

Consumer Consent Solution

Engagement Day

4 March 2026

Delivering a secure solution, enabling consumers to control access to their energy data – simply, transparently and securely



Join at slido.com

Code: 7522718

Welcome

Elizabeth Lawlor | Chief Operating Officer

Aims and Objectives

By the end of today, you will have gained:

- **A clear, practical understanding** of the proposed Consumer Consent Solution design
- **The confidence and insight to engage meaningfully** with the Design Consultation
- **A stronger foundation for collaboration** with RECCo to help shape a robust, consumer-centric solution

We will also:



Explain the four key areas within the design consultation and hear from our panel of experts on how CCS interoperates with other programmes, consumer-led flexibility, and digitalisation.



Connect with industry peers shaping the future of consumer consent, data sharing, flexibility, and retail market design.



Answer any questions you may have.

Welcome and Housekeeping

- Breaks are planned throughout the day, with a 45-minute lunch break
- Interactive Sessions with two breakout sessions
- Please stay for drinks and networking after the event
- There are no Fire Alarms planned for today
- Use the Slido QR code on your leaflet (on your table) to ask questions at any time – add your name if you'd like. All survey feedback will be anonymous.



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Code: 7522718



Agenda

01

Welcome and
introduction

02

Ofgem's
policy setting

03

CCS in the wider
ecosystem

04

CCS recap and progress
so far

05

MMP scope

06

Breakout session 1&2

07

Lunch

08

Breakout session 3&4

09

Panel discussion –
interoperability

10

Q&A

11

Thank you
and close

Consumer Consent Solution

Policy Setting – Ofgem

Liam Bennett | HO Energy System Digitalisation



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, and 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 is it needed

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

As energy data becomes increasingly important for delivering more tailored retail services, **inconsistent consent management has created friction for consumers and barriers for trusted third parties.**

How Consumer Consent in energy has evolved

Foundations & Discovery (2022–23)

EDiT Recommendation

EDiT recommends a consumer consent dashboard

1

Jan 2022

Aug 2022–Nov 2023

2

Call for Input

- Stakeholder engagement begins
- Ofgem call for input on consumer consent

Consultation & Policy Direction (2024)

CCS Paper Published

Ofgem confirms mandate & publishes Consent Solution paper

3

Apr – Aug 2024

RECCo appointed as Delivery Body

Recco named Delivery Body
Project mobilisation begins

Mobilisation & Delivery Readiness (2025)

Design Consultation

- Industry working groups established and transitioned to RECCo
- Ofgem's impact assessment published
- RECCo's first design consultation published

5

Jun 2025 – present

4

Consumer Consent Solution

Scope, design, and industry delivery model

In Scope



Single, authoritative consent mechanism

- Covers the full consent lifecycle
- Consumer facing visibility and control



Sector-wide consistency

- Underpins supplier licence obligations
- Supports trusted third- party services



Built on strong foundations

- Security and privacy
- Accessibility and inclusion
- Transparency and trust
- Interoperability

Design and Governance Model



Delivery Body

RECCo appointed April 2025



Governance to sit under the
Retail Energy Code (REC)



Hybrid data model

Rather than a single central database



Iterative Delivery

- Industry working groups
- Further Ofgem and RECCo consultations
- A formal Impact Assessment prior to key downstream decisions

Benefits of Consumer Consent

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 these benefits ...



Consumer

- ✓ **Gives individuals control** over who can access their energy data and how it is used.
- ✓ **Unlock access to tailored products and services**, potentially reducing energy consumption and lowering their bills.
- ✓ **Supports a more competitive and innovative retail energy market**, delivering better consumer outcomes.
- ✓ **Making it easier for vulnerable consumers and those with additional needs** to get the support they need.

Industry

- ✓ **Enables providers to deliver more tailored and personalised energy services** enhancing the customer experience.
- ✓ Enhanced insights into energy usage can **aid in lowering overall system costs**, leading to more competitive pricing for consumers.
- ✓ **Supports inclusivity within the industry** by making it easier to serve vulnerable and underserved groups.
- ✓ **Standardising consent**, initiated by the regulator, will help companies **reduce risks related to UK-GDPR**.

Consumer Consent Solution within the wider ecosystem

A key enabler for Consumer-Led Flexibility

TPI: Third Party Intermediary, e.g. price comparison site, PV supplier etc.

FSP: Flexibility Service Provider e.g. company which controls devices for a consumer

DNO: Distribution Network Operator

DSI: Data Sharing Infrastructure

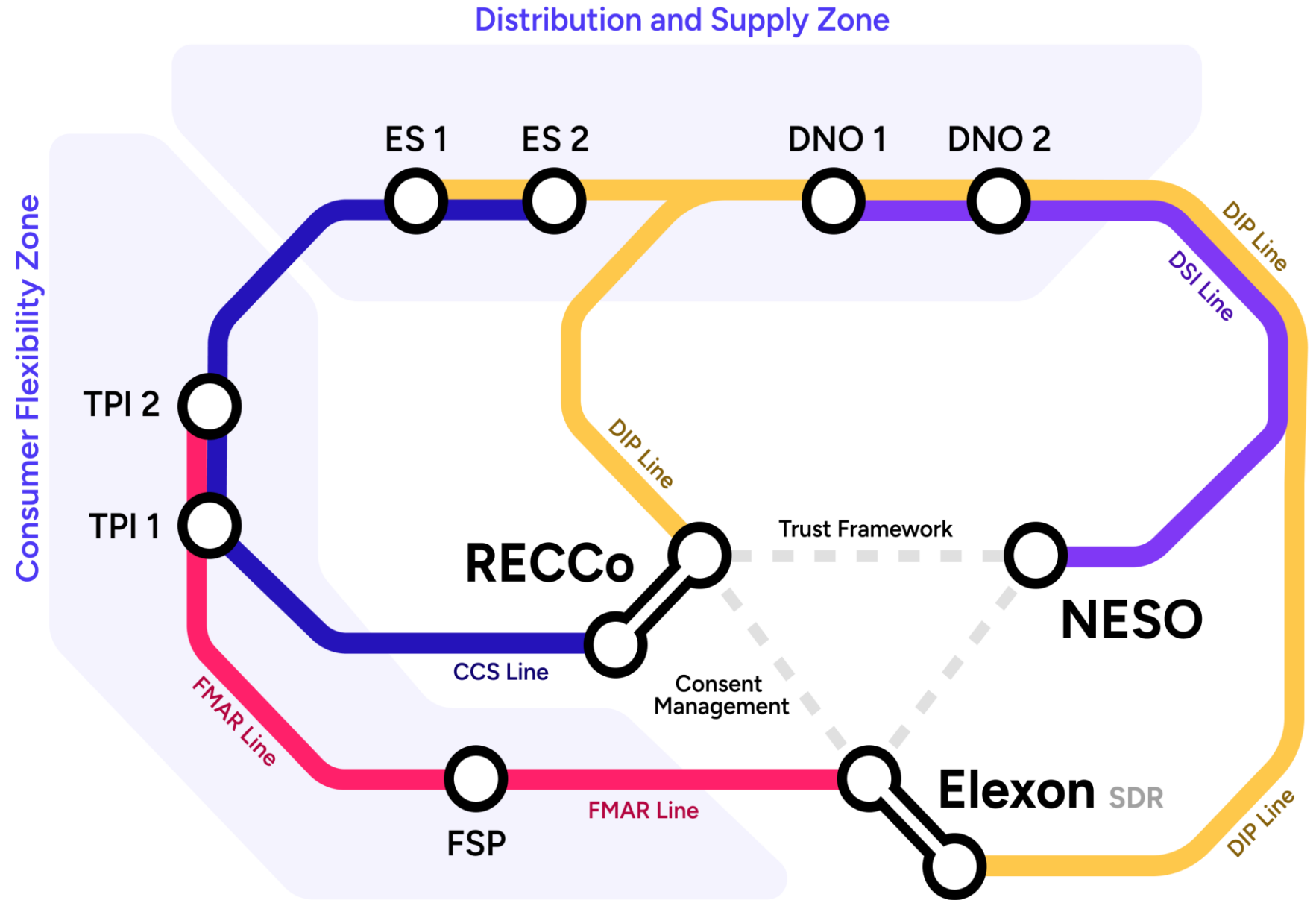
DIP: Data Integration Platform

FMAR: Flexibility Market Asset Register

SDR: Smart Data Repository

FSP: Flexibility Service Provider

CCS: Consumer Consent Solution



Consumer Consent Solution

Programme Progress so far

Michael Walsh | Consumer Consent Project Manager



Journey to date

Delivery Body (29 April 2025)

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

Mobilisation (May–Aug 2025)

- 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 & embedded 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
- **Procurement of technical solution in progress**

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; advisory papers input to consultation drafting
- **Published Design Consultation – open until 25th March 2026**

Consumer Consent Solution

High-level timeframes (indicative)

Complete Q3 2025	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> CC Working Group Advisory Reports drafted & published</p> <p> Procurement activity for Tech Prototypes, UX, and Programme Assurance Body partners</p>	<p> Design Consultation</p> <ul style="list-style-type: none"> Trust Framework UX & Access Tech Specifications <p>Closes 25 March 26</p> <p> Governance Framework</p> <p> Procurement activity for Tech Partner</p>	<p>Design, Test & Development of MMP (Minimum Marketable Product)</p> <p>Authenticated Third Party & Energy Data Provider integration with technical solution</p> <p>Governance Change Process (Code / Regulatory)</p>	<p>Launch Consumer Consent MMP</p>	<p>MMP Optimisation</p> <p>Ongoing evolution & development</p>



Complete



In Progress

CCS Working Group Structure

General CCS Webinar

Twice-per-quarter
(c.6-weekly)

60-mins

- Summary of Quarterly Review & Plan
- Project-wide updates
- Overall project plan
- Summary of topic-specific discussions
- Forward plan of topic-specific meetings

Membership open to interested parties

CCS topic-specific Solution Groups

Fortnightly
(or as needed)

60-90-mins

- Solution groups to explore specific topics or focus areas to an appropriate level of detail; review, discuss, and offer constructive challenge
- Forward plan will enable people to plan

Membership is flexible; Participants join based on their expertise and interest

We aim to maintain strong engagement, listen to expert opinions, and enable ...

Clear alignment & transparency across topic areas

Specialist topics to be explored in detail

Flexibility for participants to attend only & everything that is relevant

Greater efficiency / reduced duplication

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

Let's connect.

Join our Consumer Consent Working Groups: [Here](#)

Stay in touch on progress via our CCS Newsletter: [Sign Up Now](#)

