



**Pubs Code
Adjudicator**

Annual Report & Accounts

2024–2025

(For the period 01 April 2024 to 31 March 2025)





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Presented to Parliament pursuant to Section 62 of the
Small Business, Enterprise and Employment Act 2015.

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Performance Report



Overview

This section of the report explains the role and purpose of the Pubs Code Adjudicator (PCA). The Performance Analysis sets out how the PCA has performed during the year against its statutory reporting requirements along with other key activities. The main risks to the achievement of the PCA's objectives and the adoption of the going concern basis are set out in the Governance Statement.

Foreword by Fiona Dickie, Pubs Code Adjudicator



This year has seen the pubs sector continue to adapt to a changing trading environment, with ongoing pressures and opportunities shaping the way business and tenants operate. As we approach the end of the PCA's three-year strategy, I am pleased to reflect on the progress made in delivering our objectives and supporting fair, transparent relationships between pub companies and their tied tenants.

We want tied tenants to understand and use their Pubs Code rights, and to promote awareness of those rights to the wider industry, so I am delighted that this year we developed and launched our new website and refreshed our branding to make information about the Pubs Code and the PCA more accessible and engaging. Our digital transformation has also included the implementation of our new case management system in June 2024, which gives us additional capability to report on and analyse data to inform our regulatory work.

Stakeholder engagement has remained central to our approach, with increased direct engagement with tenants and the continuation of regular meetings with the CEOs and Code Compliance Officers (CCOs) to drive senior level ownership of Code compliance within pub companies. On the ground engagement helps inform us about the day-to-day experiences of tied pub tenants and identify areas for improvement. This year we worked closely with pub companies to agree new voluntary minimum standards for tied tenants on short agreements, who are not covered by full Code rights. This agreement represents an important step forward in agreeing common standards in good business practice and providing consistency in approaches for all tenants of the regulated pub companies in this important area.

As well as supporting good practice, the PCA continued to focus on ensuring pub companies meet expected standards through targeted interventions to promote compliance. For example, in the reporting year, we engaged with all pub companies to reinforce the requirement that tied tenants must be given the opportunity to price match their premises insurance against comparable policies available on the open market, supporting competitive rates and informed decision-making. The PCA also intervened during the year to uphold fairness and transparency following an arbitration where a tenant was ordered to pay costs, but the pub company had failed to disclose relevant Pubs Code breaches. This resulted in the pub company reimbursing the tenant's costs.

The PCA's annual tenant survey provides valuable insights, reaching over 1,200 tenants or 15% of those tied to regulated pub companies. I am pleased that the survey shows a sustained improvement in tenant awareness of their CCO – increasing from 25% in 2023 to 39% in 2024 to 46% in 2025 following discussions with pub companies and sustained efforts on the part of pub company CCOs. While tenant satisfaction remains stable overall, there are significant differences between pub companies. Star Pubs' tenant satisfaction scores have risen



significantly from 55% in 2023 to 63% in 2024 to 70% in 2025, placing them close to the top performers, Admiral (79%), Greene King (78%) and Marston's (72%). This demonstrates that effective improvements in tenant experience and confidence can be made, and I look forward to continuing to see how a focus on tenant experience and the sharing of good practice can bring and improvements in tenant satisfaction across the regulated sector.

The pubs trade is a dynamic sector offering a growing range of agreements to operators. In March 2025, the PCA published a statement clarifying that it does not currently require compliance in respect of certain innovative (non-franchise) "hybrid" agreements, where no rent is charged, and which may fall within the definition of a tied pub for the purposes of the Pubs Code. The PCA invited stakeholders to submit any evidence of harms of these agreements to help inform ongoing review.

The Chartered Institute of Arbitrators (Ciarb) continued as the sole provider of the PCA's arbitration management service during the 2024-25 year. All cases were resolved in good time, in line with our published performance measures and the PCA improved its performance in relation to the timely appointment of arbitrators. With arbitration referrals remaining at low levels, and with the end of the Ciarb contract the PCA is now preparing to bring arbitration services back in-house to ensure ongoing value for money. In addition, the PCA has since the end of the reporting period consulted on whether simplified arbitration rules may make arbitration services more accessible for tenants and will be looking carefully at stakeholder views about access to arbitration services.

As a regulator funded by an industry levy, we remain acutely mindful of the need for proportionate costs. The overall levy has reduced year-on-year between 2023 and 2025, with unspent monies returned to pub companies annually.

The appointment of the Scottish PCA in June 2024 and the subsequent introduction of the Scottish Pubs Code in March 2025 marks an important development for the sector. Recognising the significant differences between the two Codes, I have engaged with my Scottish counterpart to maintain awareness, share learning and where possible, consider opportunities for reducing reporting burden on those pub companies regulated under both.

During the summer of 2025, the PCA will be developing and consulting on a new two-year strategy, informed by stakeholder feedback. We remain committed to effective, proportionate regulation and continuous improvement, and I look forward to continuing to work with all stakeholders to uphold the important principles of the Pubs Code, ensuring fairness for tied pub tenants.



Fiona Dickie
Pubs Code Adjudicator

15 December 2025



Purpose and activities of the PCA

1. The Pubs Code

The Pubs Code regulates the relationship between all pub-owning businesses with 500 or more tied pubs in England and Wales and their tied pub tenants – of which on 31 December 2024 there were 8,323 (2023:8,046).

Pub companies/pub-owning business

A pub-owning business or pub company as defined in s.69 of the 2015 Small Business, Enterprise and Employment Act 2015 (SBEE Act 2015), is a person or company who is the landlord of 500 or more tied pubs.

The six pub companies governed by the Pubs Code on 31 March 2025 were:



admiral
T A V E R N S



GREENE KING
BURY ST EDMUNDS



MARSTON'S



PUNCH
PUBS & CO



STAR
PUBS



Stonegate Group

Tied pub tenants

Tied tenants covered by the Pubs Code are those who are obliged to purchase some or all of their alcohol (beers, wines and spirits) from their landlord.

- (1) fair and lawful dealing by pub companies in relation to their tied tenants;
- (2) individual tied pub tenants should not be worse off than they would be if they were not subject to any product or service tie (the no worse off principle).

An important element of the 'no worse off' principle is the right for a tied tenant to request a Market Rent Only (MRO) option at certain points in their tenancy. Under an MRO tenancy a tenant pays only a commercial rent for the pub premises and is free to buy beer and other products and services on the open market.

The Pubs Code gives the tenant the right in certain circumstances to choose which of the options – tied or free of tie – is the right one for their business.

In addition to the MRO option, the Pubs Code provides for transparency in respect of the financial and other information about the tenancy that pub companies must provide to new and existing tenants so that they can negotiate meaningfully.

Specifically, the Pubs Code prescribes the form and content of the tied rent proposals that must be provided to new tenants. It also prescribes the form and content of the rent assessment



proposals that must be provided to existing tenants as part of their regular rent reviews under the tenancy. In all cases, these must include a forecast profit and loss statement for the pub in question. The Pubs Code further specifies that a tenant can request a rent assessment in particular circumstances, including in connection with their rent review where no assessment has been concluded within a five-year period ensuring an assessment of rent can take place every five years.

The Pubs Code framework includes further provisions governing the compliance obligations of the pub company. These include appointing a CCO; the submission to the PCA of an annual Compliance Report; the training of their staff who have business dealings with tenants; and the duties and responsibilities of their Business Development Managers (BDMs). Among the other obligations on pub companies are the duty not to require a tied pub tenant to purchase or rent gaming machines in its new tenancies or renewals; requirements in relation to premises insurance; the use to which pub companies may put evidence gained from flow monitoring equipment and circumstances in which terms in a tenancy will be deemed void or unenforceable.

The Pubs Code also sets out the nature and duration of the Pubs Code protections that a tied tenant will continue to enjoy if their tenancy ceases to be held by a pub company with more than 500 tied tenants; and the circumstances in which certain types of agreement by which the tenant occupies and operates the pub will be exempt from the Pubs Code.

Further information on Pubs Code provisions can be found in our [factsheets](#).

2. The PCA

Fiona Dickie was appointed as the independent, statutory PCA in England and Wales on 03 May 2020 for four years. Fiona was reappointed to the role for a further three-year term from 03 May 2024.

The Adjudicator is a Ministerial appointment and a corporation sole. The statutory office of the Adjudicator was created by section 41 of the SBEE Act 2015, which places statutory, financial and reporting obligations on the holder of the office. Fiona Dickie was the Deputy Pubs Code Adjudicator in England and Wales prior to her appointment as the PCA.

The registered office for the PCA is:

4th Floor,
23 Stephenson Street,
Birmingham
B2 4BJ.

The PCA is responsible for enforcing compliance with the statutory Pubs Code. The PCA has powers to provide advice and guidance on the Pubs Code and the regulatory framework; to require pub companies to provide information on their compliance with the Pubs Code and on the management of their tied pub estates covered by the Pubs Code; and to monitor the day-to-day operation of the Pubs Code.

The Adjudicator has a statutory duty either to arbitrate disputes between tied tenants and their pub company under the Pubs Code framework that are referred to the PCA or to appoint an



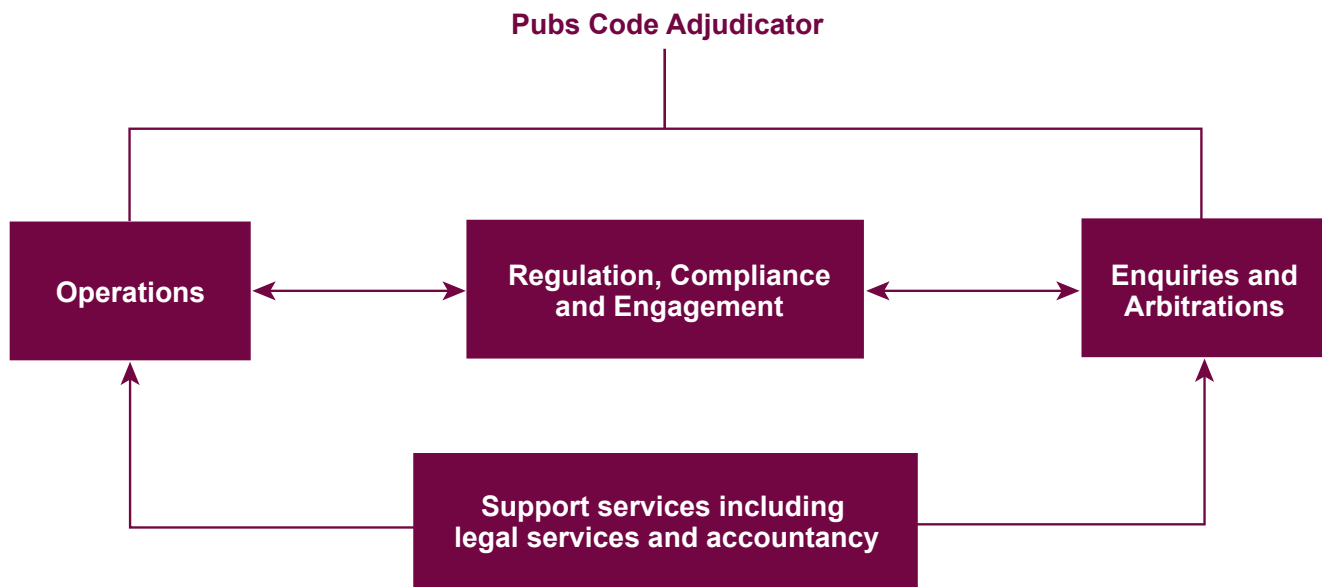
alternative arbitrator to do so. In December 2021, the PCA contracted with the Chartered Institute of Arbitrators (Ciarb) to manage its arbitration service (see page 22).

The PCA has statutory powers to investigate, where the Adjudicator has reasonable grounds to suspect that there have been breaches of the Pubs Code (or where a pub company has failed to follow a recommendation made by the PCA following a previous investigation); and subsequently to take the enforcement action the PCA considers necessary in the event that a breach is found.

The PCA has a statutory duty to report to the Secretary of State on any practices by pub companies that the Adjudicator believes meets the test for an unfair business practice set out in section 71A of the SBEE Act 2015.

3. The office of the PCA (OPCA)

Throughout the reporting year the office of the PCA adopted the following operational structure, reflecting the delivery of its key statutory functions.



Throughout 2024-25, the senior management comprised of the PCA, two Grade 6 Directors, one with responsibility for Business Management and Development and the other for Regulatory Policy and Engagement. In June 2024, the Director of Regulatory Policy and Engagement went on maternity leave, so a 12-month Expression of Interest recruitment exercise was successfully completed and an appointment offered from mid-August 2024 until mid-August 2025. A G6 Head of Legal was recruited in December and took up post on the last day of the reporting year.

