

Smart Data Team
Department for Business, Innovation, Science and Trade

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RECCo response to: Smart Data: multi-sector call for evidence

We welcome the opportunity to respond to the Government's call for evidence on the development of Smart Data schemes. RECCo supports the ambition to create a coherent and interoperable Smart Data economy, while allowing each sector to build on its existing regulatory, governance and technical arrangements.

RECCo is the Code Manager for the Retail Energy Code (REC), a role which is expected to become an Ofgem-licensed role before the end of 2026. The REC governs key arrangements for gas and electricity consumers, including switching, registration, metering information, enquiry services and performance assurance. Ofgem has also appointed RECCo as the delivery body for the Consumer Consent Solution (CCS), which is being developed for governance through the REC and will enable consumers to grant, manage and withdraw permissions for access to their energy data. Ofgem has separately proposed RECCo as the coordinator for the Consumer Data Domain.

The call for evidence states that DESNZ will consult separately on Smart Data in energy. We have therefore limited this response to the proposed cross-economy governance arrangements and to questions where the interaction between energy and other sectors is directly relevant. We have not sought to anticipate detailed questions about the scope, participants, datasets, funding or legal design of an energy Smart Data scheme, which should be considered through the DESNZ consultation.

Our detailed answers are set out in the appendix. We would highlight the following points:

- **Cross-economy governance should be federated and should build on established sector arrangements:** a central coordination function may help establish common principles, interfaces and services, but sector bodies should retain responsibility for detailed rules, assurance and change where they have the expertise, accountability and regulatory levers to act. The Government should not assume that a new or competitively appointed implementation entity is required in every sector where an established body has already been selected or directed to perform the relevant functions.
- **Common arrangements should reduce duplication rather than create an additional layer of governance:** cross-sector standards, accreditation and shared services should be introduced only where they provide clear additional value. In energy, they should interoperate with the CCS, the REC and related code and licence arrangements rather than duplicate consent records, participant assurance, identity checks, technical interfaces or performance controls.
- **Customers need clear accountability and accessible redress where services cross scheme boundaries:** the customer should have a clear first point of contact and should not have to identify which scheme, data holder or authorised third party caused a problem. The framework should allocate responsibility between participants and regulators behind that customer journey, supported by common evidence and audit requirements.
- **The cross-economy and energy work should be coordinated before either framework is settled:** the forthcoming DESNZ consultation should explain how the proposed energy scheme will interact with the wider governance model. Conversely, decisions on cross-economy governance should recognise the

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work already under way in energy and should avoid requiring advanced sector initiatives to be redesigned without a clear case that the benefits justify the cost, delay and delivery risk.

We would be happy to discuss any of the points raised in this response.

Yours sincerely,

Jon Dixon
Director, Strategy and Development

Appendix: RECCo response to call for evidence questions

Property
Q41: What value could datasets from other Smart Data sectors (like finance or energy) add to property sector datasets if made accessible? This does not need to be specific to the homebuying use case.
Subject to an appropriate lawful basis and effective customer control, energy data could support a range of property-related services. Examples include smoother moving-home journeys, assessment of energy efficiency and retrofit options, validation of property characteristics relevant to energy services, and services that help customers understand the likely cost or suitability of different tariffs and low-carbon technologies. However, the value and appropriate use of the data will depend on who the data relates to and the purpose for which it was collected. The property owner, occupier, energy account holder and bill payer may be different people. Consumption data may also reveal patterns of occupancy or behaviour. A property-sector service should not treat energy data associated with a previous or current occupier as if it were simply a characteristic of the property. Any cross-sector use case should therefore distinguish property data from person-specific energy data, obtain the appropriate permission from the relevant customer, minimise the data disclosed and make the proposed use clear. These questions should be considered jointly through the property and energy scheme design processes.
Q42: What issues need to be considered to successfully integrate Smart Data from sectors like finance or energy, into a homebuying Smart Data scheme? What would encourage/allow data sharing across sectors, and what would support cross-sector governance?
Successful integration will require reliable matching of people, premises and relevant accounts; a clear basis for determining who may authorise each disclosure; common technical and semantic standards; and an agreed allocation of responsibility when data passes between schemes. Address matching is particularly important in energy, where supply-point identifiers, postal addresses and property-sector identifiers may not align consistently. For customer data, the framework should also support clear, specific and time-limited permissions, together with withdrawal, expiry and an auditable record of what was authorised. RECCo is developing the CCS to provide these functions for energy data. A homebuying scheme should be capable of interoperating with the CCS rather than establishing a separate route for obtaining or recording permission to access the same energy data. Cross-sector governance should identify a lead body for each use case, establish formal interfaces between the relevant schemes and provide a route for escalation where responsibilities overlap. Common standards can support interoperability, but the sector body with the relevant mandate and operational levers should ordinarily remain accountable for the rules and assurance governing data within its sector.
Governance and International
Q48: What aspects of governance are most important for Smart Data schemes in practice, and why?
The most important requirement is a clear allocation of functions and accountability. Each scheme should identify who sets and changes the rules and standards; who operates any shared services; who accredits and assures participants; who monitors performance and compliance; who enforces the requirements; how the scheme is funded; and how customers and participants can obtain redress or appeal decisions.