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
on the RECCo website



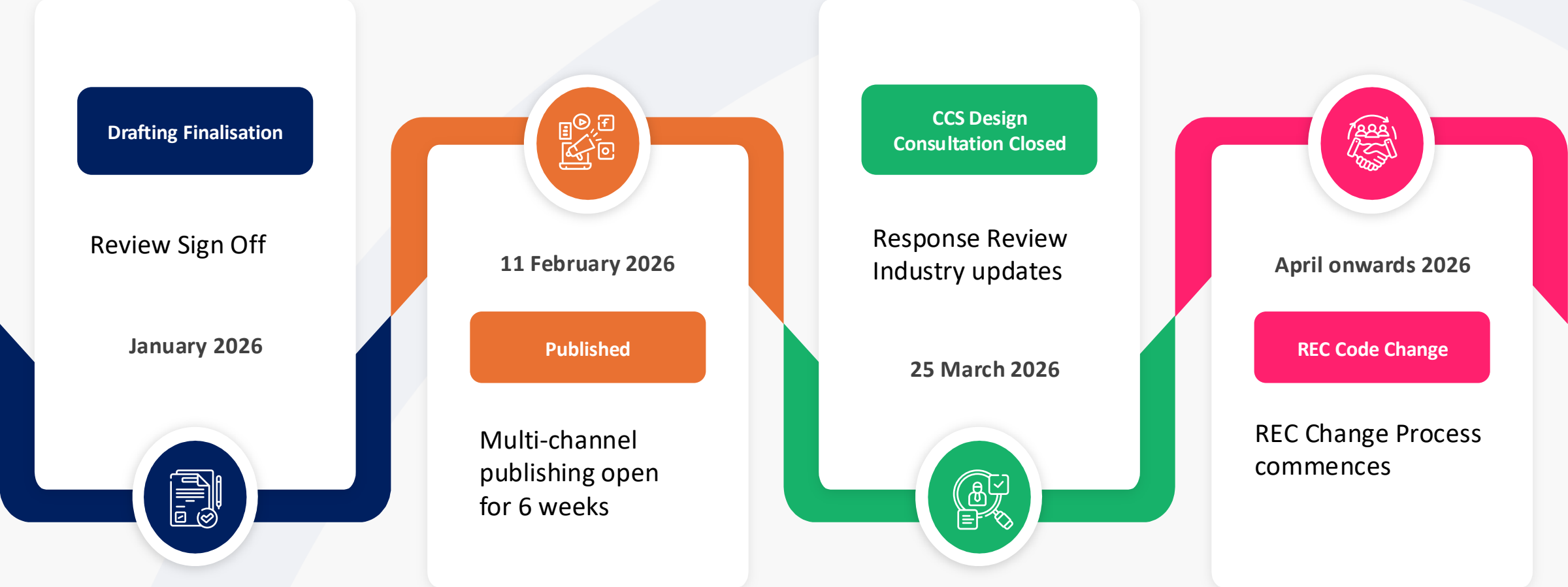
Consumer Consent Solution

Minimum Marketable Product (MMP) Scope

Matt White | Consumer Consent Product Owner



Update on CCS Design Consultation

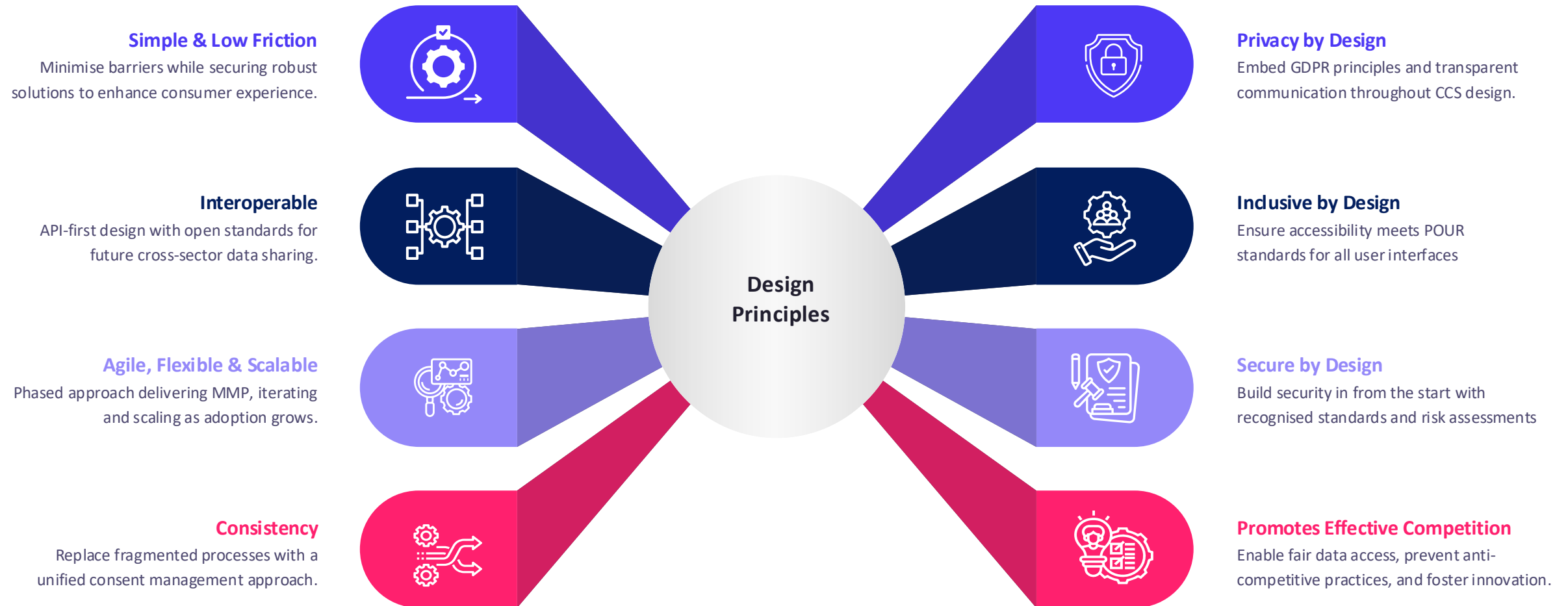


Consultation contents overview

Overview, Scope & Roadmap	Policy Positions	Governance Design	Technical Design	User Experience Design
<ul style="list-style-type: none"> ▪ Intro & background ▪ Consultation approach ▪ Design Principles ▪ Scope of CCS ▪ Product Roadmap and Horizon Model ▪ Product Pillars ▪ Capability Evolution ▪ Dependencies, assumptions and caveats ▪ Maintaining the Roadmap ▪ Next Steps 	<ul style="list-style-type: none"> ▪ Responsibilities for granting consent ▪ Minimum Identification & verification (ID&V) requirements ▪ Consumer access to CCS ▪ Consent revocation and renewal ▪ Consent checking by Energy Data Providers 	<ul style="list-style-type: none"> ▪ REC Drafting approach ▪ REC Service Definition ▪ Technical & data specification ▪ Governance Framework ▪ Funding ▪ Change control ▪ New data sharing arrangements ▪ Accreditation ▪ Assurance ▪ Issue & dispute resolution ▪ Queries consent ▪ Link to REC Assurance 	<ul style="list-style-type: none"> ▪ Overall Solution Architecture ▪ Consent Management System ▪ User Interfaces ▪ Consumer Portal ▪ Admin Portal ▪ Directory / registry ▪ ID&V services ▪ Address matching ▪ Accreditation & onboarding ▪ Testing ▪ Monitoring & Reporting ▪ Service Desk ▪ Non-functional requirements 	<ul style="list-style-type: none"> ▪ Approach to research, testing and validation ▪ UX Framework ▪ UX Principles ▪ Behavioural archetypes, inclusion needs & accessibility considerations ▪ Customer Experience Guidelines ▪ Consumer journey components

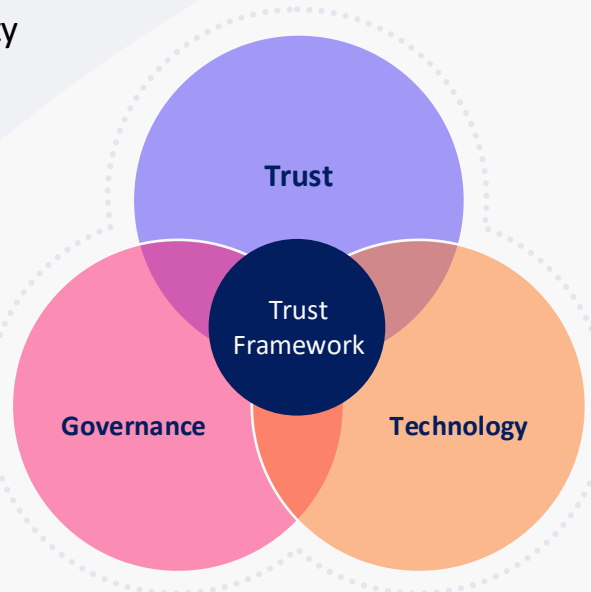
Design principles

Summary of CCS design principles



CCS MMP

The CCS Minimal Marketable Product (MMP) targeted for **Q1 2027** will bring all the core foundational deliverables so consumers can **Grant, Renew, Review, Revoke** consent to their energy consumption data through online journeys. With a **product roadmap** to evolve CCS to include more functionality and data sets over time.

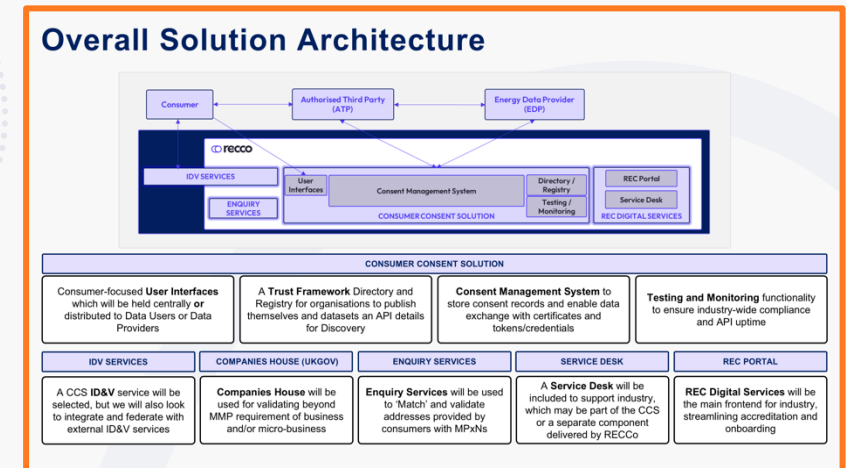
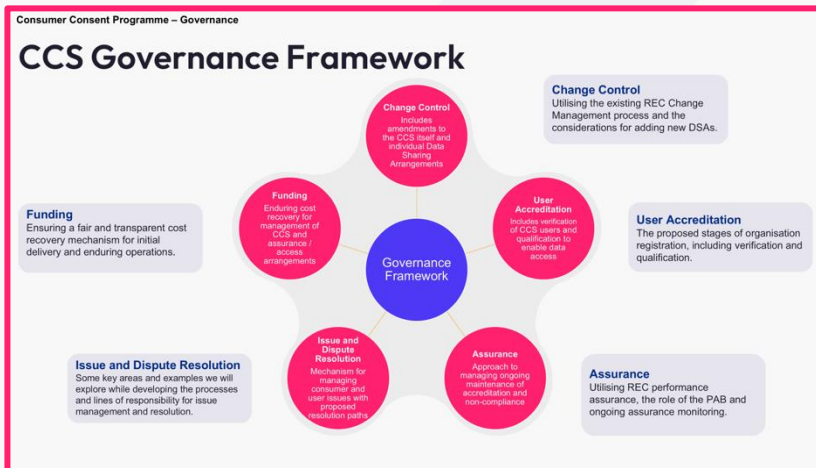


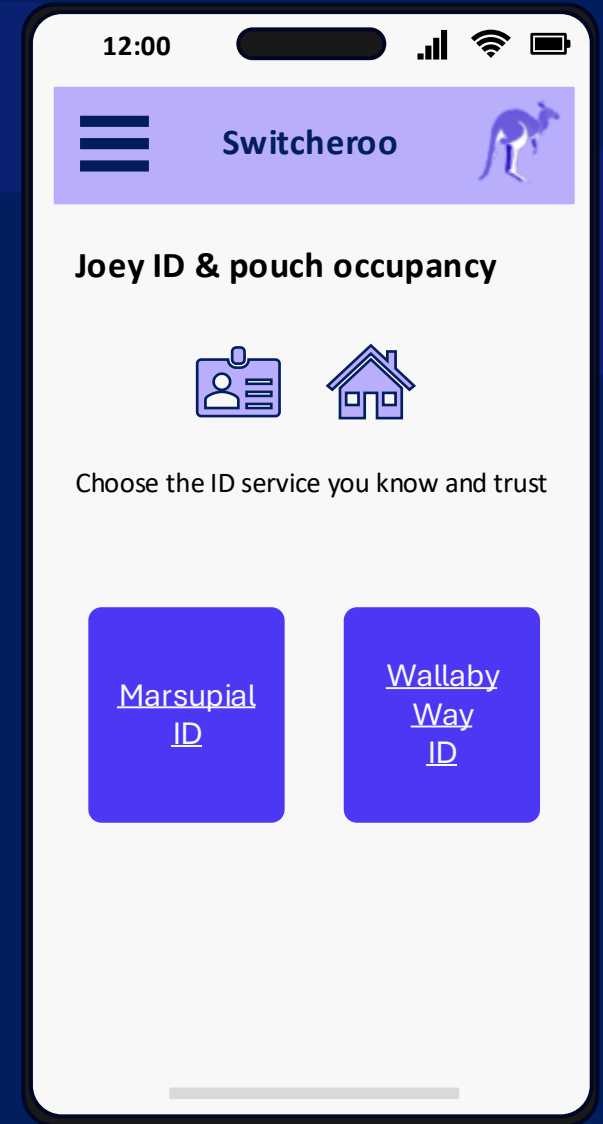
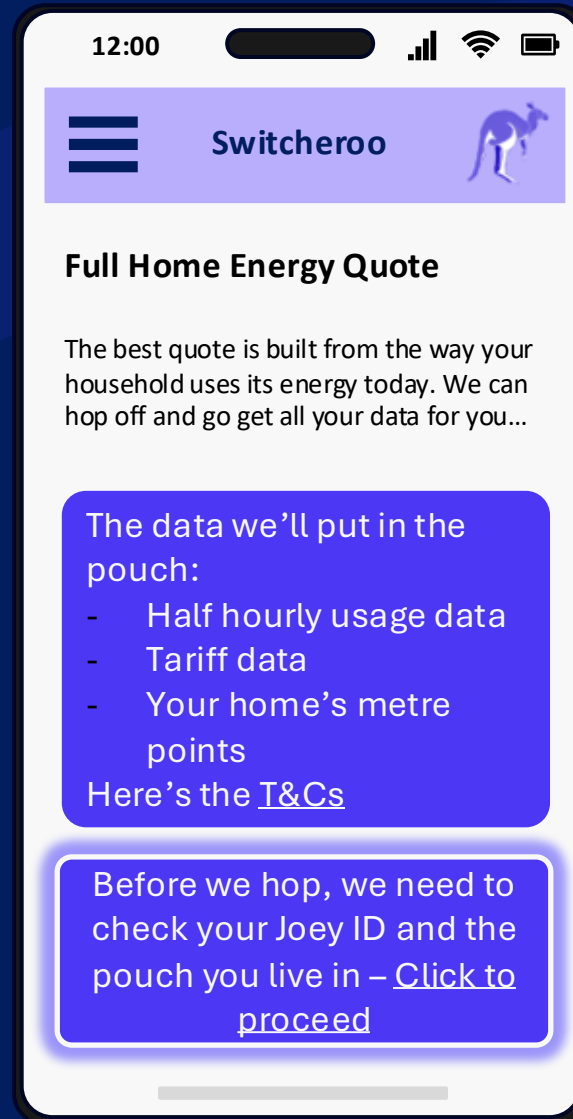
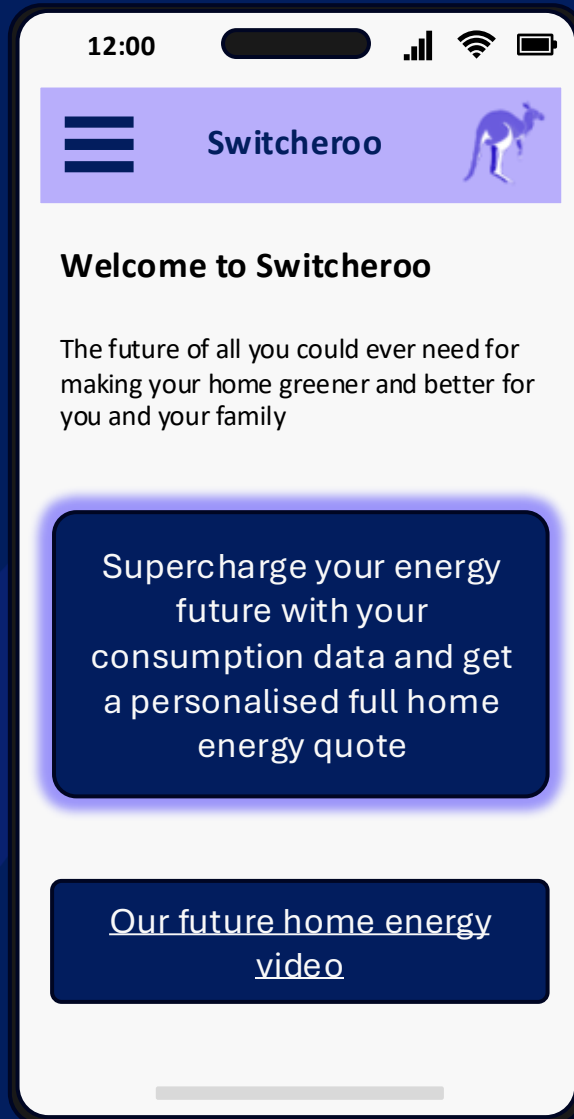
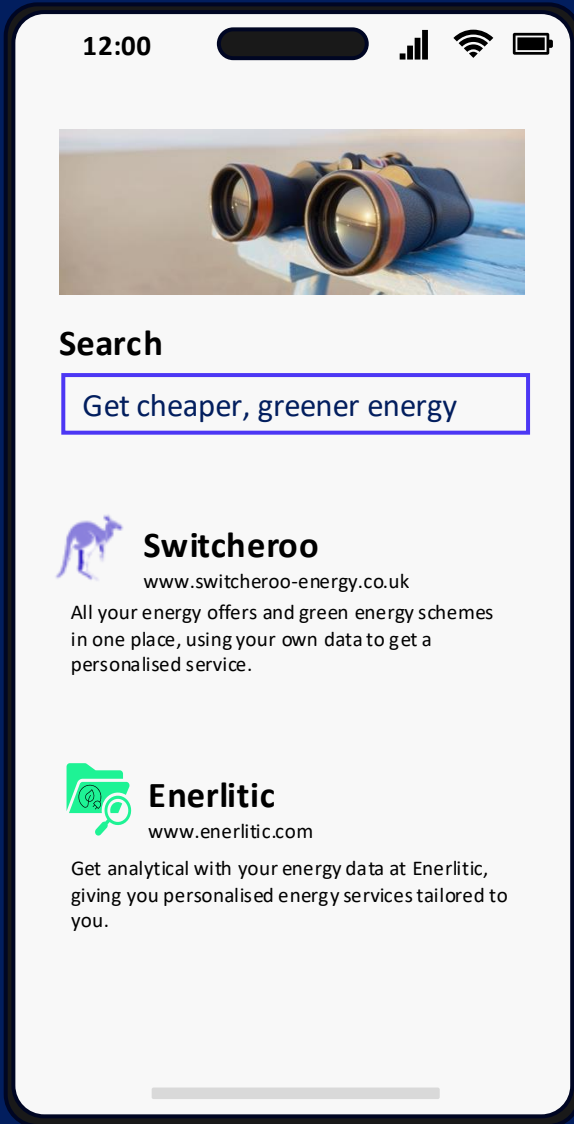
Consumer Consent Programme - User Experience

