Consumer Consent Solution Programme Working Group

15th January 2026

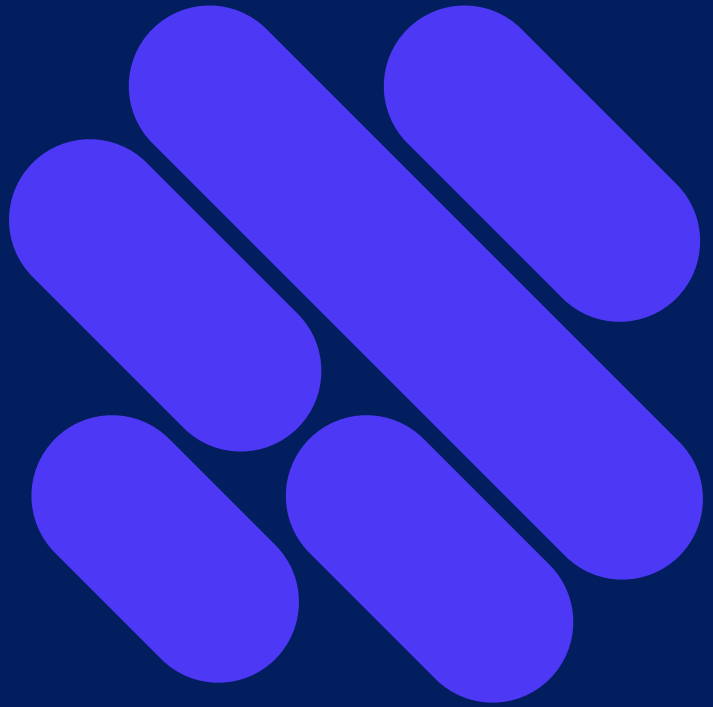
Agenda

Item	Lead	Approx Timing
Welcome & Intro	Tracy Hardy	5-mins
Recap of revised CCS Working Group arrangements	Tracy Hardy	5-mins
CCS Quarterly Review & Plan Headlines	Mike Walsh	10-mins
Update on first Consultation preparation	Matt White	5-mins
Draft Roadmap	Matt White	15-mins
Position update re. Design Principles	Sarah Jones	10-mins
Forward Plan for next Working Group sessions	Mike Walsh	5-mins



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Recap of revised CCS Working Group arrangements



Tracy Hardy

Previous CCS Working Group Set Up

Three Working Groups	Security, Technical & Design Secure | Scalable | User-first	Implementation & Governance Structured | Timely | Compliant	Consumer Protection & Accessibility Inclusive | Equitable | Accessible
Aim & Scope	• Explore security and technical design options • Includes key issues and risks	• Define governance roles and responsibilities • Shape delivery and implementation plans	• Focus on usability, accessibility, and protecting consumer interests
Key Advisory Role	• Advise on the data model and technical design • Ensure robust data privacy and cybersecurity protections	• Guide governance • Advised the delivery body on cost-effective, timely implementation	• Ensure strong consumer focus by safeguarding rights and promoting an inclusive, equitable, and user-friendly solution

2-hours per meeting

Met 4-weekly

Met on Tue – Thurs in the same week

Feedback, Insight & Observations

Responses suggest there's no single "best" approach

Clear appetite to continue to engage in the project (thank you!)

Identified positives in open and inclusive dialogue & discussions

Representation feels appropriate

Duplication & overlap in certain topics

Time commitment / efficiency for people or orgs attending more than one WG

Gaps in cross-WG info sharing & collaboration, incl. dependencies between groups

Revised CCS Working Group Structure

General CCS Working Group / Webinar (or similar)	Twice-per-quarter (c.6-weekly) --- 60-mins	• Summary of Quarterly Review & Plan • Project-wide updates • Overall project plan • Summary of topic-specific discussions • Forward plan of topic-specific meetings	Membership open to interested parties
Topic-specific CCS Solution Groups	Fortnightly (or as needed) --- 60-90-mins	• Solution groups to explore specific topics or focus areas to an appropriate level of detail; review, discuss and offer constructive challenge • Forward plan will enable people to plan.	Membership is flexible; Participants choose to join based on their expertise and interest

Through this approach we aim to maintain strong engagement with stakeholders, whilst enabling:

- Clearer alignment & transparency across topic areas
- Specialist topics can be explored in more detail
- Flexibility for participants to attend only & everything that is relevant
- Greater efficiency / reduced duplication

CCS Working Group Registration

RECCo is inviting stakeholders to **register interest** in the Consumer Consent Working Groups, now fully under RECCo's ownership, to help shape **consumer-centric consent arrangements** across the retail energy market

Why it matters:

- Enable secure data sharing
- Protect consumer interests
- Support innovation, including digital services and consumer-led flexibility

