Consumer Consent Solution

Consultation Webinar

28 May 2026

Delivering a secure consent solution that enables consumers to control access to their energy data simply, transparently and securely



Join at slido.com

Code: 1169415

Aims and Objectives

Our objective:



Today's session will :

- Explain how consultation feedback is shaping the ongoing CCS design and REC drafting process
- Share the most prominent consultation themes and areas of consensus or challenge.
- Set expectations for lower-level design, REC drafting and the summer consultation.
- Signpost how stakeholders can continue to engage.

Welcome and Housekeeping

- Please ensure that cameras and microphones remain switched off during the speaker sessions
- We encourage you to submit questions throughout the event using the Slido function
- As a polite reminder, please keep all questions relevant to the session and avoid referencing other organisations
- Please note that the meeting is being recorded
- The recording and slides will be made available on our website and communication channels following the session.

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Consultation *at a glance*

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Consultation at a Glance

- CCS Design Consultation was launched on 11 February 2026 & closed on 25 March 2026
- **31** responses received
- **32** consultation questions
- **645** individual comments
- **10** overarching themes

What we heard overall

Stakeholders broadly welcomed the ambition for clearer consumer control and centralised, secure access to energy data, while challenging key points of scope, legality, implementation burden, and consumer inclusion.

This is an interim response, final design positions will be consulted on through the summer REC drafting consultation

A balanced picture: Support and Challenge

Stakeholder challenge has directly shaped ongoing design development and areas for further evidence and engagement

Supported

- Phased Minimum Marketable Product (MMP)
- Clearer consumer control
- Secure, standardised consent framework
- Open standards and FAPI 2.0

VS

Challenged/ needs more work

- Legal and operational consent authority
- SEC alignment and duplication
- ID&V proportionality and inclusion
- Cost vs Benefit and delivery burden

Consultation Themes

Matt White | Product Owner & CCS SRO

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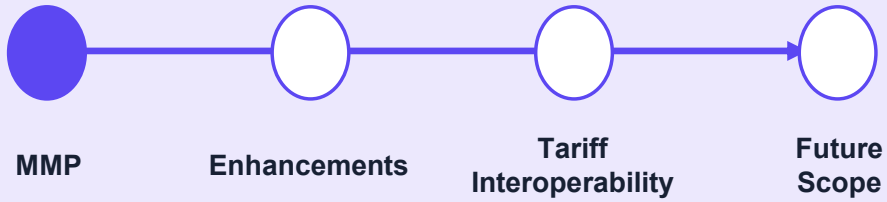
Theme 1: MMP scope and future roadmap

The long-term ambition remains broader consumer visibility over data access

What stakeholders told us

- Support for a phased MMP, but concern that the initial scope may be too narrow
- Consumers may need clear explanations that only a subset of consents is visible at first.
- Mixed views on Energy Data Holders (EDHs), including Smart DCC, SDR, and SEC Other Users.

Our Focus



- Current focus remains delivery confidence & phased implementation
- Hybrid is being implemented as a centralised consent layer with decentralised data sharing — providing a single, trusted framework and consumer identity to reducing fragmentation across journeys
- Explore feasible ‘quick wins’ for one truth consumer view without compromising delivery confidence
- Continue EDH adoption planning with Smart DCC and Elexon (SDR), aligned to DESNZ & Ofgem Framework
- Treat non-domestic expansion as a future scope question and set up scoping activity with industry

Theme 2: Consumer (occupier) versus Customer (bill payer)

The occupier versus bill payer question is being revisited before a final position is confirmed

What stakeholders told us

- Many respondents agreed with the consultation position that, under UK GDPR, the occupier is the data subject.
- Some highlighted practical challenges with an occupier-led consent model, including the risk of parallel or conflicting consent frameworks
- Questions were also raised about multi-occupancy households and how CCS would verify an individual's authority to provide consent.

Our Focus



Review the legal position

Reviewing previous legal advice and engaging with the ICO to further test the consultation position



Align and develop

Align with SECCo and develop the position in discussion with Ofgem and DESNZ, informed by feedback from the ICO



Consult on proposed position

The summer REC drafting consultation will set out the proposed position.