4. PCA Risks and Issues

The PCA Risk and Audit Committee (see Governance Statement, page 52) is responsible for identifying, monitoring and mitigating issues and risks associated with the operation and administration of the office of the PCA and the exercise of the PCA's statutory functions. As a small regulator, the PCA has a proportionate approach to considering risk. As well as Risk and



Audit Committee oversight and challenge, including a themed approach to risk reviews, key risk controls are:

- Maintaining a risk register, reviewed monthly at PCA Management Board meetings, and subject to external scrutiny at quarterly Risk & Audit Committee meetings. Risks are owned and reviewed at Grade 6 between Management Board meetings. Risk discussions are focused on what is being done and what should be done to address / mitigate risk, rather than maintaining a risk register for its own sake.
- Six-monthly horizon-scanning workshops. These aim to identify key external factors which could impact on the PCA's work. A PESTLE analysis is carried out and reviewed to challenge us to think widely (PESTLE: Political, Economic, Social/cultural, Technological, Legal, Environmental). Again, the focus is on what the team should be doing/how we should be engaging in order to address any upcoming risk areas. This horizon-scanning feeds into the risk register as appropriate.

Key strategic risks during this reporting period were:

Operational capacity and access to specialist support

As a 'micro' regulator, the PCA relies heavily on support from the Department for Business and Trade and central government functions, particularly in relation to specialist areas such as procurement, digital, accounting and HR. Delays in receiving advice from the central government teams, who are focused on providing support to very large government departments, or guidance not being relevant to the PCA as a 'micro' organisation, can hinder the PCA's ability to make progress on procurement, digital, accounting and HR matters. The PCA welcomes that this risk was highlighted in a recent NAO report 'Accountability in small government bodies' (June 2025).

Operational IT system security and data migration

The security of all PCA data is paramount. Breaches of data protection or information security could hamper the PCA's ability to effectively regulate or result in reputational harm or legal action. The PCA successfully completed the secure migration of data into a new case management system by the end of March 2023. The new case management system, iCasework, went live in several phases from June 2024.

New website development and delivery and ongoing maintenance

The PCA does not have in-house IT specialists and so procured and managed the development of a new PCA website with an external supplier. The scale of this project took significant resource to meet its aim of providing more engaging and accessible information to tied pub tenants and the wider industry. The new website went live in March 2025, meeting quality expectations, with new content created and key documents successfully migrated.



Operational Resilience

The key strategic issue for the PCA during this and previous reporting periods was staffing and operational resilience. Continuity of resourcing continues to be the top strategic issue for the PCA. Attracting and maintaining a core seconded staff at the PCA with the skills and experience required for a small regulator remains an ongoing risk. Recruitment has remained a challenge, with key specialist skills continuing to be procured where required.

PCA Risk Appetite Statement

In addition to the above controls, work is being carried out to drive a more evidence-informed and risk-based approach to regulation. As part of this work, the PCA reached out to other regulators who are members of the Institute of Regulation's Risk Special Interest Group, as well as the DBT. We have also reviewed the Orange Book – Management of Risk, Principles and Concepts (2019). While it appears that not all regulators have risk appetite statements, others have highly developed approaches.

In reviewing the approaches taken by other regulators, DBT and central government guidance, the PCA has developed a proportionate approach, consistent with its level of resourcing and regulatory scope. The development of our risk appetite statement has been informed by discussions with the team and was approved by the PCA's Management Board and Risk and Audit Committee.

For the PCA, the aims of setting a corporate risk appetite across key areas are:

- To support the PCA in targeting its resources where it is most needed and reducing effort in areas where it is not.
- To provide a consistent view of risk, agreed at Management Board level, that can be applied by PCA staff.

The wider benefits of adopting a risk appetite can include:

- Supporting informed decision-making
- Reducing uncertainty for staff responding to a range of scenarios
- Improving consistency across governance mechanisms and decision-making
- Supporting business performance improvement
- Focusing on priority areas within an organisation
- Informing spending and resource prioritisation processes.



In order for a risk appetite statement to be effective, risk areas must be prioritised effectively and maturely, with a clear-eyed view on where risks may be more tolerable than others. The PCA determined the following areas of principal risk, which align to the PCA's scope:

- a) Governance
- b) Strategy
- c) Regulatory compliance
- d) Enforcement
- e) Legal
- f) Financial sustainability
- g) People
- h) Technology
- i) IT and information security
- j) Reputational/communication
- k) Health, safety and wellbeing



Appetite	Description
Averse	Avoidance of risk and uncertainty in achievement of deliverables or initiatives is the key objective. Activities undertaken will only be those considered to carry virtually no inherent risk.
Minimalist	Preference for very safe business delivery options that have a low degree of inherent risk with the potential for benefit/return not a key driver. Activities will only be undertaken where they have a low degree of inherent risk.
Cautious	Preference for safe options that have low degree of inherent risk and only limited potential for benefit. Willing to tolerate a degree of risk in selecting which activities to undertake to achieve key deliverables or initiatives, where we have identified scope to achieve significant benefit and/or realise an opportunity. Activities undertaken may carry a high degree of inherent risk that is deemed controllable to a large extent.
Open	Willing to consider all options and choose one most likely to result in successful delivery while providing an acceptable level of benefit. Seek to achieve a balance between a high likelihood of successful delivery and a high degree of benefit and value for money. Activities themselves may potentially carry, or contribute to, a high degree of residual risk.
Eager	Eager to be innovative and to choose options based on maximising opportunities and potential higher benefit even if those activities carry a very high residual risk.



5. Going concern

The PCA is a statutory body with ongoing duties and powers and with facilities for funding. The PCA is funded by a levy on the businesses it regulates. The levy can be imposed with Secretary of State consent. The PCA received consent and raised a total levy of £2,650,000 (2023-24 £2,969,507) on the six pub companies for the 2024-2025 financial year. In July 2025, the PCA received consent to raise a total levy of £2,640,000 on the six pub companies for the 2025 – 2026 financial year.

Fiona Dickie was reappointed to the role of Pubs Code Adjudicator for a further three-year term from 03 May 2024 until 02 May 2027.

The government's third statutory review on the operation of the Pubs Code ('the Code') and the Pubs Code Adjudicator (PCA)'s performance over the 3-year period from 1 April 2022 to 31 March 2025, was open from 22 May 2025 until 14 August 2025. The first post-implementation review of the Pubs Code ran simultaneously. At the beginning of December 2025, the PCA had not received the final report.

As such the accounts have been prepared on a going concern basis.



The Pubs Code Adjudicator: Performance Report

Strategic Objectives and Performance Analysis

6. PCA's progress against Strategic Priorities 1–8

In 2022, the PCA launched its first three-year strategy, 'Rebalancing the Tied Pubs Trade', informed by a review and listening process with key sector stakeholders. The eight strategic objectives, set out below, underpinned the PCA's approach to regulation and delivery during the 2024-25 reporting year.

This section sets out progress against each objective and the impact of our work during the reporting period. The three-year strategy period continues beyond the reporting year and is due to complete during late 2025. A new strategy for 2025-27 is currently being developed. The PCA made substantial progress against our eight strategic objectives in 2024-25, delivering improvements in transparency, information provision and industry engagement. The period saw the successful launch of a new independent website, enhanced casework and reporting tools, and the voluntary agreement of new good practice by POBs in line with our commitment to minimising regulatory burden. Challenges to tenant satisfaction remain in areas such as repairs and dilapidations, and our work in this area is ongoing. Our outputs also reflected the evolving landscape of agreement types and innovation in the provision of information to tenants.

- 1. Solid Foundations:** Building relationships with key cross-sector stakeholders to discuss strategic priorities.
- 2. Active Listening:** Develop a two-way communication flow around what tied pub tenants and pub companies need and how we can support them.
- 3. Effective Signposting:** How we signpost and support tied pub tenants if they have issues during their journey.
- 4. Clear Parameters:** Clarifying the role and scope of the PCA and Pubs Code in serving tied pub tenants across their journey.
- 5. Great Expectations:** Plotting clearer regulatory approaches.
- 6. Arbitration Excellence and Beyond:** Developing continuous learning and development provision for arbitrators and other sector specialists.
- 7. Joining the Dots:** Developing more sophisticated processes for how we manage intelligence.
- 8. Internal Development:** Investment in people and processes to ensure high quality service provision for tied pub tenants and pub companies.



PCA Strategy

Strategic Priorities for the next 1 to 3 years

Key:

TPT = tied pub tenant

POB = pub-owning business

Short-term (3 - 6 months)

Medium-term (6 - 18 months)

Long-term (18 - 36 months)

1. SOLID FOUNDATIONS

Building relationships with key cross-sector stakeholders to discuss strategic priorities.

Regular meetings

Regular meetings with senior stakeholders, to discuss key issues and challenges, build trust and promote a compliance culture.

Round table discussions

Engagement cross-sector through round table exercises to discuss strategic priorities, deepen Code and wider legislative understanding, to build working relationships cross sector.

Strategic partnering

Partner cross-sector to develop new ways to solve strategic issues affecting the tied tenant relationship including by developing the effectiveness of the Code.

2. ACTIVE LISTENING

Develop a two-way communication flow around what TPTs and POBs need and how we can support them.

Clear priorities

Use survey, consultation and other sector information to clearly identify priority areas to better support user needs.

Annual survey

Conduct Tenant survey to gather feedback on what is working well and where we and others can do better to support them.

Partnering

Identify areas where working in partnership can deliver cross industry development of Code based strategies to support resolution of key cross-sector issues affecting TPTs.

3. EFFECTIVE SIGNPOSTING

How we signpost and support TPTs if they have issues during their journey.

First contact response

To best support TPTs, more clearly outline in common communications the role of the PCA and identify where the CCOs or other organisations can help.

Clear code steps

Develop the Code story so that TPTs understand the key points in the business relationship where Pubs Code rights arise, and how and where to get support.

Quality care

Work hand-in-hand with key stakeholders to develop key processes, standards and understanding so TPTs can access high quality information and support.

4. CLEAR PARAMETERS

Clarifying the role and scope of the PCA and Pubs Code in serving TPTs across their journey.

Clarify PCA role & scope of the Code

Communicate information in easily digestible ways, for example, through bitesize information, videos, journey maps, tenant stories.

Communicate clear parameters

Via website, tenant info packs and other government or trade body materials & communications – review and reclarify if necessary. Be open and clear about PCA activities and progress.

Developing online presence

Identify and develop, within resource parameters, how we can best present TPT rights and the work we do.



	Short-term (3 - 6 months)	Medium-term (6 - 18 months)	Long-term (18 - 36 months)
5. GREAT EXPECTATIONS Plotting clearer regulatory approaches.	Day-to-day Manage expectations of TPTs and POBs through setting clearer understanding on PCA's approach to regulatory issues.	Continual development Monitor and show where POBs are demonstrating proactive compliance and enable continual Code development.	Collaboration on best practice Consider strategic collaboration processes to identify and share best practice, using the Code to support improvements and raise standards.
6. ARBITRATION EXCELLENCE & BEYOND Developing continuous learning & development provision for arbitrators and other sector specialists.	Arbitrator skills building Partner with CI Arb and arbitrators to develop & implement more targeted training and assessment for arbitrators to deliver a group of knowledgeable and competent specialist arbitrators on statutory arbitration.	Review & refresh Review the training and ensure the provision of specialist quality arbitrators to enable continuous improvement and up-to-date knowledge of specialist arbitrators; support Government in any changes to arbitration rules to provide swift, consistent statutory arbitration.	Wider specialist support Consider and adopt development opportunities, including training for other industry specialists to support industry knowledge.
7. JOINING THE DOTS Developing more sophisticated processes for how we manage intelligence.	Day-to-day When listening to stakeholders raising issues, offer information and guidance as appropriate; seek to understand industry context and be clear on prioritisation.	Developing processes Develop more strategic intelligence gathering and processing, in line with resources, to improve analysis and understanding.	Preventative measures Clarify information POBs can pro-actively share with the PCA & tenants to pre-empt matters before they escalate and how the PCA will view that so that lines of communication are clear and constructive.
8. INTERNAL DEVELOPMENT Investment in People and Processes to ensure high quality service provision for TPTs and POBs.	Investment in people Develop our people to provide the best possible service to TPTs and POBs through learning and development and targeted training.	Investment in processes Review operations to identify what we should stop, start, and continue. Structure team accordingly to ensure everyone has clear roles, responsibilities to enable them to operate as a team.	IT and web presence Continue to develop cost-effective systems and web presence to support delivery of a high-quality service.



Priority 1 Solid Foundations

Key: TPT = tied pub tenant POB = pub-owning business	Short-term (3 - 6 months)	Medium-term (6 - 18 months)	Long-term (18 - 36 months)
1. SOLID FOUNDATIONS Building relationships with key cross-sector stakeholders to discuss strategic priorities.	Regular meetings Regular meetings with senior stakeholders, to discuss key issues and challenges, build trust and promote a compliance culture.	Round table discussions Engagement cross-sector through round table exercises to discuss strategic priorities, deepen Code and wider legislative understanding, to build working relationships cross sector.	Strategic partnering Partner cross-sector to develop new ways to solve strategic issues affecting the tied tenant relationship including by developing the effectiveness of the Code.

In the final year of the strategy, the PCA continued to deepen and develop our engagement with sector stakeholders, including tenant groups, POBs and wider industry stakeholders.

