



**SECURE
TICKETS from
AUTHORISED
RETAILERS™**

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RESPONSE TO THE CONSULTATION ON THE RESALE OF TICKETS FOR LIVE EVENTS

Summary

1. **Consumer-first approach to resale:** STAR advocates for a secondary market that enables genuine fans to resell when they can't attend, while preventing speculative profiteering that harms fans, event organisers, and the wider live events sector.
2. **Existing provision:** Good, accountable and uncontroversial Capped¹ resale already operates effectively in the UK market.
3. **Support for a capped resale market:** STAR strongly supports a mandated price cap on ticket resale to reduce profiteering by touts, reduce bot attacks, protect consumers, and ensure fairer access to tickets.
4. **Clear and enforceable definitions:** STAR recommends replacing the outdated term "face value" with "Original Ticket Price Paid" (or similar) to ensure consistency and clarity in applying resale caps and informing consumers.
5. **Improved transparency and accountability:** STAR advocates for verified listings, stronger enforcement of resale restrictions, and legal requirements for Secondary Ticketing Platforms to verify key information and seller ownership before listing tickets.
6. **Targeted regulation and practical enforcement:** STAR emphasises the need for effective enforcement of existing and future regulations, rather than burdensome licensing systems, and warns that measures must account for offshore resellers and others seeking to circumvent UK law.

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 consultation on ticket resale 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 surveys conducted in September 2024 and February 2025. There are some outlier views held by members that have not been included.

¹ Definitions are set out in Part 2.



Part 2: understanding the ticket market

Question 1: We invite you to share any additional information or evidence you have concerning the live events sector, the pricing of tickets in the primary market, and/or the impacts of secondary ticketing markets on consumers and the live events sector.

3. The following definitions are used in our response.

a. Event Organiser

- i. In entertainment, these include producers (theatre) and promoters (live music and festivals). In sports, they include governing bodies and clubs. In some cases – for example producing theatres – the event organiser may also be the venue. Event organisers set the prices for tickets. In live music, prices will be agreed with the artist and/or their management. These prices will often be set at lower than the market might sustain to ensure equitable access. However, this is undermined by resale for profit that provides no additional benefit to the event and compromises that equitable access.

b. Primary Ticket Seller

- i. The sellers authorised by the event owner and venue to market and sell tickets. These include ticket companies (ticket agents) and the venues themselves. Some events, particularly smaller ones, may sell their own tickets through 'self-service' ticketing platforms that enable them to create, market and sell tickets directly.

c. Reseller: those who resell tickets through a Secondary Ticketing Platform after their original sale including:

- i. Those who can no longer use tickets they have and who wish to offer them for resale to other customers who could use them.
- ii. Those who have purchased tickets with the sole purpose of reselling them for profit (ticket touts). These Resellers may be traders and may use automated processes to help them buy tickets from Primary Ticket Sellers.

d. Secondary Ticketing Platform: an internet-based platform that facilitates the resale of tickets for Resellers. There are two types of Secondary Ticketing Platforms:

- i. **Capped** resale – Secondary Ticketing Platforms that limit the amount a Reseller can list a ticket for. This has grown in recent years, with most major ticketing companies now offering in-house resale as well as some independent capped Secondary Ticketing Platforms. These platforms predominantly service Resellers that can no longer use tickets they have bought or Resellers (ticket touts) who have not managed to sell the ticket that they bought intending to make a profit.
- ii. **Uncapped** resale – Secondary Ticketing Platforms that allow Resellers to list tickets for any amount they wish. This is where high resale prices are seen, particularly Resellers listing tickets they have bought with the intention of reselling them for maximum profit.

e. Face Value

- i. Traditionally, "Face Value" referred to the amount set by the Event Organiser as the price of a ticket before any primary ticket seller fees were added. This term dates



back to when tickets were pre-printed with the price on their face. However, this definition is now outdated. Today, ticket prices must be shown as inclusive of any mandatory fees at the point of sale, meaning the actual amount paid by the buyer is higher than the historic "face value." A more accurate and relevant term is needed in this context - such as "Original Ticket Price Paid" - to reflect the total amount paid by the ticket buyer at the time of first sale.

f. Original Ticket Price Paid

- i. The total amount paid by the original buyer for the ticket. This is the amount that the Reseller might be seeking to recover when offering a ticket for resale and therefore the amount on top of which any cap should be set. This would include all per ticket fees and the relevant proportion of any per transaction fees paid when originally booking the ticket.

g. Access Tickets

- i. Tickets that are sold to customers needing reasonable adjustments to facilitate their attendance at events. These are more problematic to resell because they are sold to address particular needs and criteria.