Objective: Reach a clear, evidence based and workable position on who can provide consent. Practical implementation and evidencing approaches remain under review

Theme 3: SEC alignment and assurance

CCS cannot be designed in isolation from existing SEC arrangements.

What stakeholders told us

- Respondents urged RECCo to carefully manage the transition to CCS, particularly during any period of parallel consent models.
- Concerns were raised about increased complexity for market participants and potential consumer confusion without clear guidance.
- Clarity on the long-term relationship between CCS and existing SEC consent mechanisms, including whether CCS may replace current arrangements over time
- Further detail was sought on how CCS and SEC assurance responsibilities would be defined to ensure proportionate, coordinated processes and avoid duplication.

Our Focus

RECCo and SECCo are reviewing REC and SEC assurance boundaries to avoid duplication while maintaining data safeguards

CCS assurance arrangements are continuing to be developed to ensure appropriate controls while remaining proportionate and coordinated with SEC arrangements

The summer REC drafting consultation will clarify how SEC processes interact with CCS and support the Energy Digitalisation Framework

Objective: Avoiding duplication and unnecessary participant burden remains a key design objective

Theme 4: Identity Verification

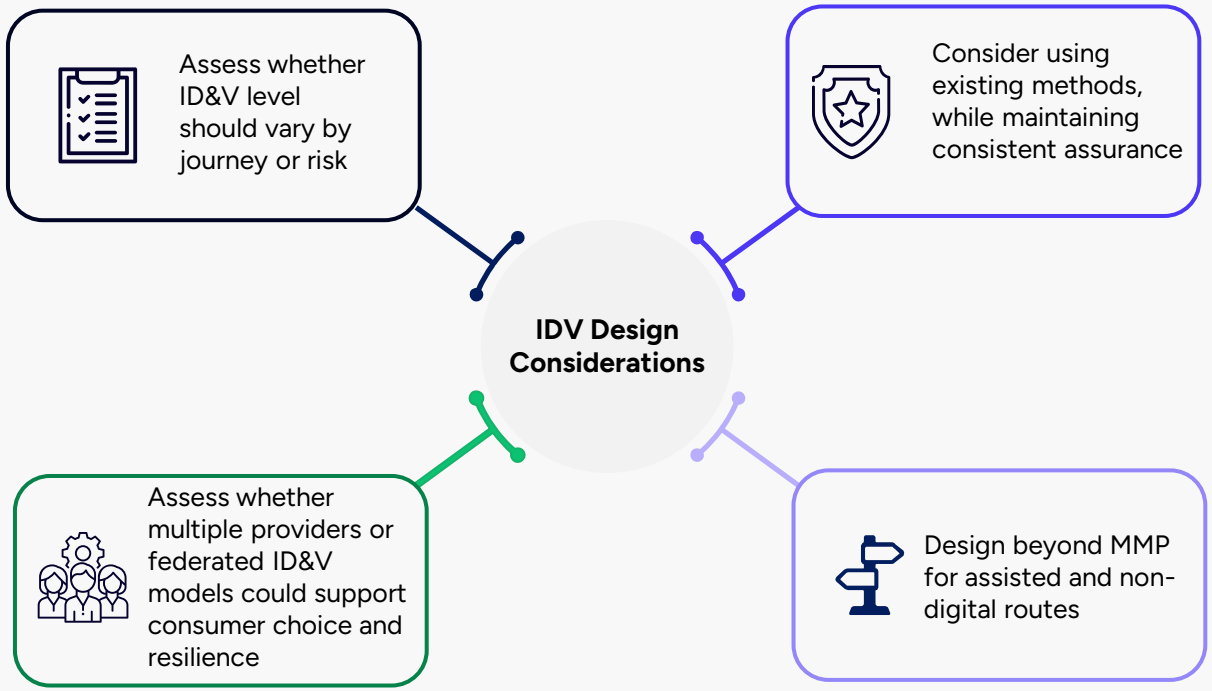
The challenge is to protect consumers without creating disproportionate friction

Current work is focused on balancing assurance, usability, inclusion and proportionality