Identifying consumer needs

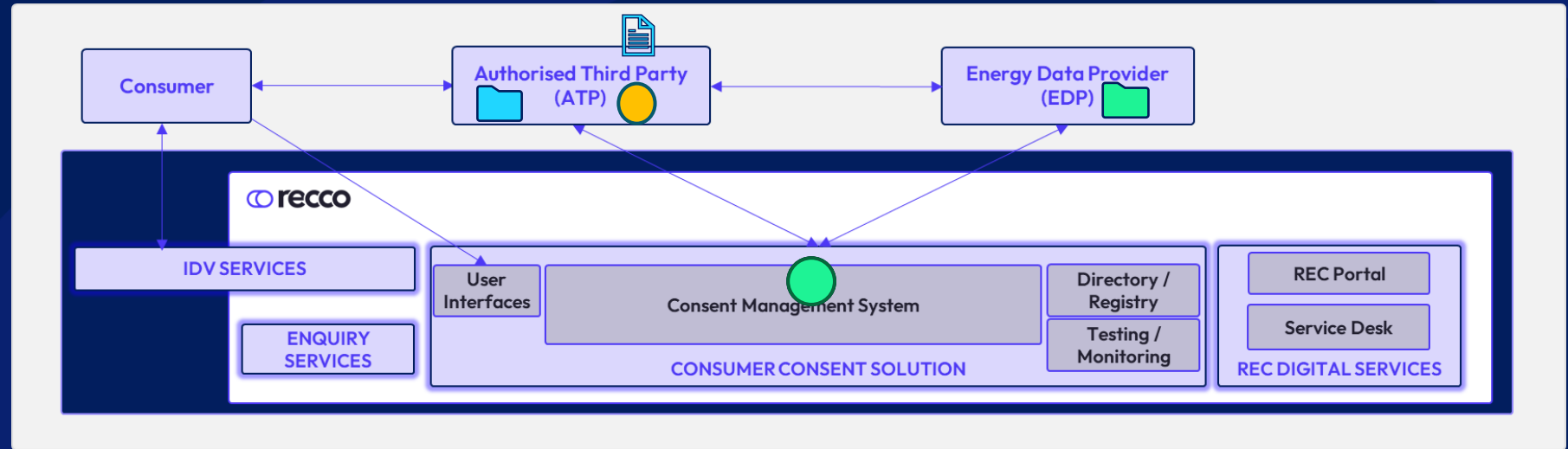
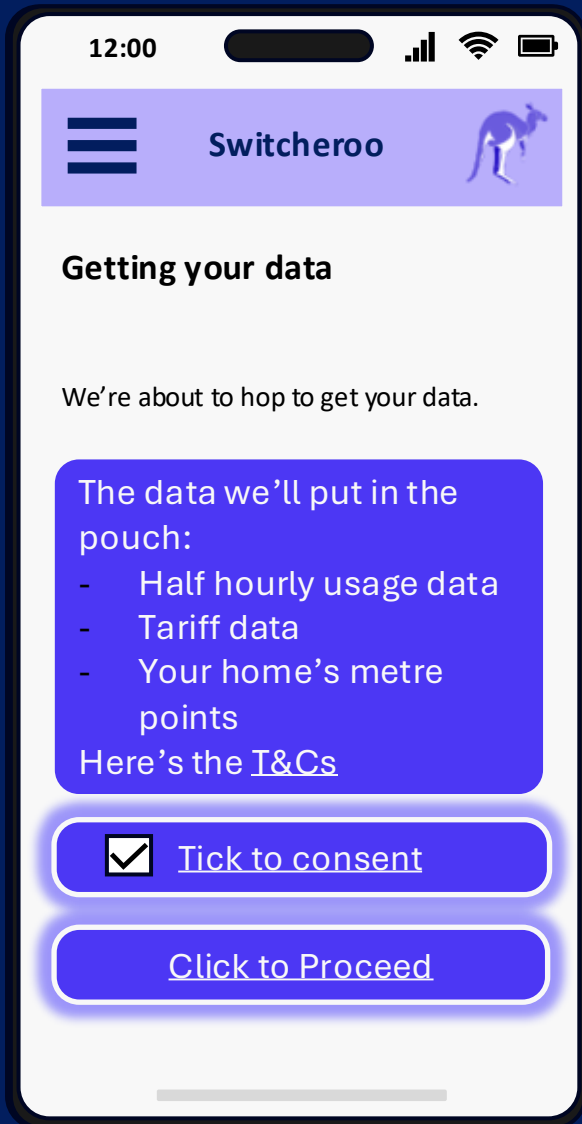
Behavioural archetypes

Comfortable data enthusiast	Careful budgeteer	Time-poor professionals	Surviving juggler
<p>Pains</p> <ul style="list-style-type: none"> "I find it harder than I used to stay focused when things get complicated." "If something feels clunky or confusing, I lose patience very quickly." <p>Gains</p> <ul style="list-style-type: none"> "I want clear information that helps me stay in control." "Well-designed tools should make things feel easier without 'bumping them down'." 	<p>Pains</p> <ul style="list-style-type: none"> "I worry all the time about bills going up and not being able to keep on top of them." "When screens are cluttered or unclear, I find it really hard to use them." <p>Gains</p> <ul style="list-style-type: none"> "Simple layouts help me manage costs without stress, I'll stick with it." "If something helps me manage costs without stress, I'll stick with it." 	<p>Pains</p> <ul style="list-style-type: none"> "It's exhausting juggling work, children, and all the admin at home." "Clunky or slow systems are frustrating when you're already stretched." <p>Gains</p> <ul style="list-style-type: none"> "Smart defaults and automation save us time and headaches." "Anything that saves me thinking or deciding is a huge help." 	<p>Pains</p> <ul style="list-style-type: none"> "There's too much to juggle that I don't know where to start." "Numbers and bills just feel overwhelming, so I put them off." <p>Gains</p> <ul style="list-style-type: none"> "If I can do one small thing at a time, I can keep going." "Anything that saves me thinking or deciding is a huge help."

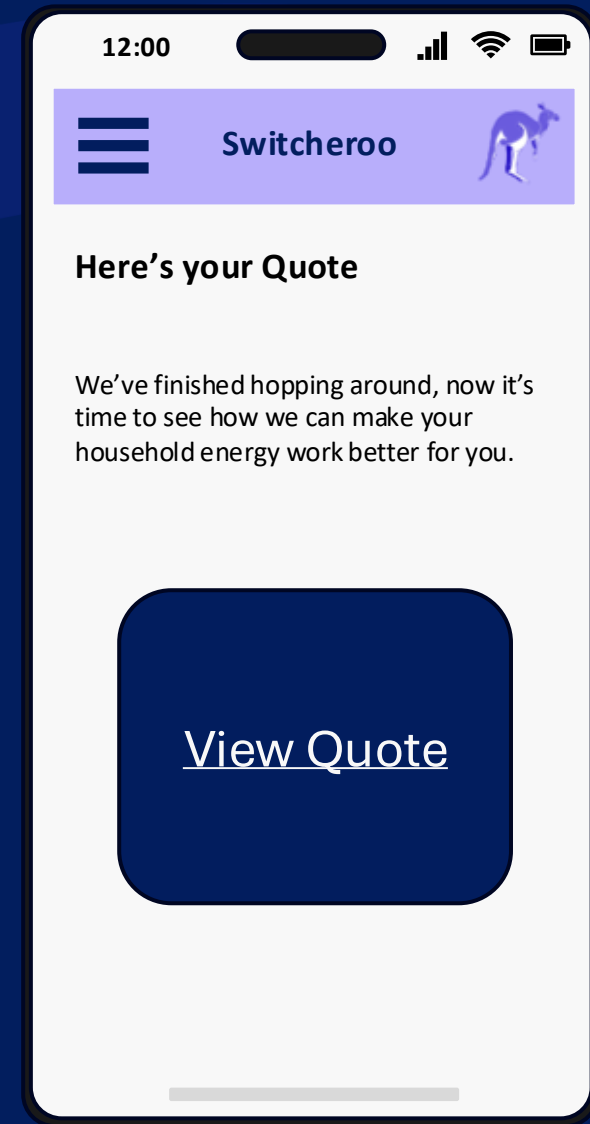
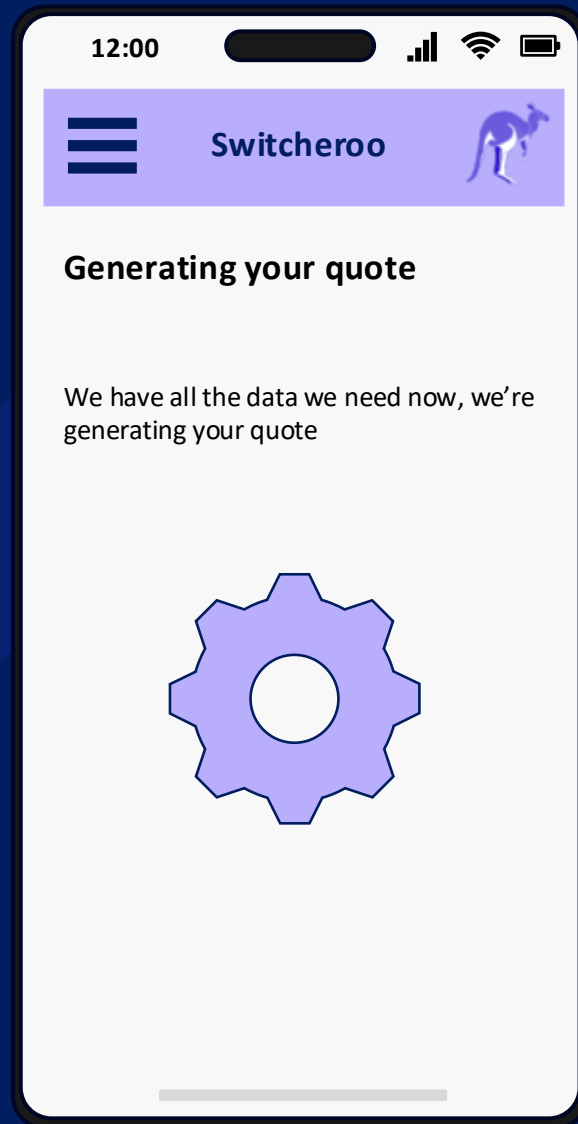
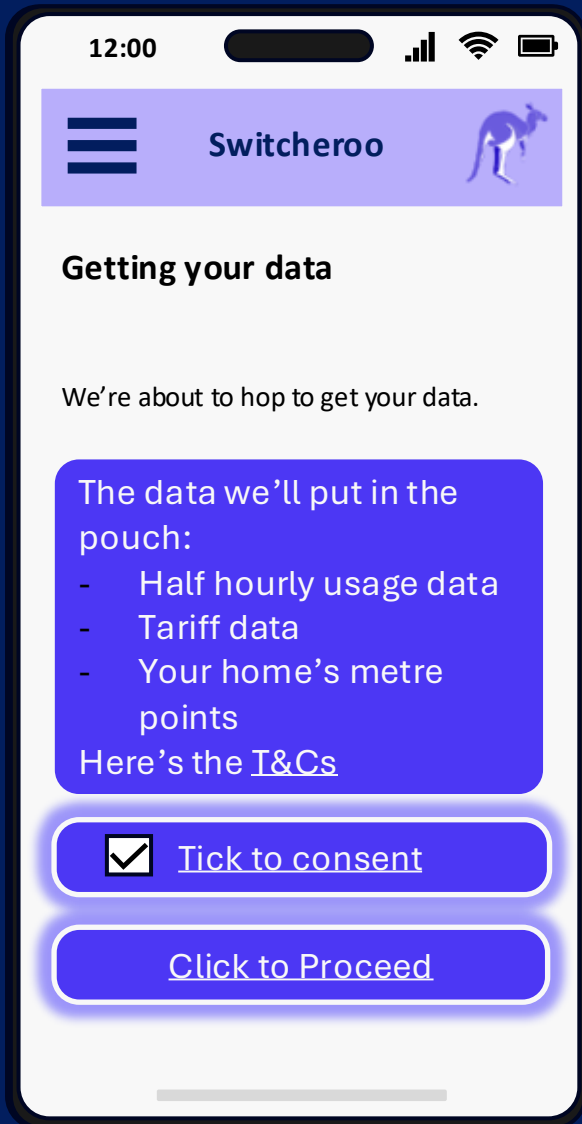




This is for illustration only and does not represent the journey, rather it is to help bring CCS to life while RECCo continues the consultation and procurement activities before designs and user flows are built and finalised.



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Product roadmap – pillars

The CCS Product Pillars provide a structured way of describing how the solution will evolve, grouping capabilities into coherent areas that can be developed, governed, and communicated consistently. They form the backbone of our product roadmap, helping us show not only what the CCS will deliver, but how each part matures through MMP, enhancements, and future expansion.



Identity, Access & Verification

Trusted identity and secure access for consumers and organisations.



Consent Lifecycle Management

End-to-end rules and processes for creating, validating and managing consent.



Consumer Portal & Experience (incl. CEGs)

The user experience for consumers to view and manage their consents.



Ecosystem & Data Access Framework

How organisations, datasets and roles operate within the CCS ecosystem.



APIs & Authorisation

Technical APIs and secure authorisation that enable trusted data sharing.



Monitoring, Audit & Assurance

Insight and audit capabilities that ensure transparency and accountability.



Platform Resilience & Operations

The secure, reliable and scalable operation of the CCS platform.



Governance & Trust Framework

The rules, obligations and enforcement model that govern CCS.