4. STAR members have expressed the following concerns about Uncapped Secondary Ticketing Platforms and problems caused by ticket touts.
 - a. Difficulty dealing with customers in venues who are denied entry with tickets they have bought from Uncapped Secondary Ticketing Platforms because those tickets do not work.
 - b. Difficulty in enforcing resale restrictions that have been put in place to try to stop tickets being sold for profit through Uncapped Secondary Ticketing Platforms.
 - c. Increased advertising and Pay Per Click advertising costs as the margins on Uncapped Secondary Ticketing Platforms enable them to buy listings that promote secondary tickets (at a higher price) ahead of tickets that might still be available in the primary or Capped resale market (at a lower price).
 - d. The use of bots that cause disruption to primary ticket sales for in-demand events and the resultant costs of trying to defend against such attacks.
 - e. Public backlash to Primary Ticket Sellers about over-inflated resale prices.
 - f. Surveyed in September 2024, STAR members strongly supported Government action to tackle the following issues caused by Uncapped Secondary Ticketing Platforms and ticket touting:
 - i. Accountability.
 - ii. Bulk-buying and the use of bots.
 - iii. Tighter regulations.
 - iv. Enforcement of existing regulations.
 - v. A price cap on ticket resale.



Part 3: tackling the incentives behind touting

Question 2: What is the maximum uplift that you think should be applied if ticket resales were to be subject to a price cap? Please state the reason for your selection.

- no uplift at all
 - 10% or less
 - between 10 and 20%
 - between 20 and 30%
 - other – please state
5. There are currently a number of pricing models being operated by Capped Secondary Ticketing Platforms. These models use the Original Ticket Price Paid as the base amount and range from no uplift at all to 20%. For the majority, there is a fee charged to the buyer but currently no uplift at all for the Reseller.
 6. Any cap should be sufficient to ensure that the profitability for Resellers is reduced, thereby reducing the number of tickets bought to resell for profit and causing the attacks by bots on primary ticket sales.
 7. STAR members have indicated that, to achieve this, they would favour a cap on the amount that the Reseller can charge of between 0% and 20%, with the majority favouring 10% or less or no uplift at all.

Question 3: Would the introduction of a price cap be likely to impact the service fees charged by resale platforms to both the buyer and the seller? If so, how?

- yes
 - no
 - other – please state
8. There is a cost to Secondary Ticketing Platforms for administering resale transactions. Rather than being a direct B2C sale, they are effectively C2C with the platform acting as intermediary to facilitate the resale. This results in more 'touch points' in the transaction and an additional commission fee paid for card processing when the Reseller is refunded once the transaction is concluded. These are in addition to the usual costs relating to the sale of a ticket which are always subject to changes, such as overheads and increased card processing fees. The provision of customer service as well as investment in business development also need to be considered. These costs are currently reflected in Capped Secondary Ticketing Platforms with charges of between 10% and 20% of the Original Ticket Price Paid with the majority being in the 15%-20% bracket.
 9. There is a need for competition in the market and for Secondary Ticketing Platforms to set their own commercial arrangements about how they recover their fees. Some may charge the Reseller a fee as well as the buyer.
 10. If there is a price cap which affects the price the buyer sees rather than what the Reseller can sell the ticket for and the cap is not sufficient to cover the Secondary Ticketing Platform fees, the Reseller will not be able to recoup all of the Original Ticket Price Paid.



11. The possibility of higher fees being charged by Secondary Ticketing Platforms to compensate for the cap or to rebate to Resellers to circumvent the cap should be considered and may need to be provided for. However, where there is legislation to cap resale in other territories, Secondary Ticketing Platforms have not increased their fees in this way.
12. Consideration could be given to regulating that Secondary Ticketing Platform fees cannot be shared with Resellers however, this may present challenges in enforcement.

