

doxa.co

DMCCA Compliance Guide for Dealer Groups

**What the UK's New Fake Review Law Means for Your
Business**

April 2026 | Free Resource

DOXA | Pixxnow Limited | doxa.co

Sandyford, Dublin | Fort Dunlop, Birmingham

1. What Is the DMCCA?

The Digital Markets, Competition and Consumers Act 2024 (DMCCA) is a UK law that came into force in April 2025. Among its provisions, it introduces the most significant regulation of online reviews in UK history. The Act gives the Competition and Markets Authority (CMA) direct enforcement powers — including the ability to impose fines of up to 10% of global turnover — without needing to go through the courts.

For dealer groups, the critical provisions relate to fake reviews and misleading review practices. The Act specifically prohibits businesses and platforms from commissioning, incentivising, or facilitating fake or misleading consumer reviews, and from suppressing, hiding, or manipulating genuine negative reviews to present an artificially positive picture to consumers.

2. The CMA Investigation: Autotrader and Feefo

In March 2026, the CMA launched a formal investigation into Autotrader and Feefo under the DMCCA. The specific allegation is that 1-star reviews moderated by Feefo were not published on Autotrader's platform and were not counted towards published star ratings. In practical terms, the CMA believes that car buyers browsing Autotrader were shown an artificially inflated picture of dealer reputation — not the genuine one.

This is the highest-profile regulatory enforcement action in the automotive review sector since the DMCCA came into force.

Why this matters to you: If your dealer group uses Autotrader's review system, Feefo, or any review tool that routes customers differently based on predicted sentiment, you are operating with regulatory exposure. The CMA investigation means this is no longer a theoretical risk — it is an active enforcement priority.

3. What Practices Are Now Illegal?

The DMCCA bans the following practices in relation to online reviews:

3.1 Review Suppression

Filtering, hiding, or preventing genuine negative reviews from being published. If a customer writes a legitimate 1-star review and your review tool prevents it from appearing publicly, that is a breach.

3.2 Sentiment Routing

Directing happy customers toward public review platforms (such as Google) while steering unhappy customers toward private feedback channels, complaint forms, or internal surveys — where their negative experience never reaches the public. The CMA's test is whether the mechanism of your review tool gives unhappy customers a less prominent or harder-to-reach path to a public review than happy customers.

3.3 Selective Solicitation

Only requesting reviews from customers you expect to leave positive feedback, or timing review requests to coincide with positive interactions while avoiding negative ones.

3.4 Star Rating Manipulation

Publishing aggregated star ratings that do not include all genuine reviews. If 1-star reviews are excluded from the calculation, the published rating is misleading under the Act.

3.5 Fake Review Facilitation

Commissioning, purchasing, or incentivising reviews that do not reflect genuine customer experiences. This includes offering discounts, prizes, or other inducements in exchange for positive reviews.

4. The Compliance Test for Your Review Tool

The CMA applies a practical test: does your review management process give every customer — regardless of their likely sentiment — an equal and equally prominent opportunity to leave a public review?

The key question: If a customer clicks the "unhappy" option in your review flow, do they have the same visibility, the same number of clicks, and the same prominence of path to leave a public Google review as a customer who clicks the "happy" option? If not, you have a compliance problem.

5. 10-Point Compliance Checklist

Use this checklist to assess your current review management process against DMCCA requirements. If you cannot answer "yes" to every question, you should seek a compliance review.

- Does every customer receive the same review invitation, regardless of predicted sentiment?

- If your tool uses a happy/sad face or sentiment selector, does the unhappy path offer a public review option with equal prominence to the happy path?

- Are all genuine reviews — including 1-star reviews — published or passable to public platforms without filtering?

- Does your published star rating include all genuine reviews, not just selected ones?

- Do you avoid sending follow-up messages, reminders, or "nudges" specifically to customers who haven't yet left a positive review?

- Do you avoid offering any incentive (discount, prize draw, voucher) in exchange for reviews?

- Can you demonstrate that your review tool does not use an algorithm to predict sentiment and route customers accordingly?

- Do you have documented legal sign-off on your review tool's compliance with the DMCCA?

- Can you produce an audit trail showing that your review process treats all customers equally?

- Have you reviewed your manufacturer or franchise review obligations against DMCCA requirements?

6. What Fines and Penalties Apply?

Penalty	Detail
Maximum fine	Up to 10% of global annual turnover
Enforcement route	CMA can impose fines directly — no court case required
Personal liability	Directors can be held personally liable if they consented to or connived in the breach
Reputational damage	CMA investigations are public. Being named in an investigation damages trust with customers, manufacturers, and lenders
Manufacturer impact	Franchise agreements increasingly require compliance with consumer protection laws. A DMCCA breach could trigger manufacturer review

7. What You Should Do This Week

Step 1: Audit your current review tool

Walk through your own review process as if you were an unhappy customer. Click the sad face. Count the clicks to reach a public Google review. Compare that journey to the happy customer path. If they are not identical in prominence and accessibility, flag this immediately.

Step 2: Ask your provider for documentation

Request documented legal sign-off from your current review management provider confirming that their platform complies with the DMCCA fake review provisions. If they cannot provide it, that should tell you something about their confidence in their own compliance.

Step 3: Brief your board

The CMA investigation of Autotrader and Feefo is now a board-level issue for every dealer group that uses those platforms or any platform with similar mechanics. Prepare a one-page briefing note for your board or compliance committee outlining your current exposure and next steps.

Step 4: Consider a compliance review

DOXA offers a free, no-obligation compliance audit for any UK dealer group. We will walk through your current review management process, identify any areas of DMCCA exposure, and show you how a compliant workflow operates. If you are compliant with your current tool, we will tell you.

DOXA's compliance position: Taylor Wessing LLP reviewed the DOXA platform against the DMCCA fake review provisions in December 2025 and confirmed it to be fully compliant. DOXA's workflow presents every customer with equal-prominence options — public review or private contact — with no sentiment routing, no follow-up chasing, and no suppression of negative reviews.

8. How DOXA Is Designed Differently

DOXA's review workflow is architecturally designed to pass the CMA's compliance tests:

Practice	Autotrader/Feefo (Alleged)	DOXA
Sentiment routing	1-star reviews not published	No routing — customer chooses

Follow-up chasing	Unknown	One message per transaction only
Sad-face path	Under investigation	Equal prominence: public review or private contact
Star rating integrity	Excluded negative reviews from ratings	DOXA does not publish or curate ratings
Legal sign-off	Not publicly confirmed	Taylor Wessing LLP — December 2025

9. Get a Free Compliance Audit

Contact DOXA for a free, no-obligation compliance review of your current review management process. We will identify any areas of DMCCA exposure and provide a clear recommendation — whether that involves DOXA or not.

Email: sales@doxa.co

Phone: +353 1 908 1570

Web: doxa.co/compliance

DOXA | Pixxnow Limited | doxa.co | Sandyford, Dublin | Fort Dunlop, Birmingham

This guide is provided for informational purposes and does not constitute legal advice. Dealer groups should seek independent legal counsel for specific compliance questions.