Communication, Transparency & Education

Clear, consistent communication that builds participant understanding and trust.



Cross-Sector Interoperability & Future Data Capabilities

Strategic expansion of CCS to new datasets, sectors and data-sharing models.



Breakout Session One

Session 1

Group A
Technical Design &
Delivery (Beaumont)

Group B
Policy & Consent Design
(Sidney)

Group C
UX Experience & Consumer
Outcomes
(Harpley)

Session 2

Group A
Policy & Consent Design
(Sidney)

Group B
UX Experience & Consumer
outcomes
(Harpley)

Group C
Governance Frameworks
(Beaumont)



Breakout Session Two

Session 3

Group A
UX Experience & Consumer
Outcomes
(Harpley)

Group B
Governance Frameworks
(Beaumont)

Group C
Technical Design &
Delivery (Sidney)

Session 4

Group A
Governance Frameworks
(Beaumont)

Group B
Technical Design &
Delivery (Sidney)

Group C
Policy & Consent Design
(Harpley)

Technical Design & Delivery

George Roberts | Senior Consultant - Digital Solution Architect | Business Technology



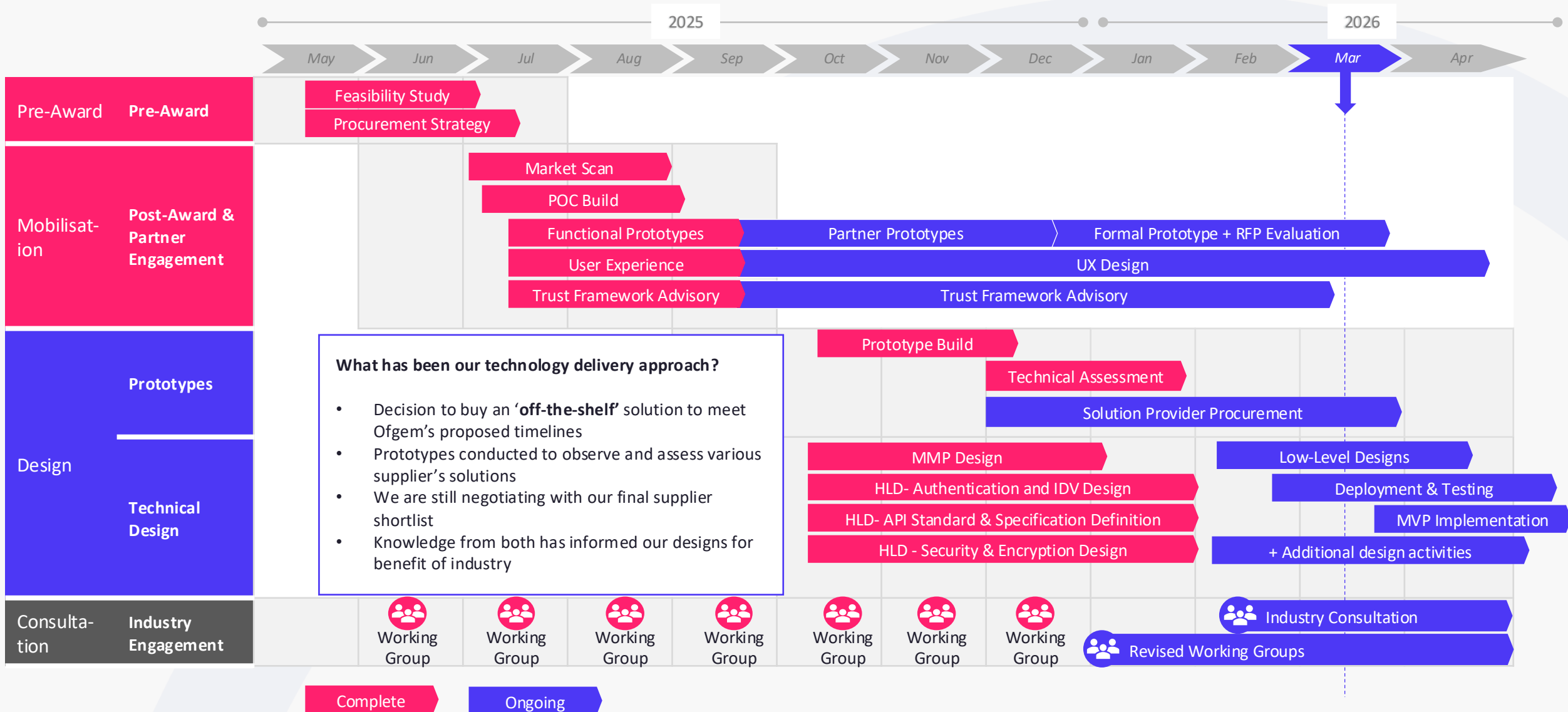
Technical Design & Delivery

What are we covering?

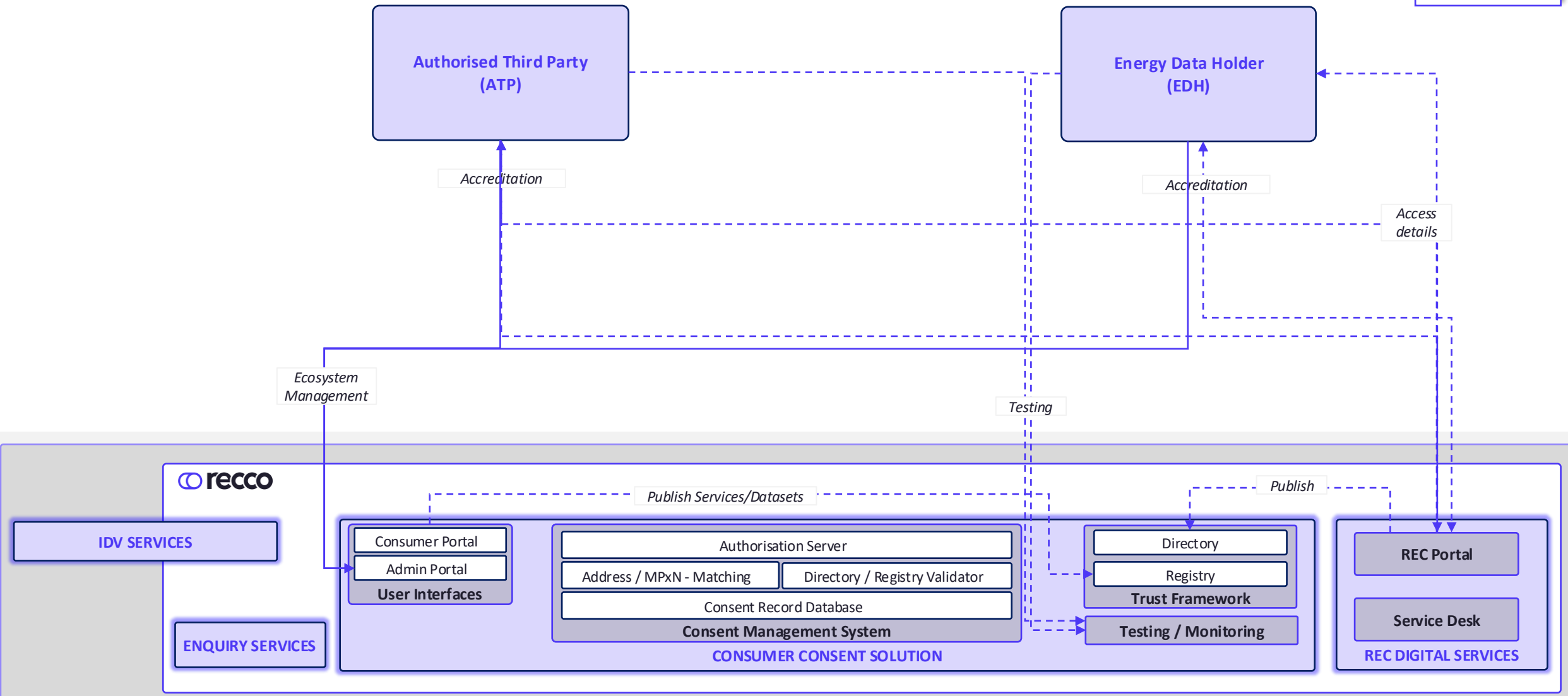
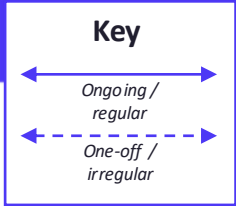
What are you interested in?

- **Technical Design & Procurement Plan**
- **Design Summary**
 - **Accreditation & Onboarding**
 - **IDV**
 - **Data Sharing**
 - **Consumer Consent Management**
- **FAPI 2.0**
- **mTLS**

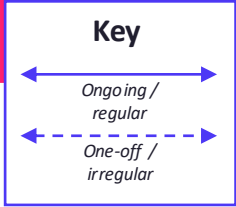
How have we arrived at these technical designs?



Accreditation and Onboarding

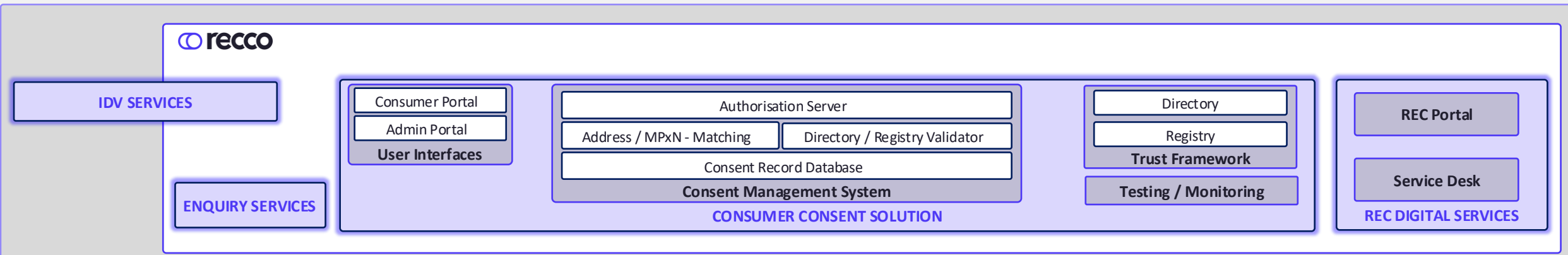


Accreditation and Onboarding - Summary

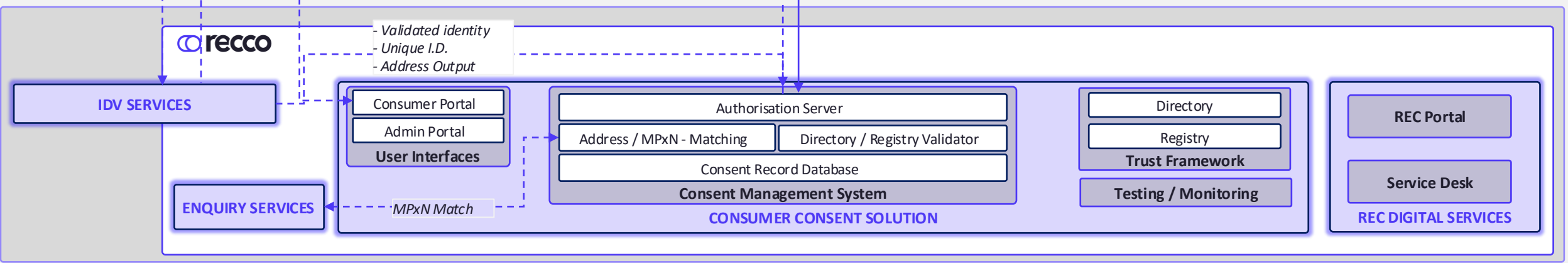
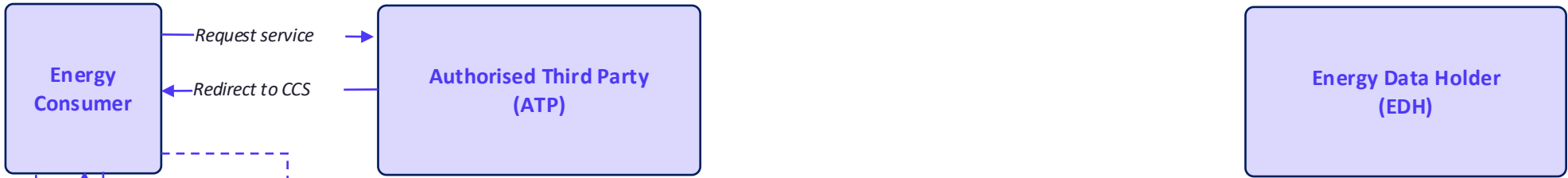
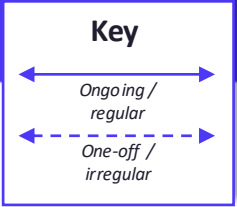


What's been achieved:

- CCS Users are published in the Directory, with associated roles assigned, and have passed initial systems testing and accreditation
- CCS Users have access to the CCS enabling them to manage APIs, certificates, datasets etc.
- Services and datasets are published for discovery and access in the Registry

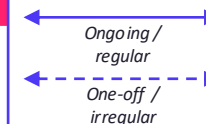


Identity & Verification



Identity & Verification - Summary

Key



What's been achieved:

