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Privacy Sub-Committee (PSC) Meeting

PSC_26_2105 21 May 2026

10:00 - 14:00

Teleconference

Non-Confidential Minutes

Attendees:

Category	Attendance	Company
Meeting Chair	Rob Parvin (RP)	SECCo
SECAS (Meeting Secretariat)	Rachael Jones (RJ)	Talan
SECAS	Fiona Bond (FB)	
	Graham Hall (GHa)	
	Lydia Bentley (LB) *(Agenda item 9)*	
	Justine Pearson (JP)	
SECAS Lead Privacy Expert	Camilla Winlo (CW)	
SECAS Privacy Expert	Aneesa Wollet (AW)	
RECCo	Matt White (*agenda item 4)*	RECCo
Electralink	Rachel Ollis (RO) (*agenda item 7*)	Electralink
User IPA	Saif Syed (SS)	User IPA (EY)
	Alistair Grange (AG)	

Party Category / Representing	Name
Large Suppliers	Amy Cox (AC)
	Sharon Armitage (SA)
Small Supplier	Edward Griffiths (EG)
	Amy Ogborne (AO) (*agenda item 1 - 3*)
Other Users	Geoff Huckerby (GH)
	Tereza Borges (TB) (*alternate*)
	Josh Cooper (JC)
Electricity Network Representative	Nick Zentner (NZ)

Apologies:

Party Category / Representing	Name
DCC Representative	Susan Nampijja-Moleke (SNM)
DESNZ	Simone Chiappi (SC)
Large Supplier Representative	Nancy Preston-Saunders (NP)
	Emma Johnson (EJ)
Citizens Advice Representative	Colin Griffiths (CG)
Other User	Matthew Roderick (MR)

Matters Arising

- 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 use 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 to define a target operating model for Energy.

    Members noted some concerns regarding the IcebreakerOne initiatives, highlighting the importance for SECCo in positioning itself as an equally significant industry voice in comparison. The discussion emphasised maintaining a balanced and proportionate approach to engagement, focusing on key priorities and ensuring clarity in how PSC contributions are framed.

- 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 citing the importance of governance over technology in digital markets.
- The PSC were presented with information on the DATA Cross-Code Steering Group. The PSC noted the ongoing discussions regarding domain responsibilities set out in the Ofgem/DESNZ Energy Digitalisation Framework, particularly their minded to position regarding the assignment of the Metering Data domain co-ordinator role to Elexon.

  The PSC understand the domain assignment process is not yet finalised pending updates from DESNZ.

1. Previous 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.

<table>
<tr><th>Action ID</th><th>Action</th><th>Owner</th></tr>
<tr><td>PSC non-Conf 25/01</td><td>SECAS (FB) to share the PSC recommendation that SEC Panel/SECCo commissions further research into emerging risks associated with export data and engages with Ofgem/DESNZ for direction and following from this; to consider Initiating a Modification to expand SEC Section I to encompass Export Data on completion of the above.</td><td>SECAS (FB)</td></tr>
<tr><td colspan="3">SECAS confirmed that the risk has been discussed by the PSC Risk Register Working Group and the agreed action was to escalate to the Sub-Committee Risk & Issues Meeting (SCRIM). The escalated risks were presented to SCRIM on 5 May 2026 and are waiting for further direction. Further consideration of Export Data and SEC I has been included in the proposed scope for the SEC I review project which was discussed under Agenda item 6. Status: Closed.</td></tr>
<tr><td>PSC non-Conf 25/02</td><td>SECCo (RP) to invite SECCo (OM) to the next PSC meeting to revisit the considerations provided by PSC Members in the Smart Data 2035 (UK Energy Strategy).</td><td>SECCo (RP)</td></tr>
<tr><td colspan="3">PSC Chair (RP) provided an update on the outcomes of the Consumer Consent Solution and Strategy Paper presented at SEC Panel in April under Agenda item 3. RP confirmed he will liaise with SECCo (OM) regarding PSC feedback and invite him to attend PSC Meeting 27 in June to provide a further strategy update. Status: Closed.</td></tr>
<tr><td>PSC non-Conf 25/03</td><td>LB to clarify whether the modification pause is expected to be weeks or months and report back on expected timelines and to ensure the lead analyst for DP307 is prepared to provide a clear business case at the next Change Sub Committee meeting.</td><td>SECAS (LB)</td></tr>
<tr><td colspan="3">SECAS (LB) confirmed that Ofgem have indicated that they expect the Modifications pause relating to Smart Meter Data to last no longer than 3 months.
Status: Closed.</td></tr>
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2. In-Flight Assessments, Remediation Plans and Forward Look (For Information) (RED)

SECAS presented an update on current in-flight assessments, ongoing Privacy Change Notifications and the Assessment Forward Look.

