Implementation and Governance Working Group paper

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This document is for those interested in the progress of the Consumer Consent Solution as being designed and delivered by 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, Consumer Protection and Accessibility and Technical Design and Security.

Contents

Executive summary

The Implementation and Governance working group contains a wealth of experience from various groups and organisations both nationally, and internationally, ranging from multiple streams of the energy value chain, banking and finance, data services and science, and other sectors. Over the past six months, the group has been briefed by RECCo delivery team and Ofgem on progress and design of the proposed solution.

During this time, the discussions in this group have crystallised around three key themes;

- Interoperability
- Designing For Consumers
- Designing for Governance

These themes are, in the view of the working group members, key requirements at the design stage of the Consumer Consent Solution and can be seen as setting the conditions for successful deployment of the technical solution. Interoperability, by definition, cannot be conducted in isolation, and will require RECCo to interact with the delivery bodies currently undertaking similar digital architecture initiatives to design and develop digital architecture within the energy sector, such as NESO's Data Sharing Infrastructure (DSI) and Elexon's Smart Data Repository[1] (SDR) and Flexibility Market Asset Register (FMAR).

Designing for Consumers and Governance can be viewed as two facets of the design process, the consumer journey, and the consent seeker journey. Both must balance the required rigour to ensure a safe, transparent and trusted Solution with the minimum of friction and burden.

From a consumer viewpoint, insufficiently robust controls, absence of the expected transparency and control, and protections in place will reduce trust; whereas too much friction in using the Solution will result in 'drop off'. Both will hamper the adoption of the solution. From a consent seeker viewpoint, too much repetition or burden in the accreditation process or trust framework will result in fewer companies using the Solution to bring innovative proposals to consumers. Both outcomes will reduce the effectiveness of the Solution in its stated policy aims.

In sections 2 and 3, the members of the working group set out recommendations to potentially mitigate against these risks, and selected what was viewed as the key recommendations, namely;

1.	Establishing a clear accreditation process, combining effective standards with a minimum of burden and barrier to entry.

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[1] The legal route to sharing consumption data via the SDR is subject to the outcome of code modification P494.

2. Consumer journeys being the focus of all design, in order to minimise friction, maximise trust, and encourage uptake of the Solution
3. Standardised consent models and API processes, taking advantage of existing technology and best practice from around the world.
4. Ensuring that the governance surrounding the Solution interacts smoothly with the Smart Energy Code and subsequently enables efficient access to smart meter data for data users.
5. Designing the Solution in such a way that enables interaction with cross-sectoral data sharing initiatives under the Smart Data agenda.

1. Key Critical Issues

Section summary

This section covers the risks and potential issues which members of the working group have raised, based on expertise and previous experience in parallel sectors and nations, such as consent work outside of the UK, and Open Banking in the UK.

This section covers the most important issues uncovered in the Implementation and Governance 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;

- Interoperability
- Designing for consumers
- Designing for governability

Interoperability

Ensuring that the Consumer Consent Solution integrates seamlessly with existing and planned regulatory frameworks and industry programmes in the energy sector must be a key consideration in the design of the Consent Solution. Without this, there is a risk of unnecessarily duplication of work, siloed development, and infringing on the scope of existing governance frameworks.

Potential sub-optimal outcomes

1.1 Without a keen focus on interoperability, it is possible that the Consumer Consent Solution could duplicate existing industry standards, governance frameworks, or regulatory mechanisms. Keeping integration and interoperability as core facets of the development focus ensures that resources are not wasted replicating existing systems and that development time is used in the to make the improvements set

out in the Ofgem Decision, such as the need for a consent platform to allow consumers to view and manage their consents in one location.[2]

1.2 It is key that the Consent Solution complements rather than conflicts with existing initiatives to not only prevent duplicated work, but to ensure seamless integration with other initiatives across sectors. Working group participants highlighted the Smart Energy Code (and subsequent data access agreements) as a key initiative to interact with. It was also noted that, given the government's ambition around the Smart Data agenda, consideration should be given as to how best to interact with other sectoral (banking, water, finance, transport) implementations of Smart Data Schemes.

1.3 A system designed without interoperability in mind would be substantially less efficient and would provide less value to consumers. A poorly integrated system could fail to solve the initial case for intervention, which was consumers needing to use many disparate systems to understand the use of their data and manage their consent in one user-friendly place.

Designing for consumers

Designing the Consent Solution with consumers in mind is key to its successful development and implementation. Protecting consumer rights and establishing trust will be key to the uptake and beneficial impact of the Consent Solution.

Potential sub-optimal outcomes

1.4 Failing to establish adequate trust with consumers will reduce the uptake of the Consent Solution, hampering its effectiveness and limiting the benefits it can provide for consumers. This would be exacerbated by the solution lacking adequate coverage of third-party access to data, which would undermine the promise of 'one stop shop' for all consented data flows.

