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

Published 11 February 2026

Response Deadline 25 March 2026

Link to the Consultation

[View the Consumer Consent Solution Design Consultation here.](#)

How to Respond

Please complete this document and send your responses to consumerconsent@retailenergycode.co.uk

Where possible, we kindly request that responses are submitted as a Word (.docx) document.

Please be assured that your responses will not be edited or amended in any way.

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

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

Your response, data and confidentiality

Responses can be submitted in one of three ways:

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 Confidential responses will not be published, and details will not be referenced in any consultation summary report(s) or subsequent REC Change Proposal documentation; or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

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

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

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

Respondent Details

NAME	Martin Pollhammer
ORGANISATION	East Lothian Housing Association
ORGANISATION CATEGORY	Other
E-MAIL ADDRESS	Martin.pollhammer@elha.com
RESPONSE CONFIDENTIALITY	Non-confidential (recommended)

Questions

Scope of the CCS

Q1	Do you agree with the proposed MMP scope, including the core functional components and the inclusion of SEC Other Users and the BSC SDR?
<p>Largely. The key issue is around ID&V. In our use case, we already know both the identity of the user, have already verified them for use of our systems, have access to their MPAN data and we create the data that confirms who is the occupier of the property (and therefore who is entitled to give consent). We should therefore not require the ID&V checks other ATP users may require, but would hope that our use case can still be included within MMP.</p>	
Q2	Do you have any comments on the assumption that SEC Other Users would not need to migrate existing consents to the CCS and would instead move to using the CCS as existing consents are renewed?
No comment	

REC Policy Positions

Q3	Do you agree with the position that consent for access to half-hourly metered data should be provided by the occupier rather than the bill payer, where these are different individuals? If not, please provide your rationale.
Yes. It is the occupier that is using the energy and it is their use that is generating the data therefore the data is linked to the occupier.	
Q4	Do you agree with the position that for multi-occupancy households, a 'lead occupant' may provide consent on behalf of other occupants only where they confirm they have the authority to do so and have obtained agreement from all other adult occupants? If not, please provide your rationale.
Yes.	
Q5	Do you agree with the proposed approach and standard for identity verification? <i>If not, please provide your rationale.</i>
<p>No. This is the single biggest issue that in its current form will result in very low levels of uptake amongst users. Only a “determined user” will navigate such onerous ID&V checks with a provider they may have little or no knowledge of.</p> <p>In our use case, the checks have no value. We are a Housing Association, and so in granting tenancies, we determine who the occupiers of the property are – our tenants and any joint tenants. The definitive data about who is an occupier, is therefore created and managed by us. “Verifying” that data with a third party is a nonsense. When accessing CCS data, our tenants will be doing so from their digital tenancy accounts with us, where they have already created an account and established ID&V with us. As in Open Banking, where accounts can be linked without any further ID&V checks, our tenants need to be able to quickly and easily link their CCS data without intrusive and wholly unnecessary ID&V checks. We understand that banks carry out a higher level of ID&V than power companies – but so do housing associations. This is not a case where a one-size-fits-all approach is the right approach.</p> <p>This issue is easily accommodated by adopting different scenarios within the ATP registration process. In our case it will be easy for us to demonstrate that we have the required systems in place to not require additional ID&V checks. Requests from us can therefore be passported past the ID&V checks – it actually simplifies the process and would allow us to take part in initial trials where ID&V checks are not necessary. We will take full responsibility for ID&V checks, and this responsibility can be passed to us through our ATP agreement – clearly if something went wrong with our processes or systems then we would lose our ATP licence.</p> <p>There must be many other use cases where no or reduced scope ID&V checks could be considered. A further alternative (not in our use case as no ID&V checks are required, but in others where users are asked to go through significant ID&V checks with a body they may have little awareness of or trust in), would be to handout to energy companies so a cross-check can be done with the user’s energy supplier,</p>	

i.e. logging into their energy user’s App or online account, and agreeing to consent there – following the process of Open Banking. Greater emphasis could be required on ID&V in terms of setting up online account access or installing Apps from supplier companies if deemed necessary.

Asking users to go through a process where they must submit photo ID etc. in all cases will result in virtually no take up. This overall approach needs to be reconsidered and ID&V in its current form only used where there is absolutely no other way of getting adequate ID&V data.

Q6 Do you agree with the position that consumers should have the option to establish an account with the CCS or grant consent via the ‘guest’ approach?
If not, please provide your rationale.

Yes – but see response in relation to Q5 on ID&V. The same applies that unnecessary ID&V checks should not be undertaken in either setting up accounts or guest checkouts.

Q7 Do you agree that consumers should have the option to revoke or renew consent directly with the relevant ATP or via their CCS account?
If not, please provide your rationale.

Yes.

Q8 Do you agree with our position that EDPs should explicitly check that active consent is in place within the CCS each time they share data with an ATP?
If not, please provide your rationale.

Yes.

Q9 Do you agree that if the CCS is unavailable, the EDP should continue to share data unless the CCS outage extends for a significant period of time?
If not, please provide your rationale.

Yes.