Regular six-monthly meetings with POB CEOs continued to drive and support senior-level ownership of Code compliance within them. During the year we held regular round tables with CCOs to share good practice, consider common challenges and support mutual learning between POBs. These round tables provided opportunities for discussion of issues flagged to us by tenants and tenant groups or identified through the PCA's annual survey, such as the provision of accessible statutory Pubs Code information, the experiences of tenants on short agreements, and the role of the CCO in improving tenant understanding of the Code.

Notably, as a result of this engagement, in early 2025 regulated POBs worked together with the PCA to voluntarily agree minimum standards when dealing with tied tenants on short agreements, for whom most Pubs Code rights do not apply. POBs committed to exceed their limited statutory duties and provide additional information to those entering short agreements, including about Pubs Code rights, the PCA, professional advice, complaints procedures and the role of the CCO. Consistent with the Pubs Code rights of those taking on substantive agreements, POBs committed to the provision of notes of conversations about rent, repairs and business planning, and to consistently provide advice in writing in advance of short agreements that tenants should not invest their own capital into the pub and the risks and implications if they do. Where these approaches reflected existing business practices, agreement to common standards nevertheless provides important clarity and consistency to those entering into a short agreement on what they can expect from their pub company in addition to what the Pubs Code requires. The agreed minimum standards for tenants on short agreements were published in March 2025.

The PCA also strengthened its engagement with professional advisors, who are key to ensuring tenants are set up for success and can also support tenants' awareness of their rights under the Pubs Code. All regulated POBs provide membership of the BII to tied tenants and those negotiating to take on a tied pub. This enables all tenants to access the BII's Accredited Advisors network of independent professional advisors (accountants, surveyors and solicitors). Through 2024, the PCA developed relationships with the Chairs of the panels of accredited advisors for each of the three professions, providing training and information on the Code.



Priority 2 Active Listening

Key: TPT = tied pub tenant POB = pub-owning business	Short-term (3 - 6 months)	Medium-term (6 - 18 months)	Long-term (18 - 36 months)
2. ACTIVE LISTENING Develop a two-way communication flow around what TPTs and POBs need and how we can support them.	Clear priorities Use survey, consultation and other sector information to clearly identify priority areas to better support user needs.	Annual survey Conduct Tenant survey to gather feedback on what is working well and where we and others can do better to support them.	Partnering Identify areas where working in partnership can deliver cross industry development of Code based strategies to support resolution of key cross-sector issues affecting TPTs.

During the 2024-25 financial year, the PCA engaged with tenants and tenant groups by taking part in a range of sector events and dedicated forums. This included industry events such as the Northern Restaurant & Bar Show, the National Pubwatch Conference, and the Publican Awards, providing opportunities for direct discussion of issues relevant to tenants and their experience of Pubs Code rights. In September 2024, the PCA worked with tenant groups on two roundtables designed for tied tenants, focusing on topics such as fairness, transparency, and Code compliance. The PCA also attended a number of publican and supplier-focused events to understand tenant issues or concerns and met publicans directly via engagement with the Society of Independent Brewers (SIBA). Such engagements enabled the PCA to gather feedback in a variety of settings, supporting a more informed regulatory approach.

In addition to direct engagement, the PCA’s 2025 annual Tied Tenant Survey reached over 1,200 tenants (15% of the regulated estate), providing robust data on the tied tenant experience. This feedback enables the PCA to understand what is working well and where we and others can do more to support tenants. Further details about this year’s tenant survey results are provided on pages 36 of this report.



Improving information for new tenants

The PCA has continued to work with POBs to encourage and understand improvements in the new tenant experience, including engaging with them on improvements to the accessibility of the wide range of Code information they must provide to new tenants. A review of updates from POBs in 2025 suggests that key improvements made to the provision of new tenant information include:

- a) Streamlining and adapting recruitment information to suit the digital age
- b) Provision of clearer, bite-sized information to applicants, such as accessible online guides and visuals
- c) Moving new tenant information to digital platforms, such as websites and mobile apps
- d) Improving recruitment and induction information for new tenants such as moving some information online or holding real life events with new tenants
- e) Ensuring more regular reviews of sustainable business plans throughout tenancies
- f) Improving staff training in relation to new tenant information
- g) Improving the visibility of the BDM and CCO within pub companies to ensure tenants know who to contact and why, with videos of CCOs and regular tenant newsletters highlighting important Code rights or information from the regulator.

The PCA is encouraged that a number of the pub companies are planning to make further significant improvements in how statutory new tenant information is provided, particularly in the development of new technologies to support digital tenant journeys and continues to encourage innovation and improvement in this area.



Priority 3 Effective Signposting

Key: TPT = tied pub tenant POB = pub-owning business	Short-term (3 - 6 months)	Medium-term (6 - 18 months)	Long-term (18 - 36 months)
3. EFFECTIVE SIGNPOSTING How we signpost and support TPTs if they have issues during their journey.	First contact response To best support TPTs, more clearly outline in common communications the role of the PCA and identify where the CCOs or other organisations can help.	Clear code steps Develop the Code story so that TPTs understand the key points in the business relationship where Pubs Code rights arise, and how and where to get support.	Quality care Work hand-in-hand with key stakeholders to develop key processes, standards and understanding so TPTs can access high quality information and support.

To support signposting of advice and information to tenants, during the reporting year, the PCA increased its focus on online publications and social media to reach wider audiences and improve tenant awareness of Code rights.

The PCA maintained an active presence on LinkedIn, X (formerly Twitter) and Facebook, using these platforms to share regulatory updates, factsheets, arbitration data, and case studies. Posts were tailored to highlight both good and practice in the industry and effective regulatory interventions, and included graphics with bitesize statistics, commentary on industry news, and profiles of key figures such as CCOs and BDMS. The PCA’s approach to social media was informed by platform-specific audience insights: for example, image posts and polls performed well on LinkedIn, while video content and user-generated material were prioritised across platforms including YouTube.

The PCA also published thought-leadership articles and blogs, including interviews and commentary pieces, on both its own website and within the Morning Advertiser (the magazine for the pub trade) to promote knowledge of Code rights.

In March 2025, following extensive development and testing, the PCA launched a new independent website. This was initiated so that the PCA could sufficiently demonstrate it’s independence and the separation of its powers from government and provide the opportunity to develop a website which was easier for tied pub tenants to access. As part of the refreshed content, the PCA revised signposting information for:

- [tenants seeking advice from professional advisers](#) (e.g. BII Accredited Advisers)
- [professional advisers seeking information about the Pubs Code](#) (e.g. setting out when the Code requires tenants to be informed to seek professional advice)
- tenants seeking wider sources of support (e.g. Licensed Trade Charity and UK Hospitality).

To coincide with the launch, the PCA introduced new branding designed to promote recognition of the Pubs Code and the PCA. The branding uses a shield icon alongside classic pub iconography, including pint glasses and pumps, with beer and wine reflected in the colour palette.



Priority 4 Clear Parameters

Key:

TPT = tied pub tenant

POB = pub-owning business

Short-term
(3 - 6 months)

Medium-term
(6 - 18 months)

Long-term
(18 - 36 months)

4. CLEAR PARAMETERS

Clarifying the role
and scope of the
PCA and Pubs Code
in serving TPTs across
their journey.

Clarify PCA role & scope of the Code

Communicate
information in easily
digestible ways, for
example, through
bitesize information,
videos, journey maps,
tenant stories.

Communicate clear parameters

Via website, tenant
info packs and other
government or trade body
materials & communications
– review and reclarify if
necessary. Be open and
clear about PCA activities
and progress.

Developing online presence

Identify and develop,
within resource
parameters, how we can
best present TPT rights
and the work we do.

The new PCA website was a significant step forward in delivering clear and accessible information about the Pubs Code to tenants, those working within pub companies and the wider pubs industry. This increased transparency will further the PCA's objective to promote understanding of Pubs Code arbitration as information is easier to find and clearly demonstrates to tenants how the PCA responds to breaches of the Pubs Code.

The new website is more user friendly with a clear, intuitive layout for smoother user flow and an improved search functionality to help visitors find information more easily. Bite-sized content was created, including short videos to introduce key areas. As part of the development process, the PCA's twenty factsheets were also reviewed and updated for clarity and accessibility, with site layout and graphics designed to guide tenants through Code rights at key points in their tenancy. Content was optimised for desktop, tablet and mobile.

The pubs trade is an innovative industry and there are a developing variety of agreements available in the market to operators who wish to partner with a pub company in their business. To provide clarity to the industry, in March 2025 the PCA published a [statement](#) on innovative agreement types. This addressed the status of certain types of profit or turnover share agreements which may have increased in popularity in the market since the introduction of the Pubs Code. The PCA advised that it does not at present consider it appropriate to require compliance in respect of any of these types of agreements which may fall under the Pubs Code and will not be taking action to regulate them. The PCA will continue to keep matters under review. This does not affect the ongoing regulation of Pubs Code franchise agreements.

The PCA also responded to the Law Commission's consultation on Part 2 the 1954 Landlord and Tenant Act, [Business tenancies: the right to renew](#). This highlighted that the Pubs Code was designed to work alongside rights provided in the 1954 Act, particularly in relation to the right to request a Market Rent Only option. We recommended that any proposed changes should be carefully assessed for their impact on the operation of the Pubs Code considering the unique nature of the tied pub sector.



Priority 5 Great Expectations

Key: TPT = tied pub tenant POB = pub-owning business	Short-term (3 - 6 months)	Medium-term (6 - 18 months)	Long-term (18 - 36 months)
5. GREAT EXPECTATIONS Plotting clearer regulatory approaches.	Day-to-day Manage expectations of TPTs and POBs through setting clearer understanding on PCA’s approach to regulatory issues.	Continual development Monitor and show where POBs are demonstrating proactive compliance and enable continual Code development.	Collaboration on best practice Consider strategic collaboration processes to identify and share best practice, using the Code to support improvements and raise standards.

In addition to our work promoting good practice, set out above, the PCA continues to focus on ensuring that pub companies meet the standards required of them under the Pubs Code. This includes targeted interventions with pub companies to uphold compliance and fairness in line with Code principles.

During the previous reporting period, the PCA formally concluded monitoring related to enforcement action taken in relation to unreasonable stocking terms in proposed Market Rent Only tenancies by Star Pubs. This resulted in Star Pubs implementing a series of reforms in response to the PCA’s binding recommendations, including the removal of non-compliant lease terms and the introduction of a Pubs Code Champions staff network and monthly ‘Compliance Cabinets’ to embed Code compliance into its management systems.

The PCA has been pleased to see the impact of these changes reflected in improved tenant experience during the reporting year. The PCA’s 2025 annual tied tenant survey demonstrated that satisfaction among Star Pubs tenants has increased significantly, rising by 15 percentage points over two years, from 55% in 2023 to 64% in 2024 to 70% in 2025. This reflects positively on Star’s work since the impact of regulatory intervention and the importance of pub companies meeting the expectations set out in the Code, demonstrating how effective improvements in tenant experience and confidence can be made.

The PCA has sought to improve pub company approaches to compliance by sharing learning from arbitrations and breaches consistently with all pub companies. This includes for example, being clear on expectations for all pub companies, following the PCA’s review into Star’s self-reported breaches of regulation 46(2) (premises insurance).

Following the conclusion of its review in the previous financial year into Star’s self-reported breaches of regulation 46(2) of the Pubs Code (relating to premises insurance), the PCA wrote to all pub companies in October 2024. This was to draw attention to Star’s actions and ask CCOs to make sure they were complying with the information requirements in regulation 46(2), including where they had self-insurance arrangements.

As the PCA’s 2024 annual Tied Tenant Survey showed that only 56% of tenants were aware of the right to price match, the PCA asked all pub companies to consider whether changes should



be made to their insurance communications with tied tenants to improve awareness of their rights and ensure the price match right under the Pubs Code is clearly explained.

In March 2025, the PCA took steps to clarify tenants' rights under regulation 46 (premises insurance) of the Pubs Code. The PCA wrote to all pub companies to reinforce the requirement that tied tenants must be given the opportunity to price match their premises insurance against comparable policies available on the open market. By issuing this communication, the PCA aimed to ensure that pub companies were fully compliant with their obligations and that tenants were empowered to make informed financial decisions.

During the reporting year, the PCA also intervened following an arbitration to uphold fairness and promote transparency in outcomes. In this instance, the tenant was ordered to pay £5,832 in arbitrator's costs under section 51(6) of the 2015 Act. However, Star Pubs had failed to notify the arbitrator and the tenant of relevant breaches of the Pubs Code during the arbitration process, which the PCA was reviewing at the time of the arbitration. Following PCA involvement, the costs were fully reimbursed to the tenant by Star Pubs. The PCA publishes Pubs Code Action Stories to help the industry understand Pubs Code issues and give a clear picture of the action the PCA has taken.

