RETAIL ENERGY CODE

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# REC CONSUMER CONSENT TOPIC SPECIFIC SOLUTION GROUP
## MEETING MINUTES

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| MEETING | **REC_CCTSSG_26_0507** |
| DATE | **07 May 2026, 10:00** |
| LOCATION | **By teleconference** |

## 1. INTRODUCTIONS

The Chair welcomed attendees to the meeting of the Consumer Consent Topic Specific Solution Group (CCTSSG). This session would focus specifically on User Experience and the overview of findings from the first wave of research.

## 2. OVERVIEW OF WAVE ONE RESEARCH FINDINGS

AB took Members through the findings from the first wave of research. The research represents the first of three planned waves, with the objective of understanding consumer needs, mental models and behaviours in relation to energy management, data sharing, trust and consent, in order to inform the design of CCS. 16 hours of in-depth one-to-one interviews were conducted with 16 participants, generating approximately 150 insights, and identifying thirteen distinct accessibility needs. Accessibility considerations were treated as a cross-cutting factor applicable to all users rather than a standalone segment.

AB advised that four behavioural archetypes were refined through the research, building on earlier quantitative work and deliberately focusing on edge cases rather than population-wide segmentation. These archetypes reflected differing levels of digital confidence, financial pressure and engagement with energy management, and highlighted that user needs and behaviours vary significantly depending on lived experience, time pressure and trust.

Key themes emerging from the research were summarised. Energy management was found to be dominated by cost and bill volatility, with energy bills described as a significant source of stress across all archetypes. In most households, responsibility for managing energy sat with a single individual. Smart meters were widely available, but engagement varied considerably, with some participants actively monitoring usage while others avoided in-home displays due to anxiety or lack of perceived value.

With regard to data sharing, participants generally did not initially perceive half-hourly energy consumption data as sensitive, viewing it as operational rather than personal. However, awareness of how such data could be used, and who might access it, was low. Concerns were

primarily driven by the potential for marketing use or data resale, while the primary motivator for sharing data was clear personal financial benefit, such as savings or access to better tariffs.

The research identified a clear tension between the desire for control and practical behaviour. While participants consistently expressed that being in control of their data was important, consent management was often deprioritised in practice due to time pressures, complexity, legal language and competing life demands. Friction points such as long forms, repeated verification steps and photo ID requirements were highlighted as significant contributors to drop-off.

Trust was noted to be highly contextual. Energy suppliers and regulators were generally viewed as the most trusted custodians of energy data, whereas third parties and comparison sites were frequently distrusted unless clearly accredited or endorsed. Unclear explanations of data purpose or justification for identity verification requirements were found to undermine confidence.

Overall, AB noted that Wave One findings reinforce the need for CCS to prioritise clarity, accessibility, low friction and trust-building from the outset. The insights from this phase will inform Wave Two research, which will move from exploratory work into targeted journey and usability testing at key moments of friction identified through Wave One. Furthermore, AB noted that external research from other bodies including Citizens Advice and mental health charities was noted as broadly corroborating these findings, particularly in relation to cost sensitivity, trust and the burden of repeated data sharing.

A Member sought clarification on the profile of participants and the robustness of the Wave One research methodology. AB confirmed that the sample deliberately included participants with varying levels of engagement with energy management, including individuals who were largely disengaged and tended to pay their energy bills by direct debit without active involvement, unless triggered by a specific change such as increased costs. These users were reflected within the “time-poor professional” archetype. In response to queries on digital exclusion and low digital confidence, AB confirmed that these factors were explicitly considered during recruitment, with participants reflecting a range of digital abilities, including those experiencing digital poverty or low digital literacy. It was noted that future waves would build on this work, including further testing with users who rely on assistive technologies such as screen readers.

A Member asked how sentiment was assessed. AB responded that findings were derived from hour-long qualitative interviews rather than binary or survey-based responses. Participant views were explored in depth, with probing of underlying motivations and feelings, allowing insights to be drawn from context and behaviour rather than simple agreement or disagreement, making it easier to identify nuanced behavioural drivers and barriers relevant to the design and implementation of CCS. AB further clarified that Wave 1 findings should not be interpreted quantitatively. Given the qualitative nature and small sample size of the research, it was not appropriate to assign percentages or distribution levels across archetypes.

A Member asked how acquiescence bias had been managed within the research. AB explained that non-leading, open questions were used throughout, and that the discussion guide was

informed by a behavioural science framework to support interpretation of responses. This approach enabled researchers to assess whether stated preferences aligned with observed motivations and constraints, reducing the risk that participants were providing socially expected responses.