New Working Group structure:

·**General CCS Working Group/Webinar** (six-weekly) – progress updates and key topics
·**Topic-specific Solution Groups** (fortnightly) – deep dives on specific issues

Who should participate:

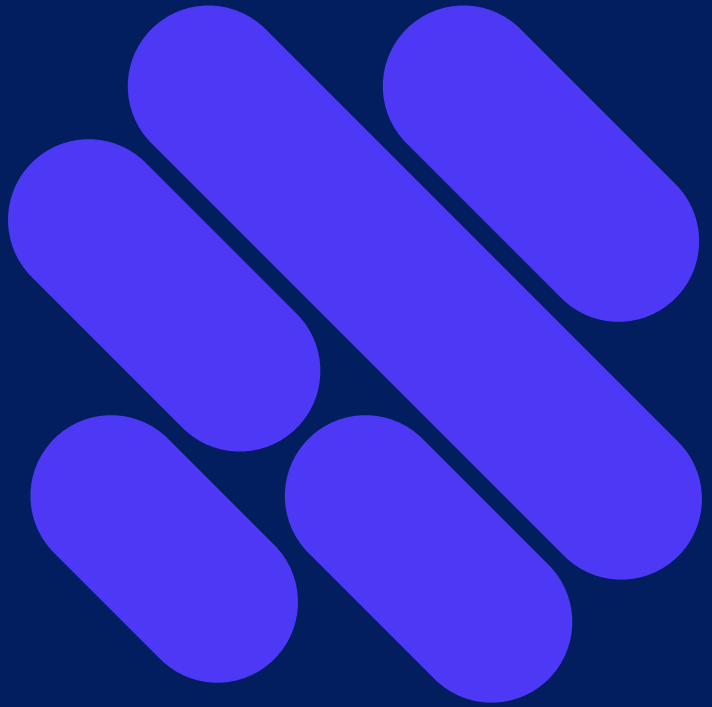
Suppliers, data users/providers, consumer bodies, innovators,
cross-sector experts, and policy stakeholders.

A Schedule of dates that will be published on the REC Portal: Consumer Consent Hub - REC Portal

Get in touch @ **consumerconsent@retailenergycode.co.uk**

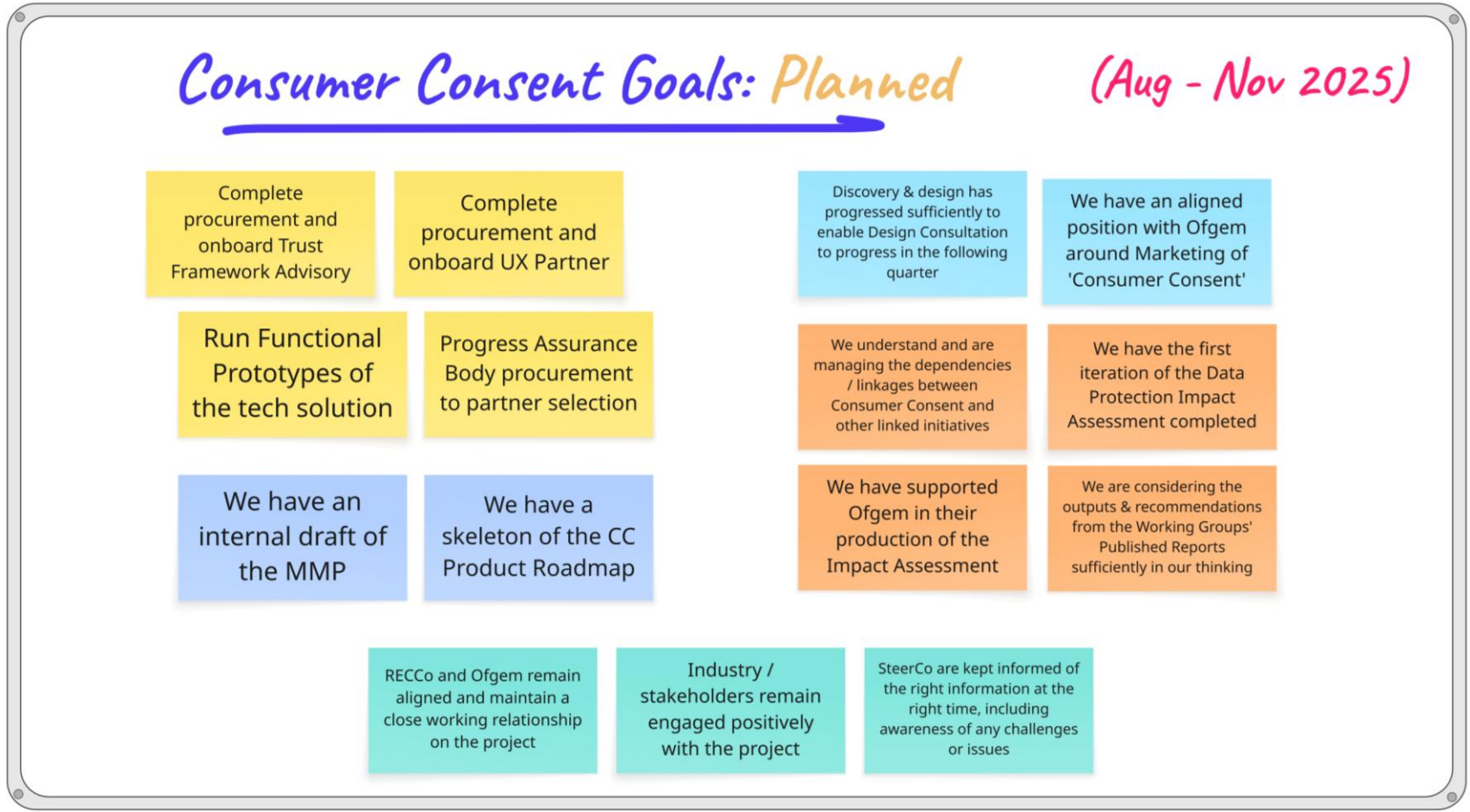
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Quarterly Review & Plan Summary

