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Privacy Sub-Committee (PSC) Meeting 25

10:00 – 12:35, 16 April 2026

PSC_25_1604 – Meeting Headlines

At every meeting, the PSC will review, if required, the outcome for any Other User Privacy Assessments and set an Assurance status for Initial Full User Privacy Assessments (FUPAs) or a Compliance status for Random Sample Privacy Assessments (RSPAs), Privacy Self Assessments (PSA) and subsequent FUPAs.

The PSC discussed the following items:

Matters Arising (GREEN)

- The PSC Chair provided information on the Information Commissioners Office (ICO) Response to the PSC HMO Statement. It was noted that the ICO advised that withdrawal of consent by any occupant in HMOs removes the lawful basis for processing half-hourly smart meter data, likely requiring processing to cease for the full premises, stressed that compliance responsibility remains with the data controller and confirmed that the ICO would not approve any approach to compliance.
- SECAS provided an update on the Privacy Controls Framework (PCF) V2.16 Consultation Outcome and Publications, noting minor amends proposed. The PSC **AGREED** to include the proposed amends and SECAS confirmed that the document would be published shortly.
- The PSC Chair advised members that the next Icebreaker One Webinar hosted by Open Energy on Industrial and Commercial (I&C) flexibility and the role of data in accelerating its up take, is due to take place on 23rd April from 2 to 3pm.
- The PSC Chair provided information on the recent Smart Data Steering Group (Tech UK) meeting which focused on an overview of the recent Smart Data 2035 publication from the Department of Business and Trade, and members noted the update.
- The PSC noted the below industry Consultations and Publications since the last PSC meeting in March and the planned agenda items covering these at this PSC meeting.
 - [Energy Digitalisation Framework: A vision for a coordinated and connected energy system](#) –
 - [Smart Data 2035](#)
 - [Energy-UK-response-to-the-Consumer-Consent-Solution-consultation-25-March-2026.pdf](#)
 - [Joint Open Letter: Wider Access to Smart Metering Data](#)

- [Data for AI in the energy system: call for evidence \(accessible webpage\) - GOV.UK](#) - closing date 24 April

Agenda Items

1. Previous Meeting Minutes and Actions Outstanding (CLEAR)

SECAS presented the draft non-confidential and confidential minutes for PSC_24_1903 and the PSC **APPROVED** the minutes as final.

SECAS presented the outstanding actions and the PSC **NOTED** the updates and **AGREED** to close all actions marked as propose to close.

2a. Other User 'O' Full User Privacy Assessment Remediation Plan and Director's Letter (RED)

The PSC **NOTED** Other User 'O's Privacy Self-Assessment Remediation Plan and Director's Letter. The PSC **APPROVED** the Remediation Plan and Director's Letter.

2b. Other User 'O' CN Approval (RED)

The PSC **NOTED** Other User 'O's Privacy Change Notification review by the User IPA and the SECAS Privacy Experts and **AGREED** with the recommendation to **APPROVE** the request and confirm that Other User 'O' can implement the proposed changes.

2c. Other User 'T' Assurance Window Confirmation (RED)

The PSC **NOTED** a further request from SECAS regarding the outcome of Other User 'T's Privacy Self-Assessment presented at the last PSC meeting and setting the Assurance Window. The PSC **APPROVED** Other User 'T's Assurance Window in line with the recommendation from SECAS.

3. In-Flight Assessments, Remediation Plans, Change Notifications and Forward Look (RED)

The PSC **NOTED** an update on current in-flight assessments, progress on pending Privacy Change Notifications and the Assessment Forward Look.

4. Energy Digitalisation Framework (GREEN)

The PSC noted the Ofgem/DESNZ Energy Digitalisation Framework, and discussed the implications and considerations for Privacy and SEC I regarding the data-related matters. Members further noted the need for stakeholder engagement to include the SEC and PSC and encouraged proactive action to ensure this is taking place.

The PSC provided feedback and **AGREED** next steps.

5. Smart Data 2035 (UK Energy Strategy) (GREEN)

The PSC were provided with information on the Smart Data 2035 strategy noting ambitions set for the implementation of 5 schemes by 2030 and 20 by 2035. Members discussed the PSC-relevant themes identified including light-touch regulation, joined-up data policy, cross-sector innovation and links to AI adoption; members invited to engage with Department of Business and Trade (DPT). Members

further discussed the implications for the PSC and the need for proactive engagement with the government including the importance of horizon scanning and regulatory alignment.

The PSC provided feedback and **AGREED** to prepare a briefing note for the SEC panel summarising the PSC's view on the Smart Data Strategy highlighting the importance of ongoing engagement with relevant government team including the Department of Business and Trade and DESNZ.

6. Consumer Consent Consultation Responses (GREEN)

The PSC were provided an update on the Consumer Consent Consultation and RECCo's initial feedback on the 31 consultation responses received from a range of stakeholder groups, noting with surprise RECCO's view that the overall sentiment of responses was broadly positive. Members discussed issues raised during the consultation that were of relevance to PSC and noted a hope for continued positive engagement with the SEC.

The PSC **NOTED** the update and provided feedback on how the PSC should support SECCo and RECCo moving forward.

7. DP305 Communications Hubs Returns Process (GREEN)

SECAS provided an overview of the [DP305 Communications Hub Returns Process Review - Smart Energy Code](#). SECAS noted the issue raised that the SEC returns process is being misapplied, with misaligned categories, "no fault found" used for installing failures, and unclear batch fault definitions leading to unnecessary returns of functioning Comms Hubs. SECAS provided the next steps noting an additional reporting forum and review processes to identify the changes required, and encouraged contributions from members to these forums.

The PSC **NOTED** the update and provided feedback.

8. Modifications Update (GREEN)

SECAS informed members that Ofgem and DESNZ issued a joint letter on 1 April 2026 advising that work on Code Modifications potentially affected by a future Smart Meter Data repository should pause until the repository scope is agreed.

- As a result, the SEC Change team are placing the following Modifications on hold:
 - [MP218 'Review of the SEC Charging Methodology'](#)
 - [MP234 'Addition of Public Task and Legitimate Interests into the SEC'](#)
 - [MP235 'Enhanced Meter Data Access for Other Users'](#)
 - [DP257 'DCC Management of Duplicate Messages'](#)
 - [MP291 'DNO Alerts to Suppliers'](#)
 - [MP302 'Supplier Alerts for ENOs'](#)



- [MP307 'Extension of MP219 'Accessing Consumption Data on behalf of SEC Parties' concept to section I 1.3'](#)¹

SECAS further provided an update on the new modifications.

The PSC **NOTED** the update and provided feedback.

9. Standing Agenda Items (CLEAR)

SECAS presented the proposed agenda items for the next PSC. Members noted the update.

10. Any Other Business

The PSC Chair invited members to raise any additional items of business. There was one item of other business raised, and the PSC Chair closed the meeting.

For Further information regarding the Privacy Sub-Committee please visit [here](#)

Next Meeting: Thursday 21 May 2026.