- A consumer has been authenticated to the minimum standards established for personal energy data sharing
- A unique identifier for that consumer has been created and stored in the Consent Management System
- The consumer has proven occupancy of the property and will now be able to request services for that location
- If a consumer wishes to create an account, they can then continue to add or manage services without going through the IDV process again (a minimum reauthentication process is still being designed)

recco

IDV SERVICES

ENQUIRY SERVICES

Consumer Portal

Admin Portal

User Interfaces

Authorisation Server

Address / MPxN - Matching

Directory / Registry Validator

Consent Record Database

Consent Management System

CONSUMER CONSENT SOLUTION

Directory

Registry

Trust Framework

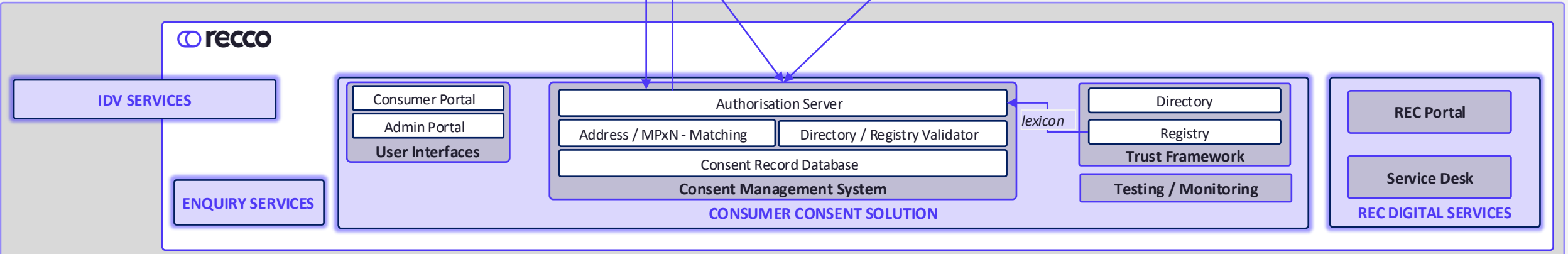
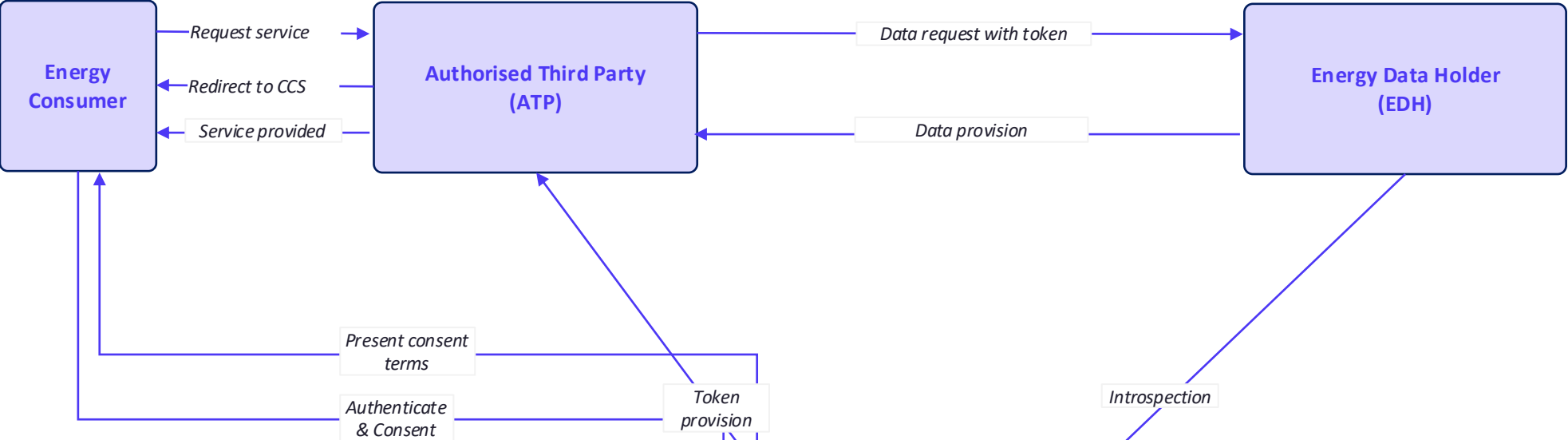
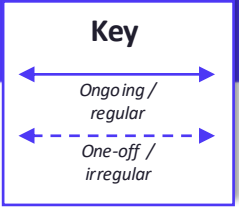
Testing / Monitoring

REC Portal

Service Desk

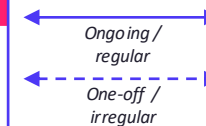
REC DIGITAL SERVICES

Data Sharing



Data Sharing - Summary

Key



What's been achieved:

A complete data sharing flow has been achieved. This was underpinned by:

1. Successful redirect by an ATP to CCS, after establishing that consent is required
2. CCS presenting the correct terms of the consent to the consumer, pulling data directly from the Registry
3. A Consent Record was created by the CCS according to the Consent Record Schema, which captures all necessary information
4. The ATP retrieves a token constraining the consent record schema by providing the right access information
5. The ATP uses this token to request data from the EDH, who performs a successful introspection before sending the data

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IDV SERVICES

ENQUIRY SERVICES

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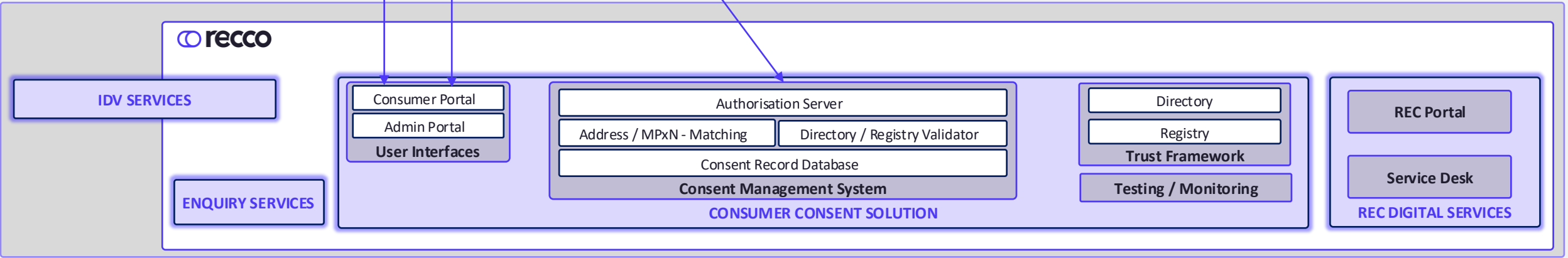
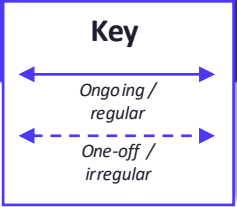
Testing / Monitoring

REC Portal

Service Desk

REC DIGITAL SERVICES

Consent Management



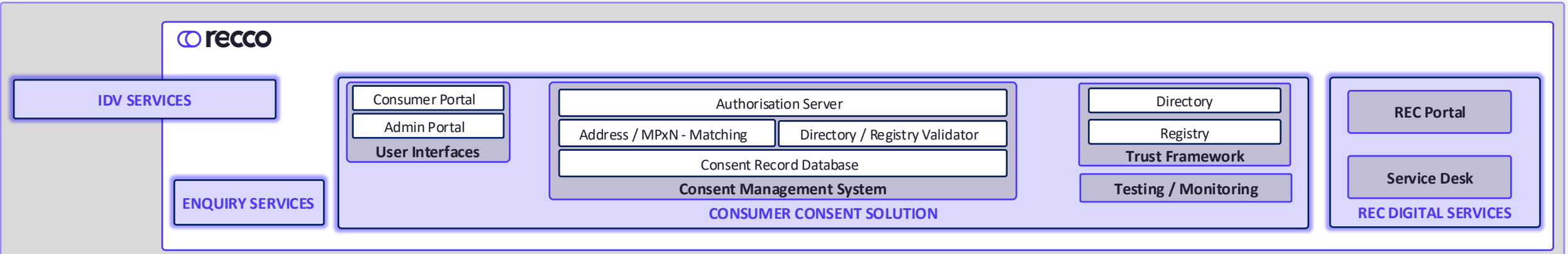
Consent Management - Summary

Key

←→ Ongoing / regular

←- - - - -> One-off / irregular

- ### What's been achieved:
- Consumers are able to observe all of their consents in one place using the CCS dashboard
 - Consumers are able to review, revoke, renew or extend their consents for services using either their ATP for individual services, or through CCS
 - Consent records are immediately updated across the ecosystem through webhooks



What has driven us to propose the use of FAPI 2.0?

Ofgem's drive for CCS and principles necessitates standardisation

Ofgem have noted the inconsistency across consent management, and is keen to standardise whilst improving security and consumer protection standards



RECCo as the Delivery Body view use of Open Standards as essential

To aid implementation, reduce complexity and minimise delivery risk, we believe using existing open standards is the best technical route to deliver CCS



Our Functional Prototypes experience only confirmed this

The potential risk for using proprietary technology, with associated lack of SDKs (Software Development Kits), documentation and threat modelling became evident

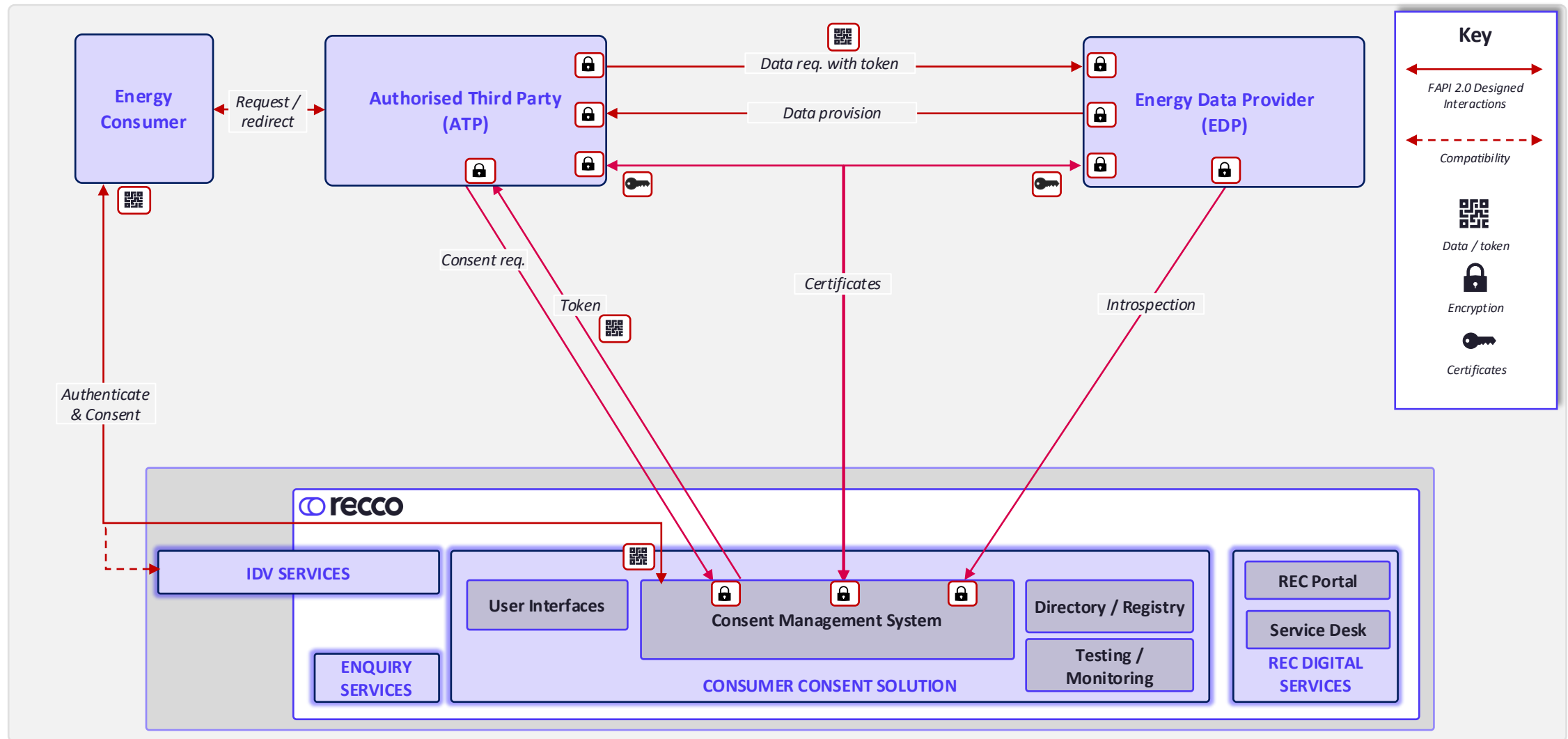


FAPI 2.0 was demonstrated to be the best choice for industry and consumers

Abundant documentation and SDKs to help implementation, existing threat modelling for security as well as its proven ability to underpin massive data sharing ecosystems make it ideal for CCS



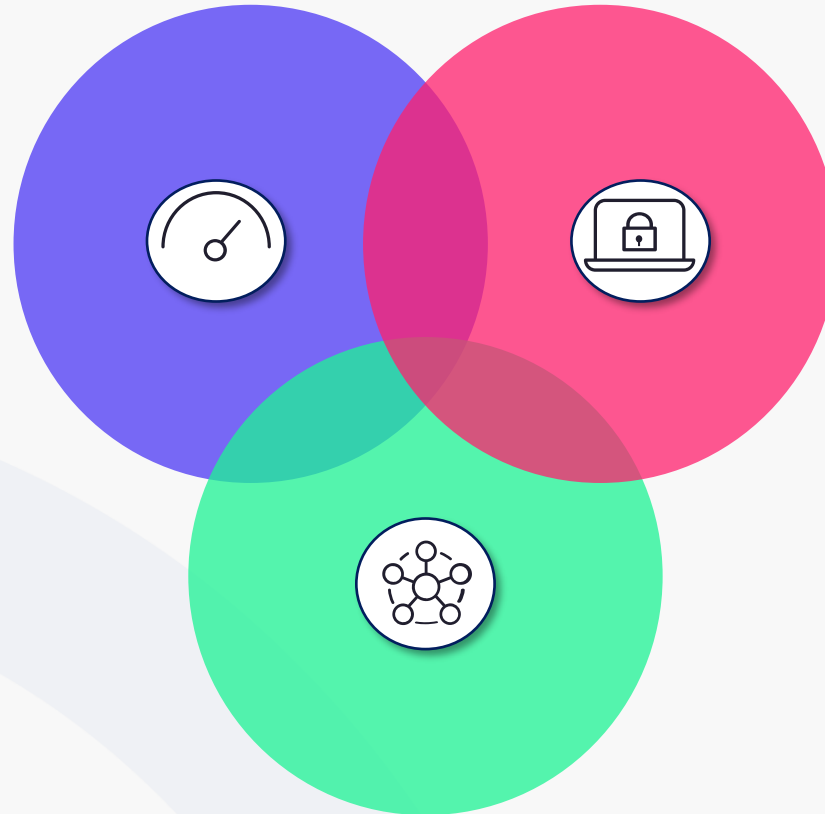
FAPI 2.0 Provides a Proven, Tested Design across our ecosystem



A proven, tested design will simplify implementation

Delivery Benefits

Clear and proven specifications
Abundant documentation and guidance
Proven test profiles



Reduced Risk

Globally reviewed security model
Proven at ecosystem scale
Auditable design

Ecosystem Benefits

Common language for CCS Users
Compatible with authentication Open Standards (OIDC/Oath2)
Compatible with other ecosystems

What has driven us to enforce mTLS across the ecosystem?

