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REC CONSUMER CONSENT SOLUTION TOPIC-SPECIFIC WORKING GROUP
MEETING MINUTES

MEETING	**REC CCSTSWG_26_0129**
DATE	**29 January 2026, 14:00**
LOCATION	**By teleconference**

1. INTRODUCTIONS

The Chair opened the first meeting of the Consumer Consent Solution Topic Specific Solution Group, welcoming participants and outlining the group's purpose in supporting development of the Consumer Consent Solution (CCS) and industry engagement ahead of the upcoming consultation.

2. UPDATE ON FIRST CONSULTATION PREPARATION

MPW reported that the first CCS consultation drafting is in final review, with publication scheduled for mid-February. The consultation period will run for six weeks, closing in late-March. Engagement activities, including working group discussions, will continue throughout this period. Following closure, responses will be analysed and inform the REC Change process.

3. CUSTOMER JOURNEY CLARIFICATIONS

EVS took members through RECCo's current position on the Consumer journey using CCS ahead of the upcoming consultation. They noted that this position has shifted slightly following feedback received from previous Working Group meetings.

EVS advised that based on strong stakeholder feedback, guest checkout will be supported for MMP, alongside the option to create a CCS account. EVS went through the planned consumer journey for guest checkout:

- Consumers can grant consent via CCS without creating an account.
- ID&V required each time a consumer provides consent for a new service (no persistent identity).
- Consent management (view/revoke/renew) will be done via the ATP (app/website) with which consent was originally granted.
- Future consideration: Exploring how existing guest consents could be linked if a consumer later creates a CCS account, so consents become visible centrally.

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A member asked how this journey will meet the requirement that withdrawing consent should be as easy as giving it. EVS and MPW responded that if the consumer interacts directly with the ATP, they should be able to withdraw consent there as easily as they granted it. CCS will publish Customer Experience Guidelines (CEGs) to ensure grant/revoke parity in the ATP journey. This will be covered in the consultation, and more information will become available once the technology procurement is complete.

Another member suggested that relying on ATP journeys long-term may make withdrawal hard, such as instances like finding an old app. They asked if there is a way to make withdrawal simpler—akin to email “unsubscribe”—and not keep the current approach for too long. MPW responded that this approach was adopted due to the strong support for a guest checkout option. They added that RECCo will take this into lower-level design and use CEGs to establish and ensure easy and discoverable withdrawal (e.g., standardised, “unsubscribe-like” patterns). MPW added that this will only apply to time-bound consents, as single-use consents will end immediately.

A member asked if they authenticate with an ATP, will that authenticate the User with CCS to avoid re-login or ID&V. MPW responded that federation/synchronisation will be explored with the technology partner to reduce friction. Some ID&V will still be required; an account makes this smoother than guest checkout. The member asked if CCS could be the main authentication provider, and ATPs could potentially rely on this. MPW responded that this could be possible and will be considered during design. RECCo have flagged this as a topic for further exploration post-procurement.

A member noted that SEC Other Users already have ID&V in place and asked whether CCS can rely on this, so it appears in CCS via API. MPW responded that this is not the current proposal, the strategy is to centralise ID&V within CCS using trusted third-party platforms to reduce burden and standardise.

A member asked about historic consents. MPW responded that historic consents will remain with the originating organisations. As parties onboard to CCS, new consents (from the first CCS consent onward) will be in CCS. Ofgem will run an RFI to understand more about supplier consents so we can assess the suitability of inclusion of these within CCS.. MPW advised that this position is in the upcoming consultation for feedback. A member asked if this position would mandate CCS. MPW responded that this is not the intention and provided clarity. Once an entity is onboarded, new or renewed consents will go through CCS. There is no implication of retroactive or compulsory consent migration. They encouraged the member and others to respond to this section in the consultation to help clarify RECCo’s approach.

