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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 Confidential responses will not be published, and details will not be referenced in any consultation summary report(s) or subsequent REC Change Proposal documentation; or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	Nigel Walley
ORGANISATION	Residential Logbook Association (RLBA)
ORGANISATION CATEGORY	Trade Association
E-MAIL ADDRESS	chair@rlba.org.uk
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>The Residential Logbook Association (RLBA) represents the UK providers of Digital Building Logbooks (DBLs). As such we champion the rights of homeowners and tenants (we use the word 'Resident' to cover both below) to access, manage and control their building and energy data within a Logbook, a secure digital tool, that is legally recognised as connecting to a specific property.</p> <p>Our members are distributing DBLs across the UK today via estate agents, conveyancers and developers. The intention of a DBL is to ensure EVERY home in the UK, irrespective of tenure, eventually has a tool with full management rights over its property/energy data. As such our members are already building consent systems to control data and documentation held in our own DBL systems, and we are participating in projects to create trust frameworks and consent systems, with partners across the property sector, which align with the Data (Use and Access) Act 2025.</p> <p>We broadly agree with the objectives and design principles set out in the consultation documents with some caveats:</p> <p>We would ask the CCS designers to be aware that the proposed CCS will be just one of a number of property-related trust frameworks and consent systems to be offered to building residents in the emerging smart data future.</p>	

The split between ‘property data’ and ‘energy data’ is a supplier-led perspective that isn’t supported by consumer research. Residents treat all information about their property together, so we should emphasise systems that can bring all permission management together into single consent dashboards. It is likely that these will be better provided by an open market solution in which service providers compete on functionality than a regulator supplied system.

There are also areas of ‘hybrid data’ emerging, like EPC data, Solar PV performance data that don’t fall neatly into the property/energy split. These are data categories that are expected to have a high demand for sharing in the emerging smart data world. They are crying out for a consent system that can be managed in a single interface alongside utility and smart meter data. Later iterations of the CCS could be used to extend the principle of consent to data types like this where no consent systems are currently being considered.

Finally, there are new categories of service providers – like Digital Building Logbook (DBL) companies – that should be enabled by your design principles to build consent dashboards within their own apps that include CCS functionality. Mechanisms to link DBLs to the Central Administration Portal, to enable federated control of permissions and consent should be prioritized. This may need an extra class of participant, unless the Authorized Third Party (ATP) concept can be broadened to include a class of third party that just wants to offer consent dashboards.

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?
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Click or tap here to enter text.

REC Policy Positions

<p>Q3</p>	<p>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.</p>
<p>Click or tap here to enter text.</p>	
<p>Q4</p>	<p>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.</p>
<p>Click or tap here to enter text.</p>	
<p>Q5</p>	<p>Do you agree with the proposed approach and standard for identity verification? <i>If not, please provide your rationale.</i></p>
<p>No. This is an area that would benefit from integrating the CCS with other identity verification solutions being developed and tested in the property sector. Residents won't want to be burdened with multiple, conflicting ID systems just to manage the place where they live. The RLBA is already testing personal and property ID systems that include identification of tenure within a building. The CCS design approach must co-ordinate with these other systems if we are to avoid consumer chaos around ID.</p>	
<p>Q6</p>	<p>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.</p>
<p>No. This is an anti-consumer proposal that is the result of ignoring the wider context that the CCS will have to operate in. It will create a wholly unnecessary step and introduces a service that most residents won't intuitively understand the need for. The model that almost all consumers understand is the centralised 'Notification Management' on a smart phone. One interface where a consumer can manage notifications across all apps connected to their device. We should be working towards a model where a single app (most likely a DBL) can offer a single interface where Residents can manage ALL data sharing consents. The list will vary between owner-occupiers, rental tenants and other tenure types, but the interfaces and account management within DBLs can manage this difference.</p>	
<p>Q7</p>	<p>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.</p>

Those are NOT the only two options that should be considered. See answer above.

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.

Click or tap here to enter text.

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.

Click or tap here to enter text.

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.

Click or tap here to enter text.

Technical Design

Q11	Do you have any comments on the proposed overall solution architecture and the component descriptions?
Click or tap here to enter text.	
Q12	Do you agree with the proposed approach to matching MPxN to the address? If not, please provide your rationale.
Click or tap here to enter text.	
Q13	Do you have any comments on the non-functional requirements detailed within Annex D?
Click or tap here to enter text.	
Q14	Do you have any comments on the split between centralised and decentralised elements of the overall solution outlined in Annex D?
Click or tap here to enter text.	
Q15	Do you have any comments on the technical diagrams and / or business process diagrams set out within Annex E?
Click or tap here to enter text.	

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>The needs and interests of Owner-occupiers will be significantly different to those of Renters. This isn't addressed in the Archetypes which ignores 'tenure types' completely. It is likely that renters will be more focussed on a limited number of services (eg bill paying and data management around utilities and council tax), while owner-occupiers will put data management of utilities into a wider context of accounts and services that would include property data, energy performance, mortgage data etc. Designs for Consent Interfaces have to allow for those differences, as well as enabling all data-based relationships to be managed (as in a Smart Phone).</p> <p>Owner-occupiers are also significantly more likely than Renters to be commissioning energy reduction/Retrofit projects where they will want to manage the sharing of energy data with other professionals and other Authorised Third Parties. Once again, this wider set of uses, data sources and third party relationships should be managed within a single interface. The proposed CCS has to allow third parties to build these unified interfaces, rather than locking in the solution to a single, regulator supplied service.</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>Click or tap here to enter text.</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>Providing alerts and reporting on who is requesting to share data are fundamental requirements of Consent systems in the emerging Smart Data landscape. Once again, these features should be co-ordinated across all data holding service providers, who offer consent models, not just solved for utilities, otherwise it will create exactly the kind of information overload you have envisaged. See SmartPhone reference above.</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>
<p>Introducing a completely new service, with an unknown brand, to offer a service that a consumer didn't know they needed can be a disproportionate source of friction. RECCO should work in co-ordination with third parties like DBLs to create a single point of permission/consent across all property/energy data that can minimise consumer confusion and 'app overload'.</p>	

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?
Yes we agree, but refer to our previous answer on co-ordinating the design of Consent dashboards across all service providers. This functionality has to be delivered by neutral third party organisations that can offer this service for all providers.	
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?
Click or tap here to enter text.	
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?
Click or tap here to enter text.	
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?
Click or tap here to enter text.	

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?
Click or tap here to enter text.	
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.
Click or tap here to enter text.	
Q26	Do you agree with the proposed CCS Accreditation model? If not, please provide your rationale.
Click or tap here to enter text.	
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.
Click or tap here to enter text.	
Q28	Do you have any comments on the application of the existing REC change process to cover management of the CCS arrangements?
Click or tap here to enter text.	
Q29	Do you have any comments on applying the existing REC performance assurance framework to cover assurance of the CCS arrangements?
Click or tap here to enter text.	

Q30	Do you have any comments on the proposed issue/dispute resolution paths defined for the management of CCS issues?
Click or tap here to enter text.	

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>We believe that RECCO needs to consult more widely to establish the true consumer context that energy data consent systems have to fit within. The vision of the Data (Users & Access) Act is for systems within the same industry verticals to be interoperable and mutually supportive. Our argument is that, viewed from the consumers' perspective, property and energy data are the same vertical. System suppliers across property and energy have to co-ordinate to deliver a truly consumer oriented outcome.</p>	

Additional Comments

Q32	Please provide details of any additional issues you feel have not been adequately captured within the consultation document.
<p>Click or tap here to enter text.</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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