1.5 A lack of trust would most easily be created by having poor transparency regarding why, how, with whom, and for how long consumer data is being shared, or by making it difficult to give, withdraw, or manage their consent. It is important that this information is presented clearly to consumers and that they have control over the use of their own data. This risk was highlighted in both this working group, and the Consumer Protection & Accessibility (CPA) group.

1.6 An interface to the Consent Solution that is not designed with consumers in mind will similarly hamper the uptake and potential possible benefits by making it too difficult or inconvenient for consumers to use. The question of UX, or User Experience design was gone into in more detail in the CPA group.

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[2] [Consumer Consent decision | Ofgem](#)

1.7 In circumstances where the billpayer is not the occupier, there may be issues in identifying the appropriate party from which to get consent. This 'landlord/tenant' issue has been a known consideration in the energy sector as to who has right to grant consent for some time. While no firm conclusions were drawn in this group, members pointed to the work being done in various spaces, existing practice with suppliers and billpayers, and work done by SEC Other Users. This is to be progressed as part of Identification and Verification (ID&V) within the delivery programme.

Designing for governability

In addition to designing with consumers in mind, it is important that the Consent Solution is designed with governability in mind.

Potential sub-optimal outcomes

1.8 Members have warned that without a focus on governability from the outset, there is a risk that a technically elegant solution is created without ensuring that the data sharing mechanism is accountable, auditable and enforceable, all of which are crucial facets of the Consent Solution. This could lead to misuse of consumer data without oversight, eroding consumer trust. A balance must be struck here, as there is a risk that overregulation would stifle innovation, particularly for smaller market entrants.

1.9 Conversely, if the accreditation process for the Consent Solution is too time-consuming or costly, it could pose an unnecessary barrier to entry for companies legitimately looking to work with consumer data. A balance must be struck here to ensure that consumer data is appropriately protected but not needlessly locked away.

2. Proposed mitigations

Section summary

This section covers the suggestions made in the working group to include in the design of the CCS in order to mitigate the risks and issues foreseen in the previous section.

This section covers the critical steps recommended by working group members to mitigate the issues uncovered in the Implementation and Governance 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;

- Interoperability
- Designing for consumers
- Designing for governability

Interoperability

To avoid a poorly integrated system which does not address all the issues intended, it is important that interoperability is a key focus of the development process.

Potential mitigations

2.1   Members have suggested that **consent models and APIs should be standardised, allowing for easier integration with existing systems** and an awareness of existing approaches to prevent duplicated work.

2.2   Members have also suggested that **international best practices should be researched and followed** – particularly with reference to governance and governance boundaries - to avoid duplicating effort and accelerate delivery.

Designing for consumers

There has been strong alignment from members about the importance of a consumer-centric solution that is intuitive, inclusive, and empowering for all users.

Potential mitigations

2.3   Members have stressed the importance of the **consent gathered from consumers being comprehensive, informed, revocable, and easy to manage to maximise uptake of the Consent Solution as well as the benefit it can bring**. It should be clear that consumers' consent is purpose-specific and time-bound, reinforcing the accountability principles that should also be key pillars of the design, as well as highlighting the sense of consumer control that the Consent Solution should bring.

2.4   In order to facilitate a sense of consumer control, **communication with consumers should be transparent and informative, using simple language.**

2.5   The consumer-facing elements of the Consent Solution should include user-friendly tools such as dashboards to allow users to view, manage, and withdraw their consent at any time to provide them with much-needed agency in the process. A user-friendly interface also works to shield consumers from the technical complexities of the process, providing them with a simple method of managing consent.

2.6   Similarly, the **consumer journey facilitated by the Consent Solution should be simple, intuitive, and embedded into existing customer interactions**, minimising any barriers that might dissuade consumers from using the service and maximising the trust felt by consumers

2.7   Consumers need to be able to see who is accessing their smart meter data, for what purposes, in what detail, and – where not bound by contractual terms – make choices about that.

Designing for governability

It is crucial that the system is designed with governability in mind, and members have agreed that the governance and regulatory structure of the Consent Solution will require careful design and development.

Potential mitigations

2.8   In order to avoid creating a technically elegant but ungovernable Consent Solution, members have recommended that governance be integrated into the development process from the outset, allowing accountability mechanisms, auditability, and enforcement workflows to be implemented and tested early. Clear roles will be defined for enforcement bodies including the ICO and industry regulators. Capturing purpose in the consent process is a key step to ensuring auditability and enforceability.

2.9   Members have suggested that **a clear accreditation process for third parties and data providers needs to be implemented to ensure that consumer data is only accessible to carefully vetted parties**. It is important that this process is sufficiently rigorous to ensure only appropriate parties are able to access the data, but it is also important that the vetting process is not overly taxing on the party seeking accreditation. **The process needs to be timely and not overly expensive so as not to create an unnecessary barrier to entry**. Members have suggested that the accreditation process prevent duplication of work by using other accreditations held by a company as proof towards their accreditation for the Consent Solution.