Q10 Do you agree that the FAPI 2.0 standard should be adopted for the CCS, which includes use of mTLS for all data sharing?
If not, please provide your rationale.

Yes.

Technical Design

Q11	Do you have any comments on the proposed overall solution architecture and the component descriptions?
<p>This ship has already sailed, but I still believe that consent should be held in two places – with the ATP and in the account of the energy supplier(s) to the property. I do not believe there is a need for a central CCS account where all consents are held. This approach would mirror the approach taken in Open Banking and would be more consumer focused. The fact that energy suppliers do not operate to the same standards as banks in terms of ID&V is something for the sector to address rather than new mechanisms being built to make up for this perceived deficiency.</p>	
Q12	Do you agree with the proposed approach to matching MPxN to the address? If not, please provide your rationale.
<p>Yes. We already hold this data (MPxN numbers) for our properties, again supporting the case for not requiring ID&V checks (see response to Q5) in our use case.</p>	
Q13	Do you have any comments on the non-functional requirements detailed within Annex D?
<p>This consultation does not consider time limit for consents, which should be carefully considered, and monitoring drop-off rates on expiry of consent and monitoring of reactions to any pre-emptive warnings in the system about future expiry of consent should be included.</p>	
Q14	Do you have any comments on the split between centralised and decentralised elements of the overall solution outlined in Annex D?
<p>No Comment.</p>	
Q15	Do you have any comments on the technical diagrams and / or business process diagrams set out within Annex E?
<p>No comment.</p>	

UX Design

<p>Q16</p>	<p>We have identified four groups of people who will use the consent system, each with different needs (Annex F – Behavioural Archetypes). Have we missed any important user groups? Are there any needs we haven't considered for any of these groups? If yes to either, please tell us what's missing and why it matters.</p>
<p>It is impossible to consider every circumstance. What this shows is that the team are considering a broad range of different needs and behavioural circumstances, and this is sufficient for the purpose of this exercise.</p>	
<p>Q17</p>	<p>Do the proposed inclusion requirements adequately address the needs of vulnerable customers, digitally disadvantaged consumers, and consumers with limited English proficiency (Annex F – Accessibility and device constraints)? If not, what additional requirements should be included?</p>
<p>I think this is more a concern for ATPs. CCS is a digital service. People who are digitally excluded are excluded from wide parts of society, not just this process. This is a wider issue, and ATPs can put in place their own processes to assist people with low or no digital skills to access their services – if that is a business priority for the ATP. In our case we offer a “Friends & Family” service to achieve this - My Home - Friends and Family Account - East Lothian Housing Association. We also offer “My Home Help” where staff will operate a user’s account for them when communicating with them – either in person or over the telephone, with an audit trail to show the transaction was keyed by a staff member on behalf of a user rather than by the user directly.</p> <p>It should always be recognised that digital channels enable far more people to access services without support (compared to offline service provision such as office, shop or telephone based services), than they exclude. Any service of any kind will always present some barriers to use but this should not be used to prevent all access to services unless every barrier can be removed, the right balance needs to be struck.</p>	
<p>Q18</p>	<p>Do you agree that consumers need to know who is requesting consent, what data they want, and for how long? If not, what's missing? Is there a risk of information overload?</p>
<p>Yes, but using the fewest amount of words possible, and using good digital design to help explain (for example clear graphics, use of tick and cross symbols to explain things that can and cannot be done, and so on). No-one reads through long sets of terms & conditions. For example “You are giving consent for X to process data relating to your energy consumption until either you revoke your consent or you end your tenancy with X” is clear and sufficient. There is definitely a risk of both information overload and of users not granting consent because it then appears too onerous, too risky, or there is too much to read through / too many tick boxes to check first.</p>	
<p>Q19</p>	<p>Where should additional verification steps or friction be introduced to protect consumers? Where might such steps create disproportionate barriers? (Refer to figures 7–10: User journey stage)</p>

The aim should always be to reduce friction. In our case, there is no requirement for ID&V checks for example (see response to Q5). Consumers can revoke their consent at any time both with CCS and with their ATP. There is no need for additional protection given how simple it is to revoke consent.

Q20

Do you agree that showing consumers which organisations hold consent, what data is shared, when consent was granted, and when it expires provides adequate visibility? If not, what's missing? What limitations should be communicated to manage expectations?

I do not feel this is necessary. I think consent should be managed by the ATP and the energy supplier (with consumers able to see multiple consents by energy supplier, mirroring Open Banking where multiple consents are seen by bank or individually with the equivalent of each ATP). I find it unlikely that many users will want to view their account with their ATP and their energy supplier and then have an account with a third place to manage consents centrally (it is understood that there is no current ability for users to see consents by energy supplier, but this seems a more user-friendly approach). Having said that, for any user that does want to see all their consents in one place, there is nothing wrong with offering this service.

Q21

Do you agree that consumers need to understand which services will be affected, what happens to their data, how long changes take, and whether revocation is reversible? If not, what's missing? Is there a risk of information overload at the point of revocation?

