



Department for
Business & Trade

Kate Dearden MP
Parliamentary Under-Secretary of State for
Employment Rights and Consumer Protection
Department for Business and Trade

Old Admiralty Building
Admiralty Place
London
SW1A 2DY
United Kingdom

T +44 (0) 20 4551 0011
E Dearden.Correspondence@businessandtrade.gov.uk
W gov.uk

Gabriel Quinn
Policy Manager
News Media Association

Our ref: MCB2026/06374

By email: Gabriel.Quinn@newsmediauk.org

27 May 2026

Dear all,

Thank you for your correspondence of 29 April, regarding the Government Response to the consultation on the implementation of the subscriptions regime. I am replying as this matter falls within my portfolio.

The Government recognises that the initial cooling off waiver is an established mechanism in the existing Consumer Contract Regulations (CCRs) 2013 and decided to retain it. However, Ministers were not persuaded that there is a substantial risk of 'binge and cancel' after a trial or 12 month+ contract auto-renews. The purpose of the subscription regime is to protect consumers from unwanted subscription contracts and on balance, we consider that the overriding factor is for the consumer to be able to recover their payment if they do not want the trial or 12 month+ contract to continue.

The approach to refunds set out in the Government Response is consistent with how refunds apply to service contracts in the CCRs. Government is not mandating a time- based refund. The government's approach ensures that if a consumer cancels a services or digital content contract during the renewal cooling-off period, the consumer remains liable for the proportion of the contract (as agreed) that has been performed, calculated on the basis of the contract's agreed price. We reflected on business' suggestions of value based refunds, but consider that implementing alternative models based on consumption, or giving businesses a choice of refund models, are likely to be complex, depart from existing law, or create legal uncertainty.

We will continue to engage with businesses as we develop guidance on the subscription regime. We understand that businesses need time to prepare to implement the regime and will continue to support them ahead of commencement.

With best wishes,

Kate Dearden MP
Minister for Employment Rights and Consumer Protection
Department for Business and Trade