Priority 6 Arbitration Excellence and Beyond

Key: TPT = tied pub tenant POB = pub-owning business	Short-term (3 - 6 months)	Medium-term (6 - 18 months)	Long-term (18 - 36 months)
6. ARBITRATION EXCELLENCE & BEYOND Developing continuous learning & development provision for arbitrators and other sector specialists.	Arbitrator skills building Partner with CIARB and arbitrators to develop & implement more targeted training and assessment for arbitrators to deliver a group of knowledgeable and competent specialist arbitrators on statutory arbitration.	Review & refresh Review the training and ensure the provision of specialist quality arbitrators to enable continuous improvement and up-to-date knowledge of specialist arbitrators; support Government in any changes to arbitration rules to provide swift, consistent statutory arbitration.	Wider specialist support Consider and adopt development opportunities, including training for other industry specialists to support industry knowledge.

During the 2024–25 financial year, the PCA continued to deliver a reliable and efficient arbitration service under the Pubs Code. The Chartered Institute of Arbitrators (Ciarb) remained the sole provider of arbitration management services for the fourth consecutive year, operating under a procured contract. Ciarb recommend suitable arbitrators to the PCA, who exercises her statutory power to appoint an alternative arbitrator as required.

The PCA met all performance measures for the arbitration service, including an improvement in the timeliness of appointments: 90% of arbitrators were appointed within 20 working days of receiving all relevant information, compared to the previous benchmark of 25 days. The PCA and Ciarb worked together to maintain arbitration quality through ongoing recruitment, training, and monitoring processes, with arbitrators required to pass an assessment to demonstrate the necessary level of Pubs Code knowledge.



Arbitration referrals remained low, with ten cases submitted during the year, most of which related to Market Rent Only (MRO) disputes. This continued the trend of low referral numbers seen over recent years. This trend may reflect that cases are now more likely to be settled prior to arbitration, particularly given amendments to the Pubs Code supporting resolution of the MRO process with an extended period for negotiation. The PCA is considering approaches to arbitration and whether bespoke rules might be required. The PCA will consult later in the summer on any proposals.

The PCA intends to update the website further in 2025-26 by introducing a searchable arbitration database online, to improve visibility of arbitration outcomes and support tenant understanding.

The current contract with the Ciarb ended on 28 November 2025; and due to the continued low numbers of referrals for arbitration, the PCA brought management of the Arbitration Service in house from that date.

Priority 7 Joining the Dots

Key: TPT = tied pub tenant POB = pub-owning business	Short-term (3 - 6 months)	Medium-term (6 - 18 months)	Long-term (18 - 36 months)
7. JOINING THE DOTS Developing more sophisticated processes for how we manage intelligence.	Day-to-day When listening to stakeholders raising issues, offer information and guidance as appropriate; seek to understand industry context and be clear on prioritisation.	Developing processes Develop more strategic intelligence gathering and processing, in line with resources, to improve analysis and understanding.	Preventative measures Clarify information POBs can pro-actively share with the PCA & tenants to pre-empt matters before they escalate and how the PCA will view that so that lines of communication are clear and constructive.

The PCA’s priorities and activities are guided by information and insights gathered from different sources. These include the tied tenant survey, enquiries, arbitrations, engagement with stakeholders, self-reported Code breaches and the POB’s annual compliance reports. This information is reviewed and analysed to inform the PCA’s regulatory activities, such as those described in the sections above. The PCA’s bi-annual meetings with pub company CEOs/Senior Leaders and regular engagement with CCOs are informed by the PCA’s analysis.

Throughout the 2024–25 financial year, the PCA continued to develop and launch various new case types for its iCasework case management system, in advancing the PCA’s ability to track and report casework and trends. The first applications in the new system went live in June 2024 with all data having been successfully migrated from the previous system. The PCA’s IT transition process was recognised as good practice in the research report [‘Digital change in UK regulation: Learning from the front line’](#) (Objective, March 2025), which highlighted the effective managing of procurement and implementation of a new case management system as a micro-regulator, with high levels of staff engagement and smooth implementation.



The PCA reviewed and updated its breach reporting process during the reporting period, including its template forms and internal guidance, supporting effective and consistent decision-making and clarity in communications with POBs about the PCA’s response, expectations and next steps.

Priority 8 Internal development

Key: TPT = tied pub tenant POB = pub-owning business	Short-term (3 - 6 months)	Medium-term (6 - 18 months)	Long-term (18 - 36 months)
8. INTERNAL DEVELOPMENT Investment in People and Processes to ensure high quality service provision for TPTs and POBs.	Investment in people Develop our people to provide the best possible service to TPTs and POBs through learning and development and targeted training.	Investment in processes Review operations to identify what we should stop, start, and continue. Structure team accordingly to ensure everyone has clear roles, responsibilities to enable them to operate as a team.	IT and web presence Continue to develop cost-effective systems and web presence to support delivery of a high-quality service.

The skills and knowledge of staff are vital to ensuring effective discharge of the PCA’s statutory functions. During 2024–25, the PCA continued to invest in staff through an ongoing programme of Code and regulatory training. Training sessions delivered by internal and external industry specialists covered key topics such as data protection, regulatory compliance, land law, rent assessment, insurance and obligations to new tenants. All new staff completed effective inductions including Cask Marque Cellar Management training to provide an insight into the business of the pub operator. Staff also continued to visit industry trade events and a variety of tied pubs, gaining valuable insights into day-to-day work within the pub industry and reporting on this through ‘Day in the life’ articles published on the PCA’s website.

As reported above, the PCA’s internal IT system and external website were both redeveloped in the reporting year to support the effective provision of information to tenants and sound information management and casework systems.

The PCA’s 2022-25 strategy continued to provide the framework supporting clarity for the PCA team in the delivery and monitoring of key activities. This strategy covered the period until September 2025 and will complete after the end of the 2024-25 reporting year. The PCA will develop and consult on a new strategy for 2025-27. The PCA remains committed to delivering proportionate, evidence-based regulation and looks forward to working with pub companies and stakeholders so that Code principles are upheld.

In delivering these improvements and meeting the priorities set out in the 2022-25 strategy, the PCA has remained mindful of the need for regulation to be delivered proportionately including in relation to cost. This commitment is reflected in the year-on-year reduction in the overall approved levy on pub companies: from £3,425,118 in 2022-23, to £2,969,507 in 2023-24, to £2,650,000 in 2024-25.



Performance Analysis

7. Statutory reporting requirements for the period 01 April 2024 to 31 March 2025

The Adjudicator has a statutory duty to arbitrate disputes between tied tenants and their pub companies under the Pubs Code framework that are referred to the PCA or to appoint an alternative arbitrator to do so.

The PCA has statutory powers to investigate, where the Adjudicator has reasonable grounds to suspect that there have been breaches of the Pubs Code (or where a pub company has failed to follow a recommendation made by the PCA following a previous investigation) and subsequently to take enforcement action in the event that a breach is found.

The PCA has a statutory duty to report to the Secretary of State any practices of pub companies that the Adjudicator believes meet the test for an unfair business practice set out in section 71A of the SBEE Act 2015.

62 annual report

- (1) *After the end of each reporting period, the Adjudicator must prepare and publish a report describing what the Adjudicator has done during the period.*
- (2) *The report must include a summary of –*
 - (a) *arbitrations conducted by the Adjudicator,*
 - (b) *investigations carried out by the Adjudicator,*
 - (c) *cases in which the Adjudicator has taken the enforcement measures mentioned in section 55, and*
 - (d) *cases in which the Adjudicator has exercised functions in relation to the offer of a market rent only option or the provision of parallel rent assessments.*
 - (e) *if the Adjudicator has made recommendations under section 56, the report must include an assessment of whether they have been followed.*
- (3) *As well as publishing the report, the Adjudicator must send a copy to the Secretary of State.*
- (4) *The Secretary of State must lay a copy of the report before Parliament.*
- (5) *In this section “reporting period” means –*
 - (a) *the period beginning with the day on which section 41 comes into force [i.e. the date on which the PCA was created] and ending with the following 31 March, and each successive period of 12 months.*



Reporting in this annual report covers the period 01 April 2024 to 31 March 2025 and the PCA is specifically reporting on:

- the arbitration activity specified in section 62(2)(a);
- investigations carried out by the PCA and section 55 enforcement measures (section 62(2)(b) and (c)) and;
- the cases in which the specific arbitration functions under section 45(1) in relation to the MRO option have been exercised (as required in section 62(2)(d)).

Open arbitration cases by dispute type

Open arbitration cases by dispute type as of 31 March 2025 compared to the same date in the previous year.

Dispute type	This Year 31.03.2025	Last Year 31.03.2024
MRO		
Full Response Proposal	3	6
Full Response disagreement MRO event occurred	1	0
TOTAL MRO Cases	4	6
Non MRO dispute types		
Assigning Tenancy	1	0
Business Development Managers	1	1
Detriment due to Using Code Rights	1	0
Flow Monitoring Devices	1	0
Insurance	1	1
POB to Notify PCA and TPTs of Status under the Pubs Code	1	0
Premises	1	1
Pubs Entry Training	1	0
Sustainable Business Plan	0	1
Schedule 1 information	1	0
Short Agreements	1	0
TOTAL Non MRO Cases	1	1
<i>Non MRO cases may include more than one dispute type</i>		
TOTAL Cases	5	7

The PCA is pleased at the continuation of the low level of arbitration disputes referred to the PCA. Open cases reduced further to 5 on 31 March 2025 from 7 on the same date in 2024.



MRO full response cases also reduced from 6 on 31 March 2024 to 4 on 31 March 2025 and these remain the most common dispute type.

Accepted arbitration referrals

Accepted arbitration referrals in the 12-month period between 1 April 2024 and 31 March 2025 compared to the previous 12-month period.

Dispute type	This Year to 01.04.2025	Last Year to 31.03.2024
MRO		
Full Response Proposal	7	14
Independent Assessor	1	1
TOTAL MRO	8	15
Non MRO dispute types		
Business Development Managers	2	2
Detriment Due to Using Code Rights	1	0
Flow Monitoring Devices	1	0
Gaming Machines	0	1
Rent Assessments	0	0
Rent Proposals	1	0
Short Agreements	1	1
Sustainable Business Plan	1	1
Assigned tenancy	1	0
Schedule 1 information	1	1
Pubs Entry training	1	0
TOTAL Non-MRO CASES	2	2
<i>Cases may include more than one dispute type</i>		
*TOTAL CASES	10	17

The number of cases accepted for arbitration has reflected the long-term trend of a fall in referrals. On 31 March 2025 the number was 10, compared to 17 on the same date in the prior reporting year. The majority of referrals continue to relate to the MRO option.



Closed arbitration cases

Closed arbitration cases in the 12-month period between 1 April 2024 and 31 March 2025 by dispute type and outcome compared to the previous 12-month period.

Dispute type	Outcome	This Year (01.04.2024 – 31.03.2025)	Last Year (01.04.2023 – 31.03.2024)
MRO			
Full Response Proposal	Claim Withdrawn	1	0
	Final Award on Substantive Issues	1	3
	Parties Agreed – MRO Tenancy	6	8
	Parties Agreed – New Tied Tenancy	1	0
	Parties Agreed – No Information Provided	0	1
	Parties Agreed – Other	1	2
Independent Assessor	Final Award on Substantive Issues	0	2
Total closed MRO cases		9	15
Non MRO			
Business Development Managers	Other – Non-MRO Dispute	2	0
	Final Award on Substantive Issues	0	2
	No Jurisdiction	0	1
Rent Assessments	Final Award on Substantive Issues	0	1
Flow Monitoring Devices	Final Award on Substantive Issues	0	1
Insurance	Final Award on Substantive Issues	0	1
Premises	Final Award on Substantive Issues	0	1
	Other – Non-MRO Dispute	1	0
Short Agreements	No Jurisdiction	0	1



Dispute type	Outcome	This Year (01.04.2024 – 31.03.2025)	Last Year (01.04.2023 – 31.03.2024)
Schedule 1 information	No Jurisdiction	0	1
Detriment Due To Using Code Rights	Final Award on Substantive Issues	0	1
Gaming Machines	Final Award on Substantive Issues	0	1
Sustainable Business Plan	Other – Non-MRO Dispute	1	0
Total Closed Non-MRO cases			
*Non MRO cases may include more than one dispute type.		2	3
TOTAL Closed CASES		12	19

The number of cases closed this year has reduced by more than a third, which reflects the declining number of open arbitrations. The most common outcome of arbitration is for the parties to reach an agreement, as in the previous year. For MRO referrals, in most cases the parties agreed an MRO tenancy although in some cases the tenant remained tied.

Duration of closed arbitration cases.

Duration of closed arbitration cases (minus stay periods agreed by the parties) in the 12-month period between 1 April 2024 and 31 March 25 compared to the same period last year. A stay period is where the parties have agreed to put the proceedings on hold, for example, while negotiations take place.

Duration (minus stay periods agreed by parties)	This year (01.04.2024 – 31.03.2025)	Last year (01.04.2023 – 31.03.2024)
Less than 3 months	4	11
3 – 6 months	3	4
6 – 12 months	3	2
1 year +	2	2



Duration of closed arbitration cases (including stay periods agreed by the parties) in the 12-month period between 1 April 2024 and 31 March 2025.