End-end encryption aligns with ministerial push towards enhanced ISDP

- DESNZ and Ofgem have frequently called on industry to bolster information security models, and we aligned on zero trust principles

End-end encryption has natural benefits for Energy Consumers

- Sender-constrained tokens means even if tokens are intercepted or sold on a black-market, data cannot be retrieved by any organization not identified as the true recipient

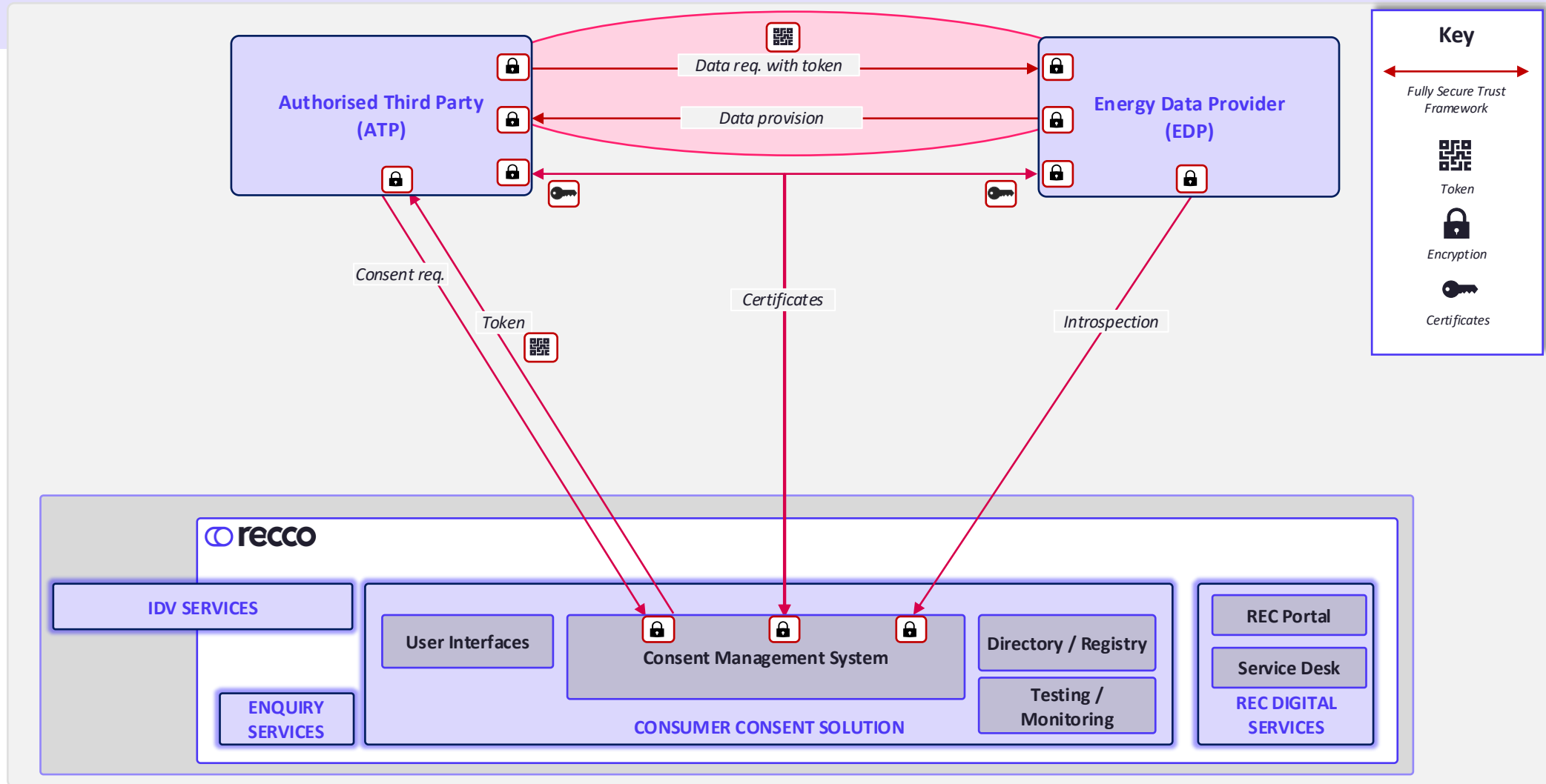
End-end encryption has natural benefits for CCS Users

- mTLS enhances overall trust in the ecosystem as Energy Data Holders know requests are legitimate, and ensures interoperability through consistent implementation standards

An incremental step for system-wide benefit

- Adding mTLS as a min. standard for data sharing is a small addition given mTLS is required for interactions with CCS whilst ensuring we have a closed security model and simpler implementation through full standard adoption

To achieve a secure Trust Framework, data sharing must be end-end encrypted



REC Policy & Consent Design

Alison Nickson | HO Information Security & Data Protection



RECCo policy positions – notable areas for discussion



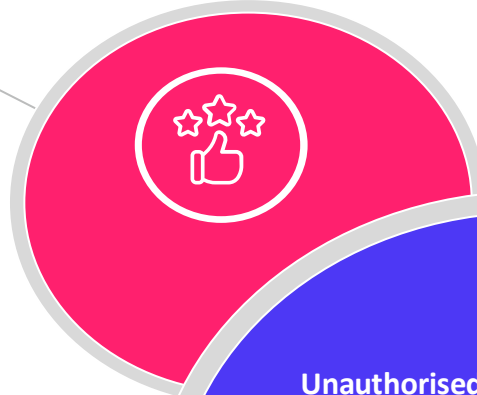
The consultation sets out proposals for the Minimum Marketable Product and invites views on technical design, governance, user experience, accessibility, and the future roadmap.

Consultation closes 25 March

Risk Profile – Addition of HH Metered Data

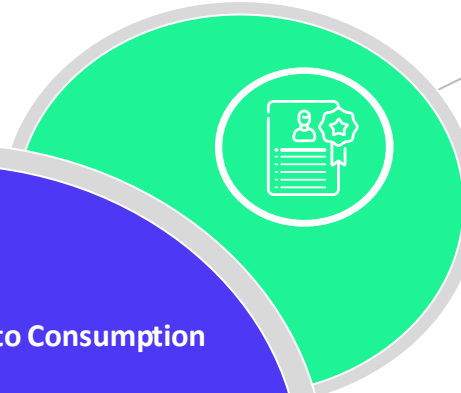
Public Trust

Beyond the affected organisation, energy consumption data breaches inflict broad reputational damage. This has manifested, for instance, as reduced consumer trust in Smart Meters, resulting in missed installation targets and lost opportunities for beneficial data utilisation. It can further impact programmes such as SSES, CSS and retail market reform.



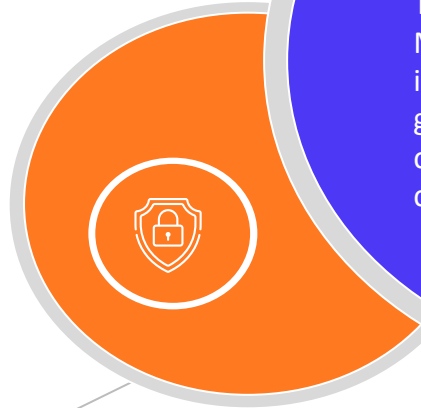
Regulatory Breach

Energy Consumption data is defined as personal data under GDPR and related breaches may require reporting to the ICO. This could also lead to fines imposed based on the level of data compromised.



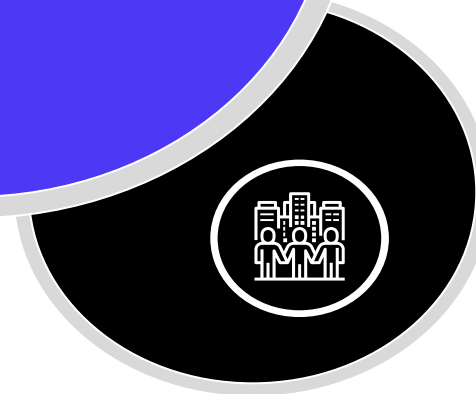
Unauthorised Access to Consumption Data

The key risk under the initial CCS Minimum Marketable Product (MMP) is that an organisation or individual gains access to consumer consumption data without valid consent in place.



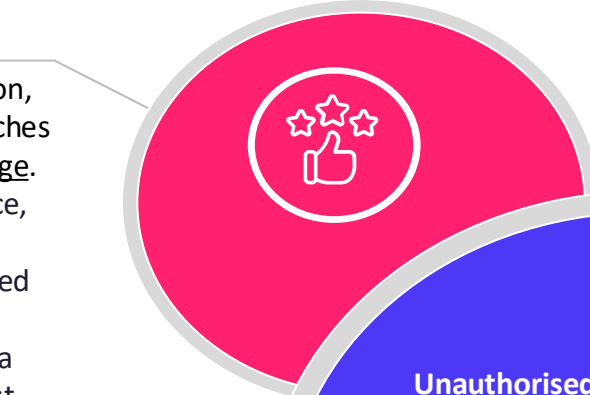
Discrimination

Energy Consumption data could be used to discriminate against consumers in areas like insurance, housing, or employment.



Consumer Safety

Energy Consumption data can be used to identify patterns about an individual which could facilitate targeted fraud or reveal when someone is likely to be away from home.



Policy Position: Who is the relevant data subject?

Context: CCS MMP and the sharing of half-hourly consumption data

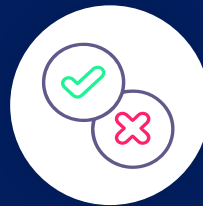
Consumer

An individual who lives at or occupies a premises and whose energy consumption data relates to that premises.

The Consumer is the Data Subject under UK GDPR for half-hourly metered energy data.

The Consumer is therefore the person who may grant, manage, or revoke consent for the sharing of that data, regardless of whether they hold the energy account or pay the bill.

- A Consumer may not be the bill payer
- A Consumer may not be named on the energy account
- In multi-occupancy premises, more than one Consumer may be associated with a single property, depending on the metering arrangement



Customer

The individual or organisation that holds the energy supply account with a licensed supplier and is responsible for payment under the supply contract.

The Customer is the party recognised in supplier systems for billing, contractual, and licence purposes.

In some cases, the Customer and the Consumer are the same person; in others (e.g., rented accommodation, bills included in rent), they are different individuals.

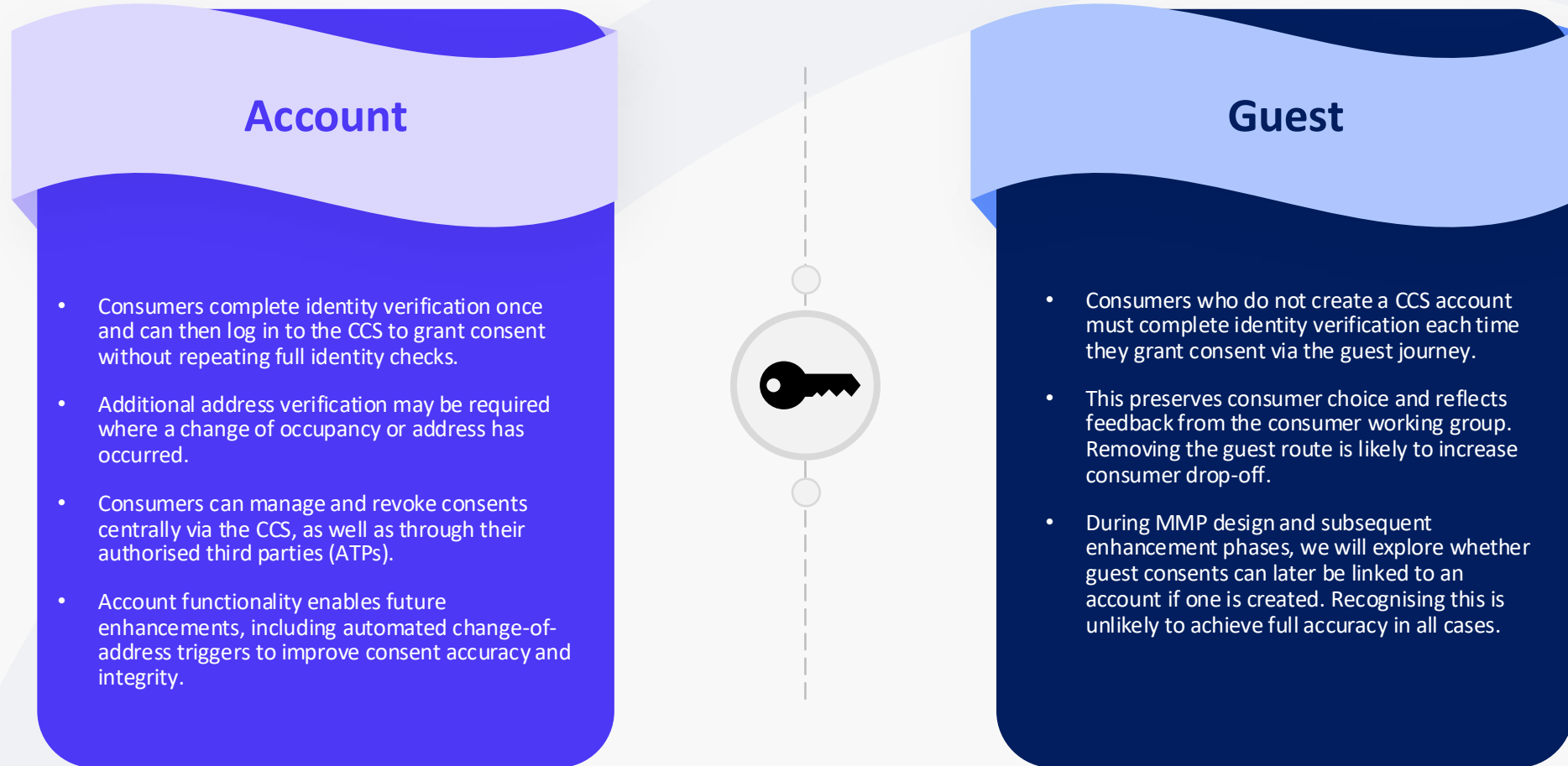
- A Customer is not automatically the Data Subject for consumption data
- A Customer cannot grant consent for consumption data relating to a property unless they are also the Consumer (i.e., the occupier)
- Supplier obligations (e.g. billing, SLCs) are typically framed around the Customer, not the Consumer

Policy Position: Who can grant consent

Scenario	Who can provide consent?	What must be demonstrated	Key things to note
Domestic - Single Occupancy	The occupying energy consumer (Data Subject)	<ul style="list-style-type: none"> Successful IDV Address Match to MPxN Right to consent for period of occupancy 	<ul style="list-style-type: none"> Not automatically the bill payer Consent limited to occupancy period Landlords/off-site payers excluded
Domestic - Multi-Occupancy (Single MPxN) Shared household or family/ HMO with one supply	A verified "Lead Occupant"	<ul style="list-style-type: none"> Successful IDV Address Match to MPxN Confirmation of authority Confirmation of agreement from all adult occupants 	<ul style="list-style-type: none"> Data relates collectively to household Other verified occupants can view active consents Dispute triggers termination of consent. Fresh consent will be required for further data processing.
Domestic - Multi-Occupancy (Multiple MPxNs) Separate supplies/accounts per occupier	Each occupier for their own MPxN only	<ul style="list-style-type: none"> Successful IDV Address Match to MPxN Right to consent for own supply 	<ul style="list-style-type: none"> No cross-consent permitted One occupier cannot consent for another Occupier
Landlord (Non-Resident)	Cannot provide consent (unless separate lawful basis applies outside CCS)	N/A (not Data Subject)	<ul style="list-style-type: none"> Not Data Subject if not residing CCS only covers consent-based sharing Important to distinguish from contractual billing rights Alternative lawful bases sit outside CCS framework
Bill Payer (Not Resident)	Cannot provide consent (if not occupier) – another lawful basis may enable data sharing	N/A	<ul style="list-style-type: none"> Data Subject is linked to occupancy, not payment responsibility
Power of Attorney / Legal Representative	Outside standard consent model	<ul style="list-style-type: none"> Must rely on alternative lawful basis (not consent) 	<ul style="list-style-type: none"> CCS does not replace legal processing rights
Former Occupant	Cannot consent beyond occupancy period	<ul style="list-style-type: none"> IDV and occupancy must align with consent duration 	<ul style="list-style-type: none"> Consent must not extend beyond period of entitlement ATP must revoke consent when informed of move-out

Policy Position: Consumer Access to CCS

Consumers (Data Subject) may choose to create a CCS account when undergoing initial identity verification or they may choose to use the 'guest' functionality.