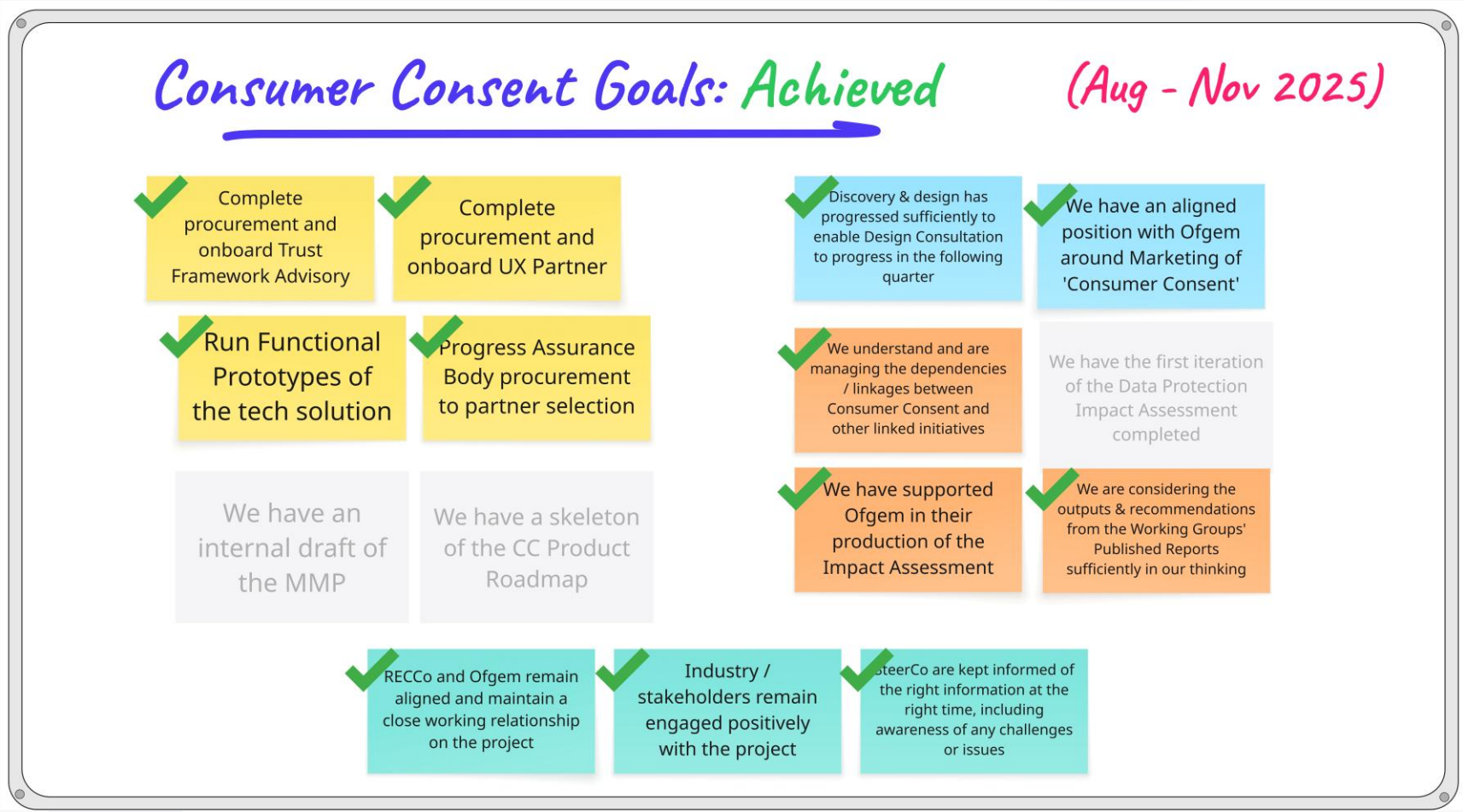


Mike Walsh

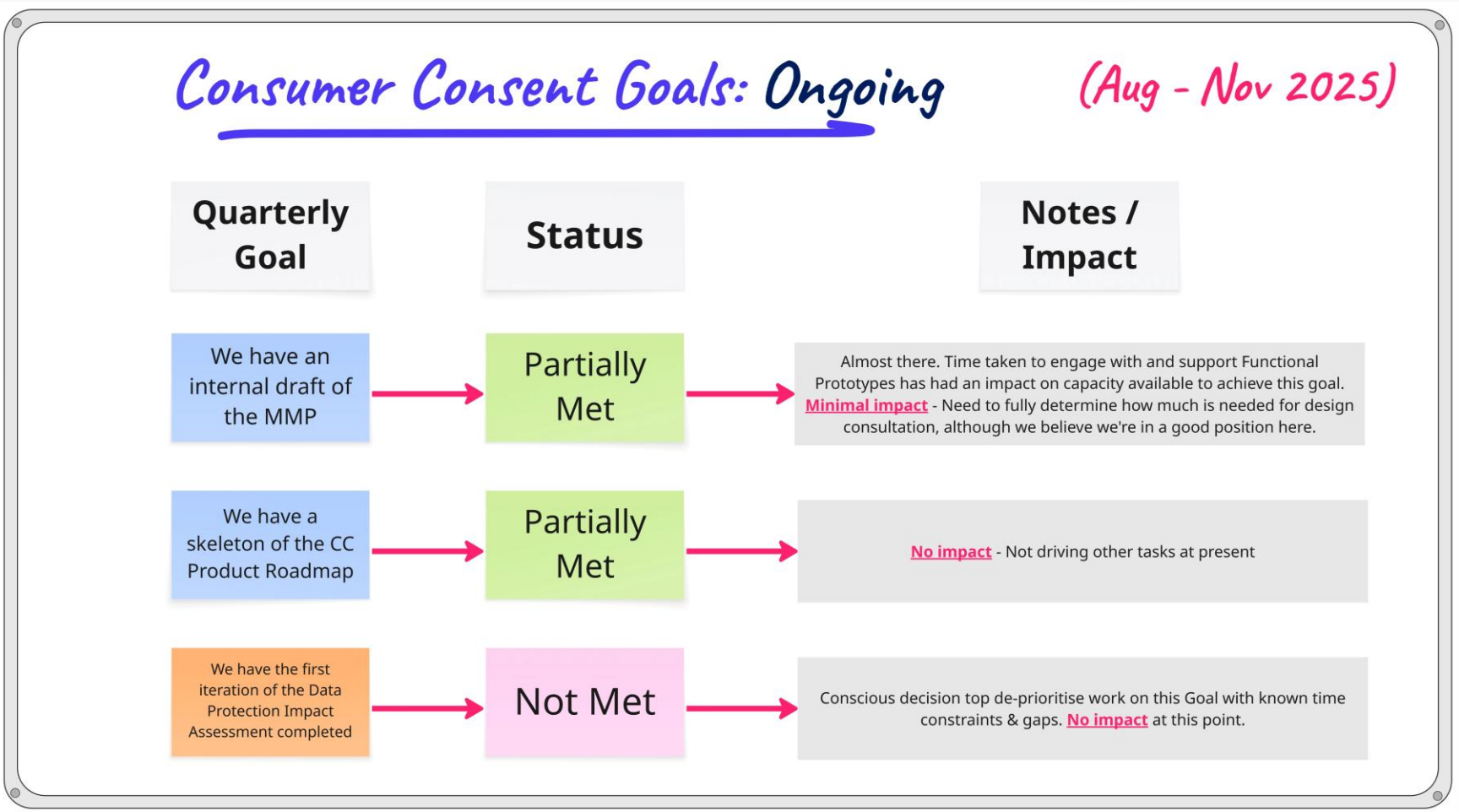
Consumer Consent: Quarterly Review



Consumer Consent: Quarterly Review



Consumer Consent: Quarterly Review



Quarterly Plan: Goals (to end March 2026)

Task-focussed Goals + Prioritisation

1

- Tech Partner preferred bidder confirmed
- Issue 1st consultation
- First version of CEGs
- Restructured WG's implemented
- Budget approval for 2026/27 & necessary extensions, contract & agreements in place