Duration (including stay periods agreed by parties)	This year (01.04.2024 – 31.03.2025)	Last year (01.04.2023 – 31.03.2024)
Less than 3 months	1	6
3 – 6 months	3	7
6 – 12 months	5	4
1 year +	3	2

Investigations carried out by the PCA and section 55 enforcement measures (section 62(2) (b) and (c))

The PCA did not conduct any investigations during the 2024-25 reporting period.

Annual Compliance reporting

The Pubs Code places legal duties on pub companies to verify and demonstrate their compliance through appointing a CCO and annual compliance reporting to the PCA. To promote transparency, the compliance reports must accurately detail the pub company's compliance with the Pubs Code. They also include information about the pub company's tied estate and Pubs Code rights exercised by their tenants under the Code.

The PCA conducted a thorough review of the compliance reports for the reporting year and issued letters to the pub companies highlighting any areas of concern. The PCA also provided an [overview of the compliance reports](#) on its website.

The PCA updated the 2024-25 data collection template issued to POBs for compliance reporting due back to the PCA this summer and provided additional guidance to support the return. The PCA has committed to conducting a more in-depth review of the annual data collection with a focus on reducing regulatory burden for future reporting periods.

Self-Reported Breaches Policy

The PCA's policy for the handling and publication of pub companies' self-reported breaches forms part of our business-as-usual activity. During the year, the PCA updated its internal policy and handling of self-reported breaches to increase timeliness of review and improved scrutiny of material matters.

Twelve self-reported breach forms were submitted during the reporting year, of which, one was discounted after a review revealed no breach had occurred.



	Number of breach reports by pub company.
Admiral	1
Greene King	0
Marston's	1
Punch	1
Star	1
Stonegate	7
Total across all POBs	11

Three regulations were reported as breached during the reporting year. The most frequently reported breaches relates to the failure of the pub company to provide tenants with notes of discussions with their BDM in the appropriate timeframe (Reg 41 (4)). Also reported were breaches of Reg 13(7) carrying out a survey of the premises for the purposes of determining dilapidations, and Reg 20(2), regarding provision of rent assessment proposals.

Breaches that are within the PCA's breach reporting policy are published on the [Register of Self-Reported Breaches](#) on the PCA website. From July 2025, the Register of Self-Reported Breaches will be fully searchable by year, pub company and regulation. This will provide additional transparency for the industry and stakeholders on reported breaches.

In February 2025, the PCA Management Board agreed to introduce and publish the following external Breach Reporting performance measure:

95% of breach reports that are handled in accordance with the Breach Reporting policy are published within 10 working days of the final outcome.

Progress against this performance measure will be included in the Performance Analysis section of the PCA's 2025-26 Annual Report and Accounts.

During the reporting year, the PCA shone a light on areas of the Code based on a thematic overview of incoming enquiries. This has included work on Short Agreements and premises insurance.

Recognising that the Code offers limited protections for tenants on Short Agreements – a tied agreement which is either a Tenancy at Will or a tied tenancy (including when considered together with any other short agreements) which entitles the tied tenant to occupy the pub for no more than 12 months. As part of CCO roundtable meetings, the pub companies together agreed to a series of steps designed to introduce more clarity and consistency for tenants on Short Agreements. The PCA published agreed [minimum standards for Short Agreements](#) in March 2025 which would apply from 1 May 2025.

The PCA has also continued to consider how all pub companies are complying with their obligations in respect of premises insurance. Following the conclusion in the previous reporting period of the PCA's supervised inquiry into Star's self-reported breaches of regulation 46(2) the



PCA wrote to all pub companies in October 2024 to draw attention to Star's actions and ask CCOs to make sure they were complying with the information requirements in regulation 46(2), including where they had self-insurance arrangements.

The PCA subsequently wrote to all pub companies in March 2025, asking them to verify compliance with regulation 46 more broadly, and in particular, the requirements of the premises insurance 'price match' right. As the PCA's 2024 annual Tied Tenant Survey showed that only 56% of tenants were aware of the right to price match, the PCA asked all pub companies to consider whether changes should be made to their insurance communications with tied tenants to improve awareness of their rights and ensure the price match right under the Pubs Code is clearly explained.

The PCA has continued to be asked questions during the reporting year regarding innovative agreement types. The PCA published a statement in March 2025 relating to this which is addressed in a previous section on page 34.

Extended Protection

When a tied pub belonging to a regulated pub company is sold to a pub company which is not regulated under the Pubs code, the tenant is afforded 'Extended Protections'. Under those circumstances the tied tenant retains their Code rights, other than the right to request a free of tie 'Market Rent Only' tenancy. The Extended Protections end once the next rent assessment for the tied pub concludes (by agreeing the new rent in writing), or sooner if the tied tenancy ends (including where it is renewed under the Landlord and Tenant Act 1954). Pub-owning businesses have a duty under the Pubs Code to notify the PCA of circumstances giving rise to extended protection. The PCA received extended protection notifications in relation to 24 pubs in the reporting year (2023-24 the PCA received extended protection notifications in relation to 6 pubs). All were dealt to time in accordance with the PCA's internal performance measure.

In February 2025, the PCA Management Board agreed to introduce and publish the following external Extended Protection performance measure:

95% of Extended Protection information is issued within 10 working days of receipt from the previous POB.

Progress against this performance measure will be included in the Performance Analysis section of the PCA's 2025-26 Annual Report and Accounts.

8. PCA's Financial Performance

The PCA's 2024-25 levy submission to the Secretary of State was based on a budget forecast for the year of £2,650,000 (2023-24 £2,969,507). Fixed costs for accommodation and IT maintenance and support were broadly in line with the budget forecast. Budget forecasts must include costs for an investigation because should the Adjudicator have reasonable grounds to suspect breaches of the Pubs Code, and subsequently need to take enforcement action in the event that a breach is found, the PCA must have funds available. No investigation occurred in the reporting year, which significantly contributed to the £839,419 (23-24: £1,111,448) contract liability. Referrals for arbitration and Independent Assessor fees are unpredictable and prove difficult to forecast for the forthcoming year. For 2024-25 the numbers remained low further





contributing to the predicted contract liability. In the 2023-24 reporting year contract liability was £1,111,448 which was returned to the pub companies in January 2025 following the certification of the accounts.

The PCA monitors spend against the forecasted budget, and a monthly report is provided to Management Board. A detailed quarterly finance report, highlighting PCA spend and tracking underspend against the individual budget lines is provided to the PCA's Risk and Audit Committee. Staff costs were lower than the PCA forecast as a G7 member of staff left in January, but the post was budgeted for a full year. An unsuccessful recruitment campaign was also not predicted when the budget was forecast.

Throughout the 2023-24 reporting year the PCA reduced the historic accrued expenditure relating to individuals who had been on secondment to the PCA during 2017 and 2018. The home organisations had not submitted invoices for their staff member's time, despite numerous requests to do so by the PCA. Over time the individuals either moved on from the PCA or returned to their home organisations and the historic salary accrual of £248,804 remained. The PCA took active steps to reduce this in the prior reporting year. The remainder £36,179 was reaccrued for 2024-25.

Further correspondence was issued to the two remaining home organisations confirming that given 7 years had elapsed and no invoices had been submitted, the PCA were closing the file, and the outstanding monies would be returned to the levy payers in the next financial year if no further correspondence was received.

9. PCA's progress against published performance measures

The PCA's performance measures are uploaded to Gov.UK website, where all the PCA's corporate and governance information is published. The PCA's progress against its published performance measures is available [here](#).

These are monitored and reported at PCA's monthly Management Board meetings and monitored at the PCA's Risk and Audit Committee meetings.

The PCA's overall performance measures for the 2024-25 reporting year are listed below with a comparison for the same reporting period in 2023-24.



PCA Published Performance Measures	1 April 24 – 31 March 25	1 April 23 – 31 March 24
Correspondence and Enquiries		
1. 95% of correspondence and enquiries (excluding regulatory interactions with pub companies and arbitration case correspondence) responded to within 15 working days	93.8%*	100% enquiries 99.95% correspondence
*Due to system development during the reporting year 2024-25 we are unable to report on correspondence.		
Arbitration		
1. In 90% of cases the PCA will appoint a person to arbitrate a dispute within 20 working days of acceptance of a referral and receipt of all relevant information from the parties.	100%	100%
Publication of Awards		
1. For 80% of awards for publication, in accordance with the PCA publication policy, consent is sought to publish no later than 6 weeks from the date the award is issued.	100%	100%
2. 80% of awards and summaries will be published according to the PCA publication policy within 6 weeks of receipt of all appropriate consents (or of expiration of timescale for consent).	100%	83.3%

The PCA has no financial performance measures.

10. PCA's Performance Against the Public Contracts Regulations 2015

The Public Contracts Regulations 2015 (regulation 113) require contracting authorities to pay undisputed invoices within a 30-day period. For the reporting year, due to administrative errors the value of undisputed invoices not paid within the time period was £11,623.11 [2023-24: £1,956].

Sustainability

Throughout 2024-25, the Government Property Agency (GPA) was responsible for managing and maintaining DBT's accommodation on the 4th Floor at 23, Stephenson Street, Birmingham B4 2BJ. The PCA occupies a small footprint of 8 desks within the 4th floor, however overall accountability for sustainability remained with DBT.

The PCA's ICT services are delivered under a master shared services agreement with Integrated Corporate Services (ICS), part of the Department for Energy Security and Net Zero (DESNZ). DESNZ oversees this agreement to ensure compliance with government procurement standards, including Social Value and GGCs.



Our commitment to the principles of the Modern Slavery Act 2015.

The PCA is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. As an Equal Opportunities Employer, we are committed to creating and ensuring a non-discriminatory and respectful working environment for our staff.

Through robust policies and procedures, we continue to take steps to ensure that neither slavery nor human trafficking (together, referred to as ‘modern slavery’) take place in our organisation or supply chains. This includes the recruitment of colleagues and in our contracts with suppliers.

The Greening Government Commitments 2016-2020

The Greening Government Commitments (GGC) set out high level targets for central government and its agencies to make reductions in operational consumption and waste as well as standards for transparent reporting on sustainable procurement and key sustainability areas including biodiversity; climate change adaptation, sustainable food and catering and sustainable construction. The commitments apply to the office and non-office estate of central government departments and their Executive Agencies (EAs), Non-Ministerial Departments (NMDs) and executive Non-Departmental Public Bodies (NDPBs), unless specifically exempted.

The office of the PCA’s accommodation is contractually managed by the Government Property Agency (GPA). The PCA was exempt from the Sustainability Reporting Guidance due to its headcount and occupancy footprint.

Diversity

The PCA follows the recruitment processes of our sponsor department DBT, seconding staff through DBT where appropriate. As DBT is a Disability Confident Employer, we offer a guaranteed interview to any candidate meeting the minimum criteria.



11. PCA's 2024-25 Tied Tenant Survey and Findings at a Glance

Following a fair and open procurement exercise the PCA commissioned the independent research company Ipsos to conduct three annual waves of the PCA's tied tenants survey in 2025, 2026 and 2027. The PCA uses the tied tenant survey to provide positive incentives within the regulated pub industry, and it was highlighted as good practice in published, independent research carried out into UK regulators' approaches to data, "[Data in Regulation](#)" (2024). The tied tenant survey builds on the previous three years of the study also run by Ipsos between 2022 and 2024. This year, many aspects of the survey questionnaire were consistent with previous years, measuring familiarity with the Pubs Code, awareness of tenant rights, and tenant satisfaction with their pub company. New questions were added this year on rent negotiations, repairs, satisfaction with the BDM, and the nature of contact with the PCA.

This year's survey followed a similar approach to the past two years. Ipsos interviewed 1,217 tenants across the six regulated pub companies that own more than 500 tied pubs in England and Wales. Interviews took place by telephone between 15 January and 26 March 2025.

A representative mix of tenants was surveyed by region and the estate size of the various pub companies. In terms of tenant demographics, the tenant profile surveyed is similar to 2024 and previous years. The majority of tenants were men (59%) and tend to be older, with 67% aged 45 and over and one in ten being aged 16-34 (10%). The majority of tenants were white (93%). One in ten said their day-to-day activities were limited 'a little' or 'a lot' because of a health problem or disability lasting at least 12 months (10%). Most tenants surveyed were single operator outfits (85%), with just over half (53%) having held tenancies, either at their pub or another, for ten years or more. Almost all tenants (95%) had their most recent agreement come into force following the introduction of the Pubs Code in 2016. Over half (59%) have had their most recent agreement for 2 years or less.

2025 Survey findings explained and comparisons with previous years' results

The 2025 survey findings found three in five tenants were satisfied with their relationship with their pub company (61%). At an overall level, this was consistent with previous years (63% in 2024 and 62% in 2023). However, there were significant differences by pub company. Tenants with Admiral (79%), Greene King (78%) and Marston's (72%) were the most satisfied (although satisfaction amongst Marston's tenants has fallen seven-points year on year). Tenants from Stonegate were the least satisfied at 43%. Satisfaction amongst Stonegate tenants has fallen seven points in a two-year period. Scores for Stonegate had a significant impact on the overall figure because Stonegate has the largest estate of pubs. In fact, if Stonegate ratings were removed from the data, overall satisfaction would have increased to 72%.