A member asked how CCS will interact with the Tariff Interoperability Programme. It seems Suppliers will have to build/maintain a consent mechanism for tariff interoperability and another for CCS. How will these join up so consumers have a clear, single route and parties don’t have duplicate costs.

MPW responded that the current plan was for Tariff Interoperability to launch first and utilise CCS once it’s live. However, this approach is being actively reviewed based on the TI consultation responses, this topic will be discussed at future Working Group meetings.

The Chair encouraged the member to include their views on this within their consultation response.

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A member asked about whether any potential SEC modifications will be included within the consultation. MPW responded that the consultation will set out the REC position only—it does not contain any SEC modification text. RECCo, SECCo, and DCC are coordinating in the background to understand what changes may be needed. More detail will come later, once the consultation feedback is reviewed. MPW added that this consultation is a "project consultation", outlining direction of travel—formal REC drafting will come later in the REC Change process. A SECCo representative confirmed that active engagement between REC and SEC is ongoing, and alignment will be managed through cross-code collaboration, including the Cross Code Steering Group. The member asked whether a SEC Modification will be a dependency for CCS MMP. The SECCo representative and SJ confirmed that there has been no specific dependency identified yet. There may be possibly only a change to the SEC Privacy Controls Framework to recognise CCS as a valid mechanism.

EVS outlined some of the key features for consumers creating a CCS account:

- Consumers creating a CCS account will complete ID&V once, at the first consent.
- For later consents, CCS will reuse the verified identity—no repeated full ID&V.
- Few exceptions requiring re-verification – e.g., Change of address → only occupancy verification needed (not full ID&V).

Benefits of account creation include a central portal to view/manage all CCS consent records. It is also expected there will be visibility of all consents associated with the property (MPxN), even those granted by another consumer, whilst ensuring the identity of the granting consumer is protected. This is intended to help consumers understand who has access to energy data for their property.

EVS went over the planned journey for change of tenancy. They advised that CCS wants consumers to be able to notify CCS if they move home. RECCo are also exploring automated routes (e.g. DCC notifications) to reduce reliance on consumers remembering to tell them. The aim is to mitigate risk, although CCS recognises it won't eliminate all cases.

A member asked if CCS states ID&V is valid for a set period, who takes the legal risk if that proves incorrect. EVS and MPW responded that this question is under active review. It will be resolved during the REC drafting phase, where liabilities and responsibilities must be formally set out, and RECCo will share a position once concluded.

A member suggested that most consumers won’t report their house move. They queried whether that means the new tenant could see information they should not have access to. EVS acknowledged that not all consumers will report change of tenancy. The goal is to reduce the risk as much as possible by combining automated and manual mechanisms, which includes backstops so tenants can also manually report moves. SJ added that the new tenant won’t see personal information, only that a consent exists for the MPxN. At that point, they are the current data subject, so it is appropriate for them to see which organisations are currently accessing data at their property. If an organisation is still accessing data from a previous tenant, they should revoke that access—this is a core benefit of CCS (visibility enabling correction). The member suggested that the new tenant will still see who the previous tenant gave consent to. SJ responded that the new tenant might see the organisation, but not the identity of the granting consumer. If the organisation is incorrectly still accessing data, the current tenant should be able to see and challenge it,

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and the organisation should stop access. This does not expose personal data of the previous tenant. Another member suggested that the bigger issue is that the previous tenant could still access old property data. SJ responded that this should not happen if organisations properly revoke consent upon a move-out.

A member raised concerns over the use of CCS as the public name for the solution, adding that consumers will not easily recognise this. They also highlighted early needs around trademarking, protecting domains, and building public trust and awareness. MPW responded that CCS is currently an industry name only, the consumer-facing name will likely be different. Work on naming, branding, and associated trademarking is planned. Consumer-awareness planning is ongoing with Ofgem and is a critical part of delivery, though not yet defined in the consultation. Another member agreed that CCS would not work as a public name. They advised that from their experience, tools with clear consumer need often attract traffic even without heavy promotion. What matters most is that the service does what consumers expect.