2

- Increased Consumer/ Charity engagement
- Increase engagement with potential early adopters
- Decision Matrix embedded

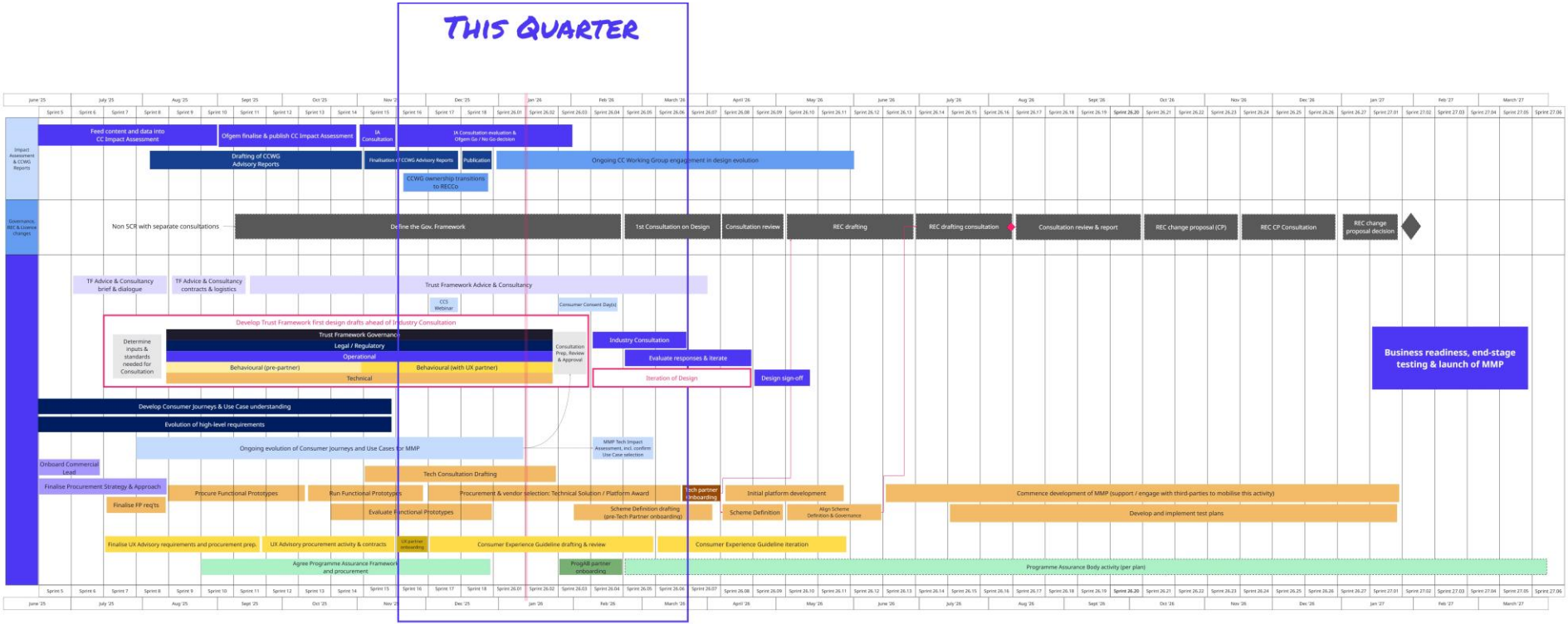
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- DPIA draft and iteration plan established
- Project Assurance Body Signature

Underpinned By...

- RECCo and Ofgem remain aligned and maintain a close working relationship on the project
- Industry / stakeholders remain engaged positively with the project
- SteerCo are kept informed of the right information at the right time, including awareness of any challenges or issues
- Team collaboration remains strong & supportive
- Continue to embrace agility to help navigate uncertainty
- Our governance & controls remain healthy

Consumer Consent: High-level Plan



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Update on first Consultation preparation

