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REC CONSUMER CONSENT SOLUTION TOPIC SPECIFIC SOLUTION GROUP
MEETING MINUTES

MEETING	**REC CCTSSG_26_0212**
DATE	**12 February 2026, 10:00**
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 alongside the live consultation.

2. UPDATE ON FIRST CONSULTATION

MPW advised that the first CCS consultation was published on 11 February. The consultation period will run for six weeks, closing for responses on 25 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. SPOTLIGHT ON POLICY POSITIONS

MPW took members through RECCo's current policy positions as set out in the consultation. They encouraged members to ask clarification questions during the meeting, but to express their opinions on the policy positions as part of their consultation responses.

Responsibility for Granting Consent

- The Data Subject for half hourly metered data will be the occupant of the property, which in some cases will not be the bill-payer.
- For multiple-occupancy households, the proposed approach is that one occupant may provide consent on behalf of other occupants only where they confirm they have authority to do so and have obtained agreement from all other adult occupants.

A SEC representative noted that while the SEC permits consent from anyone who can demonstrate access to the meter and a relationship to the premises, in practice many organisations default to the bill payer due to operational simplicity. This has led to a perception that only bill payers can consent, even though this is not strictly required under SEC rules.

A member reinforced that SEC requirements focus on two principles: (1) identity verification of the individual and (2) validation of that individual's relationship to the premises. Use of the

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bill is one way of achieving this, but not the only way. The CCS proposal therefore represents a deliberate policy choice, recognising that operational practices may need to evolve to support occupier-based consent.

A member asked if RECCo will hold a different position for commercial and residential, noting the differences in data protection for the different types of consumers. MPW clarified that the scope of CCS for MMP is domestic only, with planned future iterations to include microbusinesses and non-domestic consumers.

A member asked about domestic consumers who are under a non-domestic contract. MPW responded if the consumer has their own MPXN and can complete ID and address/location matching to that meter point, the contract type (domestic vs non-domestic) doesn't matter as much to CCS, as the data access can still be validated.

Minimum Identity and Verification (ID&V) standards

- Granting consent to share half-hourly smart meter consumption data will require a high-confidence IDMV standard, including the use of photo ID. This reflects the sensitivity and granularity of the data involved.

A member asked whether these ID&V checks will identify the individual or their relationship to the property. MPW responded that both will apply. They acknowledged concern over consumer friction and was open to varying approach depending on the journey, but also want a standard, robust ID&V process for half-hourly smart meter data. The member suggested that it is possible to verify a person's occupancy without identity. MPW responded that this position is not finalised.

Consumer Access to CCS

- Account journey: Consumers complete ID&V at account creation, after which their identity is known to CCS. They still need to validate their address when linking to specific meter points but repeat ID checks are avoided. This supports easier participation in multiple services over time.
- Guest journey: Consumers do not create an account and instead complete ID&V and address validation for each transaction. This provides choice and avoids mandatory account creation but involves repeated friction.

Grant/Revoke only vs Implementation

- Option 1: ATPs share a valid consent token with the EDP and once validated against the CCS, the EDP continue to provide data until that token expires or is revoked.
- Option 2: EDPs are required to verify that consent is active each time it shares data with the relevant ATP.
- Current position is to follow a zero-trust model with mandatory introspection e.g. the EDP will validate there is active consent on each occasion, prior to sharing data.

A member asked if the consultation asks how long tokens last for. MPW responded that RECCo haven't set a specific token lifetime. They stated that GDPR does not allow open-ended consent, so consents need a time limit/backstop. They referenced Open Banking's 90-day renewal as context but said CCS is not necessarily mirroring it. ATPs should request consent duration aligned to legitimate need.

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Downtime Continue v Suspend

- To balance cost and reliability, the CCS is proposed to have 99.9% availability, consent checks to be expected during downtime (8hrs per year).
- Option 1: Continue data sharing if CCS is unavailable and retries fail, with possible caps during extended outages under BCDR plans.
- Option 2: Pause data sharing during CCS outages to prevent data protection risks, as mission-critical services likely won't rely on live personal energy data.

A member asked if the legal risk is with the EDP to share data during CCS downtime, why do RECCo have a position. MPW clarified this is because if CCS downtime allows data sharing to continue, CCS still needs to handle record recovery for what happened while CCS was down - maintaining the "one truth" record of active consents. The member asked if RPO/RTO times are covered in the consultation. MPW responded that this is not defined yet as the procurement phase is ongoing.

A member asked why there is not an option for the consumer to be able to share data during an outage. MPW responded that it is valuable feedback and asked the member to include it within a consultation response.

Use of Open Standard – FAPI2

- RECCo propose the adoption of FAPI2 as the open standard governing interactions between CCS, ATPs and EDPs. This aligns with Ofgem's direction on open standards, future interoperability and security.

A member asked what other options did RECCo consider. GR responded that they had looked at a range of solutions and had settled on FAPI2 as the best option. They promised further information in the next Topic Specific Solution Group focused on technology.

There was further discussion on FAPI2. A member clarified that FAPI 2 is finalised and both DPoP and MTLS are supported. They explained DPoP is trending in wallet-based ecosystems where MTLS isn't feasible, but many Open Banking/data-sharing schemes still use MTLS as default

4. SPOTLIGHT ON GOVERNANCE DESIGN

SJ took members through RECCo's current governance approach as set out in the consultation.