2.10   Additionally, members have advised that it should be possible to revoke data access from parties in the case of misuse. RECCo will be managing the project through the REC Performance Assurance Framework, and moving to a bespoke trust framework, designed in concert with other energy initiatives which are deploying trust frameworks to avoid duplication for accreditation and revocation.

2.11   **Flexibility will be key in the implementation of the consent solution**, as it is important to strike a balance between designing for governability, designing for consumers, and innovation. It is important for flexibility to be baked into how consent is granted and managed as well as in accommodating non-traditional scenarios such as non-digital consumers – it is key that the governance framework designed must be flexible enough to support a wide range of use cases and user journeys.

2.12   **The Solution should interact smoothly and favourably with the Smart Energy Code,** to allow the timely release of consumption data from DCC arrangements. This would allow efficient access to smart data, whether through DCC systems, or other potential methods, for data users The SEC contains detailed considerations of consent today in the energy sector and will provide a starting point for the governance of the Solution.

2.13 **The Solution should be designed to take account of Smart Data Schemes across multiple sectors.** Given the nascent nature of Smart Data Schemes (outside of Open Banking), the members noted the challenges in matching delivery pace with policy development around Smart Data Schemes.

First recommendation

Clear accreditation process, combining effective standards with a minimum of burden and barrier to entry.

Reasoning behind recommendation

2.14 Accreditation and validation of consent seekers ought to be standardised with the other initiatives and made as low a burden as practicable while retaining safety, appropriate controls, and reliability for the consent solution. Reuse of existing frameworks and technologies ought to be a key feature of this.

2.15 This will reduce barriers to entry while maintaining security, consumer trust, and reliance placed on the Solution, which will in turn increase the number of businesses participating in the Solution to access smart meter data via consent and increase the number and quality of commercial prospects for consumer through competition.

Second recommendation

Consumer journeys being the focus of all design, in order to minimise friction, maximise trust, and encourage uptake of the Solution

Reasoning behind recommendation

2.16 Considerable experience in consent propositions across multiple countries and industries has shown that increased friction in the consumer journey has an immediate and detrimental effect on consumers continuing with any technical solution.

2.17 Understanding of the needs of consumers and the necessities of UX will be a balance between ID&V requirements for probity and reliability and minimising friction as much as is practicable. The recommendation, echoed by the CPA working group, was that RECCo could and should be prescriptive in how wording was applied across consent seekers using the solution.

Third recommendation

Standardised consent models and API processes, taking advantage of existing technology and best practice from around the world.

Reasoning behind recommendation

2.18 None of the technology or governance approaches being considered for the CCS are novel or untested, and there are a wealth of examples to learn from, and technologies suitable as 'off the shelf' procurement. The recommendation is to re-use existing technology and systems where appropriate rather than bespoke design.

2.19 This has multiple benefits, including reducing design and deployment cost and time, reducing barriers to entry for consent seekers by creating the opportunity to reuse existing practices or accreditations where applicable, and increasing consumer trust through familiarity.

Fourth recommendation

2.20 Ensuring that the governance surrounding the Solution interacts smoothly with the Smart Energy Code and subsequently enables efficient access to smart data through whatever route for data users.

Reasoning behind recommendation

2.21 The SEC is the current system for processing smart meter consumption data shared on a consent basis and while not precluding other sources of smart meter data in future, will be considered in the development of the solution. Further to this, there are existing practices which will be relevant to the CCS, and good practice which can be learned from. This ties back to the points raised across all three working groups not to 'reinvent the wheel' where possible.

Fifth recommendation

2.22 Designing the Solution in such a way that enables interaction with cross-sectoral data sharing initiatives under the Smart Data agenda. Designing the delivery of the solution that there is a comprehensive roadmap from MMP to full functionality in future, with a focus on integration with other initiatives.

Reasoning behind recommendation

2.23 Smart Data Schemes are proposed through the Data Use and Access Act 2025, with considerable powers and mandate for government to develop these schemes in a cross-sectoral manner. With the nascent levels of data understanding in other sectors, and the lack of any existing Smart Data Schemes outside of Open Banking and the beginnings of Open Finance, it is critical that the CC Solution is developed in such a way as to prevent silos developing, and be mindful of the responsibility of being 'first mover' in sharing learnings and ensuring consideration of interoperability across sectors.

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.

2.24 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 Membership

Ofgem
RECCo
Energy UK
WHICH
NESO
Citizens Advice
Centrica
EON Energy
Department for Energy Security and Net Zero
Smart DCC
SECCO
N3RGY
Radiam
FDATA
Cadent
Icebreaker One
Elexon
Ovo Energy