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REC CONSUMER CONSENT TOPIC SPECIFIC SOLUTION GROUP
MEETING MINUTES

MEETING	**REC_CCTSSG_26_0826**
DATE	**26 August 2026, 14:30**
LOCATION	**By teleconference**

1. INTRODUCTIONS

The Chair welcomed Members to the meeting of the Consumer Consent Topic Specific Solution Group (CCTSSG). This session would focus specifically on the Permission Token Model, how this works with Shared Signals, and Controlled Lists.

2. PERMISSION ACCESS TOKEN MODEL & HOW THIS WORKS WITH SHARED SIGNALS

MPW explained the CCS token model, emphasising that consent is bound to access tokens, which provide the mechanism for ATPs and EDHs to verify that valid Consumer consent exists before data is shared. They clarified that there are two token types:

- Refresh tokens are created when Consumer consent is granted and remain valid for the duration of that consent (for example, three years). They cannot be used to access data directly but allow ATPs to generate access tokens. Revoking consent revokes the refresh token, preventing any new access tokens from being created.
- Access tokens are used to request and share data and have a 30-minute lifetime. EDHs validate access tokens locally, without needing to contact CCS, and data transfers should normally be completed within the token's validity period.

MPW noted that while the model works straightforwardly for synchronous data exchanges, some use cases involve delayed or scheduled processing where data is not ready within 30 minutes. In these circumstances, the EDH uses the initial access token to establish the request, prepares the data, and then notifies the ATP once the data is available. The ATP must then obtain a new access token before the data can be released, ensuring that consent remains valid at the point of data transfer.

MPW also explained the role of the Shared Signals Framework (SSF) in managing consent revocations during longer-running processes. If consent is withdrawn while data is being prepared, CCS sends a revocation signal to both ATP and EDH. The EDH can then cancel any ongoing processing and prevent unnecessary or unauthorised data handling. This ensures that

no data is processed or shared once consent has been revoked and reinforces the principle that data should only move when supported by a valid access token.

A member asked how the model would operate for the Tariff Interoperability (TI) use case. MPW confirmed that the token and consent model would apply consistently across all CCS use cases. For TI-related journeys, Suppliers acting as EDHs will use the Shared Signals Framework to send notifications when tariff information changes. ATPs must then obtain a valid access token before accessing the underlying data. EVS clarified that Suppliers would initially send only a notification that a change had occurred, while the ATP would subsequently obtain an access token and use it to request the detailed information. Revocation signals would prevent further notifications from being sent once consent had been withdrawn.

A member sought clarification on scenarios where consent might be revoked after data preparation but before transfer. MPW explained that the access token remains the primary source of truth. If consent is revoked before the ATP obtains a new access token, data cannot be shared because no valid token can be generated. If a valid access token has already been issued, it remains trusted for its 30-minute lifetime, with CCS committing that revocations will propagate through the ecosystem within that period. MPW reiterated that the Shared Signals Framework is primarily intended to support longer asynchronous processes, while standard synchronous exchanges rely on the validity of the access token itself.

3. ONE-OFF PERMISSION

MPW explained how one-off consents will operate within CCS, particularly distinguishing between synchronous and asynchronous data sharing arrangements. When an ATP selects a one-off permission type in the consent schema, no expiry date is required from the ATP because CCS will automatically apply a 25-hour validity period. This allows sufficient time for data processing arrangements that may take up to 24 hours, with an additional hour to support recovery scenarios. The refresh token is therefore available for up to 25 hours, although the consent should be revoked earlier once the requested data has been received.

For asynchronous data exchanges, the existing token model remains unchanged. An ATP may need to obtain multiple access tokens during the 25-hour window because access tokens are only valid for 30 minutes at a time. A one-off consent therefore does not mean a single-use access token. Instead, the control mechanism is that the EDH is informed through the token that the consent is a one-off permission and must therefore only fulfil the request once by providing a single batch of data. In parallel, the ATP is placed under a REC obligation to revoke the consent as soon as the requested data has been received. If the ATP does not revoke the consent, the permission will expire automatically after 25 hours.

A member queried whether one-off consents would be implemented through single-use access tokens. MPW clarified that this approach would not work in asynchronous scenarios where data may not be available within the initial 30-minute token lifespan. The EDH may require a subsequent access token to deliver the data once it becomes available. Instead, the EDH must enforce a control that ensures the consent ID associated with a one-off consent can only be fulfilled once, regardless of how many access tokens may subsequently be generated.