What stakeholders told us

- Some respondents saw strong IDV as essential protection against unauthorised access to half-hourly metered data.
- Others warned that it could introduce friction, especially for consumers without photo ID, digital confidence, or easy access to digital routes.
- The design work now needs to balance assurance, usability and inclusion

Our Focus



Objective: Once verified, consumers should be able to authorise future requests without repeating full ID&V. The proportionality of ID&V continues to be assessed across different consent journeys and risk profiles

Theme 5: Zero-Trust consent checking model

Introspection and mTLS: current design direction remains, but implementation guidance is needed

What stakeholders told us

- Concerns that real-time consent checks could create performance, scalability and integration challenges as CCS usage grows.
- Questions were raised over whether consent must be checked for every transaction, particularly for scheduled or bulk data-sharing models.
- ATPs and EDHs highlighted potential technical overheads, monitoring and error-handling impacts.
- Clarity on consent caching and how data access would operate during CCS outages or service disruptions.

Our Focus

Lightweight Introspection

Introspection is intended as a very lightweight OAuth-based API validation, not a repeat of the consumer consent journey

Batching & Scheduling

EDHs and ATPs will manage batching and scheduling, while CCS validates active consent at the point of access.

Supporting Operability

Webhooks and cached consent states may support operability but are not currently expected to replace active consent validation

Outage Scenarios & Assurance

RECCo is engaging with the ICO on outage scenarios, with a current working assumption of up to 12 hours, subject to further testing, legal review & stakeholder engagement.

Key Takeaway

Active consent is validated at the point of data access, with a pragmatic approach to operability and resilience to support secure and reliable data sharing. **Consumers are not expected to repeat the consent journey for every access request**

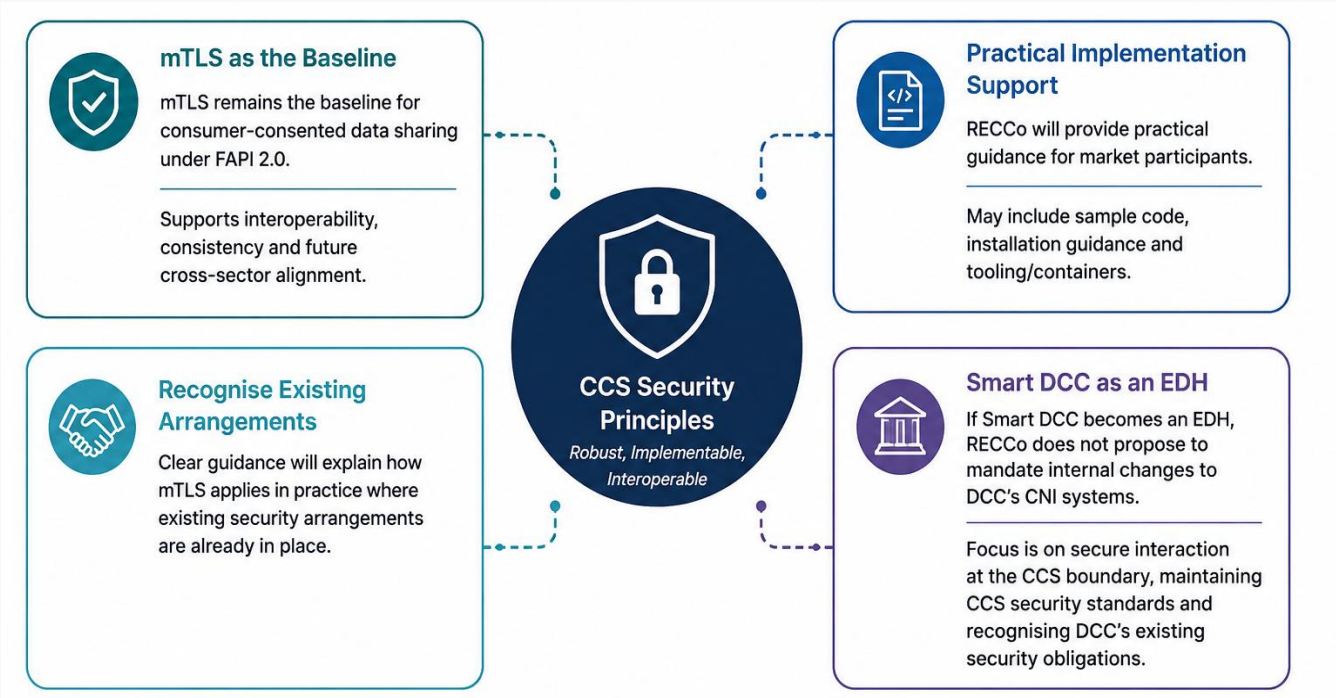
Theme 6: Use of mTLS security standard for data sharing

