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Privacy Sub-Committee (PSC) Meeting 28

10:00-14:00, 16 July 2026

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. There were no Privacy Assessments presented at PSC Meeting 28.

The PSC discussed the following items:

Matters Arising

SEC Engagement Day

Members were provided with an overview of the SEC Engagement Day that took place on 15 July. The PSC Chair noted to ongoing collaboration between RECCo and SECCo in relation to REC's Consumer Consent Solution (CCS) development.

Icebreaker One

Members discussed wider developments across the energy data landscape and considered the implications of emerging digitalisation initiatives for SEC governance. The PSC noted ongoing industry engagement regarding future data access, consent management and interoperability arrangements, including how existing SEC processes may need to evolve alongside these developments.

Triage In Data Best Practice Consultation Webinar

Members were provided with a summary of the Ofgem webinar on Securing Open Data including triage in data best practice noting the resistance from industry to the centralised approach. Further discussion regarding privacy considerations for data triage and data governance was covered under the dedicated agenda item.

Cross Code Steering Group

Members were provided with a summary of the recent CCS Group discussions including updates from Elexon on digitalisation, the status of P494 and the need for tools to visualise overlapping consultations. Ofgem is considering solutions.

SEC I Review

The PSC received an update on the progress of the project proposal, noting some additional considerations for the project scope were required prior to a project proposal approval decision from SEC.

Smart Data Multi-Sector Call for Evidence – Ofgem Consultation

Members were encouraged to respond to the consultation noting Ofgem's desire for wider engagement, welcoming feedback even if it does not directly address the consultation questions.

Elexon SDR Update

Members noted the recent publication from Elexon regarding their ongoing work on their Smart Data Repository (SDR). Members discussed Elexon's intention to use CCS for access to the data not this was subject to CCS being ready in time for SDR launch. Members noted that Ofgem had confirmed approval for P494 and taken responsibility for ensuring the legal basis for use of data for SDR.

Agenda Items

1. Previous Meeting Minutes and Actions Outstanding (FOR DECISION) (CLEAR)

SECAS presented the draft non-confidential and confidential minutes for PSC_27_1806 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.

2. In-Flight Assessments, Remediation Plans and Forward Look (FOR INFORMATION) (RED)

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

3. Privacy Risk Register (FOR DECISION) (RED)

The PSC considered Version 1.5 of the Privacy Risk Register.

The PSC **APPROVED** the Version 1.5 of the Privacy Risk Register.

4. Consumer Consent Solution Webinar Updates (FOR DISCUSSION) (AMBER-STRICT)

The PSC received the updates arising from the Consumer Consent Solution (CCS) webinar and the potential impact of the proposed assurance and accreditation approach on SEC Other Users. The PSC also considered opportunities to leverage existing SEC assurance obligations and reduce duplicated compliance activity.

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

5. Securing Open Data in Energy (FOR DISCUSSION) (GREEN)

The PSC discussed the recently published Securing Open Data in Energy consultation and the key implications for the SEC. PSC Members considered the distinction between open, public, shared and closed data classifications, together with the potential impacts on future governance and access arrangements. The PSC noted that DCC currently does not classify any of its data as open data and discussed concerns regarding the proposed centralised model, including the role of the Digitalisation Coordinator. Members highlighted the need for greater clarity before any future implementation activity proceeds.

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

6. Ofgem AI Assurance – Call for Input (FOR DISCUSSION) (GREEN)

The PSC discussed Ofgem's AI Assurance Call for Input and considered the increasing prominence of AI across the energy sector, emerging AI assurance developments and the potential implications for SEC Parties. Members agreed that the SEC should proactively consider the implications of AI-enabled and agentic AI processes, particularly where these may influence consent management and data access activities in the future. PSC Members discussed the importance of maintaining appropriate human oversight and highlighted cyber security considerations associated with increasingly autonomous AI solutions. The PSC noted that AI governance considerations should be incorporated into future reviews of Section I and wider cross-code discussions.

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

7. Ofgem Open Letter Update (FOR DISCUSSION) (GREEN)

The PSC discussed Ofgem's wider smart meter data initiatives and received an update on the Smart Meter Energy Data Repository (SMEDR). PSC Members considered the benefits of improving access to smart meter data, the relationship with existing smart metering infrastructure, and the need to maintain appropriate privacy and security controls.

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

8. Empowering People Through Data Intermediaries (FOR DISCUSSION) (GREEN)

The PSC discussed the Government's Empowering People Through Data Intermediaries consultation and reviewed feedback gathered from Other User representatives noting this had been shared with SECCo for input to the SEC Panel response.

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

9. MP321 'Managing SEC Party Organisation Changes' (FOR DISCUSSION) (CLEAR)

The PSC discussed MP321 'Managing SEC Party Organisation Changes'. The PSC Members considered proposals to facilitate the transfer of SEC Party rights following corporate restructuring, whilst preserving existing assurance, operational and security controls. The PSC also discussed the treatment of historic device and certification issues and the need to ensure any future process maintains appropriate governance safeguards.

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

10. Modifications Update (FOR DECISION) (CLEAR)

SECAS presented Members with an update on Modifications where a privacy interest or impact had previously been identified.

- [DP305 Communications Hub Returns Process Review](#) remains in progress and the legal text changes are currently being developed to support the Communications Hub returns triage process. SECAS confirmed that work is ongoing with the DCC to ensure that and [MP324 'Legacy Communication Hub Returns'](#) are recognised within the SEC as separate returns processes.
- SECAS further advised that [MP234 'Addition of Public Task and Legitimate Interests into the SEC'](#) has been taken off hold and is being progressed with the Proposer following feedback from the Information Commissioner's Office (ICO) on the proposed legal text.
- Members asked for more information on the other modifications which had been place on hold following the Ofgem Open letter and were advised that their status was being discussed at the next Change Sub-Committee meeting.

SECAS presented the new modifications:

- [DP326 Changes to G2.22A and G2.22B to improve the SXCX Service Provider Security testing requirements.](#)
- [MP327 4G SMWAN Coverage Checker](#)

The PSC **NOTED** the update and provided feedback including confirming the two new modifications did not appear to be privacy impacting.

10. Standing Agenda Items (FOR INFORMATION) (CLEAR)

SECAS presented the forward look and noted the proposed agenda items for the next PSC meeting in August.

The PSC **NOTED** the update.

11. Any Other Business (FOR INFORMATION) (CLEAR)

The PSC Chair invited members to raise any additional items of business. There were three items 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 20 August 2026