A member sought clarification on the 30-minute access token window and how this interacts with consent revocation. MPW explained that an ATP can only request data while holding a valid access token, and any data transfer must occur within the 30-minute validity period of that token. Consequently, if a Consumer revokes consent during that 30-minute window, there remains a possibility that a previously requested package of data could still be transferred before the token expires. They noted that CCS currently assumes a 30-minute processing period for revocations, although shorter periods, such as the 10-minute model used in Open Banking, were considered. Previous working group discussions concluded that a 30-minute notification period was appropriate for the CCS use case.

4. PROPOSED PURPOSE CATALOGUE

MPW introduced the predefined permission purpose lists that will be used within CCS, seeking working group feedback before these are formalised through consultation and subsequently embedded into REC governance processes. The intention is to create standardised purpose categories that explain to Consumers why their data is being requested while avoiding excessive complexity. MPW emphasised that additional purposes could be added in the future through a streamlined REC Change process where a valid business need is demonstrated.

The proposed purpose categories were grouped into four areas:

- Tariff Discovery and Switching: tariff comparison, tariff switching, and tariff and usage optimisation.
- Insights and Efficiency: energy efficiency advice, solar and battery assessments, and bill analysis and budgeting.
- Carbon, Flexibility and Connected Devices: carbon footprint tracking, demand-side response, smart device and EV optimisation, and home energy retrofit and grants.
- Research and Diagnostics: research and innovation activities, and appliance and usage diagnostics.

MPW explained that the purpose selected by an ATP describes the service being provided and forms part of the Consumer consent journey. The purpose is separate from the specific data items being requested, which are defined elsewhere within the consent schema.

A member queried what would happen if an ATP could not find a suitable purpose or selected the wrong one. MPW explained that ATPs would be obliged to use the most appropriate purpose and that assurance arrangements under the REC would monitor compliance. Where no suitable purpose exists, ATPs would be able to request a new purpose through the proposed change process. Assurance measures could range from operational guidance and corrective action through to suspension from CCS in serious cases of misuse.

The member also questioned how important it is to get the purpose list correct from the outset and suggested that stakeholders would need more time than the meeting allowed to consider whether the proposed categories covered all relevant use cases. MPW acknowledged this concern and confirmed that the forthcoming consultation would provide another opportunity for detailed feedback on the proposed lists.

A member highlighted that newly added purposes could only be used for future consents and would not automatically apply to existing consents. They also questioned whether ATPs might seek to select multiple purposes. MPW clarified that, at least for MMP, the current proposal is for a consent to be linked to one purpose only, although multiple data items could be requested under that purpose provided they are relevant to the service being delivered.

Several members raised concerns about the consumer experience. One member asked how Consumers would challenge a purpose they believed was inappropriate. MPW explained that the selected purpose would be presented clearly during the consent journey, alongside details of the data being requested. If a purpose appeared inconsistent with the service being offered, Consumers would be expected to refuse consent or later manage the consent through CCS processes.

A member questioned the underlying rationale for maintaining a predefined purpose list at all. They argued that ATPs already explain data usage within their own customer journeys and expressed concern that CCS could introduce an additional layer of complexity. MPW responded that a standardised purpose framework had previously been supported by the working group as a means of creating consistent Consumer understanding across the ecosystem and helping consumers understand, review and manage consents throughout their lifecycle. They noted that previous discussions had rejected free-text purposes because they could lead to inconsistent or confusing descriptions. The member suggested that predefined purpose categories may not reflect the broad variety of real-world services and consumer journeys that exist today. They argued that meaningful consent should be driven by the specific context of the ATP's proposition rather than a centralised catalogue of purposes. MPW acknowledged the feedback and confirmed that these concerns would be considered further through the consultation process, while reiterating that the current proposal reflects feedback received during earlier working group discussions.

5. REVOCATION REASONS

MPW introduced the list of revocation reasons. These are the reasons a Consumer may optionally select when withdrawing consent, whether the revocation is initiated through an ATP or directly through CCS. MPW emphasised that providing a reason would not be mandatory, ensuring Consumers can revoke consent quickly without encountering barriers. The purpose of collecting revocation reasons is to provide insight to ATPs and CCS into why consents are being withdrawn, helping identify Consumer trends, service issues and potential future improvements to the solution.

A member questioned the need for a revocation reason list, noting that under UK GDPR Consumers should simply be able to withdraw consent without explanation. MPW agreed that Consumers can revoke consent without providing a reason but explained that the optional reasons provide valuable operational insight. For example, a high volume of revocations linked to property moves could help identify future process improvements or additional functionality required within CCS. The collected information could also help ATPs improve their services and support evolution of the CCS framework.