The level of identity verification required for granting access to half-hourly metered data will not differ depending on the route chosen.

Policy Position: Minimum Identity Verification Standard

The CCS will align with the Government Digital Service Good Practice Guide 45: Identity Proofing and Verification of an Individual (GPG 45).

GPG 45 defines four levels of identity confidence.

For the CCS MMP, we are proposing a high level of confidence.

Why a High Level of Confidence?

Granting consent for half-hourly metered data:

- Enables access to granular consumption patterns
- Can reveal occupancy habits and behavioural insights
- Presents risk if identity is misappropriated

For this reason, the minimum baseline will include:

- Initial verification using photo identification
- Verification of occupancy through MPxN and address matching
- Linking identity to a unique CCS record

Centralised IDV Model

- Delivered via CCS-integrated provider(s)
- Standardised across ATPs
- Removes fragmented, bespoke approaches

GPG 45 supports proportional identity proofing. As CCS expands identity confidence will be **dataset-specific in future phases**.

Policy Position: Cyber Essentials Plus Certification

All CCS Users — including Authorised Third Parties and Energy Data Providers — must, as a condition of accreditation:

Hold a valid **Cyber Essentials Plus** certificate

Or Hold **ISO 27001** certification

Certification must be maintained throughout participation in the CCS ecosystem.

Why this approach?



Clear, Recognised Baseline

- Cyber Essentials Plus provides independent technical verification of security controls.
- ISO 27001 provides a broader, risk-based information security management framework.
- Both are established, recognised assurance mechanisms.



Minimise Duplication

- Where organisations already hold ISO 27001 accreditation, they will not be required to obtain Cyber Essentials Plus in addition.
- This supports proportionality and reduces unnecessary burden.



Trust Framework Alignment

- The CCS is positioned as a secure trust framework.
- A consistent minimum organisational security standard underpins consumer trust.
- This complements (but does not replace) REC data protection assessments

What This Does Not Do

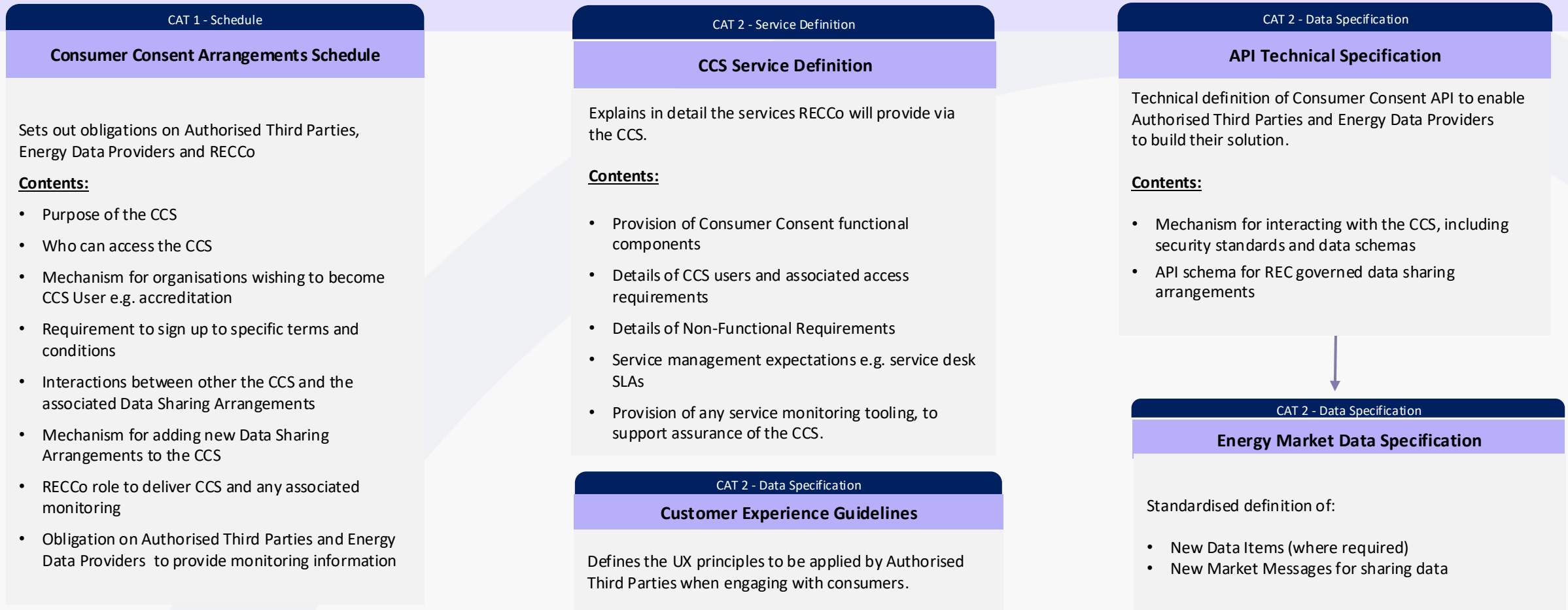
- It does not open the requirement to unspecified “equivalent” certifications.
- It does not remove the need for REC data protection assessment.
- It does not replace technical security controls required under the CCS technical specification (e.g. mTLS, FAPI 2.0).

Governance Design

Sarah Jones | Governance Lead CCS

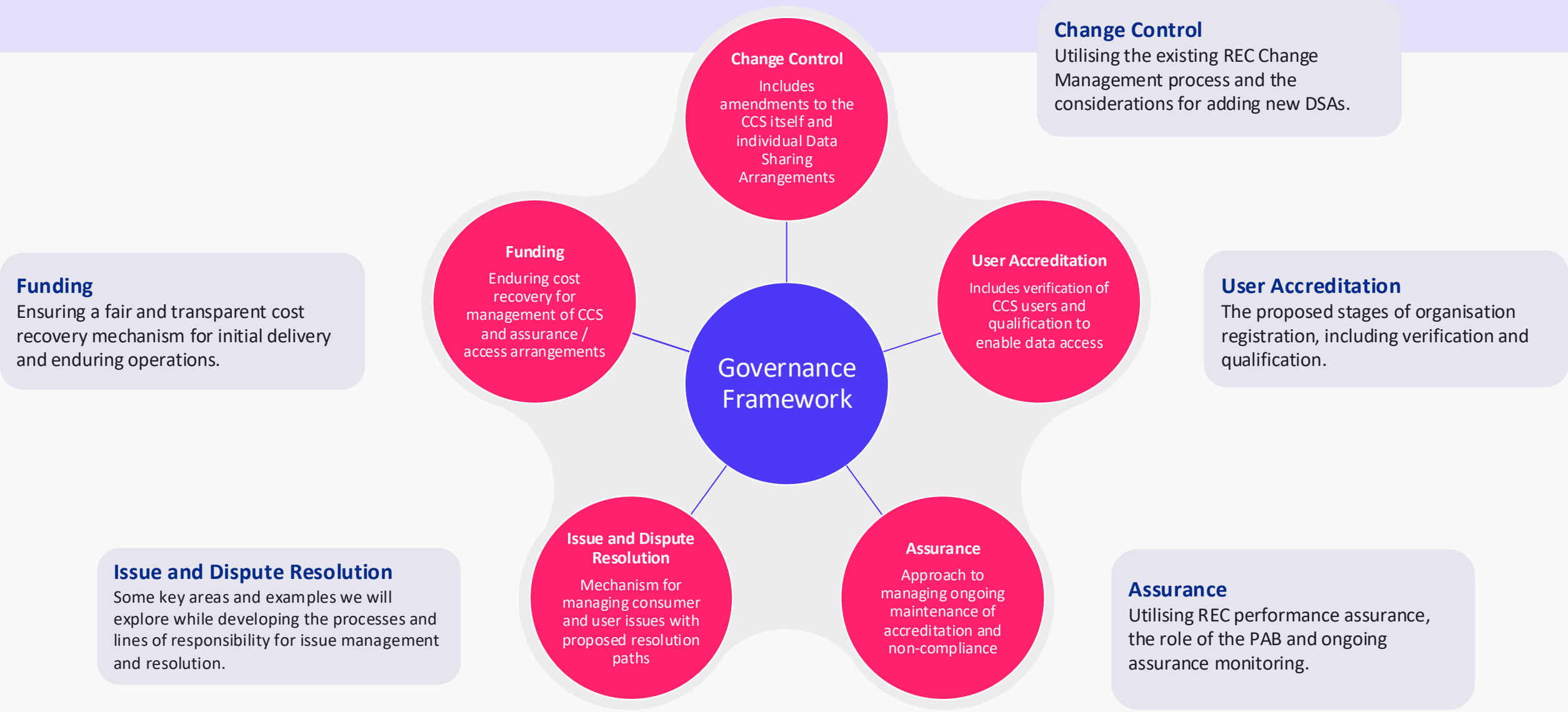


CCS Drafting Approach



In addition, new definitions will be included in Schedule 1: [Schedule 1 Interpretations and Definitions](#), details of the funding arrangements will be included in the Charging Methodology [Schedule 10 Charging Methodology](#), details of the accreditation will be included in Schedule 9: [Schedule 9 Qualification and Maintenance](#) and reporting requirements will be defined in the Performance Assurance Reporting Catalogue: [Reporting Catalogue](#)

CCS Governance Framework



Funding options for the CCS

The Consumer Consent Solution will be funded using the RECCo Cost Recovery Model up until and including the delivery of MMP. For the enduring cost recovery, the working groups considered the possible funding options.

RECCo Cost Recovery Model

All costs recovered from suppliers, which means the costs are spread evenly across consumers. Supports the position that the CCS is a central energy industry function.

User Pays

A user pays solution whereby organisations utilising the CCS pay to manage consent via the solution. Introduces a barrier to early users of the CCS.

Hybrid Model A

The base cost is recovered centrally using the RECCo cost recovery model and users pay transaction fees for the transfer of data which utilises the CCS.

Hybrid Model B

The base cost is recovered centrally using the RECCo cost recovery model and users pay for assurance activities such as accreditation and breach investigations.

Conclusion

- Key principle underpinning the CCS is delivery of a trusted consumer focused mechanism for obtaining and managing consent.
- Therefore, proposing central funding by suppliers through the RECCo Cost Recovery Model with the option to recover assurance costs from individual CCS Users.

The REC Change Management Process

The consultation proposes that CCS will rely on the existing change management process for the CCS as it is already an established and robust process that has been effective in managing change for the REC.

Why we should rely on the existing REC Change Process

Open and Transparent

any individual or organisation can raise a change and engage in the REC change process. Appeal rights and consultation requirements provide transparency and accountability.

Consumer Focused

changes to the REC must better facilitate the REC objectives which includes requirement to ensure customers interests and data is protected in the operation of the REC. The ultimate test of any change is whether it improves outcomes for consumers

Inclusiveness and Engagement

there is a high level of stakeholder engagement with regular updates provided through REC communication channels, such as weekly bulletins. Impacted parties also have the opportunity to contribute to the development of proposed changes through consultation, with stakeholder feedback actively sought and considered before decisions are made.

Proportionality

the level of assessment and governance applied to a change depends on its scale and impact. Minor changes may follow a streamlined process, while major changes undergo more rigorous review.

Adopting this framework for CCS ensures:

1

Stakeholder visibility at every stage

2

Consumer protection through structured decision making

3

Consistency with existing energy market governance

4

Regulatory confidence through Ofgem oversight and appeal mechanisms

Adding New DSAs to the CCS

Where a new DSA is being added to CCS, it's important to have a robust process in place to assess if they are suitable for inclusion to ensure consumer trust is maintained. We will develop a process that ensures appropriate and proportionate controls are in place whilst also avoiding creating any unnecessary barriers to entry.

Key considerations for the process of adding new DSAs into the CCS

- **Legal Basis:** Does the data provider have the relevant legal basis for holding and/or accessing the data and sharing it with data users
- **Scope:** Is the data being shared appropriate for inclusion within the CCS
- **Controls:** What controls does the data provider have in place for sharing data with a data user
- **Terms:** What terms does the data provider have with the data user including ensuring data is not shared further without the appropriate terms and conditions
- **Accreditation:** Are there any additional qualification or verification steps a data user is required to complete to obtain the data, how do we ensure there isn't unnecessary duplication with the RECCo accreditation requirements
- **Data Retention:** What arrangements are in place for the retention and deletion of data once consent expires or the purpose for processing the data has been fulfilled
- **Identity Verification:** What confidence level is required based on the data set, in line with GSP 45
- **CEG Impacts:** Is there an impact on the CEGs e.g. if bespoke guidance required for new types of data sharing
- **Data Source:** Whether a single organisation is providing a bespoke data set or the DSA is introducing a standard data set

User Accreditation

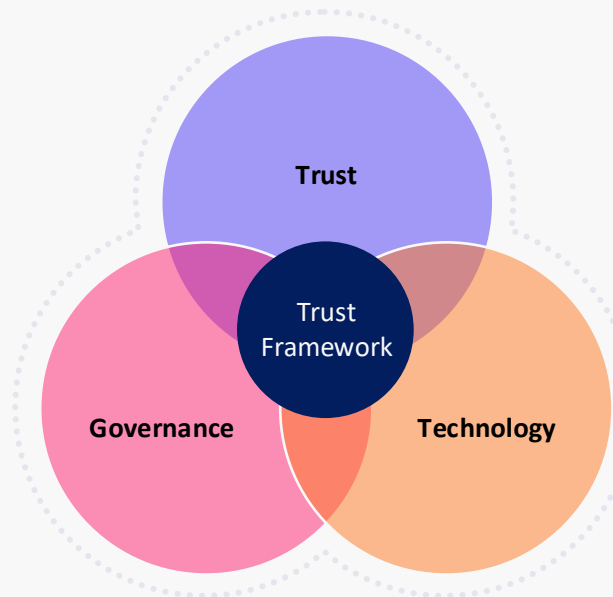
Any organisation operating as an EDP or ATP in the CCS will be required to undergo accreditation. This will be made up of a verification process and a qualification process:

- 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 data users) is a key trust builder.