Over the past three years, Star has shown the most positive improvement in satisfaction scores. 70% of Star tenants are satisfied in 2025, up from 64% in 2024 and 55% in 2023. This reflected a 15-point increase in tenant satisfaction for Star in a two-year period.

Overall tenant satisfaction with agreement type has seen a statistically significant drop of nine-points since 2024 (68% in 2024 and 59% this year). Across the six pub companies there was a downward trend in satisfaction, except for Greene King who noted a two-point increase (77%). Marston's saw the most statistically significant fall in satisfaction with the type of



tenancy chosen, falling by 14-points since 2024 (83% in 2024 and 69% now). Stonegate tenants have remained the least satisfied for the past two years (57% in 2024 and 53% in 2023) and saw a 11-point statistically significant decrease in 2025. Meaning that in 2025 just under half (46%) were satisfied with their current tenancy arrangement.

Tenants were asked in their own words why they are satisfied or dissatisfied with the relationship with their pub company. The reasons provided were familiar ones. Tenants value communication, transparency and relationships they see as fair, honest, and upfront. Clarity in the commercial relationship and roles and responsibilities were also seen as important. Moreover, having good relationships with their BDM can help drive tenant satisfaction, particularly when the BDM was seen to be approachable and understanding. On the other hand, dissatisfied tenants cite a lack of support and slow communication as driving reasons behind their dissatisfaction, alongside feelings of unfair commercial practices by their pub company. Like 2025, issues with maintenance and repairs are cited as key reasons behind tenant dissatisfaction too.

Focusing on BDMs, almost all tenants were aware of who their BDM is (98%), with seven in ten satisfied with the relationship with their BDM (70%). Admiral (84%), Greene King (81%) and Star tenants (81%) were more satisfied than the average. Tenant satisfaction has remained strong across various aspects of the BDM relationship. 78% of tenants overall consider BDMs to be 'fair with me in discussions' and almost three in four say they have all the information they need about their role (73%). However, as in previous years, tenants are more likely to disagree (43%) than agree (38%) that they are happy with how repairs were managed by the BDM.

Tenant perceptions of their BDM vary by pub company. Tenants from Admiral, Greene King, and Marston's tend to give the best scores across a range of metrics, whereas Stonegate scores the lowest across all six statements. For example, when asked if tenants have all the information they need about their BDM's role, 89% of Greene King tenants, 88% of Admiral tenants, and 81% of Marston's tenants agree they do, followed by 77% of Star tenants, 71% of Punch tenants, and 60% of Stonegate tenants.

Trends in tenant perceptions of their BDM tend to mirror overall satisfaction trends by pub company. For example, Marston's saw a seven-point decrease in overall satisfaction and Star a six-point increase. Likewise, Marston's saw a statistically significant drop in tenants feeling their BDM is fair with them in discussions (90% in 2024 to 82% this year) and that they supply business planning support on an ongoing basis (84% in 2024 to 73% this year). On the other hand, Star saw a statistically significant rise in tenants feeling their BDM is fair in discussion with them (77% in 2024 to 85% this year) and that their BDM provide accurate notes about rent repairs and business planning (67% in 2024 to 78% in 2025). Whilst it would be overly simplistic to assume these trends were responsible for the changes in satisfactions scores, they are likely at least partially related.

Tenant awareness of who their CCO is has increased significantly over time (from 25% in 2023 to 46% in 2025). Awareness was highest among Marston's (59%) and Greene King (58%) tenants, but others show improvement too. Overall satisfaction with different aspects of the tenant / CCO relationship have remained stable year on year. There was a four-point increase (to 58%) in the proportion of tenants that said they knew how to contact their CCO if they wished to raise a Pubs Code matter. Across six statements about their CCO, Greene King tenants gave the



highest scores in five of the six. Like BDMs, Admiral, Greene King, and Marston's were the top performers. For example, if we looked at whether tenants knew how to contact their CCO to raise a Pubs Code matter, 78% of Greene King tenants, 71% of Admiral tenants, and 69% of Marston's tenants agreed they do. This dropped to around half of Stonegate (51%), Punch (47%), and Star tenants (46%).

Experience of Pubs Code Rights

Tenant awareness of the Pubs Code is high. 84% of tenants have read, seen or heard about the Pubs Code. The three highest performing pub companies by overall satisfaction were also those whose tenants were most aware of the Code, with 91% of Greene King tenants, 88% of Marston's tenants, 87% of Admiral tenants, having seen or heard about the Pubs Code. Awareness is lowest among Punch's tenants at 79% (but this is still eight in ten tenants). Alongside high levels of awareness of the Pubs Code, tenants were much more familiar with their specific rights under the Code this year. Notably tenant familiarity with their rights when receiving a rent proposal regarding a new or renewed tenancy (83% familiar) and when receiving a rent assessment regarding a rent review on an existing tenancy (80%) both increased by 16-points since 2024.

Most tenants could recall information they received when their most recent agreement started. 87% recalled details of tied obligations, 86% recalled rent and deposit information and 82% recalled receiving information about maintenance and repairs obligations. Some 43% recalled being introduced to their CCO. This was highest among Greene King (64%) and Marston's (61%) tenants who were, as previously mentioned, the most likely to know who their CCO was. Following this trend, these tenants were also the most likely to say they had a good understanding of their CCO's role (76% Greene King and 72% Marston's) and said they had all the information they needed about their role (71% Greene King and 70% Marston's).

Overall, four in five (81%) tenants found the information they received before their most recent agreement started to be useful, with tenants of Marston's (90%) and Admiral (90%) finding the information the most useful. Similar with previous trends, Stonegate tenants found the information they received to be the least useful, although seven in ten (72%) still said it was. Notably, tenants that started with their pub company in the last two years were more likely to find the information useful (86%) than those who had been with their pub company for five years or more (75%).

On their sustainable business plan, whilst more than half of tenants found their plan to be useful when managing their tenancy (54%), one in four (24%) do not. Marston's (73%) and Greene King tenants (63%) found the information to be the most useful. Stonegate's tenants were the least likely to say this, with two-fifths (41%) finding their plan useful and one third (32%) saying it is not.

Rent negotiations

The 2025 survey asked tenants a new series of questions about their experience of rent negotiations. These focused on tenants who had agreed or renegotiated their rent with their pub company in the last 2 years. Four in ten said they had done so (40%). Of this group, four in ten (38%) said this negotiation had been over a new agreement, 17% a mid-term rent review and a further four in ten said this was when they had the right to renew an existing agreement (40%).



Most tenants were satisfied with the information their pub company provided to support them during their rent offer (62%) and felt their pub company had handled any negotiation fairly (64%). Half felt the information provided helped in the negotiations (51%). However, across these questions, one in five were dissatisfied with the information provided and how the negotiation was handled. Those with a tied tenancy were more satisfied than average across all three questions than those with lease agreements. Due to low sample sizes, significant differences between pub companies cannot be observed but broadly tenants of Admiral, Greene King, and Marston's were the most satisfied.

The survey also asked tenants who had had a mid-term rent review or a rent negotiation and right to renew if they submitted a formal MRO request at this time. Two in five (19%) tenants said they submitted a formal request (which amounted to 4% of the total sample). When asked why tenants had not submitted an MRO request, many cited a lack of awareness about the process, felt it was not financially feasible, or generally felt satisfied with their current arrangement.

Repairs and premises insurance

This year's survey asked tenants new questions about how repairs were handled in their pub. Around one in four tenants (24%) said they were solely responsible for repairs, 18% said the pub company was solely responsible and 57% said responsibility was shared. Most tenants (68%) understand the process for repairs when the pub company is responsible but there was significant variance by pub company. Stonegate tenants scored below average with fewer than half (47%) saying they understood the process well.

In terms of tenant satisfaction, 45% of tenants were satisfied with how their pub company dealt with repairs they were responsible for and 41% were dissatisfied. Again, there was strong variance in scores by pub company. 68% of Marston's and 64% of Admiral tenants were satisfied compared to just 22% of Stonegate tenants (of whom 62% are dissatisfied).

When tenants were asked why they were satisfied with repairs handled by their pub company, satisfied tenants mainly speak of clear communication and quick resolution of issues. Tenants also mentioned high quality workmanship and work being done well as reasons for satisfaction. On the other hand, dissatisfied tenants tended to say the reverse, citing poor communication and lengthy delays as key reasons for dissatisfaction; alongside poor quality workmanship.

Tenants were also asked how satisfied they were with how their pub company dealt with them concerning repairs the tenant is responsible for. Overall, 41% were satisfied and 22% were dissatisfied, with similar patterns by pub company as above (satisfaction was 60% for Marston's, 59% for Admiral and 32% for Stonegate). Meanwhile, 41% of tenants with some degree of responsibility for repairs were satisfied with the information provided by pub companies concerning dilapidations and 25% were dissatisfied.

Tenants were also asked about price matching premises insurance on the open market. Overall, 11% of surveyed tenants claimed they had contacted their pub company about this. Three in four of this group (77%) were satisfied with how their pub company dealt with them when they did.



Trust and contact with the PCA

Tenant trust in the PCA remained stable since last year, with two thirds of tenants reporting they trusted the PCA to be independent of government (62%) and of pub companies (65%). Marston's tenants were the most trusting, with around eight in ten trusting the PCA to be independent of either. When tenants were asked about their reasons for distrusting the PCA they mentioned a perceived bias towards pub companies, a lack of action on certain issues and a general scepticism that such an organisation could ever be 100% independent. Though, it should be stressed, most tenants did trust the PCA to be independent overall.

Conclusions

These results should be seen in the context of tenants facing significant financial pressures. Tenants themselves make this very clear in their free form responses to the survey and have done so consistently over time. In this context, there are many positives to take away from these results. Notably, a consistent majority of tenants were satisfied with their relationship with their pub company over time – 61% satisfied overall this year. With increased satisfaction over time for tenants of Star, a notable success story. The success, or otherwise, of the commercial relationship is clearly a significant factor in tenant satisfaction but it is not the only one. Satisfied tenants point to positive relationships with their BDM (7 in 10 satisfied with the BDM overall), with clear communication and open, honest business relationships key. Eight in ten see their BDM is fair in discussions and a clear majority said they provide the information tenants need about the Pubs Code. Eight in ten say the information received at the beginning of their agreement was useful and a majority say the same about their sustainable business plan.

Many of these trends are consistent over time but there were some notable improvements in certain areas. This year there was a clear step change in tenant familiarity with different aspects of their rights under the Pubs Code, including 16-point increases in the proportion of tenants that claim to be familiar with their rights when receiving a rent proposal or a rent assessment proposal. Awareness of the CCO also continued to increase over time (up 21 points in two years).

New survey questions shed further light on key areas such as rent negotiations and how repairs are handled. Rent negotiations generally seem to work well, with 6 in 10 saying they were satisfied with the supporting information provided by pub companies and around half said this information helped the tenant with negotiations. Predictably, given what we know from previous surveys, attitudes to how repairs are dealt with are mixed. Whilst the process is typically well understood, tenants were almost equally split between those satisfied with how the pub company deals with repairs they were responsible for and those that were dissatisfied. The clarity and speed of resolution, or otherwise, was key factor in this. Whilst there were many positives to take away from these results, there were areas to consider in future:

- Whilst overall satisfaction with the tenant relationship was healthy – 23% were dissatisfied. This increased to more than a third (37%) for Stonegate tenants.
- There has been a decrease in tenant satisfaction with agreement type year on year. It remains to be seen whether commercial pressures on tenants leads to falling satisfaction with the relationship over time – though there is no evidence of this to date.



- One in four tenants disagreed their BDM provided the business planning support they needed or the information and advice they needed about the Code. One in four tenants disagreed that they had the information they needed or a good understanding of their CCO's role.
- There was some evidence in the data that a minority of tenants did not feel adequately informed about their rights to request an MRO option. Whilst, seven in ten said they were familiar with such rights, three in ten said they were not, with some eligible tenants stating that a lack of understanding of their options was one reason they chose not to pursue this option further.
- Whilst more than half of tenants (54%) thought their sustainable business plan was useful for managing their tenancy – one in four tenants disagreed. Pub companies may wish to consider whether the sustainable business plan is working for tenants as it should.
- Repairs continue to divide tenants. Four in ten tenants said they were dissatisfied with how their pub company deals with repairs the company were responsible for, with the greatest levels of dissatisfaction found among tenants of Stonegate and to a lesser extent Star and Punch.

The PCA's Annual Tied Tenant 2025 [full survey results](#) can be found on our website.



