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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 Confidential responses will not be published, and details will not be referenced in any consultation summary report(s) or subsequent REC Change Proposal documentation; or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	Angela Love - SEC Panel Chair
ORGANISATION	Smart Energy Code (SEC)
ORGANISATION CATEGORY	Code Body/ Administrator
E-MAIL ADDRESS	consultations@seccoltd.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>The Panel broadly supports the proposed MMP scope, including the inclusion of SEC Other Users (OUs) as a primary data sharing arrangement.</p> <p>However, the Panel emphasises that the SEC OU framework already provides a regulated and GDPR-compliant mechanism for accessing smart meter data, supported by well-established consent practices and governance through the SEC and its Privacy Sub-Committee. The CCS should therefore be positioned clearly as a layer that enhances and standardises consent, rather than introducing parallel or duplicative requirements.</p> <p>The Panel notes that the design sets out that inclusion of Elexon's Smart Data Repository (SDR) is explicitly conditional. Given the ongoing uncertainty around the SDR's approval and delivery timeline, we would urge RECCo to set out:</p> <ul style="list-style-type: none"> • how the CCS will operate if the SDR is not available at MMP go-live; and • whether the absence of the SDR would require any change to the scope or timing of the CCS. <p>The Panel would also welcome clarity on the longer-term role of the CCS within the wider consent landscape, to support industry planning.</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?
<p>The Panel agrees that mandatory migration of existing consents at MMP stage would be disproportionate.</p>	

However, the Panel notes the potential for a fragmented consumer experience during the transition period, where some consents are visible within the CCS and others remain managed outside it. This risks undermining consumer trust in the solution.

RECCo should therefore consider how this transitional state will be communicated to consumers and whether there are proportionate measures that could improve visibility without requiring full migration.

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.
Click or tap here to enter text.	
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.
Click or tap here to enter text.	
Q5	Do you agree with the proposed approach and standard for identity verification? <i>If not, please provide your rationale.</i>
Click or tap here to enter text.	
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.
Click or tap here to enter text.	
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.
Click or tap here to enter text.	
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.
<p>The Panel supports the use of open standards such as FAPI 2.0 to promote interoperability and security.</p> <p>However, the Panel considers that further justification is needed for the degree of centralisation proposed within the CCS architecture. In particular:</p> <ul style="list-style-type: none">• the reliance on a central endpoint and centralised services introduces potential concentration risk; and• it is not clear how this aligns with the hybrid model envisaged in policy decisions. <p>The Panel would welcome:</p> <ul style="list-style-type: none">• clearer articulation of the rationale for the chosen architecture;• assurance on resilience, failover, and operational continuity; and• consideration of whether certain elements could be more decentralised without undermining the core objectives. <p>In addition, the Panel encourages RECCo to consider whether full FAPI 2.0 implementation is proportionate at MMP stage, or whether a phased approach could better support participation from a broader range of organisations.</p>	

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 Panel considers that there is a risk that some important user groups are not fully reflected in the proposed design. In particular, the Panel highlights:</p> <ul style="list-style-type: none"> digitally disengaged consumers, who may be unlikely to actively engage with consent journeys unless they are simple and intuitive; and consumers with limited access to digital services or shared access to devices, who may face practical barriers to participation. <p>The Panel notes the indication that further consideration of inclusion may be addressed in a later enhancement phase. However, the Panel considers that designing for these groups from MMP stage is important to ensure that the CCS is accessible, trusted, and capable of achieving meaningful take-up from the outset.</p> <p>Deferring consideration of these users risks embedding barriers into the solution that may be more difficult to address retrospectively.</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>The Panel supports the intent to ensure that the CCS is accessible to vulnerable consumers, including through compliance with recognised accessibility standards and the provision of assisted journeys.</p> <p>However, the Panel considers that further assurance is needed that the proposed approach will be effective in practice. In particular:</p> <ul style="list-style-type: none"> the proposed identity verification (IDV) and consent journeys may introduce friction that could disproportionately impact vulnerable or less digitally confident consumers; and current proposals appear to rely on relatively limited user research, which may not fully capture the diversity of consumer needs and behaviours. <p>The Panel therefore encourages RECCo to:</p> <ul style="list-style-type: none"> ensure that inclusion and accessibility are fully embedded at MMP stage, rather than deferred; and continue to expand and test the user experience across a broader and more representative range of consumers to support confidence that the solution will achieve meaningful engagement. 	
<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>Click or tap here to enter text.</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 Panel notes that the proposed renewal approach raises important questions regarding alignment with existing regulatory obligations. In particular, further clarity is needed on:

- how renewal and ongoing consent requirements will align with SEC obligations relating to data access and consumer protection; and
- whether the proposed approach to ongoing verification provides an appropriate level of assurance.

The Panel encourages RECCo to ensure that the CCS design does not inadvertently create misalignment with existing frameworks or introduce additional compliance complexity for SEC Parties.

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?

Click or tap here to enter text.

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.
<p>The Panel recognises the rationale for funding the CCS through the REC cost recovery model in the initial period. However, given the uncertainty around consumer engagement and adoption, the Panel considers it important that:</p> <ul style="list-style-type: none"> • funding arrangements remain proportionate; and • there is clear visibility of how costs are expected to evolve over time. <p>In particular, the Panel reiterates that there is a risk that CCS uptake may be lower than assumed, which could impact the realisation of anticipated benefits. We would therefore encourage RECCo to ensure that funding arrangements remain flexible and are able to respond to actual levels of adoption.</p>	
Q26	Do you agree with the proposed CCS Accreditation model? If not, please provide your rationale.
<p>The Panel broadly supports the proposed accreditation approach.</p> <p>The Panel recognises that the CCS accreditation framework is intended to address a range of requirements, including data protection considerations, which may not fully align with existing SEC assurance processes.</p> <p>However, there remains a clear risk of overlapping or duplicative requirements for organisations already operating under established industry frameworks, particularly the SEC. The Panel therefore proposes that RECCo:</p> <ul style="list-style-type: none"> • clearly articulate how CCS accreditation requirements differ from, and interact with, existing frameworks; and • seek to align assurance processes where possible, to minimise unnecessary duplication and burden on participants. <p>The Panel would welcome ongoing engagement with RECCo to explore how alignment can be achieved in practice, while recognising that not all requirements will be directly interchangeable.</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.

The Panel supports the principle of setting a clear minimum standard for security assurance and recognises the direction of travel towards standards such as Cyber Essentials Plus and ISO 27001.

The Panel notes that this represents a more prescriptive approach than existing SEC arrangements, which take a broader assurance-based approach rather than mandating a single standard. In this context, the Panel encourages RECCo to ensure that implementation is proportionate and takes account of existing certifications and assurance processes, to avoid unnecessary duplication of effort.

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>The Panel welcomes the publication of a roadmap and the structured approach to future development. However, the Panel considers that further clarity is needed on:</p> <ul style="list-style-type: none">• how key dependencies (including the SDR) will be managed within the roadmap; and• how and when additional data sharing arrangements will be introduced. <p>Clear milestones and transparency around these elements will be important to support industry planning and investment decisions.</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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retailenergycode.co.uk



consumerconsent@retailenergycode.co.uk