This seems to over-complicate matters. Users are opting-in to a service with their ATP – they know that, why would they need to be repeatedly told the same thing? Managing and revoking consent is very straightforward. It is more important to show how to grant and revoke consent than get into too much detail about every fine detail of the process. There will be Privacy Policies and End User Agreements that set this out for the very small percentage of users that actively want this level of detailed information.

Q22

Do you agree that assisted journeys should enable consumers to grant consent, review active consents, revoke consent, and receive the same information as digital users? If not, what additional outcomes are needed to achieve equivalence?

Only where there is some kind of statutory requirement or similar for this consent. In our use case, this is an opt-in service through a digital channel, and whilst we do provide offline support to use our digital services, it should not be obligatory for all ATPs to provide offline support. In terms of accessing CCS to view all consents, it makes sense that a supplementary service is provided for this aspect of the service for users who cannot use digital channels. It should always be recognised that digital channels enable far more people to access services without support (compared to offline service provision), than they exclude.

Q23

For consumers who are unable or choose not to use digital services, what outcomes should an assisted or alternative consent service journey deliver to be considered fair and equivalent?

Using our example of a Friends & Family account, this enables a third party (in our case a friend, family member or formal advocate that has our user's consent to represent them, and they have demonstrated

this to us) to be able to access and use the digital service on our user's behalf (with a second, audit trailed login to their account).

[My Home - Friends and Family Account - East Lothian Housing Association](#)

We use a similar approach where our staff offer a “My Home Help” service, an audit trailed login to our user's account which our staff member then uses to process whatever transaction the user is unable to do themselves – for example to book a repair. This process is used whilst talking to the user – either in person or over the telephone and could be described as a “Digital Assistant” service.

In both cases, the digital service is used as normal, but with a proxy user using the actual system, with the full consent of the user.

Similar approaches could be offered by ATPs for services generally, a telephone line could offer a similar approach for CCS access, whereas accredited organisations, for example CAB, could be considered so they are able to offer Friends & Family style services.

Governance Design

Q24	Do you have any comments on the proposed REC drafting approach, including the creation of a new REC CCS Arrangements Schedule, a new CCS Service Definition, the Customer Experience Guidelines, consequential changes to existing REC artefacts, and the new CCS API Technical Specification?
<p>All these standards are key requirements, but it will be important to keep these flexible initially. Use cases outside the core energy industry may find it difficult in practice to meet requirements designed around a different industry or sector. In our case, as a Housing Association, we have an unusual company structure, whilst we also work within a heavily regulated sector. On one level we have very robust governance arrangements, but these may look unfamiliar to someone in private industry. We need to ensure that if there is some incompatibility with the detail of the required governance structures that this can be accommodated.</p>	
Q25	Do you agree with the proposed initial funding model, including the ability for the cost of qualification and breach investigation activities to be recovered from the individual organisations? If not, please provide your rationale.
<p>Full agreement on the cost of breach investigation where a breach is found, but if there is no breach the cost should not be passed to the ATP. On qualification charges, consideration should be given to each use case and the ability to waive or reduce charges where the proposition has, for example, strong social purpose and/or is not profit making, or the ATP has limited financial resources (there could be a case for deferred payment to allow services to be established and start generating revenue too).</p>	
Q26	Do you agree with the proposed CCS Accreditation model? If not, please provide your rationale.
<p>Yes</p>	
Q27	Do you agree that a minimum standard should be set whereby all CCS Users should be Cyber Essentials Plus certified or ISO 27001 accredited? If not, please provide your rationale.
<p>Yes – this gives a clear and level playing field. “Should be” is different to “must” and allows a very small amount of flexibility to waive this requirement in some exceptional circumstances, and this is welcomed. The situations where this may be required would be exceptional and monitored closely, but for example would cover a situation where an organisation could not meet the standards in time, perhaps because they are in the process of setting up a business to become an ATP, but could be seen to be working towards or in-line with the required standards until such point they can register.</p>	
Q28	Do you have any comments on the application of the existing REC change process to cover management of the CCS arrangements?

No comment.

Q29

Do you have any comments on applying the existing REC performance assurance framework to cover assurance of the CCS arrangements?

No comment.

Q30

Do you have any comments on the proposed issue/dispute resolution paths defined for the management of CCS issues?

No comment.

Product Roadmap

Q31	Do you have any comments on the approach to defining the future roadmap within the consultation or the content of the draft roadmap in Annex G?
<p>With reference to our response to Q5, the roadmap needs to reconsider ID&V, and in particular use cases such as ours where ID&V checks are not necessary. This should not be a post-MMP consideration – our use case makes it easier to have a working model service and achieve all other elements of MMP without the requirement for ID&V checks. Our use case will help to establish the basis on which a mix of no / light-touch / full ID&V checks are required, and can inform how this is built into the ATP authorisation process.</p>	

Additional Comments

Q32	Please provide details of any additional issues you feel have not been adequately captured within the consultation document.
<p>This project has huge potential to develop the range and types of energy tariffs available, to help better balance the grid, and to alleviate fuel poverty. If the challenges in relation to ID&V can be overcome, we very much hope to be an early adopter of this new technology.</p>	

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Thank you for responding

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



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