Question 4: What would be the main operational requirements that need to be in place for primary sellers and resale platforms, to ensure original ticket prices can be easily identified for the purposes of a resale price cap?

13. There needs to be clarity that any cap is on top of the Original Ticket Price Paid. While the wording for this may need to be debated, this new definition should be included in the legislation rather than using 'Face Value' which is an outdated term and may be misunderstood.
14. Consideration should be given to the current use of 'Face Value' in the Consumer Rights Act 2015 and whether that definition needs to be updated.
15. It should be made a requirement that the Original Ticket Price Paid is confirmed to the original buyer at the time of purchase or in any post-transaction confirmation.
16. The Original Ticket Price Paid should be clearly and promptly indicated to buyers by Resellers on Secondary Ticketing Platforms and this should be mandated by the Secondary Ticketing Platforms themselves.
17. Where the Primary Ticket Seller is also the Secondary Ticketing Platform for the resale of tickets primarily sold on their platform, original pricing can be readily identified.
18. Some independent Secondary Ticketing Platforms in the Capped market already successfully verify the Original Ticket Price Paid for tickets listed on their sites. This is by referencing existing price information on Primary Ticket Seller websites or through their co-operation with those sites or Event Organisers.
19. Any requirement for Primary Ticket Sellers to confirm Original Ticket Price Paid to independent Secondary Ticketing Platforms will come with development costs as well as concern about potentially allowing API access from those Secondary Ticketing Platforms to their systems, if that was a requirement.

Question 5: What challenges might exist for primary sellers and resale platforms with a resale price cap?

20. Relying on the Reseller to give correct information about the Original Ticket Price Paid.
21. Secondary ticketing platforms may attempt to circumvent the price cap by bundling tickets with merchandise, hospitality, or accommodation, and charging an excessive amount for the overall package.
22. Verifying the Original Ticket Price Paid when sold through an independent Secondary Ticketing Platform (for example where the ticket that is being resold was originally discounted or free).



Question 6: If ticket resales were subject to a price cap, should the cap apply to all live events taking place in the UK? Please state the reason for your selection.

- yes
 - no
23. Yes – this will be less complicated, protect all events and lead to greater public understanding of any restrictions around resale prices.

Question 7: If a resale price cap did not apply to all live events, what criteria should be used to determine which events are in scope? You may select more than one option. Please state the reason for your selection.

- venues and events above a certain capacity threshold
 - venue and event organisers 'opting-in' to being subject to a price cap
 - other – please state
 - not applicable
24. Not applicable.

Question 8: If ticket resales were subject to a price cap, should resale above the price cap be permitted where tickets are resold for charitable purposes?

- yes
 - no
25. Yes.
26. There may be a need for exceptions where tickets are being resold for charitable purposes as that is the intended purpose of selling the ticket for a higher amount. However, clear information about the intended charity should be given at the time of sale and this should only be done with the authority of the Event Organiser.

Question 9: Aside from charitable purposes, are there any other circumstances where resale above the price cap should be permitted?

- yes – please state
 - no
27. No.
28. The issue of debenture seat ownership and the freedom of those owners to sell their tickets on at a market price will need to be considered.

Question 10: What are the risks, unintended effects or practical problems associated with a price cap on ticket resales? How could these be addressed?

29. Those wanting to continue reselling tickets for profit will seek different routes to market or ways of circumventing the legislation.



30. Uncapped resale will continue, the problem will just move offshore. This could be partly mitigated by ensuring that uncompliant Secondary Ticketing Platforms operating overseas are not able to advertise in the UK, including through paid search advertising.
31. Some Secondary Ticketing Platforms may need development to enable functionality.
32. There will need to be effective enforcement.
33. There may be an increase in the resale of tickets via social media channels by Resellers trying to circumvent the law. This is already a problem, with many consumers being affected by fraud and that may increase. However, it is not a practical 'route to market' for the number of tickets currently being resold through Uncapped Secondary Ticketing Platforms.

Question 11: Should resale platforms be prohibited from allowing sellers to list more tickets for an event than one individual is permitted to buy on the primary market? Please state the reason for your selection.