Open standards and interoperability remain key design principles. Mandating a consistent baseline security profile supports interoperability, trusted connections and future cross-sector alignment

What stakeholders told us

- Strongly supported open standards, FAPI 2.0 and mTLS between CCS Users and CCS..
- Some questioned whether mandating mTLS between ATPs and EDHs exceeds the intended scope of CCS and aligns with Ofgem's hybrid model.
- Concerns were raised that existing Smart DCC security arrangements may already provide a sufficient baseline.
- Call for further work to ensure CCS security requirements align with existing DCC arrangements without reducing security or creating unnecessary change.

Our Focus



Ensure secure, standards-aligned data sharing through CCS, while being practical for implementation and aligned with existing obligations. RECCo continues to work with NESO, DCC, Elexon and wider digitalisation initiatives to support aligned implementation approaches.

Theme 7: Consumer experience

Trust and confidence are critical to successful adoption

What stakeholders told us

- CCS will only build trust if consumers clearly understand the purpose, benefits and consent requirements of data sharing.
- identity verification, MPxN association and consent steps could create unnecessary friction, particularly for simpler use cases.
- the need for clear, intuitive and confidence-building first-time journeys that avoid overwhelming consumers with excessive information.
- Consistency across ATP implementations was highlighted as important to avoid uneven consumer experiences and maintain trust in the CCS framework.

Our Focus

Customer Research & UX design

Continuing consumer research and UX testing to understand needs, expectations and friction points, informing ongoing design iteration with support from our UX partner

Trust mark workstream

Exploring which trust signals (e.g trust marks) can best support consumer understanding and confidence throughout the consent journey

Customer Experience Guidelines (CEGs)

CEGs, anchored in the REC and given effect through the ATP Access Agreement, will ensure a standardised, transparent and trustworthy consent experience.

Consistent experience, flexible delivery

CEGs enable consistency and trust across the journey, while allowing ATPs to maintain their own branding and customer relationships.

Our combined approach ensures CCS journeys are inclusive, transparent and trustworthy, building consumer confidence and supporting the success of the market. Ongoing engagement with Citizens Advice and Money & Mental Health Policy Institute is helping inform consideration of vulnerability, accessibility and consumer trust

Theme 8: Inclusion and Accessibility

“Inclusion and accessibility must be designed in from the outset

What stakeholders told us

- CCS should account for varying levels of digital access and capability, particularly for vulnerable or digitally excluded consumers.
- Greater clarity was requested on how non-digital and assisted journeys would operate and provide equivalent support to digital journeys
- The need for clear, intuitive and confidence-building first-time journeys that avoid overwhelming consumers with excessive information.
- Whether inclusive design is being treated as a core requirement and where responsibility for inclusive access will sit across the CCS framework.

Our Focus

RECCo agrees that inclusion & accessibility must be built into CCS and MMP design from the outset, supported by consumer research into barriers and support needs

This research is shaping a clear and accessible initial digital journey within the MMP

Further development of non-digital and assisted journeys is planned beyond MMP due to the additional design, testing and operational considerations involved.