CCS Drafting Approach

- CCS will be introduced into the Retail Energy Code via a new REC Change Proposal, supported initially by a REC Issue to raise awareness and enable early engagement.
- The change proposal will define CCS functions, governance, obligations on users, and how the solution is operated and assured within the REC framework.

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- The drafting approach will consist of a new Consumer Consent Arrangements Schedule, several new Category 2 documents and changes to the existing Schedule 1, Charging Methodology and Performance Assurance Reporting Catalogue.

A member noted the sizeable amount of work required ahead of the planned MMP release in March 2027. SJ confirmed that CCS is still on time for the planned MMP delivery and added to expect a consultation on the REC Code drafting in the summer.

A member raised concerns about when consultation outcomes would be sufficiently finalised to give organisations certainty on requirements, noting that system builders typically need a clear, stable position well in advance to allow adequate build time, based on experience from Tariff Interoperability. SJ responded that unlike Tariff Interoperability, CCS will not be mandatory from day one, so there is no single date by which all parties must have built. They explained that there will be a defined point at which the technical solution is baselined, allowing organisations to begin building against that baseline before the enduring REC changes are formally in place.

CCS Funding Options

- Several options considered including full Supplier funding, a User Pays model and two hybrid models.
- Preferred option is a hybrid model where base CCS costs are recovered centrally through suppliers, but assurance-related costs (e.g. accreditation and investigations) may be recovered from individual CCS users.

Change Management

- CCS will use the existing REC Change Management process, which is open, transparent and accessible to both REC parties and non-parties. The process is considered fit for purpose, with flexibility to handle major policy changes and minor technical updates.
- Additional governance controls are proposed for adding new data products to CCS, ensuring appropriate identity assurance and consumer experience standards are met.

Accreditation and Assurance

- ATPs and EDPs will be subject to qualification arrangements aligned with existing REC Enquiry Service accreditation.
- Key elements include organisational verification, access agreements, information security standards and data protection assessments.
- Minimum standard of security proposed is Cyber Essentials Plus, with ISO 27001 recognised as exceeding the minimum.
- CCS will fall under the REC Performance Assurance Framework, overseen by the Performance Assurance Board. Monitoring will include CCS metrics, consumer feedback, compliance with Customer Experience Guidelines (CEGs) and query resolution data

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- Ongoing assurance - annual compliance checks will be risk-based, ranging from simple attestations to full reassessments.

A member asked what is meant by a simple attestation within the accreditation and assurance model, asking whether this equated to a self-assessment or signed declaration. They also queried how the risk-based approach would operate in practice, particularly for lower-risk organisations, and whether reliance on existing SEC trust frameworks was still intended. SJ explained that a simple attestation aligns with current REC practice: a signed compliance statement confirming continued adherence following initial qualification, with the level of annual assurance scaled on a risk basis. Lower-risk organisations may only need to provide a compliance statement, while higher-risk organisations would be subject to fuller reassessment. They confirmed that CCS assurance will be a REC-led assessment, RECCo does not intend to rely on other codes' data-protection assessments, as it needs independent assurance for CCS.

SJ further clarified that SEC obligations still apply to SEC Other Users, and REC obligations will apply when those organisations participate in CCS. While this may require organisations to meet both SEC and REC assurance requirements, CCS-managed consent should reduce duplication in SEC privacy assessments, as SEC focuses on consent while CCS focuses on data management.

Issue and Dispute Resolution

- Covered in further detail in the first Topic Specific Solution Group.
- Escalation routes include formal breaches and potential removal of access to CCS.
- Consumers will be able to view, revoke and dispute consents through CCS, with RECCo engaging the ICO and Energy Ombudsman to refine dispute handling.

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-Specific Working Groups will focus on different aspects of the upcoming consultation, with spotlights on technology and user experience.

The Chair advised that the Central Webinar scheduled for 05 March will be replaced with a wider in-person engagement event on the consultation, scheduled for 04 March. They encouraged members to sign up for this event.

6. AOB

No AOB items raised and the Chair closed the meeting.

Next meeting date: 26 February 2026

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Attendee	Representing	Initials	Role
Michael Walsh	Retail Energy Code Company	MJW	Chair
Matt White	Retail Energy Code Company	MPW	Committee Member
Sarah Jones	Retail Energy Code Company	SJ	Committee Member
Tracy Hardy	Retail Energy Code Company	TH	Committee Member
Hemant Mistry	Retail Energy Code Company	HM	Committee Member
Chris Stock	Retail Energy Code Company	CS	Committee Member
Teresa Thompson	Retail Energy Code Company	TT	Committee Member
George Roberts	Retail Energy Code Company	GR	Committee Member
Harry Firth	REC Code Manager	HF	Secretariat

Ofgem	REC Code Manager
DESNZ	E.ON Next
CGI	Centrica
N3rgy	Citizens Advice
East Lothian Housing Association	Electralink
PRIME	Kraken
SEC	Cresconet
Elexon	Which?
Publicis Sapient	Energy UK
Raidiam	Icebreaker One
NESO	Perse Energy
ESG Global	One Utility Bill
DCC	Consumer Scotland

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