- yes
 - no
 - other
34. While this may be preferable, it is not easy to facilitate or enforce.
 35. Ticket limits are generally set (but not always) by the Event Organiser. Systems may have their own ways of limiting, but otherwise it can be difficult to enforce.
 36. Difficult for Secondary Ticketing Platform to operate as there might have been different limits at different times depending on event/show.
 37. Some events have no ticket limit or have special measures for groups.

Question 12: What are the risks of introducing new limits on resale volumes? How could these risks be countered?

38. Ticket touts already breach existing limits by using multiple identities, payment cards etc. The incentive for this would increase.
39. Resellers may list on more than one platform to circumvent the limit.
40. There is no effective way of passing accurate information on ticket limits to independent Secondary Ticketing Platforms.
41. Some shows have no ticket limit or have special measures for groups.
42. Event Organisers set ticket limits but, unless they are in a commercial partnership with promoters for some events, independent Secondary Ticketing Platforms are not answerable to Event Organisers.

Part 4: making Secondary Ticketing Platforms more accountable

Question 13: Should resale platforms be required by law to verify that the seller owns a ticket before it can be listed for resale on their website?

- yes
- no



- other – please state

43. Yes – however, it is not clear how this can be done effectively except where the Secondary Ticketing Platform is also the Primary Ticket Seller.

Question 14: Should resale platforms be required by law to verify certain key information provided by a reseller about a ticket (for example, original price and location within the venue) before it can be listed for resale on their website?

- yes
- no
- other – please state

44. Yes

45. This is already possible where the Secondary Ticketing Platform is also the Primary Ticket Seller.

46. Booking confirmation emails provide the necessary information and could be checked by independent Secondary Ticketing Platforms.

Question 15: What steps should ticket resale platforms take to ensure that tickets listed on their websites do not breach requirements under consumer law?

- 47. Ensure they meet all legal requirements in the same way as primary agents must do
- 48. Ensure they meet all the specific requirements on secondary ticketing in the Consumer Rights Act 2015
- 49. Not list speculative tickets where the event hasn't yet gone on sale in the primary market or where the Reseller does not yet own a ticket.

Question 16: Should resale platforms be responsible for preventing resale of tickets when the primary seller has prohibited resale under their terms and conditions?

- yes
- no
- other – please state

50. Yes.

51. In 2019, STAR worked closely with the CMA on guidance for Event Owners regarding terms and conditions that restrict resale, aiming to ensure these are not unfair to consumers. The principle established was that ticket holders who can no longer attend should always have a way to dispose of their ticket—whether through refunds, exchanges, or other options, depending on the Event Owner's policy. As this guidance is not legally binding, greater clarity on its status and legitimacy would be beneficial.



Question 17: Should consumers be able to obtain refunds for resold tickets purchased from professional traders through secondary ticket platforms? Please state the reason for your selection.

- yes
- no
- other – please state

52. No.

53. If the aim is to allow customers to cancel a resale booking and obtain a refund because they could buy cheaper tickets elsewhere - then an effective and enforced resale price cap would negate the need for this as professional traders would not be able to list tickets at excessively high prices.

54. If refunds were allowed, would this unnecessarily allow consumers to cancel tickets bought through Capped Secondary Ticketing Platforms where there aren't excessively high resale prices?

55. A high number of consumers resell tickets close to the date of the event, once they realise they can no longer attend. A cooling off period so close to the event would be impractical.

Part 5: enhancing enforcement

Question 18: Should the government review the levels of penalties available for breaches of the Consumer Rights Act and if so, what factors should we consider in respect of these?

- yes – please state
- no

56. No.

57. If a cap is effective through new legislation, there should be no need to increase penalties for breaches of the Consumer Rights Act 2015.

Question 19: Would a licensing system for Secondary Ticketing Platforms help to address issues on the secondary ticketing market? Please state the reason for your selection.

- yes
- no
- do not know

58. If a cap is effective then there should be no need for licensing.

59. Licensing could be costly and those wishing to circumvent the law would probably not participate.

60. A 'mark of confidence' that is tied to compliance with the law, a code of practice and approved alternative dispute resolution could, however, help increase public awareness of who to transact with. STAR already provides this in the primary market and for Capped Secondary Ticketing Platforms that are members.

