



**SECURE  
TICKETS from  
AUTHORISED  
RETAILERS™**

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## **RESPONSE TO THE CALL FOR EVIDENCE ON TICKET PRICING FOR LIVE EVENTS**

### **Summary**

1. **Ticketing is diverse and event-led:** There is no one-size-fits-all approach—pricing, distribution models, and use of technology vary significantly across sectors like theatre, music, and sport. Strategies such as pre-sales and variable pricing are determined by event organisers, not ticketing companies.
2. **Multiple primary sellers benefit consumers:** Distributing tickets across multiple authorised sellers broadens reach, supports marketing, and helps manage demand peaks—particularly for major on-sales—while offering consumers more choice and the opportunity to compare prices.
3. **Transparency and clarity are essential:** STAR supports clear fully-inclusive, pricing from the outset. Improvements to information provided in online queues and early in the purchase process are welcome.
4. **Risks are greater for high-demand events:** Large-scale events face increased threats from bots, fraud, and the secondary market. Measures like resale price caps would reduce profit-driven resale activity.
5. **Effective enforcement and consumer protection are key:** Legislation exists but must be properly enforced. STAR advocates for better mechanisms to report bot attacks and a review of the harms created by the uncapped secondary market.

### **STAR**

1. The Society of Ticket Agents and Retailers (STAR) is the self-regulatory body for the live event ticketing industry in the United Kingdom. Established to promote high standards of service and consumer protection, STAR represents a wide range of ticketing organisations, including primary ticket agents, secondary marketplaces, and venue box offices. We estimate that around 90% of live entertainment tickets in the UK are sold by our members. Members are bound by a strict Code of Practice designed to ensure transparency, fairness, and integrity in the sale and resale of tickets for live events. In addition to setting industry standards, STAR operates as an approved provider of Alternative Dispute Resolution (ADR) under the Consumer Disputes (Competent Authorities and Information) Regulations 2015. This allows us to provide an accessible, impartial, and effective mechanism for resolving disputes between consumers and our members. Through this work, STAR plays a vital role in maintaining consumer confidence and supporting fair outcomes in a complex market.
2. This response to the government call for evidence on ticket pricing is informed by STAR's commitment to consumer protection, its expertise as an approved ADR body, and its comprehensive understanding of the ticketing ecosystem. It also reflects a range of views expressed by our members, gathered through a survey conducted in February 2025.

### **Question 1: Outline key changes to how tickets are priced, distributed and sold to consumers in recent years, for example on stages of release (such as pre-sales), any changes in role for different actors and pricing strategies (such as dynamic pricing) and use of technologies.**

- i. Fans/consumers: Has your experience of buying tickets changed either for better or worse in recent years?
  - ii. Give examples of good or bad practice where relevant.
6. The sale of tickets for different sectors - theatre, sports and music - all operate very differently – it is not one-size-fits-all. For example, rock and pop still operate on physical allocations (set, block, row



and seat numbers) to ticket agents whereas, for West End theatre, agents access the same seating plan via API links.

7. Pricing and distribution strategies are set by event organisers, not by ticketing companies.
8. Pre-sales are an important part of the process, honouring links between the event and other stakeholders, including sponsors.
9. There has been an increase in tickets being offered with added extras, such as VIP tickets to reflect the growing demand from consumers for enhanced experiences.
10. Variable pricing retains the value for the originating artist / promoter as opposed to the secondary market. Directing more sales volumes towards primary channels helps to protect the direct relationship between the consumers and the artist / venue. Sometimes variable pricing leads to price reductions.
11. The use of the word 'dynamic' for pricing for live events is inaccurate as it suggests automated changes in pricing based on consumer behaviour or ticket demand. It is more usually the case that all price changes are manual and do not happen while the consumer is transacting on the website.
12. The Covid pandemic prompted some positive changes in the flexibility of ticket bookings, particularly for theatre events, where multiple performances of the same event over a longer period make it easier to accommodate exchanges. Theatres and other ticket sellers may offer customers the option to exchange tickets for another date - subject to availability and, in some cases, a fee - up to a specified time before the original performance. Others provide the option, also for a fee, to return tickets in exchange for a credit voucher within a similar time frame.
13. This level of flexibility is less common for music events, such as concerts and festivals, where alternative performances are rarely available.
14. Many ticket sellers now offer a "ticket protection" product that allows tickets to be refunded under certain circumstances affecting the ticket purchaser (rather than the event), such as illness.
15. When an event is cancelled, most sellers will refund the original purchase price or offer an exchange to another date, where possible. However, some may retain booking or transaction fees for services provided when exchanges are not permitted or feasible.

**Question 2: To what extent do consumers find it beneficial when primary tickets are available across multiple ticketing platforms? We are interested in understanding if this approach improves consumer access, reduces queue times, affects pricing transparency, or provides a better overall purchasing experience.**

16. Spreading sales across different ticket agents helps with marketing events and reaching the widest possible audience. It enables Consumers to be able to shop around between different ticket sellers for many events.
17. Whenever demand outstrips supply, there will be disappointed and angry consumers, and this is where the greatest heat is felt for major on-sales.
18. Many of the perceived problems of major on-sales are caused by outsized demand that is focused into a relatively short space of time.
19. For major on-sales, using multiple sellers may help to reduce the load on any one single seller.

