknowledged the challenge of balancing security, interoperability, and user convenience, particularly in cases where consumers have already completed ID&V steps with other providers.
- 2.18 The group discussed the importance of supporting other alternative user journeys, such as those for tenants. There was also a strong emphasis on the need for clear, consistent, and tested consent language, as well as the differentiation between one-off and enduring consent. The overarching goal is to ensure consumer benefit and trust.
- 2.19 RECCo talked through some future considerations that they hope to incorporate in later iterations of the Consent Solution, beyond MMP. These included the inclusion of Priority Services Register (PSR) data, personalised journey enhancements, expanded data sharing and partnerships, affordability filtering and advanced consent options. A member asked if the Consumer Consent solution could become a blocker for vulnerable users trying to access services.
- 2.20 Key assumptions made by RECCo as a common understanding with the working group included the solution's adaptability, integration with Elexon's Smart Data Repository, accreditation requirements for Smart Energy Code (SEC) Other Users, and the absence of direct Smart DCC (DCC) integration for Minimal Marketable Product (MMP).

Language and Cultural Inclusion**Potential sub-optimal outcomes**

- 2.21 In the development of the Consent Solution, it was important to define where and how language and cultural inclusion should be addressed in UX design. We asked members to consider whether to set standards or use templates to guide language use. All user-facing content, including UI text, specifications, agreements, and documentation, should be clear, concise, and as non-technical as possible. Members of the group were of the view that this could and should be prescribed to a standard as part of accreditation to using the Consent Solution.
- 2.22 The group discussed the importance of supporting other alternative user journeys, such as those for tenants. There was also a strong emphasis on the need for clear,

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consistent, and tested consent language, as well as the differentiation between one-off and enduring consent. The overarching goal is to ensure consumer benefit and trust.

Mitigations

- 2.23 Members recommended consistent language to be used in the development of the Consumer Consent Solution. RECCo devised a glossary (see appendix 3). It is intended to be a living document that evolves with the project and will be developed in collaboration with DESNZ to ensure consistency across initiatives.
- 2.24 A member made recommendations to RECCo that they use simple English, with short sentences, without technical jargon and abbreviations. The recently completed UKRI-funded PRIME (Protecting Minority Ethnic Communities Online) project found that people who speak English as a second language, despite being also fluent in English, struggle with digital services which use uncommon vocabulary, legalese, technical jargon, and abbreviations. A member also made recommendations for RECCo to consider official translations of the Consent Solutions standard consent interface to the top minority languages such as Welsh, Polish, Punjabi, and Urdu, instead of leaving it to users to use their own translation apps.⁶

Consumer Adoption of the Consent Solution

- 2.25 Several members raised concerns about the ambitious timelines for delivering the Consent solution. They noted that the project is being developed alongside other major energy initiatives, such as the Energy Smart Data Scheme and work on tariff interoperability. There was a risk, they argued, that without careful coordination, the new Consent Solution could duplicate existing mechanisms like the Smart Energy Code, leading to confusion and inefficiency.
- 2.26 The vision for the Consent Solution is to support multiple data sources and identity verification methods, while avoiding duplication with existing frameworks such as the Smart Energy Code. RECCo clarified that the solution aims to be more inclusive and consumer-centric, accommodating a broader range of users and use cases. It will also offer a clear and transparent mechanism for consumers to manage and revoke consent, an area that is often complex and unclear in current systems.
- 2.27 Several members raised concerns about how the new solution will interact with existing consent mechanisms. RECCo confirmed that a “Big Bang” rollout is not planned. Instead, the transition will be phased, with parallel processes in place to ensure continuity and minimise disruption. The solution is designed to be both

⁶ [PRIME Technical Policy Briefing.pdf](#)

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flexible and extensible, enabling the gradual onboarding of new service providers and user types over time.

- 2.28 While a “Big Bang” rollout for MMP has been ruled out, some members questioned why a similar approach couldn’t be considered later, once the scheme proves effective. Members repeatedly raised this in working group discussions. Members considered it acceptable for MMP to remain optional, but the Consent Solution should become mandatory soon after to deliver the promised consumer benefits.