Certain principles should align across schemes, including customer control, security, data minimisation, accessible customer journeys, auditability and interoperability. Common terminology and interfaces may also reduce costs for authorised third parties operating across sectors. Detailed rules, risk controls and assurance should nevertheless remain capable of reflecting the characteristics of the relevant data, market and existing regulatory framework.

RECCo supports a federated model under which existing sector bodies exercise responsibility within their established areas of expertise, supported by coordination across scheme boundaries. This allows sectors to progress at different speeds while preserving clear accountability. A central entity should take on a function only where common delivery is necessary or produces a demonstrable benefit that cannot be achieved effectively through coordinated sector arrangements.

The Government's research suggests that sector implementation entities might be appointed competitively. That may be suitable where no capable or accountable sector body exists. It should not be a universal requirement where a regulator or government department has already selected or directed an entity to develop and govern the relevant arrangements. Any decision to replace or duplicate such an entity should be supported by a clear assessment of benefits, transition costs and delivery risk.

Q49: How should Smart Data schemes be governed and coordinated in practice where services or data flows span more than one sector?

Cross-sector services should operate through defined interfaces between accountable sector schemes. For each service or data flow, the arrangements should identify the lead body, the responsibilities retained by each sector, the standards governing exchange, the evidence needed for assurance and the route for resolving conflicts or gaps.

A cross-economy coordination body could maintain common principles and interface standards, facilitate mutual recognition of equivalent accreditation or assurance, coordinate shared services where there is a sound case for them, and provide escalation where an issue cannot be resolved bilaterally. It should not become an additional approval layer for routine sector decisions or displace the authority of regulators and sector governance bodies.

Where a proposed change affects more than one scheme, each affected body should have a defined right to raise or sponsor the necessary change and a duty to cooperate and provide relevant information. The process should preserve a clear decision-maker for each legal or regulatory instrument and include an escalation route where changes must be coordinated across different timetables.

In energy, this model should recognise the roles of DESNZ and Ofgem, Ofgem-licensed Code Managers, Ofgem-appointed Data Domain Coordinators and the designated bodies responsible for relevant technical and operational systems. The detailed allocation should be considered in the forthcoming energy consultation rather than fixed indirectly through a generic cross-economy model.

Q50: How should customers be protected and able to seek redress where Smart Data services span more than one scheme or sector?

Customers should have a clear first point of contact and should not be required to determine which participant, scheme or sector caused a failure before seeking help. The organisation providing the customer-facing service should ordinarily receive the complaint, keep the customer informed and coordinate referrals or recovery actions with other participants behind the scenes.

The governance framework should allocate responsibility for inaccurate data, unauthorised access, failure to act on withdrawal, service failure and misuse after disclosure. It should also specify how existing routes, including sector ombudsman arrangements and the Information Commissioner's Office, interact; how complaints are

transferred without the customer having to restart the process; and how evidence is shared between the relevant bodies.

