Putting fans first: consultation on the resale of live events tickets

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Representing 300 firms, we're a centre of trust, expertise and collaboration at the heart of financial services. Championing a thriving sector and building a better society. This includes helping lead the industry's collective fight against economic crime in the UK, including combatting fraud and cybercrime. This response is representative of our diverse membership and follows a series of member-led engagements.

Executive Summary

We welcome the government intent to raise standards for consumers with respect to the resale of tickets for live events. Resale of tickets is one of the top three purchase scam types that victims of APP fraud encounter, there is a need to ensure that any future price cap conditions not only aid fans in acquiring tickets at a fair price, but it also avoids exacerbating an existing and material consumer risks encountered. An introduction of price caps on regulated secondary marketplaces risks shifting ticketing reselling activity to unregulated marketplaces and online platforms, leading to the loss of consumer protections and risking exposing consumers to fraud and scams on online platforms.

Similar legislation introducing price caps on secondary marketplaces in Ireland and Victoria, Australia has failed to protect consumers or lead to good consumer outcomes. Rather, research from Bradshaw Advisory demonstrates that ticketing fraud rates "are almost four times higher in Victoria and Ireland than the UK", suggesting that price caps leads to the unintended consequence of increasing the rates of ticketing related fraud.[1] Any increase in fraud and scams as a result of an introduction of price caps and a migration of tout activity to unregulated online marketplaces will expose consumers to not only the financial burden of being a victim of fraud, but also the emotional harm of being defrauded.

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.

There is a need to ensure effective compliance requirements, and consumer recourse opportunities are built into a secondary ticketing market where a price cap becomes imposed. This is to avoid criminals gaming the controls applied in the secondary marketplace, and also protect consumers from criminal manipulation.

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[1] Ticket Fraud: Its Impact and the Cost of Market Regulation — Bradshaw Advisory | Public Affairs & Economics Consultancy, UK

An example of weak controls: Verification should constitute clicking on a link to verify an email address is owned, it should constitute that the person who says they are selling a ticket is in fact that person.

An example of legal requirements: An unlicensed platform should not be allowed to resell tickets.

The Government should explore a number of measures on specialist sellers – as currently it is not clear how migration would be prevented away from legitimate platforms by touts, onto non specialist resellers. It is imperative there is coordination with DSIT and Ofcom to manage the risk that ticket touts will flood onto marketplaces and social media sites seeking higher prices for tickets. There is a need to create an environment where transacting away from licensed resellers will require clear warnings that the ticket is fake.

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?

Robust and automated validation system to support real time independent checks. These systems would also be required to validate:

1. a ticket is only advertised for sale once – i.e. evidence is provided that the seller holds the ticket, but the one tickets is “sold” multiple times as part of a scam and no one actually receives it.
2. Ticket sales are not advertised on sites which are unable to enforce the cap – e.g. Social media and other market place platforms would require controls to prevent resale of tickets or would also require the same validation systems as resale sites.
3. A licensing regime: Selling tickets with an unlicensed ticket reseller (specialist or otherwise i.e. social media firms) should lead customers to believing the ticket is not legitimate. A licensing regime is the cornerstone of any customer information campaign and will empower the financial services industry to check with our customers prior to sending their money whether they are transacting with a legitimate business.
4. Reimbursement obligations: requiring resellers to reimburse for tickets. This liability creates an incentive to effectively manage risk. It will require a higher price point for resales, however right now the banking sector is subsidising the poor controls for official resellers leaving them without motivation to police their platforms.

5. All licensed resellers should also be offering access to safe payment methods that are designed to support e-commerce transactions with appropriate business to consumer protections designed in - not relying on customer to customer bank transfers. It's likely that the vast majority already are, making it easier to bring this in as a standard without causing unreasonable operational overhead for those operating in the market overall.