61. A mark of confidence of this type might also be helpful to other businesses wishing to distinguish Secondary Ticketing Platforms that are complying with best practice and the law. For example, paid search advertising online such as Google.



Question 20: Beyond demonstrating compliance with UK consumer law, should licensed platforms be subject to any further requirements? If so, what should these requirements be?

- yes – please state
 - no
62. No.
63. However, if a mark of confidence as described above was used, the Secondary Ticketing Platform would also be subject to any rules in the code of practice as well as a requirement to work with an approved ADR for outstanding consumer disputes.

Question 21: What could be the potential unintended consequences of a licensing system?

64. Uncompliant Secondary Ticketing Platforms will operate from outside the UK but still resell tickets in the UK to circumvent UK law and enforcement.
65. If there is proper regulation and enforcement, licensing would not be necessary and could be over burdensome.
66. Buyer/seller fees might increase to pay for the licensing.
67. Potentially expensive - who will pay for the administration of this and to who or what will the administrative body be accountable?
68. Those operating outside UK jurisdiction and circumventing both licensing regulations and resale price caps may affect competition within the UK for those abiding by UK law.

Question 22: How might a licensing system interact with other proposals set out in this consultation, such as a resale price cap?

69. If there is proper regulation and enforcement, licensing would not be necessary.
70. If a licensing system is introduced, platforms and resellers must comply with the resale price cap and provide all information to buyers as required by law.
71. This could just be an unnecessary level of bureaucracy.

Part 6: promoting industry-led action to improve access for fans

Question 23: How could participants in the primary market adapt their ticketing distribution approach to reduce the likelihood of tickets appearing on the secondary market at inflated prices?

72. The major issues would be dealt with by an effective and enforced price cap on resale. Our members consider the most important thing is to enable consumers who can't use tickets they have bought to mitigate their loss by being able to resell them to customers that can attend without providing opportunities for profiteering.

Question 24: How could the live events sector better enforce ticket resale restrictions and harness technology to combat touts and enable more transparent, efficient and safer authorised resale for fans? What are the barriers and is there a role for government to facilitate this?

73. Progress has been made on this in recent years with the introduction of e-tickets for most events - further progress can be made.



74. Ticket sellers currently have to rely on terms and conditions of sale that prohibit Resale Platforms they have not authorised and/or resale for profit, but these are regularly ignored by professional resellers. Reinforcement of these policies in law would make them more effective.
75. A clear ruling from government that enables Event Organisers to enforce any restrictions they decide on resale (subject to those restrictions not being unfair to consumers) would be very helpful. Terms and conditions of sale are not the most satisfactory way of achieving this and can be undermined by touts.
76. Consumers would benefit from Event Owners taking a consistent approach to ticket resale and not instructing Resale Platforms that are also Primary Ticket Sellers to pause or turn off resale in advance of the event.
77. The Government needs to enforce the legislation it already has against bots harvesting tickets for resale. For as long as touts use bots to harvest tickets from the primary industry, with no sanction against those touts from enforcement agencies, this activity will continue.

Question 25: How would measures set out in this consultation (notably a price cap) interact with incentives for primary sellers to enable more permissive resale and transferability of tickets for fans?

78. The option to allow authorised resale through primary platforms is decided by the Event Organiser. Ticket agents act on their instructions.
79. Properly enforceable restrictions on resale for Event Organisers, together with a price cap on resale, would help ensure authorised transfer and resale for consumers.
80. Enforcement of any new legislation needs to be strong and effective. Consideration needs to be given to how action can be taken against breaches from overseas that affect UK consumers.

Question 26: What other factors should the primary market and the government consider to address issues identified with ticket resale?

81. Where customers with Access Tickets are unable to resell them due to restrictions designed to ensure they go to those who need them, a reasonable adjustment should be required: unused Access Tickets must be cancelled and refunded so they can be returned to the primary market and made available to others who need them.
82. Address an imbalance in paid internet searches where uncapped Secondary Ticketing Platforms can bid more because of their higher profit margins making it difficult for the events and their authorised ticket sellers to compete for listings.

STAR Council
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