Mitigations

- 2.29 A member asked about the plan for marketing the consumer consent solution to consumers. RECCo responded that initially, the technical solution will be used by industry parties. However, long-term marketing to consumers and third parties in how to use the solution is essential to build trust and awareness, and it was emphasised that consumer uptake is a key metric for success.
- 2.30 A member suggested shifting focus from broad marketing or public campaigns to targeted consumer awareness during real interactions with the energy system. They recommended researching consumer journeys to identify key touchpoints and integrating signposting and links to the consent solution at those points. Using evidence-based approaches and testing will help ensure communication methods are effective and funds are well spent. Suggesting using the EAST framework (Easy, Attractive, Social, Timely) to guide campaign design.⁷
- 2.31 It was recommended to build up trust, for RECCo to reach out to community organisations throughout the UK, who already have the community’s trust and well-established connections with people at the grassroots level. These organisations can raise awareness, build trust, and convince people from minority ethnic communities to actively use the Consent Solution. The member was happy to connect Ofgem/RECCo with relevant community organisations and continue to support in future working groups.
- 2.32 Members stressed the importance of a public information campaign to raise awareness of the solution. This should focus on benefits, trust, and empowerment, rather than marketing or sales. Campaigns should be timed to coincide with periods of high energy awareness, such as winter months, to maximise engagement.

⁷ [BIT-Publication-EAST_FA_WEB.pdf](#)

3. Conclusions

The group's recommendations emphasise the need for transparency, meaningful consent, and robust governance to build trust and ensure legal integrity. By simplifying the user experience and ensuring accessibility for all, the solution can empower consumers to manage their energy data confidently and securely.

The Working Group were clear that the Consent Solution needs to be inclusive, accessible, and consumer centric; with clear consent language and alternative user journeys to accommodate diverse consumer needs.

The working group also repeatedly emphasised the need for the Consent Solution to show all third parties accessing the customers energy data, as soon as possible post-MMP. Without having that full list of third-party permissions (i.e. all DCC Other User access, including existing pre-Consent Solution consents) there is a risk of giving consumers false confidence in a tool. Members were clear we must take a cross-sector, interoperable approach to enhance trust and reduce complexity. The importance of robust governance, realistic delivery, and benchmarking against alternative solutions was also emphasised

Language and cultural inclusion are critical components of the Consent Solution's design. Members emphasised the need for clear, simple, and non-technical language across all user-facing content to ensure accessibility for all consumers, including those with accessibility needs or for those where English is a second language. The use of plain English, short sentences, and avoidance of jargon was strongly recommended,

Consumer adoption of the Consent Solution cannot be assumed. Building trust and awareness is essential and it is vital for consumers to understand the value to use the service to encourage uptake. Members strongly supported a strategic public information campaign, focused on benefits, empowerment, and trust. They recommended using frameworks like EAST (Easy, Attractive, Social, Timely) and leveraging trusted community organisations to reach digitally excluded and minority ethnic communities, particularly those with concerns about data use and discrimination.

Members also emphasised the importance of inclusive messaging, realistic delivery, and ongoing engagement. RECCo acknowledged these priorities and committed to further investment in communications, user testing, and outreach to ensure the Consent Solution is accessible, trusted, and widely adopted.

Appendices

Appendix 1 Context and related publications

These publications are intended to be read as part of the ongoing development of the Consumer Consent Solution policy. Below, we have listed the Call For Input, Consultation and subsequent decision, Impact Assessment and Advisory Papers from other Working Groups. Following these publications, RECCo will produce a Design Consultation which these papers inform.

3.1 List of related publications

- [Data Sharing in a Digital Future | Ofgem](#)
- [Consumer Consent decision | Ofgem](#)
- [Consumer Consent Solution consultation | Ofgem](#)
- [Consumer Consent Impact Assessment \(IA\) consultation | Ofgem](#)

Appendix 2 Frequently Asked Questions

<https://recportal.co.uk/documents/20121/0/Consumer+Consent+Solution+Frequently+Asked+Questions.pdf/b122c5d9-99fa-3f08-a25c-cff4cadd32a1?t=1758196139387&download=true>

Appendix 3 Consumer Consent Glossary

https://recportal.co.uk/documents/20121/0/The+Consumer+Consent+Solution+_+Glossary+_+September+2025.pdf/edccfb55-7d23-5504-d833-27ee3efcd8b6?t=1758196172747&download=true

Appendix 4 Consumer Consent Digital Newsletters

[Published 08 October 2025](#)

[Published 10 September 2025](#)

[Published 13 August 2025](#)

[Published 16 July 2025](#)

Appendix 5 Working Group Members

Ofgem

RECCo

East Lothian Housing Association

Money Advice

WHICH

Energy Savings Trust

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Centre for Sustainable Energy

Smart Energy Code

SSE Energy

Energy UK

HIES Consumer Code

NESO

Citizens Advice

Centrica

Protecting Minority Ethnic Communities Online (PRIME)

Association for Decentralised Energy (ADE)

Department of Energy Security and Net Zero