Matt White

Update on First Consultation Prep



- Review
- Sign off

- Multi-channel publishing
- Open for 6 weeks

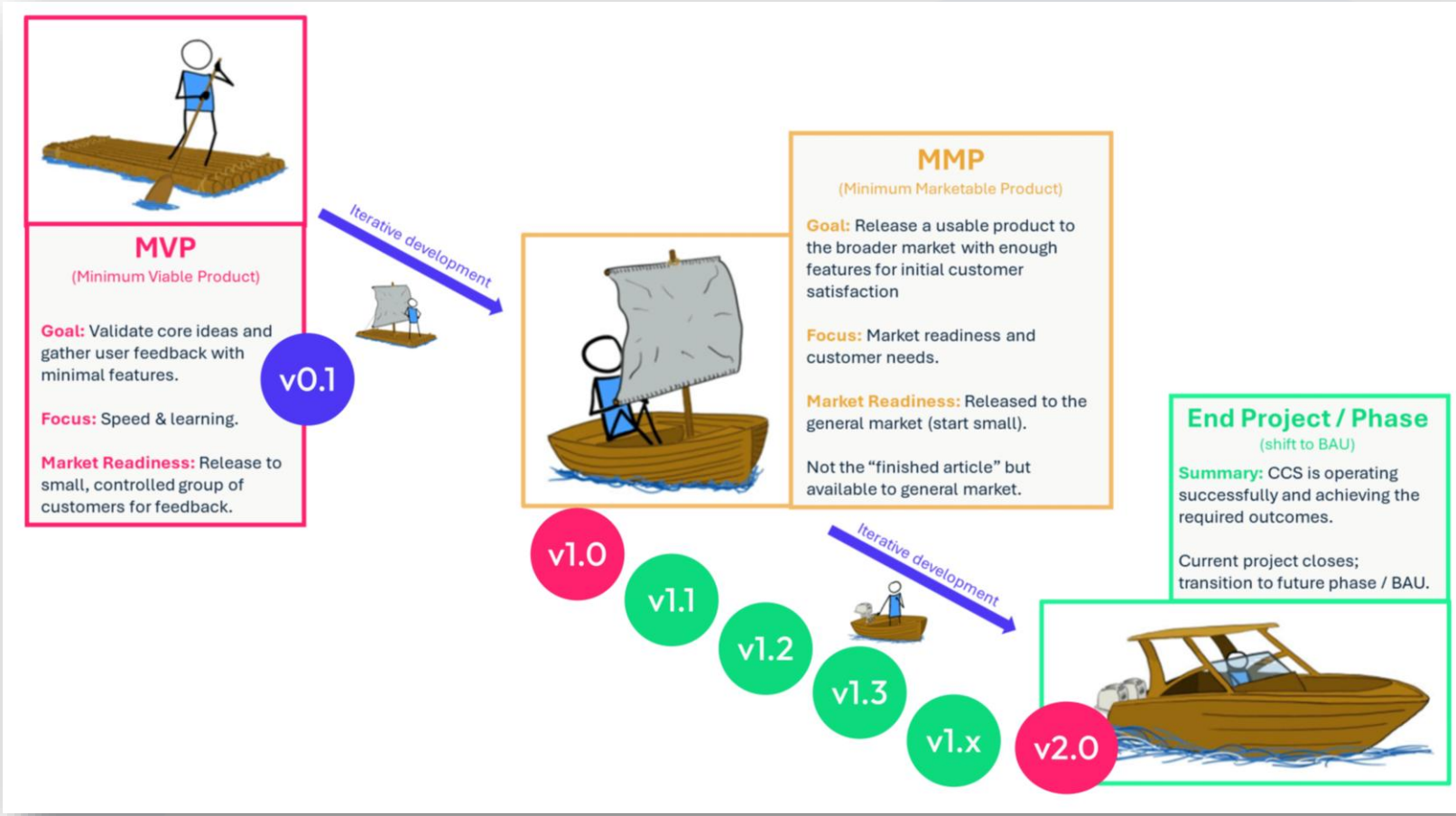
- Response Review
- Industry updates

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Product Roadmap

Matt White

MVP / MMP Approach



Product Roadmap

Product Roadmap will be tabled at the Working Group

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Position update on Design Principles

Sarah Jones

Design Principles

A more detailed update available in the appendix

In its August 2024 consultation, Ofgem proposed the following CCS Design Principles:

Simple and Low Friction	Interoperable	Agile, Flexible, and Scalable
Transparent and Informative	Inclusive by Design	Secure by Design

Respondents to the consultation proposed a number of additional design principles, as set out below together with our current position:

Design Principle	Consultation Feedback	Our Position
Value For Money	CCS should be developed in the most cost-effective way.	Already covered by RECCo procurement principles; no need for a separate design principle.
Effective Competition and Level Playing Field	Competition impacts should be explicitly recognised in design principles.	Add a new principle to ensure fair data access, prevent anti-competitive practices, and encourage innovation.
Collaborative Fairness	Concerns about fairness and collaboration raised by respondents.	Addressed by competition principle; RECCo will ensure a collaborative approach and strong stakeholder engagement.
Privacy by Design	GDPR compliance and transparency should be embedded in CCS design.	Replace ‘Transparent and Informative’ with ‘Privacy by Design’ to reflect full GDPR considerations.
Consistency	CCS should replace fragmented consent processes with a consistent approach.	Agree; CCS will deliver consistency supported by Customer Experience Guidelines to build trust and secure data use.
Minimising Scope	Some respondents suggested limiting CCS scope.	Conflicts with Ofgem’s flexibility principle; CCS will remain scalable with roadmap managed for future enhancements.