A member queried whether the proposed “Other” category would include a free-text field to provide more meaningful feedback. MPW explained that the current proposal is for a dropdown selection, as free-text responses can be difficult to manage and analyse. They acknowledged the challenge of balancing the usefulness of an “Other” category against the risk that Consumers simply select it by default. The presence of significant volumes of “Other” responses could itself indicate that the list of reasons requires refinement.

A discussion then focused on the change of tenancy or house move scenario. A member asked whether the process relies on Consumers actively notifying CCS when they move home. MPW explained that Consumers would be able to revoke consent through either CCS or their ATP using a property move reason. They also noted that future roadmap developments will seek to utilise industry address-change and tenancy signals to support automated handling of changes of occupancy.

The member raised concerns about situations where a customer moves out without notifying CCS and a new customer subsequently moves into the property. MPW acknowledged that, in such circumstances, the original consent could technically remain active until action is taken. However, they explained that CCS addresses this through the query process, which allows a newly authenticated occupant to challenge an existing consent associated with the property. A query would automatically suspend data access pending investigation, providing protection where ownership or occupancy changes are not captured through the normal revocation process.

A member observed that under the Smart Energy Code (SEC), existing mechanisms already use Supplier-driven change-of-tenancy notifications to automatically withdraw consent when occupancy changes occur. Another member similarly suggested CCS should seek to leverage these established industry capabilities rather than creating entirely separate processes. MPW agreed that incorporating tenancy and address-change signals from across the industry forms part of the future CCS roadmap and is intended to support property move scenarios shortly after MMP implementation.

Members then reviewed a separate list covering ATP-initiated revocation reasons, which apply where consent is no longer required for operational reasons rather than because of a Consumer action. Proposed reasons included the service ending, the service no longer being available, one-off access having been completed, and permissions being replaced or superseded. A member queried whether a Consumer withdrawing consent through an ATP should also appear in this list. MPW clarified that where a Consumer initiates revocation through an ATP, the Consumer-facing reason list discussed previously would still be used, with the ATP simply passing the revocation request into CCS through the API. The ATP-specific reasons are reserved for situations where the ATP itself is ending the permission rather than acting on behalf of the Consumer.

6. QUERY REASON AND QUERY RESPONSES

MPW introduced the query reasons. They explained that a query is raised by another validated occupant of the property who identifies an active consent arrangement associated with the property and wishes to challenge or investigate it. Typical examples include a new occupier

discovering an active consent granted by a previous resident, or another household member becoming aware of data sharing they were not expecting.

The proposed query reasons included scenarios such as a permission being granted by another current occupant, no current occupant recognising the permission, a consent belonging to a former occupant, the querying person being the sole occupant, permissions appearing to be linked to the wrong property, other concerns, and a "prefer not to say" option. Unlike revocation reasons, CCS intends for a query reason to be provided whenever a query is raised.

A member asked what effect a query would have on active data sharing. MPW confirmed that the act of raising a query immediately suspends data access by revoking the applicable refresh token. The ATP is notified of the query and must investigate before responding. MPW explained that this approach is based on legal and ICO advice that where there is doubt regarding the validity of consent, data sharing should cease until the issue is resolved. They also acknowledged the importance of clear user experience design to ensure Consumers understand that raising a query will stop data sharing.

A member challenged both the design of the query reasons and the underlying concept. They suggested that many of the proposed options appeared more akin to revocation reasons than genuine queries. In their view, Consumers may be more likely to have questions such as who an organisation is, how consent was obtained, or how data is being used, rather than immediately seeking to stop data sharing. They also questioned whether the level of granularity proposed was necessary and requested clearer explanation of how the data collected through queries would be interpreted and used. MPW acknowledged these concerns and noted the need to strike a balance between obtaining useful operational insight and avoiding excessive complexity for Consumers. They confirmed that query information would be tracked by both CCS and ATPs, helping identify service issues, assurance concerns, or opportunities to improve consumer understanding.

EVS provided further context, explaining that the term "query" had been selected after considering alternatives such as "dispute", which carried legal implications. They outlined several potential uses for the information gathered, including identifying ATPs with unusually high volumes of occupancy-related queries, highlighting issues with consent revocation processes, uncovering property linkage problems, or identifying data quality issues such as MPxN mismatches. EVS stressed that while the precise benefits will only become clear once data is available, the information could provide valuable operational insight to both CCS and ATPs.