Further discussion was classified as **RED** and, therefore, recorded in the Confidential Minutes.

The PSC **NOTED** the updates.

3. Outcome of SEC Panel Paper Presentation on CCS (GREEN)

The PSC Chair (RP) presented an overview of the Consumer Consent Solution paper presented at the April SEC Panel meeting.

RP shared the key discussion points including confirming prioritisation of consumers and market participants and seeking to address the concerns regarding Parties potentially having to navigate dual consent regimes. RP further outlined the need to ensure that consumer costs are minimised and that trust in both the current and any future state solutions is not eroded as a consequence of a potential dual consent regime.

PSC members highlighted that the work on consumer consent has demonstrated that a single approach for consent management is unlikely to accommodate all possible scenarios, and that engagement with consumers to address this point must reflect this complexity. A PSC member emphasised that maintaining consumer trust is a key priority and agreed with the priority of avoiding erosion of trust and echoing the concerns regarding the creation of multiple consent regimes and cost implication for both market participants and consumers.

Members agreed with the SEC Panel sentiment that SEC responses should seek to adopt a stronger and more assertive position. It was also acknowledged that, while there are criticisms of CCS noted by SEC Parties, the SEC must continue to present a constructive and progressive position in further engagement with RECCo.

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

4. Consumer Consent Next Steps - PSC only Discussion (GREEN)

RECCo (MW) 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. RECCo appoints Raidiam and PayPoint as Trust Framework partners for Consumer Consent Solution - The Retail Energy Code Company.

A PSC Member queried how CCS will interact with tariff interoperability focusing on the consumer consent mechanism supplier responsibilities and the alignments of the CCS and tariff consultations. Members further queried the impact on consumer journeys and legal rights regarding agreement to use CCS. MW suggested it would be beneficial to engage with the tariff team to gain further clarity on the incoming tariff arrangements and their intended operation and proposed inviting them to join RECCo for the next CCS update at PSC. It was suggested that, where consumers wish to access certain services, acceptance of terms (including data sharing with CCS) may be required. The member noted that, from a supplier perspective, consumers are likely to retain legal rights to opt out and emphasised the need to clearly define and communicate the consumer journey, particularly for those who may choose not to participate.MW also encouraged members to join the relevant webinars relating to tariff interoperability for further information on this subject in relation to CCS and impacts for suppliers.

A PSC Member raised concerns regarding the cost of CCS, suggesting it may be in the region of £100 million. MW clarified that this figure is not accurate and confirmed that costs are well below this level. MW advised that all RECCo information regarding the business cases and RECCo budgets are published on the website and directed further queries regarding scheme costs to the website for more information. He also confirmed that costing information was provided in the consultation and that further funding information would be discussed at the upcoming CCS webinar [CCS Design Consultation Webinar– scheduled 28 May].

PSC Non Conf 26/01: PSC Chair (RP) to liaise with RECCo (MW) and invite the RECCo tariff team to attend a future PSC meeting to provide an update on tariff interoperability and CCS developments and outline key considerations, seeking to address the queries raised by the PSC Supplier members.

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

Following the RECCo update and the earlier discussion regarding the CCS Panel paper PSC Chair facilitated a further discussion with members to collate PSC feedback and agree next steps regarding CCS and further RECCo engagement.

Members agreed it was also necessary to establish direct engagement with RECCo to gain a clearer understanding of CCS developments. Concerns were raised that their current proposals may still be missing key elements, particularly in relation to tariff-linked consent processes, and that further clarification is required regarding the SEC's role and whether additional consumer protections are necessary.

Members agreed on the need to define a clear strategic position from RECCo, including how data flows and liabilities will be managed. Ongoing concerns were noted regarding a lack of clarity around liability, cost allocation, and the overall business case, including uncertainty over who will use, fund, and ultimately bear the costs of the solution, and whether these may fall to consumers.

The PSC members expressed a general view that the programme may have diverged from its original intent. While there was support in principle for a combined solution, this did not extend to the current approach. Members noted that the solution appears to be evolving without sufficient consideration of stakeholder feedback or implementation impacts, with perceived misalignment between design developments and consultation outcomes. Concerns were also raised regarding a lack of transparency, including instances where changes have not been clearly communicated. In addition, members highlighted that assurance requirements may place a disproportionate burden on smaller organisations.

It was agreed that a structured list of issues and validation points should be developed to support further engagement and to inform the group's position, including consideration of the overall assurance approach.

The PSC **NOTED** the update, provided feedback and agreed next steps.

PSC 26/02: The PSC Chair (RP) to create structured list of issues and validation points that should be developed to support further engagement and to inform the group's position, including consideration of the overall assurance approach.

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

SECAS (CW) provided an update on SEC I review, noting a that an initial review of the historic modifications and their impacts on SEC Section I have already been completed.