A member expressed concern that CCS risks adding a new layer of complexity for consumers, especially around understanding an additional entity (CCS v ATP), knowing where to go to view or manage consent, and managing scenarios like change of tenancy, where the ATP may have more direct knowledge than CCS. They emphasised the importance of maintaining clarity about which responsibilities sit with the ATP versus CCS and ensuring communication does not create confusion in consumer journeys. MPW responded that CCS is a foundational enabling solution, not a consumer-facing full journey. ATPs will continue to manage customer interactions; CCS involvement is limited to consent elements. ATPs should notify CCS when consent becomes invalid (e.g. change of tenancy), via revocation or webhooks to maintain aligned records. The CEGs will ensure consistent wording and processes across all ATP implementations. MPW added that more detail will be available in the consultation, especially around what sits with CCS vs ATPs.

A member asked when stakeholders will know exactly which data flows CCS will and won't show, since gaps could impact consumer trust. MPW referred to the product roadmap, which will be in the consultation and outlines the MMP scope, future development horizons and the planned direction of travel.

4. ISSUE AND DISPUTE RESOLUTION

EVS outlined the CCS approach to managing issues and disputes, building on discussions held in previous Working Group meetings. The consultation now contains a more formal position, and EVS offered early visibility to this position and an opportunity to flag concerns. Issues will fall broadly into two categories: technical issues and consumer consent record issues.

For dealing with technical issues, EVS advised that CCS will include internal monitoring and reporting capabilities to support assurance activities and identify unusual or suspicious behaviour (e.g., repeated failed API calls, potential security breaches). This will also allow for proactive intervention with ATPs/EDPs. This capability is dependent on ongoing technical procurement but is explored in the consultation.

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EVS added that CCS will leverage existing REC service management processes, allowing CCS to notify ATPs and EDPs about detected issues and for CCS users to raise issues with REC. This is intended as a two-way communication channel.

EVS clarified that CCS does not handle the data sharing itself between ATPs and EDPs. Issues with external data transfer should be handled bilaterally between the parties involved. CCS users will be required to maintain current contact details to facilitate direct communication. If the issue related to suspected user misconduct, CCS Users could raise this using the REC Service Management capabilities.

EVS took members through how CCS handles scenarios where a consumer finds a consent record they don't recognise. In situations where the consumer is listed as the person who granted the consent, they can revoke the consent immediately. If they want to understand how it was granted or raise concerns, they can escalate directly to the ATP. ATPs are required to maintain visible, accessible consumer contact details via the CCS portal. RECCo are also exploring an optional "reason for revocation" field, which could help identify patterns of concerning behaviour and prompt consumers to contact the ATP if needed.

A member asked whether consumers would be able to see not only the ATP they gave consent to but also any downstream parties who process data on behalf of the ATP. They emphasised that consumers will often not recognise such parties which could cause confusion. MPW responded that RECCo have not yet defined the exact metadata shown to consumers in the portal. They added that this feedback is useful and will help to inform lower-level design. Another member added that this example illustrates distinctions between data controllers and data processors. The ATP is the controller; the processor relationship should already be made clear in privacy policies. CCS must be careful to present metadata that is consistent with these legal roles. MPW agreed.

A member asked whether CCS would detect patterns where multiple consumers query or revoke consents—potentially signalling problematic behaviour by an ATP or an issue with the consent process. MPW responded that repeated consumer queries or revocations will raise flags. The optional "reason for revocation" fields will help identify patterns. Internal monitoring, reporting, and assurance processes will pick up repeated concerns and trigger CCS intervention where needed.