A more detailed version available in the appendix

Design Principles

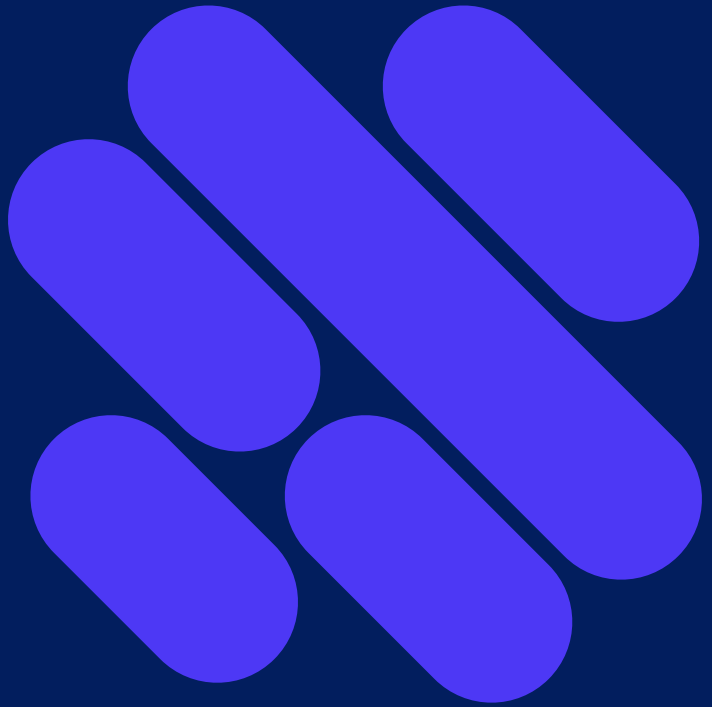
The table below summarises the CCS design principles alongside their purpose and key considerations for implementation.

Design Principle	Summary
Simple & Low Friction 🔄	Minimise barriers while ensuring secure, robust solutions to enhance consumer experience.
Interoperable 🔗	API-first design with open standards for cross-sector data sharing.
Agile, Flexible & Scalable 📈	Phased approach delivering MMP, iterating and scaling as adoption grows.
Consistency ✅	Replace fragmented processes with a unified consent management approach.
Privacy by Design 🔒	Embed GDPR principles and transparent communication throughout CCS design.
Inclusive by Design 🤝	Ensure accessibility meets POUR standards for all user interfaces.
Secure by Design 🛡️	Build security in from the start with recognised standards and risk assessments.
Promotion of Effective Competition 📊	Enable fair data access, prevent anti-competitive practices, and foster innovation.

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Forward Plan for next Working Group sessions

[Name]



Forward Plan

CCS Central Working/Webinar Groups:

Date	Agenda
15th January 2026	Quarterly Review & Plan – key headlines Preparation for CCS consultation, including roadmap focus and design principles position update
5th March 2026	Project status update and mid-quarter progress Key headlines from CCS consultation
16th April 2026	Quarterly Review & Plan – key headlines Technical partner procurement update REC Change Proposal update

CCS Topic Specific Solution Groups:

Date	Agenda
29th January 2026	Issue and Error resolution, consumer journey clarifications
12th February 2026	CCS Design Consultation – Spotlight on governance
26th February 2026	CCS Design Consultation – Spotlight on technology
12th March 2026	CCS Design Consultation – Spotlight on user experience
26th March 2026	Focus topic- *to be confirmed*
9th April 2026	Focus topic- *to be confirmed*
23rd April 2026	Focus topic- *to be confirmed*
From late April	Sessions to continue a fortnightly basis, with focus topics to be confirmed

Consumer Consent Project Team

Pete Davies
Executive Sponsor

Tracy Hardy
SRO

Michael Walsh
Project Manager

Vicky Brown
PMO

Matt White
Product Owner

Teresa Thompson
Stakeholder Engagement Mgr

Nathan Gould
Enterprise Architect

George Roberts
Technical Architect

Chris Stock
Lead Business Analyst

Eva Von-Schaxmann
Business Analyst

Ann Perry
Market Design Lead

Sarah Jones
Regulatory Compliance

Alex Kunwar
Security Analyst

Project SME's

Ray Newton
Commercial

Alison Nickson
InfoSec & Data Protection

Hemant Mistry
UX Lead

CoCo
Commercial Lead

Reach us at: consumerconsent@retailenergycode.co.uk

Retail Energy Code Company

Building a Retail Energy Market fit for the future

Involved in consumer data and consent in the energy sector?

Let's connect.

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.

Get Involved in Developing Consumer Consent (MMP)

Help shape a practical, consumer-centred approach to consent

Scan me!