Fiona Dickie
Pubs Code Adjudicator

15 December 2025

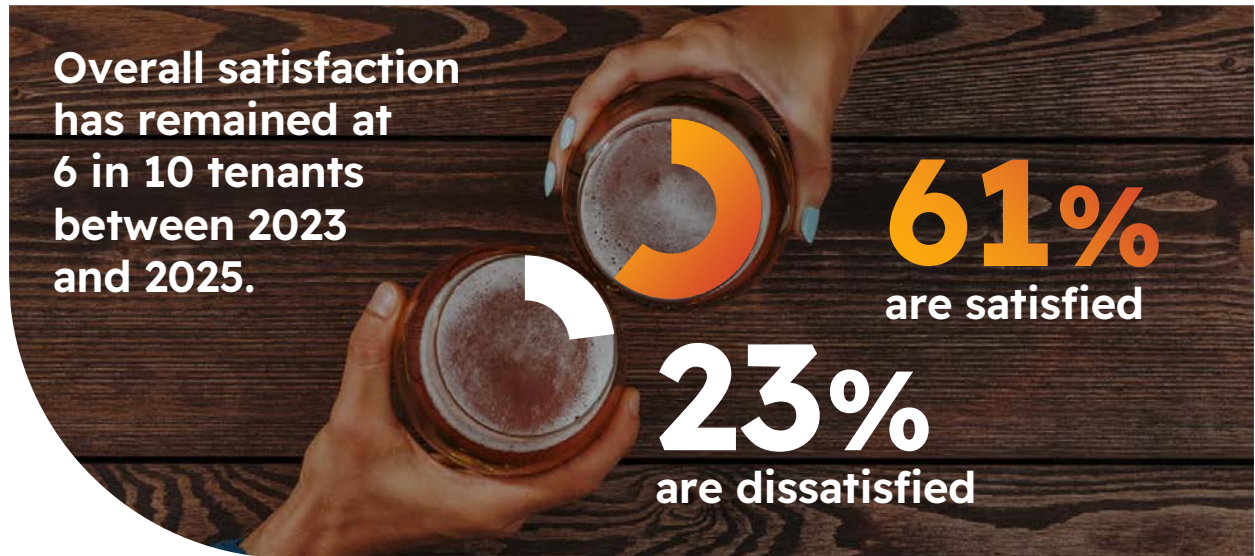




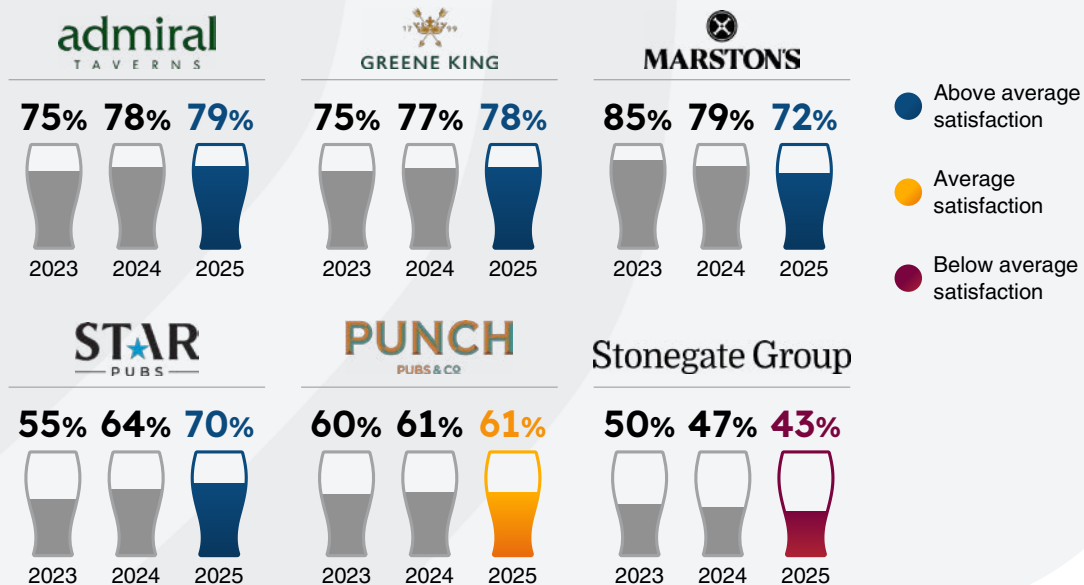
PCA Tied Tenants Survey 2025

Relationship with Pub Company

Ipsos interviewed a representative sample of 1217 tied tenants by telephone between 15th January and 26th March, 2025.



The top three Pub Companies for tenant satisfaction have stayed the same since 2023. Star is above average this year.





PCA Tied Tenants Survey 2025

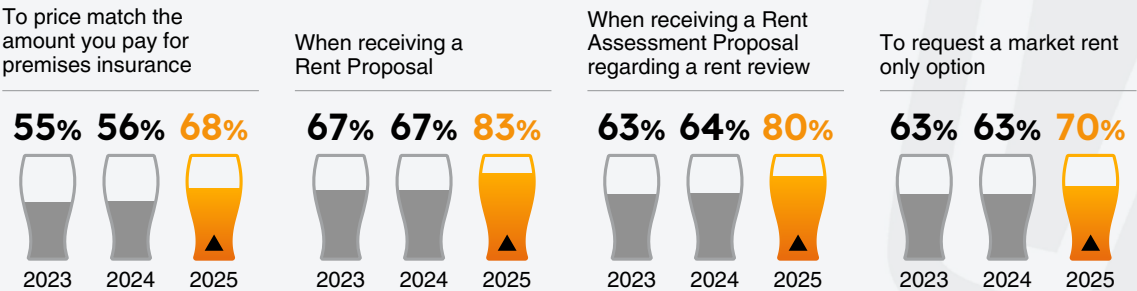
Awareness of the Pubs Code

Ipsos interviewed a representative sample of 1217 tied tenants by telephone between 15th January and 26th March, 2025.

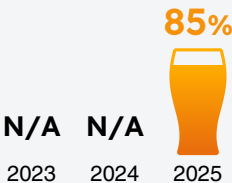


Tenant familiarity with their rights under the Pubs Code has improved this year.

% familiar with right(s)...



To copies of Meeting Minutes



▲▼ Significant difference between 2024 and 2025

Base: Tenants with a tied tenancy, tied lease agreement, something else or who don't know their agreement type.





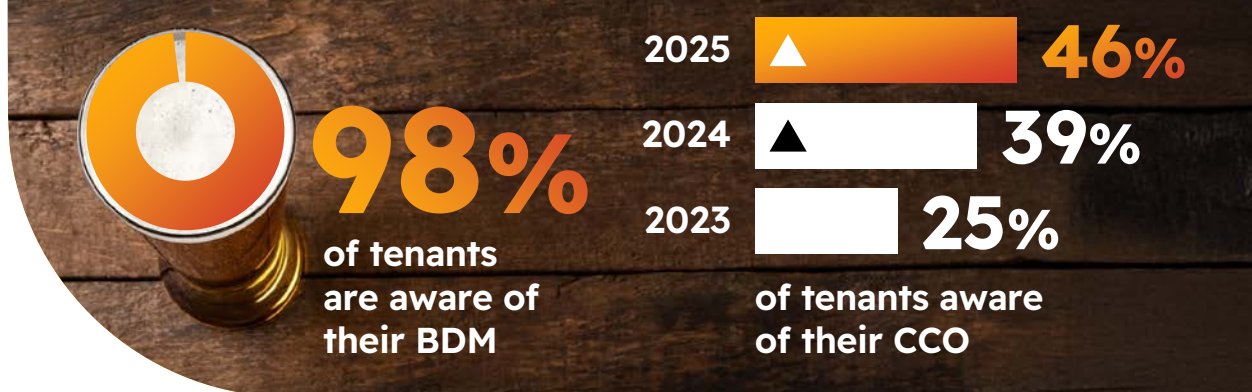
**Pubs Code
Adjudicator**

PCA Tied Tenants Survey 2025

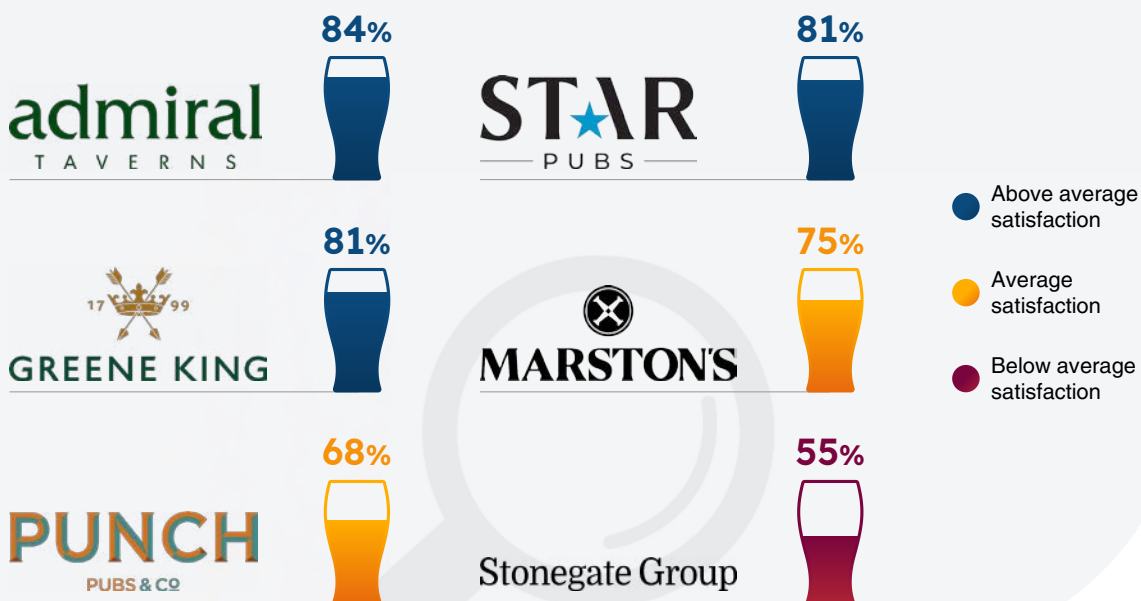
**Business Development Manager (BDM)
& Code Compliance Officer (CCO)**

Ipsos interviewed a representative sample of 1217 tied tenants by telephone between 15th January and 26th March, 2025.

**Tenant awareness of their BDM is high.
Awareness of the CCO has improved again.**



**7 in 10 tenants are satisfied with BDM relationship
but scores vary significantly by pub company.**





PCA Tied Tenants Survey 2025

Rent Negotiations

Ipsos interviewed a representative sample of 1217 tied tenants by telephone between 15th January and 26th March, 2025.



40%

of tenants said they've agreed or renegotiated their rent with their pub company in the last 2 years.

Of these agreements or renegotiations...



40%

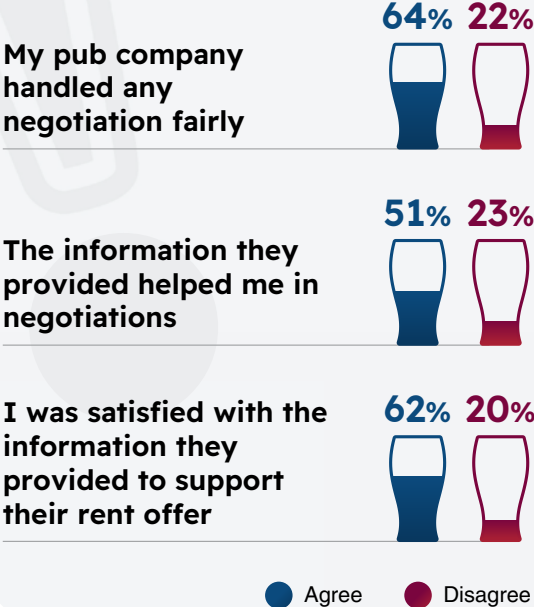
were when the tenant had the right to renew an existing agreement

38%

were for a new agreement at the pub

17%

were a mid term rent review





PCA Tied Tenants Survey 2025

Responsibility of Repairs and Tenant Experiences

Ipsos interviewed a representative sample of 1217 tied tenants by telephone between 15th January and 26th March, 2025.

We asked tenants about how repairs are handled depending on who is responsible...

Pub Company responsible...

Tenants are split when it comes to satisfaction with repairs their pub company is responsible for.

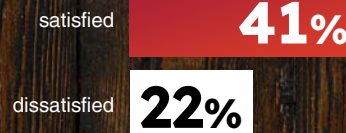


Most tenants understand the process for how their pub company deals with repairs they are responsible for.



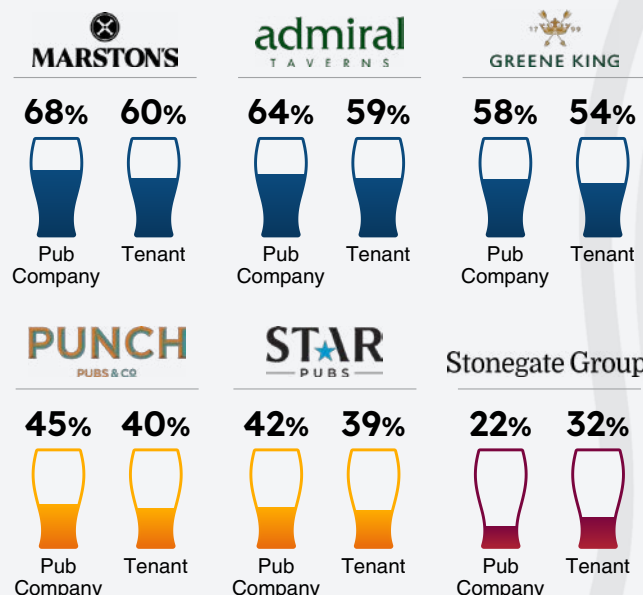
Tenant responsible...