A member suggested that consumers often forget to revoke consents when moving home. New occupants may not check the list of existing consents quickly, or at all and the member suggested that guest checkout users may never see legacy consents. They noted that DCC already has some change-of-tenancy logic that restricts access to old data — could CCS use something similar. MPW responded that RECCo are discussing this already with DCC. Change-of-tenancy and event-trigger integrations are being explored, but unlikely to be available at MMP due to timing. A potential long-term goal is CCS could use these signals to pause or invalidate consents automatically. SJ added that CCS should not be the only route for revoking consents. ATPs are expected to know when a customer moves out through their normal service relationship and should revoke consent themselves when the service is no longer needed. CCS is a window for consumers, not the primary mechanism for consent lifecycle management. The member acknowledged the distinction. EVS added that if CCS received a notification from an ATP that a consumer has moved, CCS may be able to

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identify other consents linked to the same property and use that as a signal to prompt review or revoke related consents. This would help catch lingering, forgotten consents where a consumer had multiple services. The member agreed this would be useful.

A member advised that some ATPs act as intermediaries and provide multiple services for different organisations through one adapter. A consumer might want to revoke consent for one specific service; not all services provided through the intermediary. Therefore, CCS must display the ultimate service provider / end party, not just the intermediary ATP. Without this, consumers risk unintentionally revoking multiple consents, leading to service disruption and customer frustration. Another member supported this, noting that each service corresponds to a separate consent, so CCS must show the correct granularity.

A member asked what happens if a consumer raises an issue with an ATP, the ATP does nothing or responds poorly, and the consumer has no further escalation route. SJ responded that RECCo has built significant assurance and safeguard mechanisms into the consultation, such as monitoring and reporting, escalation routes and ultimately, removal of access agreements. They acknowledged that these mechanisms mainly address systemic or persistent poor performance, not single-case consumer disputes. That current position is not finalised, although RECCo is actively engaging with the ICO, Energy Ombudsman, Ofgem and DESNZ.

A member noted that organisations often fail to keep external contact details up to date, and relying on ATPs to maintain correct contact information may lead to consumer frustration.

A DCC representative added that the DCC does receive change-of-tenancy notifications from suppliers. These may be future-dated or delayed (often consumers inform suppliers after they move out). Change-of-tenancy signals show the bill payer has moved, but this is a blunt indicator: other occupants may remain (HMOs, shared households) Therefore CCS must treat this signal with caution.

A member asked how change-of-tenancy interacts with termination of consent within SEC processes, whether non-SEC data sharing would still allow old occupants to see data they shouldn't and how multiple individuals consenting or revoking consent for the same MPAN work today in SEC. A SEC representative responded that they understand only the bill payer can legally give consent for the entire premises. Other household members may access data but cannot revoke consent unless they go via the bill payer. This implies a two-tier account structure. They raised concerns that queried consent scenarios get complex fast, particularly in domestic abuse situations and cases where individuals cannot validate their identity easily. This process is likely to be slow and must be carefully designed around ATPs' operational realities.

MPW clarified that CCS is adopting a different position from SEC expectations. Consent will be based on any occupier of the premises behind the MPAN/MPRN, not only the bill payer. This position, based on legal advice received, is stated in the consultation and is open for feedback. ICO has not yet formally endorsed or rejected this position; engagement is ongoing.

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5. FORWARD PLAN

The Chair outlined the forward plan for future industry engagement workshops in the coming months. They advised that the next few Topic-SpecificWorking Groups will focus on different aspects of the upcoming consultation, with spotlight on governance, technology and user experience.

The Chair advised that the Central Webinar scheduled for 05 March will be replaced with a wider engagement event on the consultation, encouraging members to attend this event.

6. AOB

No AOB items raised and the Chair closed the meeting.

Next meeting date: 12 February 2026

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Matt White	Retail Energy Code Company	MPW	Committee Member
Sarah Jones	Retail Energy Code Company	SJ	Committee Member
Nathan Gould	Retail Energy Code Company	NG	Committee Member
Ann Perry	Retail Energy Code Company	AP	Committee Member
Vicky Brown	Retail Energy Code Company	VB	Committee Member
Teresa Thompson	Retail Energy Code Company	TT	Committee Member
Harry Firth	REC Code Manager	HF	Secretariat
Ofgem			
DESNZ			
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