Consistent permission and audit records will be essential to establish what the customer authorised, for what purpose, for which data and for how long. However, common customer protections do not require a single cross-economy redress body. Existing sector redress mechanisms should be used where they provide effective coverage, with additional arrangements targeted at identified gaps.

Q51: What factors would encourage and deter your organisation from participating in a Smart Data scheme?

RECCo's likely role is as an implementation or governance body rather than as an authorised third party seeking access to data. For an organisation in that position, the principal enabling factors are a clear mandate, defined scope and accountability, access to the regulatory and contractual levers needed to deliver the role, a sustainable funding route, and alignment with existing code and licence obligations.

Participation would be deterred by overlapping mandates, uncertain liability, unfunded obligations, duplicated assurance or accreditation, and dependencies on other bodies without corresponding cooperation duties or escalation routes. These factors can create delay and cost without improving customer protection.

For market participants and authorised third parties, proportionate entry and assurance requirements will also be important. Mutual recognition of genuinely equivalent checks, common technical interfaces and coordinated change timetables could reduce barriers, particularly for smaller organisations. Proportionality should not weaken the controls required for personal, commercially sensitive or security-relevant data.

Q52: What lessons from existing UK data-sharing initiatives should shape Smart Data governance?

RECCo's experience of the REC and of developing the CCS suggests five relevant lessons.

- Governance should be linked to delivery levers. A body responsible for standards or coordination also needs a practical route to change the relevant rules, systems and assurance arrangements, or a formal mechanism for requiring the responsible body to act.
- Consumer permission for data-sharing must be treated as a managed lifecycle rather than a single customer interaction. The framework must address grant, verification, amendment, withdrawal and expiry, and retain an auditable record of the permission and its use.
- Standards need governed change control, version management and implementation planning. Publishing a technical standard is insufficient if participants can implement it inconsistently or if there is no process for coordinated change.
- Performance assurance and data quality should be designed into the scheme. Clear ownership, monitoring, risk-based intervention and accessible reporting are required if common standards are to produce reliable outcomes.
- Existing sector infrastructure and governance should be reused where this is efficient. New cross-sector components should have a defined purpose and should not duplicate established services or controls.

These lessons support a federated model with common principles and interoperable interfaces, underpinned by accountable sector arrangements.

Wider Considerations

Q54: Are there any other risks, opportunities or benefits (such as environmental or societal) you would like to raise that relate to Smart Data?

Smart Data could make it easier for consumers to combine services across energy, finance, property and transport, supporting energy efficiency, low-carbon technologies and flexibility. These benefits depend on services being usable by consumers with limited digital access or capability. Schemes should therefore provide accessible and, where necessary, assisted or non-digital routes without weakening security or customer control.

There is also a transition risk. Several sectors are already investing in permissions, data access, accreditation and assurance. Common requirements introduced after those services have been designed could create avoidable rework, delay, stranded cost and inconsistent consumer journeys. Government should identify existing capabilities early and provide proportionate recognition and transition arrangements. Impact assessment should also consider the privacy and exclusion risks created by combining datasets, including the risk that automated decisions disadvantage vulnerable consumers.

Q55: Is there anything you haven't said already that you would like to add in response to the Call for Evidence?

We welcome the commitment to consult separately on an energy Smart Data scheme. We anticipate that the consultation will explain how the Data (Use and Access) Act powers will interact with existing energy licences, codes and statutory functions; the respective roles of DESNZ, Ofgem and relevant industry bodies; and the relationship between the proposed scheme, RECCo's CCS and emerging Data Domain Coordination arrangements.

Early engagement between the now Department for Business, Innovation, Science and Trade ("BIST"), DESNZ, Ofgem and the relevant energy bodies would help the two frameworks develop consistently and avoid decisions in one process inadvertently pre-empting the other. We would also encourage BIST to facilitate structured engagement between the organisations involved in designing and delivering Smart Data schemes across different sectors. This could promote the sharing of experience and reusable approaches, support interoperability - including common technical and semantic standards—and help avoid unnecessary duplication or the development of incompatible sector-specific arrangements.