Design Principles

Detailed view of presented Design Principles slides

In its August 2024 consultation, Ofgem proposed the following CCS Design Principles:

Simple and Low Friction	Interoperable	Agile, Flexible, and Scalable
Transparent and Informative	Inclusive by Design	Secure by Design

Respondents to the consultation proposed a number of additional design principles, as set out below together with our current position:

- **Value For Money** – developing the CCS in the most cost-effective way is a core principle of the overall CCS project and already captured within RECCo's standard procurement principles. We therefore do not believe this should need to be added as a specific design principle for the CCS.
- **Effective Competition and Level Playing Field** – we recognise the views from consultation respondents that competition impacts should be explicitly recognised within the design principles. We also note that the REC itself includes an objective to promote effective competition and create a level playing field amongst market participants. We therefore propose the addition of a new design principle to cover effective competition. In addressing this design principle, we will ensure that the CCS enables fair access to data, prevents anti-competitive practices and encourages innovation, which will in turn enable consumers to benefit from a dynamic, competitive energy market.
- **Collaborative Fairness** – we believe the new design principle above, promoting effective competition, should address the needs of those respondents raising concerns regarding fairness. In addition, as responsibility for managing the consumer consent working groups transitions from Ofgem to RECCo, we will ensure a collaborative approach is followed, with a key focus on stakeholder engagement through the working groups and with wider stakeholders to ensure the CCS balances the needs of different organisations.
- **Privacy by Design** – we will ensure the CCS is compliant with the GDPR principles for consent with data privacy driving all elements of the design. To recognise that these principles are not limited to the need for transparency and clarity of information; we are proposing to amend the original design principle of 'Transparent and Informative' to become 'Privacy by Design' to cover the full extent of GDPR considerations.
- **Consistency** – we recognise that one of the main benefits of the centralised CCS will be the replacement of the existing fragmented and inconsistent approaches to consent management, delivering a consistent approach to engagement with consumers. This is the key driver for the development of the Customer Experience Guidelines, which aim to build consumer confidence that their data is being handled fairly and securely by introducing a robust and consistent approach for consumer interactions. We therefore agree that consistency should be added as a CCS design principle.
- **Minimising Scope** – we believe a principle that minimises the scope of the CCS would conflict with the Ofgem proposed design principle for the CCS to be flexible and scalable. We do not believe it would be appropriate for the CCS to be designed in a way that minimises its scope. In fact, we are focusing on ensuring that the CCS design is sufficiently flexible to enable future enhancements so that the scope can expand over time to further opening up the ability for organisations to access data to support consumers. We do however recognise, the need to carefully manage the future roadmap to ensure enhancements are introduced at the most appropriate time.

Design Principles

Detailed view of presented Design Principles slides

The table below are the CCS design principles alongside their purpose and key considerations for implementation.

Design Principle	Description
Simple and Low Friction	Each element of the proposed solution has been developed to minimise negative friction for both consumers and ATPs. We have sought to balance the need for a robust, secure solution that protects consumer data (positive friction), versus the need to avoid unnecessary barriers (negative friction) in order to enhance the consumer experience and maximise uptake. This is supported by the development of Customer Experience Guidelines.
Interoperable	The technical solution has been developed using an API first approach with open standards to facilitate interoperability with other data sharing initiatives and future expansion outside the energy sector.
Agile, Flexible, and Scalable	Recognising the direction from Ofgem to deliver a minimum set of requirements, with future iterations, we have defined a phased approach which focuses on the delivery of an MMP that can be iterated and scaled as market adoption grows.
Consistency	A key focus of the CCS design has been to remove existing fragmentation and develop a consistent approach to consent management through the delivery of centralised elements developed and delivered by RECCo and its service providers.
Privacy by Design	The design of the consent mechanism is underpinned by the GDPR principles for consent to be freely given, specific, unambiguous, explicit and time bound. Customer Experience Guidelines are a core part of the CCS design which will ensure interactions with consumers reflect these GDPR principles with clear and transparent communication protocols.
Inclusive by Design	The Customer Experience Guidelines will also focus on accessibility within the user interface. We will ensure that the user interfaces meets the government's POUR accessibility standard e.g., that information is Perceivable, Operable, Understandable and Robust.
Secure by Design	Security will be built into the CCS from the start. Throughout the design phase we will undertake risk analysis of cyber threats with input from the National Cyber Security Centre and produce and maintain a Data Protection Impact Assessment to underpin the solution. We will also use recognised security standards within the solution design for managing the sharing of data and authenticating organisations interacting with the CCS
Promotion of Effective Competition	Whilst a key focus of the CCS development work has been the consumer journeys, we have also been cognisant of the impact on market participants wishing to share or access data to enhance services offered to consumer. The CCS has been designed to enable fair access to data, preventing anti-competitive practices and encouraging innovation, which will in turn enable consumers to benefit from a dynamic, competitive energy market.