## 4. ACCESSIBILITY CONCERNS

AL informed Members that an accessibility and inclusive design lens was applied throughout Wave 1, with around half of participants identifying visible or non-visible access needs, including cognitive and neurodivergent conditions, physical and long-term health conditions, sensory impairments and mental health needs. It was noted that for some users these factors represent not merely friction, but fundamental barriers to participation, such as photo ID verification failing due to device limitations, digital effort carrying a physical cost for those with chronic conditions, or phone-based support excluding users with hearing or speech difficulties.

The research highlighted the need to account for memory loss, ADHD-related impulsivity, lower literacy, intolerance of unpredictable navigation, fatigue-related interruptions, reduced dexterity, reliance on proxy support, and low digital confidence, with implications including save-and-resume functionality, clear confirmation steps, plain language, consistent navigation, alternative verification routes, strong trust signals and non-time-limited sessions. It was noted that future research waves will expand coverage to additional access needs, including screen-reader users and offline or proxy-supported journeys, and that these considerations are necessary to meet obligations under the Equality Act 2010.

AB went over an overview of the planned focus for Wave Two of research, which will move from exploratory, needs-based qualitative research to more targeted journey and UX testing, concentrating on key “moments that matter” such as identity verification, trust signals and the Trustmark. It was confirmed that Wave Two will test interactive journey flows informed by Wave One findings, assess the impact of the Trustmark on user confidence at different points in the journey, and validate remaining assumptions not yet tested. Further accessibility and inclusion testing will be undertaken using a functional prototype, including testing with screen-reader users and consideration of offline, proxy and supported journeys. AB added that Wave Two is expected to commence later in May, alongside ongoing alignment with the appointed technology partner, and that Trustmark options are currently being tested through a quantitative survey, with results to be shared at a future meeting.

LB discussed comments on research methodology and scope. It was noted that the qualitative interviews did not apply A/B grouping or control groups to assess acquiescence bias, as the approach did not rely on polling or comparative testing but on exploratory, in-depth interviews. Clarification was provided on the scope of consent explored in Wave One, confirming that discussions covered both consent-based access and broader perceptions of who may access data, recognising that consumers do not always clearly distinguish between these concepts. It was noted that Wave One used a high-level journey stimulus consistent with the consultation, and that Wave Two will move into more granular, interface-level testing following technology alignment, with consent presented more explicitly and comprehension tested in greater depth.

LB noted that consideration of non-consent-based data access may be included in future testing, subject to prioritisation, and that continued engagement with stakeholders such as Citizens Advice will inform this work.

## 4. FIGJAM

LB invited Members to comment on whether the research had changed their perspective on CCS, potential implementation risks, and any existing evidence that could inform design of the Consumer Consent experience via Figjam.

Members generally indicated that the research findings aligned with expectations, although some concerns were raised regarding methodology and sample sizes. LB confirmed that the research followed industry-standard user-research practices aimed at identifying behavioural patterns rather than achieving national representativeness, with further piloting, MVP testing and iterative refinement planned.

Key themes raised included consumer understanding of consent, responsibility for educating consumers about energy data access and risks, and the need for clear guidance on consent visibility, central registry arrangements and implementation expectations. Issues relating to vulnerability, inclusion and identity verification were noted as ongoing dependencies. A question regarding potential impacts on delivery costs was raised and taken away, with no material cost risks identified at this stage.

In relation to implementation, stakeholders highlighted risks around friction in the consent journey, particularly ease of use, photo ID requirements, clarity of choices and consequences, customer trust and accessibility. Engagement with TPIs and price comparison websites was identified as important to mitigate risks of customer harm, with MPW confirming that early participation would be voluntary and encouraging direct engagement with affected parties.

Stakeholders also referenced complaints data, customer journey testing, experience supporting consumers with low digital capability and lessons from managing large customer bases as potentially useful inputs. Support was expressed for an API-driven architecture, alongside the need to avoid deceptive design and ensure neutrality and parity of consumer choice. LB confirmed that the feedback would be considered as part of ongoing CCS journey design and guidance development.

## 5. FORWARD PLAN

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

The next Engagement Webinar will be following up on the design consultation responses and is likely to be scheduled on 28 May. The Chair noted that this falls during half-term but advised that the Webinar recording will be made available afterwards. The next Topic Solution Group

meeting on 21 May will focus on the Customer Experience Guidelines and an update on the CCS Technology Partner.

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. MPW 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.

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## ATTENDEE ORGANISATIONS

| Attendee | Representing | Initials | Role |
|---|---|---|---|
| Michael Walsh | Retail Energy Code Company | MJW | Chair |
| Angelica Belli | Publicis Sapient | AB | Presenter |
| Ally Lawson | Publicis Sapient | AL | Presenter |
| Liana Bakar | Publicis Sapient | LB | Presenter |
| Matt White | Retail Energy Code Company | MPW | Committee Member |
| Edma Hyskaj | REC Code Manager | EH | Secretariat |

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