Several members questioned whether Consumers would realistically be able to identify some of the proposed scenarios. One member suggested that examples such as permissions being linked to the wrong property could be difficult for Consumers to diagnose accurately. Another member similarly argued that many options assumed a level of Consumer knowledge that most individuals would not possess, making it hard for them to confidently select the most appropriate reason. MPW accepted this feedback and agreed the proposed list would require further review before consultation.

Members then discussed how Consumers would arrive at the point of raising a query. One member questioned why a third-party occupant would ever create a CCS account. MPW explained that this would most likely occur when an individual interacts with another ATP and becomes validated against the same property through a separate consent journey. This validation would enable CCS to identify other active sharing arrangements associated with the property and provide visibility of those arrangements to the newly authenticated individual. The member remained unconvinced about how frequently this scenario would arise, but MPW noted that such situations are more likely to emerge over time as CCS adoption grows and additional address management capabilities are introduced.

MPW then moved on to ATP responses to queries. CCS proposes three broad response categories:

- Query Upheld – the ATP accepts that the consent should no longer be active, for example because it relates to a former occupant or has been associated with the wrong property.
- Query Not Upheld – the ATP believes the consent remains valid and correctly linked to the current occupant and property.
- Unable to Determine – the ATP cannot establish the facts due to insufficient evidence, conflicting information, or inability to contact the original consenting individual.

MPW clarified that even when an ATP concludes that a query is not upheld, data sharing does not automatically resume. Instead, a completely new consent must be created before data access can recommence. A member confirmed that this would require the original consenting individual to re-engage and provide consent again. MPW explained that ID&V would not need to be repeated in full if an existing CCS account already existed, but a fresh consent would still be required.

MPW reiterated that the decision to suspend data sharing immediately upon receipt of a query is grounded in legal and ICO guidance and is intended to prioritise consumer protection where consent validity is in doubt.

A member asked what would happen if an ATP ceased to be a REC participant, for example through non-compliance. HT explained that ATP removal from CCS would result in the ATP no longer being authorised to access CCS services. Existing permissions would be revoked; relevant notifications would be issued through CCS processes and suspended or revoked certificates would prevent the ATP from obtaining access tokens or continuing data collection. MPW added that once an ATP is removed from CCS, both future and existing data access arrangements would cease.

7. FORWARD PLAN

The Chair concluded the meeting by outlining upcoming sessions and encouraged ongoing feedback and engagement from all participants.

The Chair advised that RECCo plan to publish the REC Drafting Consultation in early September, with an Engagement Webinar focusing on the consultation provisionally scheduled for late September. The Chair advised that the schedule of meetings during the upcoming consultation period is under review and will be communicated to members as soon as possible.

The Chair also advised that CCS Solution Group meetings will be temporarily paused during the consultation period and for a short period afterwards. This approach reflects lessons learned from the earlier design consultation, where RECCo found it challenging to discuss stakeholder feedback before having sufficient time to complete a full analysis of consultation responses. The pause will provide the team with an opportunity to review and assess feedback properly before returning to stakeholders with any proposed revisions to the design.

Despite the planned pause in meetings, the Chair noted that additional Solution Group meetings could still be convened during or immediately after the consultation if required. Should this occur, members would receive at least two weeks' notice, together with details of the topics to be discussed.

MPW advised that any members with queries are welcome to email consumerconsent@retailenergycode.co.uk, and the RECCo project team will be happy to respond. They added that RECCo are looking for early adopters of the CCS solution and asked any interested parties to scan the QR code at the end of the meeting slides.

ATTENDEE ORGANISATIONS

Attendee	Representing	Initials	Role
Michael Walsh	Retail Energy Code Company	MJW	Chair
Matt White	Retail Energy Code Company	MPW	Presenter
Eva Von-Schaxmann	Retail Energy Code Company	EVS	Presenter
Harriet Truss	REC Code Manager	HT	Presenter
Harry Firth	REC Code Manager	HF	Secretariat

Ofgem	Publicis Sapient
Department for Energy Security and Net Zero	Centrica
Citizens Advice	CGI
Which?	SECCo
Consumer Scotland	SMS Energy

Attendee	Representing	Initials	Role
ScottishPower	PayPoint		
Elexon	GreenSync		
Perse Energy	National Energy System Operator		
SSE	N3rgy		
E.ON	Flock Associates		
East Lothian Housing Association	One Utility Bill		
Smart DCC	ESG Global		
Raidiam	PRIME		
Electralink	ScottishPower		
Cadent	Ohme		
Stark	Smart Energy GB		