Consumer Consent Solution Programme Working Group

29th January 2026

Agenda

Item	Lead	Approx Timing
Welcome & Intro	Mike Walsh	5-mins
Update on first Consultation preparation	Matt White	5-mins
Customer Journey Clarifications	Eva Von-Schaxmann	20-mins
Issue & Error Resolution	Eva Von-Schaxmann	30-mins
Forward Plan & Close	Mike Walsh	5-mins



Consumer Consent Solution

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

Consumer Consent Solution

Consumer Journey Clarifications

Eva Von-Schaxmann

Consumer Journey

Following on from the feedback we received from the previous working groups, we understand guest journeys were considered essential for MMP. We will now be looking to give consumers the choice to either give consent as part of a guest checkout process or create a CCS account as part of MMP.

Guest Checkout

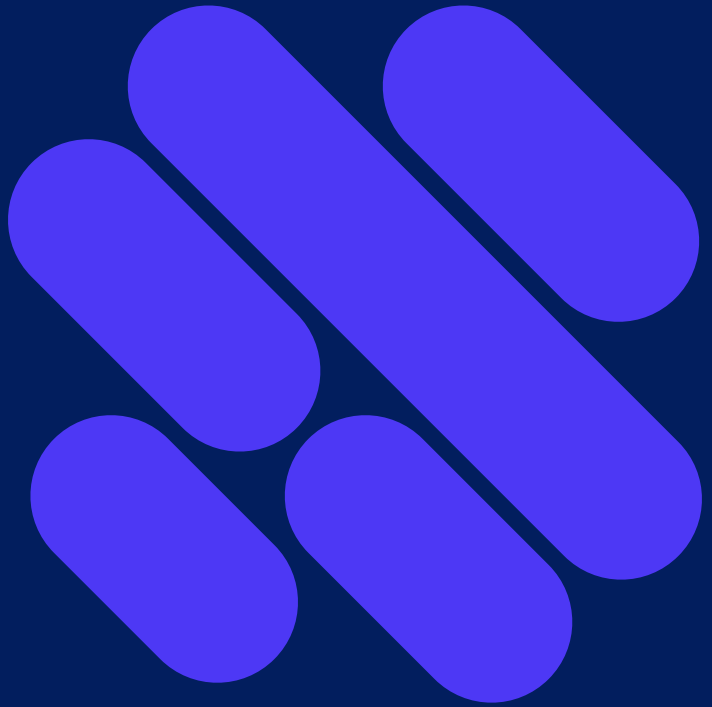
- The guest checkout process will allow consumers to give consent for a service without having to create a CCS account
- Consumers will need to complete ID&V each time they provide consent for a new service
- Consumers will be able to manage their consent with the relevant ATP they provided the consent to
- If a consumer decides they wish to create an account at a later stage, we're exploring how we could relate any existing consents granted through CCS to their account so they would be visible and manageable through the central portal

Account Creation

- If a consumer chooses to create a CCS account, once they've successfully completed the ID&V process, this would be linked to their account so they're able to provide consent through CCS in the future without having to redo ID&V. There will be triggers that could require ID&V checks to be completed again, such as a change of address
- Consumers would also have access to the central portal in which they would be able to view and manage all their consents granted through CCS in one place
- Consumers would also be able to see consent records granted through CCS that are against their MPxN but granted by a different consumer, this will be done in a way that protects the identity of the consumer who granted the consent
- This will give consumers additional control and visibility of who has access to their energy data

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Issue & Error Resolution



Eva Von-Schaxmann

Issue and Dispute Resolution

If issues are identified by consumers or CCS users while using CCS, its important established processes exist to manage and resolve these effectively. We anticipate this will broadly be technical related issues and consumer consent related issues.

Approach for identifying and resolving technical issues

Monitoring and reporting

CCS will incorporate internal monitoring and reporting capabilities to support assurance activities by assessing compliance against non-functional requirements. This will also enable us to identify incidents requiring RECCo intervention such as unexpected high usage being indicative of a security breach.

REC Service Management

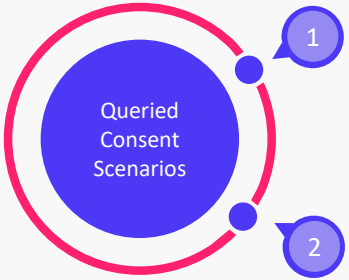
RECCo will provide service management capability to notify relevant CCS Users if an issue is identified and to also enable CCS Users to raise queries to us. This will ensure a consistent and auditable route for issue notification and handling. Situations where we'd anticipate ATPs and EDPs to be raising queries to RECCo would include CCS users encounter problems with the CCS technical solution, where an ATP believes a dispute raised with them was the result of a CCS technical issue, or where a user raises serious concerns about another CCS user. This would not be for queries relating to the data sharing itself.