Data providers and consumers must 'trust' that where data is shared to accredited data users, 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 data providers.

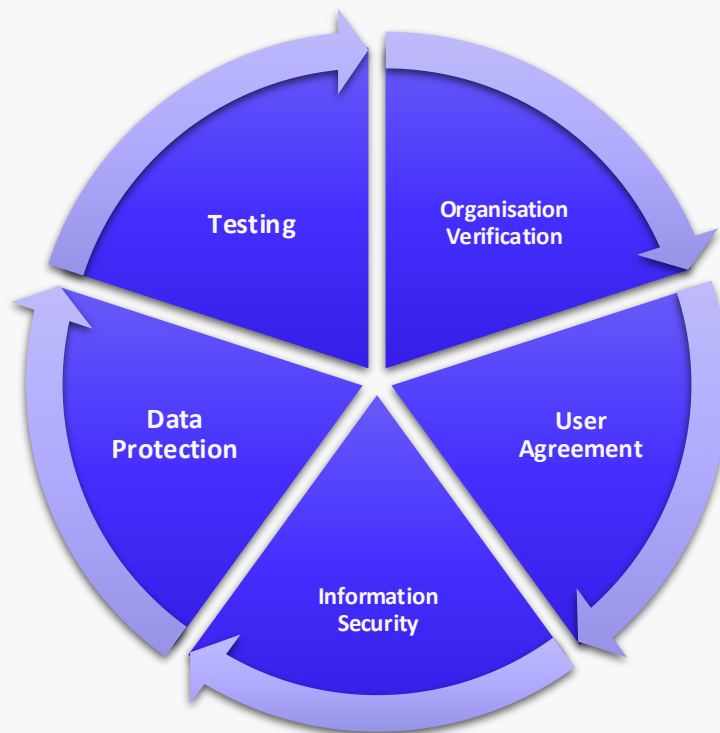
Proposed stages of CCS accreditation

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 the 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 set - Cyber Essentials Plus Certifications.

Considering advice from the government regarding Cyber Essential Certification: [Ministerial letter on cyber security - GOV.UK](#).

Role of the Performance Assurance Board (PAB)

The Performance Assurance Board (PAB) is established under the REC to oversee the operation of the **Performance Assurance Framework (PAF)**. Its role is to provide independent governance and direction over assurance activities across REC services and participants, ensuring that risks to consumer outcomes and market effectiveness are identified, monitored, and addressed.

Purpose and Responsibilities

- Oversees the effectiveness of the PAF and determines where assurance or intervention is required.
- Approves the use of Performance Assurance Techniques and reviews outcomes from qualification, accreditation and maintenance processes.
- Provides governance over issues affecting market integrity, data protection and consumer confidence.

Composition and Operation

- The PAB is a multi-stakeholder panel, including independent experts appointed by RECCo, representatives from REC Parties, Citizens Advice and other energy Codes.
- Members act impartially and independently.
- The PAB meets monthly to review performance data, assess risks and approve assurance actions, with decisions recorded in formal minutes and headline reports.

In relation to the Consumer Consent Solution (CCS)

The PAB will extend its oversight to the **accreditation and assurance of CCS Users**, applying existing REC assurance methods to monitor ongoing compliance and support continuous improvement - ensuring transparency, accountability and trust in how consumer consent data is managed.

REC Performance Assurance

Purpose: REC Performance Assurance arrangements exist to understand what is working and why. It can then intervene to drive improvements.

The following formal techniques can be applied to market participants to better understand and address identified risks or issues.



Issue and Dispute Resolution

If issues are identified by consumers or CCS users while using CCS, it's important that established processes exist to manage and resolve these effectively. We anticipate this will broadly be technical-related issues and consumer consent-related issues.

Approach for identifying and resolving technical issues

Monitoring and reporting

CCS will incorporate internal monitoring and reporting capabilities to support assurance activities by assessing compliance against non-functional requirements. This will also enable us to identify incidents requiring RECCo intervention such as unexpected high usage being indicative of a security breach.

REC Service Management

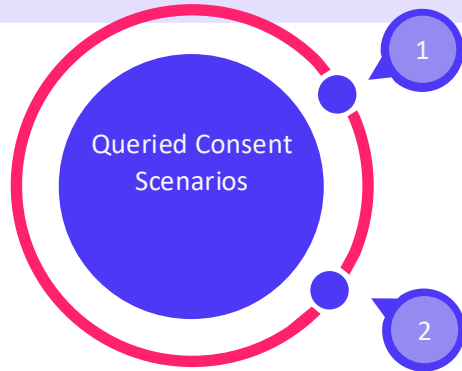
RECCo will provide service management capability to notify relevant CCS Users if an issue is identified and to also enable CCS Users to raise queries to us. This will ensure a consistent and auditable route for issue notification and handling. Situations where we'd anticipate ATPs and EDPs to be raising queries to RECCo would include CCS users encounter problems with the CCS technical solution, where an ATP believes a dispute raised with them was the result of a CCS technical issue, or where a user raises serious concerns about another CCS user. This would not be for queries relating to the data sharing itself.

Data sharing issues outside of CCS

The sharing of data from an EDP to ATP will happen outside of CCS, therefore any issues related to the sharing of this data should be handled bilaterally. To support with this, CCS users are required to provide contact details during the onboarding process which will be stored and accessible to other users. Clear guidance will be provided to CCS users to help them determine whether a query should be submitted to RECCo or directly with the relevant CCS user.

Queried Consent

To ensure we build a solution which consumers can trust, it's essential that we have clear and transparent mechanisms for identifying and resolving queried consent.



Consent shown within a consumers account as being granted by them which they do not recognise

- In this scenario the consumer is able to revoke the consent to prevent any further data sharing
- If the consumer wishes to escalate this further, ATP contact details will be easily accessible through the portal for the consumer to contact the ATP directly

Consent shown within a consumers account under their MPxN but granted by a different consumer which they do not recognise

- This could happen for a number of reasons including: the consumer is in a multi occupancy household, a previous occupant moved out without revoking the consent, one of the consents is incorrect due to issues with ID&V and the matching process.
- In this scenario the consumer is able to dispute the consent record
- When the consent record is disputed the consent is terminated and data sharing is suspended
- The relevant ATP is notified of the dispute and will be required to investigate
- The ATP would then be required to provide an outcome of their investigation e.g. they confirm the consent should be revoked, they believe the consent is still valid and there's a CCS related issue
- The only way for data sharing to resume, would be for the ATP to get the consumer to create a new consent
- Consumers disputing a consent will also be able to easily access ATP contact information if they wish to escalate their concern further

Complaints and further escalation

- Should a consumer remain dissatisfied, they would be able to make a complaint to the relevant ATP, which will be required to have a formal complaints procedure to manage data issues.
- If they remain dissatisfied after raising a complaint, they can escalate their concerns to the ICO. CCS will provide information for consumers wishing to take this route; however, CCS will not assess or determine whether a breach has occurred.
- Further consideration required regarding consumer redress for financial loss as a result of inaccurate data sharing

Assurance of queried consent

- The rationale for having different pathways is for CCS to be able to monitor and report on issues being identified and easily differentiate between the two. This will support assurance activities and may enable the proactive identification of any ATPs not acting in accordance with the CCS requirements.

UX & Consumer Outcomes

Liana Bakar | Associate Creative Director - Publicis Sapient



The approach to define the UX solution for CCS

UX framework

User research

User journeys

CEGs

Purpose

Sets the foundation for how consent should be experienced across the CCS

Ground UX standards in real consumer behaviour and risk, in collaboration with industry

Translate principles and research into concrete consent interactions

Enable consistent, trustworthy implementation across ATPs

Key outputs

- CCS UX Framework
- Design Principles applied to consent interactions
- Defined scope of CCS UX application

- Consumer needs and pain points
- Validated design assumptions
- Identified trust, comprehension and inclusion risks

- Core consent lifecycle stages (Grant, Renew, Review, Revoke)
- Expected consumer outcomes per stage
- Consideration of guest and full account access models

- Consumer Experience Guidelines
- Minimum UX requirements and guardrails for CCS touchpoints

Key outcomes

- Shared baseline for “good” consent experience
- Reduced risk of fragmented or inconsistent journeys

- Evidence-based UX standards
- Proportionate expectations aligned to real consumer behaviour

- Shared understanding of how CCS consent should work
- Clear bridge from principles to implementation

- Recognisable and consistent consent experiences
- Greater consumer trust and reduced implementation ambiguity

Identifying consumer needs

Behavioural archetypes



Comfortable data enthusiast

Digitally confident homeowner in his early 60s, managing energy use with smart technologies and solar panels. Likely to disengage if interactions feel unclear or patronising.

Control Autonomy Optimisation Efficiency

✖ Pains

"I find it harder than I used to stay focused when things get complicated."

"If something feels clunky or confusing, I lose patience very quickly."

✔ Gains

"I want clear information that helps me stay in control"

"Well-designed tools should make things feel easier without dumbing them down"



Careful budgeteer

Low-income renter in her 50s, under financial pressure, with low digital confidence and limited tolerance for complex or confusing services.

Simplicity Clarity Affordability Reassurance

✖ Pains

"I worry all the time about bills going up and not being able to keep on top of them."

"When screens are cluttered or unclear, I find it really hard to use them."

✔ Gains

"Simple layouts help me feel calmer and more in control."

"If something helps me manage costs without stress, I'll stick with it."



Time-poor professionals

Digitally confident professional couple in their mid-30s, time-poor and managing high household costs, valuing fast, low-effort solutions that reduce mental load

Simplicity Speed Convenience Automation

✖ Pains

It's exhausting juggling work, childcare, and all the admin at home.

"Clunky or slow systems are frustrating when you're already stretched."

✔ Gains

"Smart defaults and automation save us time and headspace."

"Anything that saves me thinking or deciding is a huge help."



Surviving juggler

Low-income single parent in her early 30s. reasonably digitally capable but under constant pressure. A strong need for clear, step-by-step support with complex tasks without overwhelm.

Clarity Focus Guidance Reassurance

✖ Pains

"There's so much to juggle that I don't know where to start."

"Numbers and bills just feel overwhelming, so I put them off."

✔ Gains

"If I can do one small thing at a time, I can keep going."

"Anything that saves me thinking or deciding is a huge help."

Accessibility considerations apply to all archetypes

Rather than creating separate archetypes for specific accessibility needs, the research approach treats accessibility as a set of cross-cutting considerations that may apply to any behavioural archetype.

This approach reflects the reality that accessibility needs are often situational and overlapping.



Comfortable data enthusiast

Digitally confident homeowner in his early 60s, managing energy use with smart technologies and solar panels. Likely to disengage if interactions feel unclear or patronising.

Control

Autonomy

Optimisation

Efficiency



Careful budgeteer

Low-income renter in her 50s, under financial pressure, with low digital confidence and limited tolerance for complex or confusing services.

Simplicity

Clarity

Affordability

Reassurance



Time-poor professionals

Digitally confident professional couple in their mid-30s, time-poor and managing high household costs, valuing fast, low-effort solutions that reduce mental load

Simplicity

Speed

Convenience

Automation



Surviving juggler

Low-income single parent in her early 30s. reasonably digitally capable but under constant pressure. A strong need for clear, step-by-step support with complex tasks without overwhelm.

Clarity

Focus

Guidance

Reassurance

Consumer Consent Programme – User Experience

CCS journey map overview

Grant When you're asked for your consent and encounter CCS for the first time

1 Giving consent
When an organisation needs to access your half-hourly smart meter data, it must ask for your consent. This usually happens while you are signing up for a service or choosing a new energy-related product.

2 What's being shared and why
You are shown clear information about who is requesting your data, what data will be shared, why it is needed, and how long your consent will last. This helps you decide whether sharing your data feels right for you.

Setting up a CCS account

- Connect your preferred ID type
- Confirm your address

Reuse these details whenever your consent is requested next time

3 Making your choice
You choose whether to give consent, continue later, or not proceed. Your data is only shared if you actively agree, and you receive confirmation of what you have decided.

Renew When the consent you've previously given is nearing expiry, or already expired

4 Content expiring soon
Some consents are time-limited. When your consent is close to ending, you may be reminded that it will expire unless you choose to continue it.

5 Checking for changes
You are shown a summary of what you previously consented to, including who has access to your data and why. This helps you confirm whether you are happy for the same arrangement to continue.

6 Choosing whether to continue
You decide whether to renew your consent or let it end. If you renew, your consent continues for a further period. If you do nothing, your consent will expire and data sharing will stop.

Review When you want to check who might have access to your half-hourly smart meter data

7 Seeing active consents
You can view the consents you currently have in place. This shows which organisations have access to your data, what data is being shared, and how long each consent will last.

8 Checking everything looks right
You can check that the information shown matches what you expect. This helps you feel confident that your data is being shared in the way you agreed to.

If something doesn't look right
If you notice something that doesn't match what you expect, you can raise this for review. You'll be guided on what to do next and how the issue may be looked into.

9 Taking action if needed
If something has changed or no longer feels right, you can choose to renew a consent that is expiring or withdraw a consent you no longer want to keep.

Update your CCS account

- Had a name change?
- Moved to a new home?

Reuse these details whenever your consent is requested next time

Revoke When you want to stop access to your half-hourly smart meter data

10 Choosing to withdraw consent
You may decide that you no longer want your data to be shared. This could be because your needs have changed or you no longer use the service that requested your data.

11 Confirming what you are withdrawing
You are shown clear information about which consent you are withdrawing and what this means. This helps you make sure you are taking the action you intend.

12 Consent is withdrawn
Your request to withdraw consent is recorded, and you receive confirmation of the consent's status. This stops future data sharing under that consent.

Playback Session



Panel Discussion

Interoperability



Q&A

Please use Slido.com

Code: 7522718



Alternatively, raise your hand



Consumer Consent Programme - REC Policy Position

Consumer Consent Solution Design Consultation now live

This is your opportunity to shape the design at a critical stage of development.

Closes 25 March 2026

Consultation can be found here – [CCS Design Consultation](#)



Thank you for joining us!

Involved in **consumer data** and **consent** in the energy sector?
Let's connect.

Join our Consumer Consent Working Groups: [Here](#)

Stay in touch on progress via our CCS Newsletter: [Sign Up Now](#)

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
on the RECCo website



Thankyou & Close

We really value your feedback



Code: 7522718