

This document is classified as **Clear** in accordance with the Panel Information Policy. Recipients can distribute this information to the world, there is no limit on disclosure. Information may be shared without restriction subject to copyright.

Privacy Sub-Committee (PSC) Meeting 26

10:00 – 14:00, 21 May 2026

PSC_26_2105 – 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 26.

The PSC discussed the following items:

Matters Arising (GREEN)

- The PSC Chair provided information on the ongoing participation in the Department of Business Trade's (DBT) Smart Data Guidebook and highlighted that consent management is a recurring theme across all sessions.
- The PSC Chair noted the recent publication from Ofgem regarding Ethical AI use in the energy sector. The Chair explained it uses for tests cases and the need for guidelines on privacy and security with the suggestion that SECAS could play a role in governing synthetic data practices.
- SECAS provided an update on IcebreakerOne noting information on efforts to establish Open Energy as a not-for-profit and the desire for Ofgem and DESNZ define a target operating model for Energy.
- SECAS provided the PSC with an update on the TECH UK Digital Regulation and Smart Data Steering Groups noting timelines for upcoming consultations; an upcoming Artificial Intelligence showcase; and highlighted the DBT's positions on smart data siting the importance of governance over technology in digital markets.
- The PSC were presented with information on the Cross-Code Steering Group. The PSC noted the ongoing discussions regarding domain responsibilities set out the Ofgem/DESNZ Energy Digitalisation Framework, particularly the minded to position regarding the assignment of meeting domain co-ordinator role to Elexon.

Agenda Items

1. Previous Meeting Minutes and Actions Outstanding (CLEAR)

SECAS presented the draft non-confidential and confidential minutes for PSC_25_1604 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, Change Notifications and Forward Look (FOR INFORMATION) (RED)

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

3. Outcome of SEC Panel Paper Presentation on RECCos Consumer Consent Solution (FOR DISCUSSION) (AMBER-STRICT)

The PSC Chair presented an overview of the Consumer Consent Solution paper presented at the April SEC Panel meeting and the key discussion points including noting the priorities confirmed for consumers and market participants; the concerns regarding dual consent regimes; and the proposed next steps.

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

4. Consumer Consent Solution – RECCo Update (FOR INFORMATION) (GREEN)

RECCo provided the PSC with an update on the progress of the Consumer Consent Solution design development sharing the latest news regarding procurement of the Technical Partner role, implementation timeline and planning; highlighting key webinars regarding the consultation responses; and other engagement opportunities encouraging involvement from members.

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

5. Consumer Consent Solution Next Steps - PSC only (FOR DISCUSSION) (GREEN)

The PSC concluded discussions on the CCS reiterating the key areas of concern and confirming the key areas of focus and importance of the continue engagement with RECCo.

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

6. SEC, I Review Project Scope Check (FOR DECISION) (GREEN)

SECAS presented an overview of the proposed SEC I Review Project Scope noting this would cover both privacy and data governance. This included considering whether data protection should remain a subset of SEC I or require separate governance and seeking to align with evolving industry practices and regulatory expectations.

The PSC **AGREED** with the proposed scope for the SEC I Review Project.

7. ElectraLink Governance Update (Including Legal Update on Court Case) (FOR INFORMATION) (RED)

Electralink provided an overview on the importance of good governance and shared some lessons learnt from the recent Litigation with Perse Technology.

The PSC **NOTED** the update.

8. Risk Register V1.2 Draft for Approval (FOR DECISION) (AMBER-STRICT)

SECAS presented the Privacy Risk Register V1.2 draft for approval and noted that the TLP rating had been amended to **AMBER-STRICT**.

The PSC **APPROVED** v1.2 of the Privacy Risk Register.

9. Modifications Update (FOR INFORMATION) (GREEN)

- SECAS presented members with an update on Modifications where a privacy interest or impact had been previously noted and reminded members of those still on hold including MP234 and M235: [DP305 Communications Hub Returns Process Review - Smart Energy Code](#)

SECAS further flagged the new modifications

- [DP321 Managing SEC Party Organisation Changes - Smart Energy Code](#)
- [DP322 June 2026 SEC Releases Housekeeping Changes - Smart Energy Code](#)

The PSC **NOTED** the update.

10. Standing Agenda Items (CLEAR)

SECAS presented the forward look and noted the possible agenda items for the next PSC meeting in June.

The PSC **NOTED** the update.

11. Any Other Business

The PSC Chair invited members to raise any additional items of business. There were two 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 18 June 2026.