**Question 3: Are there structural features of the live events market in the UK which impact on consumer experience and consumer choice?**

- i. Specify how this relates to market structure or integration in different parts of the live events sector.
20. Some venues are allied to companies that provide their own ticketing services. However, Event Organiser allocations are also usually provided to other ticket agents to help ensure broader distribution.
21. Tickets for many events are sold through a number of ticket agents giving consumers more choice.



**Question 4: Are consumers provided with sufficiently clear information about how and where they are able to purchase tickets for live events ahead of a sale?**

- i. Describe how different websites, platforms or search engines play a role in informing consumer choices.
- ii. Fans/consumers: When purchasing tickets, are you clear on who you're purchasing tickets from, for example is it the event organiser, a reseller or other?
- 22. Paid search engine results could be considered problematic as the highest bidder is shown favourably in results. Paid search can therefore be skewed by the high profit margins in an uncapped secondary market and their ability to bid higher prices for higher listings.
- 23. Event organisers are responsible for details of the events and how these are communicated, including links to any ticketing companies.

**Question 5: Are consumers provided with sufficient and clear information about ticket prices, including any additional fees, such as service charges or booking fees, when they are purchasing tickets on a ticketing sale platform?**

- i. How, and at what point, are consumers provided with information about different and changing prices, included the use of tiered pricing, and dynamic pricing?
- ii. Provide details if there are specific improvements that could improve transparency and clarity.
- iii. Fans/consumers: When do you normally see the total price (including all unavoidable fees), for example, at the end of the checkout process, or when the price is first advertised to you on a website?
- iv. Provide details you think are relevant, including examples of good practice, and where improvements could be made to improve transparency and clarity.
- 24. Different prices usually apply to different parts of a venue and are clearly indicated at the time of sale.
- 25. In most circumstances, for online sales, consumers are presented with the opportunity to pick their seat/position and the price will be clearly indicated to them at that time.
- 26. The law already requires that prices are indicated inclusive of any additional fees and this has been reinforced in the Digital Markets, Competition and Consumers Act 2024.
- 27. 'From' pricing is often used because of the variations in prices across a venue.
- 28. Ticket prices remain fixed once added to a basket, provided the consumer completes the transaction within the allotted time. Reasonable time limits help prevent tickets from being held without purchase, which can unnecessarily restrict availability and provide inaccurate information to consumers about what is available.
- 29. Improving the transparency of pricing information in online queues is welcome, as it ensures consumers are better informed about the range of available prices before reaching the purchase page.

**Question 6: Are consumers provided with clear information about other elements of the ticket, for example, refund policies, restrictions on resale or transferability?**

- i. Provide details on when and how is this information made available.
- ii. Provide details on this, including examples of good practice, and where improvements could be made.
- 30. These details are usually included in the ticket seller's terms and conditions.
- 31. Where there are specific variations on restrictions, these are usually made clear at the time of purchase.



**Question 7: Are developments in business models and the use of technologies (for example queuing systems or use of algorithms/AI) creating new risks for consumers?**

- i. If so, what are these risks?
  - ii. How might consumers be better protected?
32. While requiring account logins and the use of queuing systems may seem over burdensome to consumers, they actually make the experience better by helping block bots.
  33. AI customer service can be very effective by allowing consumers to self-serve and address issues quickly but AI customer service can also lead to frustration. The ability to escalate issues to a human should always be provided.
  34. Long queues may create consumer frustration. Ballots may sometimes be more effective but each event needs to be considered on its individual merits and the ticketing strategy decided by the event organiser.

**Question 8: Are there specific risks to consumers associated with large scale live events with a high demand, that are not present in lower demand smaller events or other sectors?**

- i. Provide details on these risks .
  - ii. If applicable, provide suggestions on how these risks could be addressed.
35. Larger events are inevitably attacked by more bots making it more difficult for consumers to buy tickets and disrupting the primary ticketing process.
  36. Large scale live events with high demand lead to greater gains for those who seek to exploit through ticket touting, counterfeit tickets, sham sales through social media etc.
  37. There is a greater risk of ticket fraud because the demand for tickets leads to greater disappointment for consumers and desperation to get a ticket at any cost - or risk.
  38. Introducing a resale price cap on the amount that a reseller can list a ticket for will help reduce profit incentives in the secondary market and may also discourage companies from bidding aggressively for promotion in search listings. However, limiting these opportunities could inadvertently increase the incentive for ticket fraud.

**Question 9: How else could the existing consumer protection framework be made more effective?**

39. Ensure that any current or new legislation is effectively enforced.
40. Address the issues caused by an uncapped resale market.
41. Encourage flexible refund/exchange policies, e.g. Refundable and nonrefundable prices, up to a clear deadline before the event.
42. Although legislation exists to address the use of bots, reporting remains challenging for ticketing companies due to the sheer volume of attacks and the lack of identifiable perpetrators. While incidents can be reported to Action Fraud, the effort required often outweighs the likelihood of enforcement action. Enhancing the reporting process and strengthening enforcement would help improve consumer protection.

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