Data sharing issues outside of CCS

The sharing of data from an EDP to ATP will happen outside of CCS, therefore any issues related to the sharing of this data should be handled bilaterally. To support with this, CCS users are required to provide contact details during the onboarding process which will be stored and accessible to other users. Clear guidance will be provided to CCS users to help them determine whether a query should be submitted to RECCo or directly with the relevant CCS user.

Queried Consent

To ensure we build a solution which consumers can trust, it's essential we have clear and transparent mechanisms for identifying and resolving queried consent.



Consent shown within a consumers account as being granted by them which they do not recognise

- In this scenario the consumer is able to revoke the consent to prevent any further data sharing.
- If the consumer wishes to escalate this further, ATP contact details will be easily accessible through the portal for the consumer to contact the ATP directly. ATPs will be required to provide and maintain contact details within the CCS to ensure consumers are able to raise any concerns.

Consent shown within a consumers account under their MPxN but granted by a different consumer which they do not recognise

- This could happen for a number of reasons such as:
  - the consumer lives in a multi occupancy household
  - a previous occupant moved out without revoking the consent
  - the consents is incorrect due to issues with ID&V and the matching process

- In this scenario the consumer is able to dispute the consent record through CCS, when the consent record is disputed the consent is terminated and data sharing is suspended
- The relevant ATP will be notified of the dispute and will be required to investigate
- The ATP would then be required to provide an outcome of their investigation e.g. they confirm the consent should be revoked, they believe the consent is still valid and there's a CCS related issue
- The only way for data sharing to resume, would be for the ATP to get the granting consumer to create a new consent
- Consumers disputing a consent will also be able to easily access ATP contact information if they wish to escalate their concern further

REC Service Management Role in Queried Consent

- If a consent record issue is raised by a consumer and the ATP believes this had arisen due to a CCS issue such as an error in the ID&V and matching process, they can raise this with us using the REC Service Management capability outlined on the previous slide. RECCo would then investigate this and assess whether there's any corrective action required to resolve the issue.

Queried Consent cont'd

Complaints and further escalation

- Should a consumer remain dissatisfied, they would be able to make a formal complaint to the relevant ATP who will be required to have a formal complaints procedures in place to manage data issues.
- If they remain dissatisfied after raising a complaint, they can escalate their concerns to the ICO. CCS will provide information for consumers wishing to take this route; however, the CCS will not assess or determine whether a breach has occurred.

Assurance of queried consent

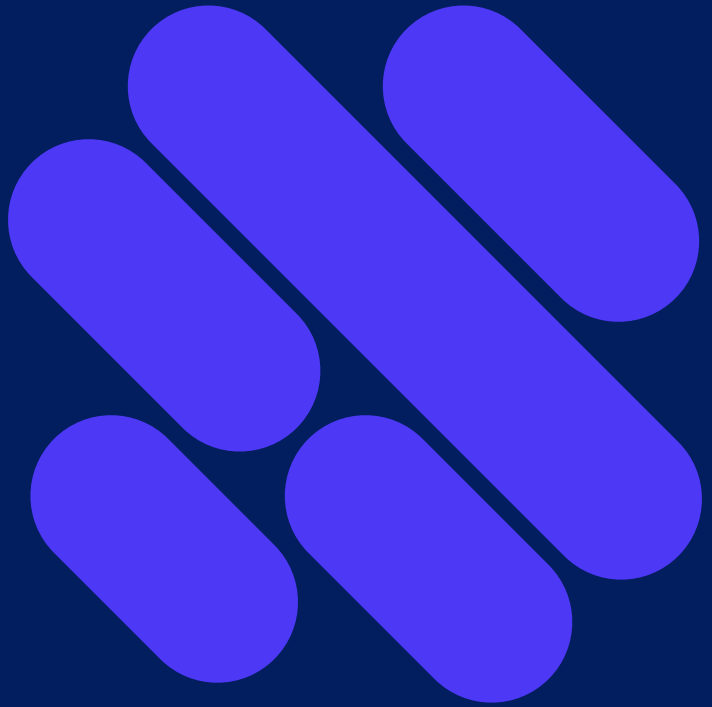
- The rationale for having different pathways is for CCS to be able to monitor and report on issues being identified and easily differentiate between the two scenarios.
- This will support assurance activities and may enable the proactive identification of any ATPs not acting in accordance with the CCS requirements such as ATPs not notifying CCS of a revocation made directly with them.

Issue and Dispute Resolution Next Steps

- Further consideration is required regarding consumer redress for consumers who have suffered a financial loss as a result of inaccurate data sharing. We are looking to engage with the energy ombudsman on the appropriate resolution pathway for consumers in this situation.
- We are also looking to engage with the ICO to discuss the proposed issue and dispute pathways

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Forward Plan for next Working Group sessions



Mike Walsh

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

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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

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