CW confirmed the proposed scope for PSC consideration which included:

- A broader strategic review is proposed to assess the effectiveness of SEC Section I in managing data and data protection, in line with government strategy and Smart Data programmes.
- The review would evaluate the current scope of SEC Section I and its data governance requirements.
- It would consider how well SEC Section I reflects emerging regulatory expectations for smart meter data.
- The review proposes to assess the effectiveness of the Privacy Controls Framework.
- It would examine alignment with evolving industry good practice, including Smart Data and wider energy digitalisation initiatives.
- Consideration would be given to the potential impact of changes to relevant ISO standards.
- The review would also explore how SEC Section I could be refined to support the government's objective of reducing compliance administration burdens by 25%.

CW noted that the review is also proposed to consider whether SEC Section I should be expanded to cover additional categories of sensitive data currently out of scope, such as export data and data relating to vulnerable consumers, including prepayment meter top-up data. This also includes assessing how other data-related issues affecting vulnerable customers such as VWAN connectivity should be addressed. CW noted that the review will also include examining the treatment of non-domestic data, noting the current lack of distinction between domestic and non-domestic smart metering data, and whether this should be more clearly defined within SEC Section I. CW noted that there will be consideration regarding the implications of any change in DCC's role from Processor to Controller, including whether and how this should affect its inclusion within the scope of SEC Section I. The scope will also include a review of the interaction between SEC Section I and REC assurance seeking clarification on the approach, including the delineation of boundaries and responsibilities. Proposed effectiveness Key Performance Indicators (KPIs) are also being explored, either aligned to those set by the Performance Assurance Board (PAB) or designed to inform future KPI development, in line with wider government efforts to measure regulatory effectiveness.

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.

Further discussion was marked as **RED** and is provided in the confidential minutes.

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-STICT**.

Further information was marked as **AMBER-STRICT** and therefore record in the confidential minutes.

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

9. Modifications Update (For Discussion) (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: The SEC Change team are currently identifying and categorising required changes. These changes will then be prioritised in order to deliver effective changes at the earliest opportunity.

SECAS presented two new modifications:

- DP321 Managing SEC Party Organisation Changes - Smart Energy Code
- If a SEC Party decides to undergo a change of corporate identity, the SEC currently does not have any provisions to make this a quick and efficient process, requiring said Party to undergo the full SEC Accession process again under the new identity.
- This Modification seeks to provide provisions to allow for this scenario, via an application submitted to the SEC Panel for approval to transfer the Party's existing SEC Party rights to the new corporate identity.
- DP322 June 2026 SEC Releases Housekeeping Changes - Smart Energy Code
- Housekeeping Modification to amend inconsistencies in SEC Appendix AP1 'Secure S1SPKI Certificate Policy'.

The PSC **NOTED** to updates.

10. Standing Agenda Items (CLEAR)

Forward Look

PSC Chair (RP) presented members with the forward look for potential agenda items to be brought to PSC_27 on 18 June including:

- Consumer Consent Solution;
- DESNZ and Ofgem Updates;
- updates on MP234 and 235;
- Information on the Energy Digitalisation Strategy Data repositories and Data Best Practice;
- SEC I Review Project Proposal - update;
- Privacy Risk Register Review;

- Ethical Use of AI;
- Cross Code Data Working Group; and
- Other Users – *"CCS Myth Busting Workshop".*

11. Any Other Business (GREEN)

The PSC Chair invited members to raise any items of business. Two items of business were raised regarding the Data Future Projects discussed at SEC Panel.

Landlord Consent and Access to Consumption Data

Clarification was sought regarding when a landlord can legitimately obtain consumption data under the SEC I. Members highlighted a lack of clarity within Section I, particularly in relation to non-domestic premises and scenarios where landlords do not have a direct relationship with the energy supply. While some use cases (such as franchise arrangements) appear more straightforward, uncertainty remains where landlords have legal obligations (e.g. carbon reporting) or wish to introduce energy efficiency measures. It was noted that the current SEC framework does not clearly set out how such scenarios should be handled. Members agreed that further discussion is required, with the potential for additional work to support landlord consent use cases and provide clearer interpretation. It was confirmed that this will be covered under to the SEC I Project Scope.

SEC I Interpretation and Alignment

A member raised concerns regarding ambiguity within SEC I, particularly when compared with CCS, noting that differences in frameworks can create confusion when attempting to compare or align approaches. It was highlighted that there are interpretation weaknesses within SEC I that should be addressed proactively, rather than deferred until CCS is implemented. Members noted the importance of clearly differentiating between resolving existing SEC I issues and broader CCS considerations, ensuring focus remains on whether current arrangements are fit for purpose. SECAS confirmed this was the intention of the SEC I Review project.

No further items of business were raised, and the Chair close the meeting.

Next Meeting: Thursday 18 June 2026