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

For large scale live events with a high demand, customers are more likely to take greater risks when buying tickets, including buying on social media where it is uncertain if the tickets are legitimate or fake. High demand events such as the Oasis and Taylor Swift concerts are used by fraudsters to target victims that are desperate to purchase tickets. For example, Lloyds reported hundreds of purchase scams related to the Oasis concert, with victims losing an average of £346, and over 90% of these scams originated from fake ads on social media.[2]

Fear of missing out could lead to outcomes such as:

- over purchase e.g. where a group of four each purchase four tickets in a rush. With sixteen tickets they would have to resell 12 tickets.
- Fans will be willing more open to opportunities to secure tickets from alternative sources if they are unable to acquire them via the mainstream options. This opens fans up to being targeted by criminals.

A way to mitigate this risk is to ensure ticket validation by resellers, with unlicensed platforms being prevented from selling tickets through enforcement. Moreover, the primary market should ensure that controls and measures are sufficiently embedded to ensure tickets are being sold to legitimate users rather than bots. Making its illegal to use software that uses bots to mass buy tickets would help mitigate this.

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

[2] Social media companies driving concert ticket scams, says Lloyds Bank - TheTicketingBusiness News

As the consultation highlights, a price cap would likely shift tout activity for high demand events to social media, where the marketplace is unregulated and will result in the loss of buyer protections for the consumer. If there are inadequate consumer safeguards, the unintended consequence of the price caps will be that criminals can exploit victims on unregulated platforms. There is also a risk that the price cap will price out legitimate resell platforms and that also will drive more users to purchase on Social Media.

Purchase scams continued to be the most common form of APP scam with 68,409 confirmed cases accounting for 70 per cent of the total number of all APP scam cases reported in the first half of 2024. A total of £42.3 million was lost to purchase scams during the same period. In the first six months of 2024, the main enabler continued to be online platforms, accounting for 72 per cent of cases and 32 per cent of losses.[3] A price cap could risk further increasing the volume of victims to purchase scams, particularly in relation to high demand events where there is less supply of tickets, and consumers will seek tickets online. In Ireland, where price caps on secondary marketplaces were introduced in 2021, warnings have been issued on the rise of ticketing related scams for high profile live events such as the Six Nations, with ticketing related purchase scams rising by a third in the second half of February. The origination of these scams were largely on social media, including X, Facebook and WhatsApp.[4] Moreover, in Ireland, ticket scams are joint-second highest in their fraud success rate at 31%.[5] Introducing a similar price cap on secondary marketplaces in the UK could risk the unintended consequence of an increase in purchase scams.

In response to “how could this be addressed”, considerations could include:

1. Social Media introducing validation checks for ticket sales, although this would be difficult operationally as they would first have to identify all instances of ticket sales which could be masked.

2. Social Media platforms to include prevalent messaging that ticket sales are prohibited on their sites due to the high risk nature and any items for sale have a higher chance of being a scam. Social media platforms could redirect the consumer to the legitimate resale sites who have introduced the validation controls.

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[3] https://www.ukfinance.org.uk/system/files/2024-10/Half%20Year%20Fraud%20Report%202024.pdf
[4] https://www.rte.ie/news/2025/0306/1500590-revolut-ticket-scams/
[5] reflecting-ireland---fraud.pdf

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

If the margin is too small there is a risk of tick box compliance and weaker implementation on verification and validation systems. Criminals are incredibly aggressive and adapt to gaps in processes at pace.

There is a need to set minimum standards and ensure that the percentage mark up on resales does not prohibit secondary markets from performing adequate checks and balances.

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, there should be a legal requirement to ensure a seller owns a ticket, this will prevent scams where tickets for an event are sold to victims, but the tickets never turn up. There should be an operational requirement to validate one ticket to one sale, which would reduce the risk of a scammer demonstrating ownership of a ticket but “selling” the ticket multiple times.

An alternative is to offer purchase protection on ticket sales which only allows funds to be released once tickets have been received. The introduced risk here is tickets being sent but the buyer claiming they have not been received. A robust process would be needed to investigate these types of disputes.