CCS will primarily operate through ATP digital channels, with RECCo continuing to consider how consistent, secure and consent-safe assisted support can be enabled

RECCo recognises that fully inclusive non-digital and assisted journeys cannot be fully delivered within the MMP and will be developed as part of the roadmap

Theme 9: Governance and Assurance

Clear governance, assurance and redress arrangements are essential to maintain trust and confidence in CCS

What stakeholders told us

- Respondents broadly supported the REC drafting approach, upcoming consultation artefacts, and use of existing REC governance and assurance processes.
- Further clarity was requested on how ATPs and EDHs will be involved in governance, particularly where changes impact their obligations or operations.
- Customer Experience Guidelines (CEGs) could become overly prescriptive or conflict with outcome-based regulation.
- the need for CEGs to ensure a consistent, transparent consent experience without constraining ATP customer journeys or branding.
- Clear customer redress, complaint escalation processes

Our Focus

- Continue development of REC drafting and governance artefacts to provide clarity & support effective assurance
- Build on existing arrangements to ensure ATPs & EDHs can engage appropriately in REC governance where changes may impact them
- Develop CEGs to support a transparent, consistent & GDPR-compliant consent experience without limiting ATP branding & customer relationships
- Ensure CCS embeds a customer-centric approach to issue resolution, helping problems be resolved quickly, fairly & with minimal friction
- RECCo continues discussions with Ofgem, DESNZ and the Energy Ombudsman regarding compliant escalation & customer redress arrangements.

Strong governance, clear assurance mechanisms & effective redress arrangements are key to building consumer trust & maintaining confidence in the CCS framework.

Theme 10: Funding

Summer REC Drafting consultation will provide more detail on how the cost recovery mechanism may be reviewed and amended post MMP

What stakeholders told us

- Mixed views on funding, with support for supplier-funded initial CCS costs and user-funded accreditation costs, alongside concerns about duplication with SEC requirements increasing costs.
- Stronger evidence was requested that CCS costs are proportionate and deliver clear consumer value, with greater transparency on early spend, benefits and cost evolution.
- Concerns were raised about cumulative supplier-funded scheme costs and the need to avoid duplication while demonstrating clear consumer benefit.
- Further clarity was sought on future funding arrangements, including post-MMP review timing and whether a user-pays model may be more appropriate as adoption grows.

Our Focus

RECCo will support early adopters and EDHs to drive CCS uptake and realise benefits over time

The CCS programme continues to operate within approved funding parameters and the assumptions considered through Ofgem's Impact Assessment

Ongoing coordination with Elexon, NESO, Ofgem and DESNZ to align CCS with wider smart data and flexibility initiatives, and ensure consistent funding approaches

Efforts will continue with SECCo to minimise duplication in accreditation requirements, with further detail on post-MMP cost recovery to be set out in the summer consultation

Transparency, proportionality and demonstrable consumer benefit will remain central throughout CCS delivery

What changes now?

Six areas of immediate design focus following consultation feedback

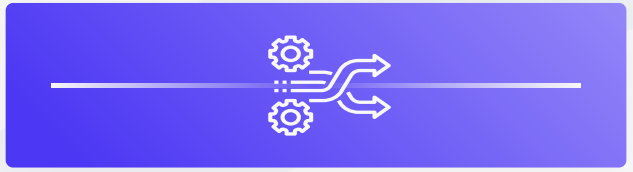


Consent Authority

Legal advice,

ICO engagement

Supplier evidence



SEC Alignment

REC & SEC boundaries

Assurance Framework

Transition



ID&V Proportionality

Inclusive routes

Choice

Assess level by journey or risk



Technical Guidance

Introspection

Outages and mTLS

implementation



Consumer Trust

Customer Experience Guidelines

Trustmark

Clear messaging



Cost Transparency

Reporting

Phasing

Post MMP Review

Q&A

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Q&A Instructions

- Please use the Microsoft Teams **Slido function** to ask your questions or raise your hand
- Questions are **not anonymous** – your name will be visible once you click ‘post’
- Keep questions relevant
- Avoid mentioning other organisations
- Questions may be **public** after the event
- This meeting is **recorded** and will be shared on our digital channels

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Next Steps

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Next steps and Engagement Route

Now	June onwards 2026	Summer Mid August 2026	Sept/Oct 2026
• CCS Design Webinar • Publish Design Consultation Response	• Lower-level design • REC Drafting legal text	• Publish REC Drafting Consultation (6- week period) • REC Drafting Engagement day	• Final positions and implementation planning

Engagement continues through working groups, bilateral discussions, and targeted input from Ofgem, DESNZ, SECCo, delivery partners, consumer representatives and market participants.

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

Consumer Consent Hub on the RECCo website

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.