41% are satisfied with how their pub company deals with them when the tenant is responsible.



Satisfaction with repairs varies sharply by pub company.

Marston's, Admiral and Greene King tenants are more satisfied than average for how repairs are dealt with – whether the pub company or the tenant is responsible.



Accountability Report

Overview

The Accountability Report contains the following three sections:

- **Corporate governance report** which explains the composition and organisation of the PCA's governance structures and how they support the achievement of its objectives.
- **Remuneration and staff report** which provides information on staff numbers and costs, and the remuneration of senior members of the Management Board; and
- **Parliamentary accountability and audit report** that presents the PCA's expenditure against the budgets set by Parliament and the audit opinion on the financial statements prepared by the National Audit Office.



Corporate Governance Report

Overview

This corporate governance report includes a statement of corporate governance procedures and compliance, information on board composition, statements on the company's performance, and information about compliance and conformance with best practices for good corporate governance. The corporate governance report is built upon the four key principles of accountability, transparency, fairness and responsibility.

Format of the accounts

The accounts have been prepared in accordance with the direction from the Secretary of State for DBT and HM Treasury's Financial Reporting Manual (FReM).

12. Director's report

The PCA is a statutory office holder appointed by the Secretary of State. The PCA is a corporation sole and an independent regulator sponsored by the Department for Business and Trade (DBT). I was first appointed to the role in May 2020 and reappointed for a further three years in May 2024 and I was also simultaneously reappointed as the Accounting Officer.

As Accounting Officer, I am responsible for ensuring that there are an appropriate governance structure and systems in place to ensure I meet my statutory obligations. I am personally responsible for safeguarding the public funds for which I have charge; for ensuring the propriety and regularity in the managing of public funds; and for the day-to-day operations and management of the office of the PCA in line with the requirements set out in Managing Public Money. The PCA governance structure combines efficient decision making with accountability and transparency.

As Accounting Officer, I convene the PCA Management Board; co-chair a Governance Board with the DBT sponsorship team and attend the Risk and Audit Committee. These are the main means for ensuring that my statutory obligations are met, that decision-making and financial management are carried out appropriately and that the PCA office is managed effectively

13. Management Board

The PCA Management Board follows the Corporate governance requirements set out in [central government departments' code of good practice](#), applying it in a way proportionate to the nature and size of the PCA.

The office of the PCA is overseen by a Management Board (the Board).

Throughout the reporting year, the Board comprised the PCA, a G6 Head of Regulatory Policy and Engagement and a G6 Director of Business Management and Development. A G6 Head of Legal joined the organisation on 31 March 2025. Responsibility for the PCA's finances was solely with the PCA.



The Board is responsible for supporting the PCA in identifying, monitoring and mitigating issues and risks associated with the operation and administration of the office of the PCA and the exercise of the statutory functions of the PCA during the reporting period.

The Board assesses its effectiveness each meeting to encourage improved approaches.

The Management Board is supported by two other bodies, a Governance Board (see page 53) and a Risk and Audit Committee (RAC) (see page 52).

14. Register of interests

The PCA maintains a [conflict of interest](#) and an interests and outside interests register which can be viewed with all corporate and governance information via the PCA's Gov.uk website.

This register is updated annually or following the appointment or exit of a member of staff.

15. Personal data

Any personal data breaches or potential breaches are reported to the Data Protection Officer in the first instance and then Management Board, with individual breaches considered and escalated as appropriate dependent on their seriousness. All staff are aware of the UK General Data Protection Regulation (UK GDPR) and undergo mandatory training on an annual basis.

In the period covered by this report, the office of the PCA had no personal data breaches that resulted in a notification to the Information Commissioners Office (ICO).



Fiona Dickie
Pubs Code Adjudicator

15 December 2025



16. Audit

The auditor of the PCA is the Comptroller and Auditor General. The audit fee for the period ended 31 March 2025 is £50,000 (2023-2024: £35,500).

The PCA's 2024-2025 audit was carried out by the National Audit Office in Autumn 2025.

The [2023-2024 annual report and financial statements](#) were certified and laid in the House on 20 January 2025.

17. Whistleblowing

In line with HM Treasury's 'Dear Accounting Officer' letter dated December 2015, the PCA has adopted DBT's Whistleblowing and Raising a Concern Policy only in relation to internal staff from July 2024. From the start of the reporting period up until the beginning of December 2025, the PCA adhered to the Whistleblowing policy and team members received annual GDPR training, which included the Whistleblowing policy in September 2025. The Whistleblowing Policy is also clearly signposted to in the PCA's draft Financial Statements (September 2025). The PCA does not directly employ any member of the office of the PCA but adhered to the policy.

18. Analytical models

The PCA does not use any analytical models.

19. Functional Standards

Functional standards are a suite of management standards alongside supporting information to guide those working in and with the UK Government. The standards were mandated in September 2021 and set out expectations on organisations in each function, which can be tailored in practice to business need. Functional Standards were designed to drive efficiency, effectiveness and professionalism across Government in key areas – including across boundaries.

In December 2021, the then Business Energy and Industrial Strategy (BEIS) informed the PCA that as an unclassified Non-Departmental Public Body (NDPB) with independent functions, it was neither carrying out discrete functions on behalf of BEIS nor was it said the PCA was controlled by BEIS. On that basis the PCA did not need to implement Functional Standards.

20. Statement of the Accounting Officer Responsibilities

Schedule 1, paragraph 15(1) of the SBEE Act 2015 requires the PCA to keep proper accounts and records in relation to those accounts. For each financial year, the PCA must prepare a statement of accounts in respect of that financial year. That statement must be in whatever form is directed by the Secretary of State and must be sent by the PCA within the period specified by the Secretary of State to both the Secretary of State and the Comptroller and Auditor General.



The statement of accounts, when certified by the Comptroller and Auditor General, must be laid before Parliament by the Secretary of State.

The Accounts Direction from HMT sets out the requirement for Agencies (Insolvency Service and Companies House) to produce accounts under the Government Resources and Accounts Act 2000 (Annex B). The statement follows the form and basis set out in the account's direction. The accounts are prepared on an accrual basis and must give a true and fair view of the state of affairs of the PCA and of net resource outturn, application of resources, changes in taxpayers' equity and cash flows for the financial year.

In preparing the accounts, the Accounting Officer is required to comply with the requirements of the Government Financial Reporting Manual (FReM), in particular by:

- a) observing the accounts direction issued by the Secretary of State, including the relevant accounting and disclosure requirements, applying suitable accounting policies on a consistent basis;
- b) making judgements and estimates on a reasonable and prudent basis;
- c) stating where the applicable accounting standards set out in the FReM have been followed; and disclosing and explaining any material departures from these;
- d) preparing the statement on a going concern basis.

The Principal Accounting Officer for DBT has designated the PCA as the Accounting Officer for the office of the PCA. The responsibilities of an Accounting Officer – including for the propriety and regularity of the statutory levy funding; for keeping proper records; and for safeguarding the PCA's assets – are set out in the Accounting Officer's Memorandum issued by HM Treasury and published in Managing Public Money.

As Accounting Officer, I confirm that as far as I am aware, there is no relevant audit information of which the Comptroller and Auditor General and the NAO are unaware, and that I have taken all the steps that I ought to have taken to establish that the NAO are aware of any such information.

I also certify that this annual report and accounts as a whole are fair, balanced and understandable; and that I take personal responsibility for the annual report and accounts and the judgements required to determine that it is fair, balanced and understandable.



Governance Statement

PCA Governance Framework Approach 2024-25

21. PCA Governance Framework Approach 2024-25

Fiona Dickie was the Pubs Code Adjudicator (PCA) throughout the reporting period.

The PCA is Accounting Officer for the office of the PCA and is responsible for safeguarding the public funds for which the office has charge and for the day-to-day operations and management of the organisation.

The PCA is responsible for ensuring and promoting propriety, regularity, affordability, sustainability, risk, value for money and feasibility in the handling of those public funds and for accounting accurately and transparently for the office of the PCA's financial position and transactions.

The PCA is also responsible for ensuring the office of the PCA as a whole is run in accordance with the standards of governance, decision-making and financial management set out in Box 3.1 of Managing Public Money. The PCA does not use modelling.

22. Risk and Audit Committee (RAC) – (for risks and issues see page 58)

The RAC supports the Management Board and the Accounting Officer in my responsibility for control and governance, risk management and associated assurance. The RAC comprises staff from the office of the PCA, officials from the Consumer and Competition Policy Directorate in DBT and an independent Chair. The RAC has a pivotal role in ensuring the PCA applies appropriate accounting and auditing standards and adopts an appropriate risk management strategy. The role of the RAC is to provide critical challenge and support to the PCA on the effectiveness of the risk and financial management arrangements. The RAC meets three times a year and its outputs are fed back to the PCA Board and Governance Board. The RAC assists the PCA in identifying, assessing, and managing risk through the strategic risk register and plays an important role in ensuring the PCA's financial and risk management are appropriate. A representative from DBT's Sponsorship team attends RAC and the National Audit Office attend as observers. The RAC annually assesses its effectiveness using the NAO's Risk and Audit Committee Effectiveness Checklist tool, which can be found [here](#). This was not completed for the 2024-25 reporting year, but will be done in Autumn 2025 and the findings will be in the 2025-26 annual report.



In September 2024 Rob Powell, the Executive Director for Resources at Warwickshire County Council was reappointed for a further, but final two-year term (completing in September 2026) as the independent Chair of the PCA's RAC. Rob Powell has held the position since September 2018 and consistent with approaches to public appointments, a new Independent Chair will be sought. Rob Powell was the independent Chair of the PCA's RAC throughout the reporting year. The PCA does not remunerate Rob Powell.

The National Audit Office (NAO) attended the meetings in the role of observer.

The RAC met three times during the reporting period. Each meeting held was quorate.

The main areas for the Committee's focus were::

- Recruitment and retention of staff;
- The arbitration management service outsourced to the CI Arb in December 2021 and the next steps for the work post November 2025, given no further contract extensions are permissible under the current contract.
- Finance management based on the finance reports;
- "iCasework go live"; completing all outstanding development work and the reporting functionality, including reports for the PCA's published and internal performance measures;
- Development and launch of the PCA's new independent website;
- Internal (when appropriate) and external audit processes
- Endorsement of the End of Year report and Accounts.

Agreed minutes of RAC are reviewed at appropriate Management Board meetings throughout the year. In addition, Management Board undertook 6-monthly horizon scans of strategic risks for the PCA.

I am personally responsible for promoting and safeguarding regularity, propriety, affordability, sustainability, risk and value for money; and accounting accurately and transparently for the office of the PCA's financial position and transactions.

23. Governance Board

This Board facilitates the relationship between the PCA and its sponsor body within Government including supporting advice to the Principal Accounting Officer and responsible Minister within DBT on the operation of the PCA and the HM Treasury's Code of Good Practice for Corporate Governance.

The Board comprises staff from the office of the PCA and officials from the Consumer and Competition Policy Directorate in DBT and is chaired by the PCA and DBT on a rotational basis. The Governance Board meets three times a year.

24. Internal Audit

The PCA aims to undertake an internal audit on a biennial basis. The Government Internal Audit Agency (GIAA) was asked to conduct an internal audit in the 2023-24 financial year, however



due to circumstances beyond our control this was not achievable. The PCA approached RSM's independent internal audit provider who agreed to conduct a review of the PCA's Finance processes in June 2025. The final report and any recommendations will be monitored via the Risk and Audit Committee.

25. PCA's Sources of Funding Income

Section 63 of the Small Business Enterprise and Employment Act 2015 (the SBEE Act 2015) requires the PCA to obtain the consent of the Secretary of State to the imposition of the levy for each financial year. Section 63 also requires the PCA to publish its levy methodology. In 2024-25 the Secretary of State approved the imposition of a levy and the methodology is published.

Income

The PCA let the Arbitration Service Management contract to Ciarb in December 2021 and from that point forward the handling of the £200 referral fees changed. Instead of the referral fee being sent by the referrer directly to the PCA's bank account, the £200 fee was collected by Ciarb and sent to the PCA on a monthly basis. Ciarb then invoiced the PCA on a monthly basis for the total cost of the referral fee plus VAT, so £240.00 in total. This arrangement continued throughout 2024-25.

The PCA received a total of £2,000 in referral fees during 2024-25 (£1,600 2023-24)

Once the PCA let an Arbitration Service Management contract to Ciarb in December 2021, all arbitrator fees payable by the parties were directed to Ciarb for direct payment to the alternative arbitrators.

Arbitration fees in 2024-25 Nil (2023-24:Nil).

26. Statement of Internal Financial Controls

The financial statements in this annual report relate to both the activities of the statutory PCA and the administrative support provided to the Adjudicator by the office of the PCA.

The PCA deploys a combination of finance and accounting systems and processes to ensure that standards set out in Managing Public Money are met. The PCA's financial management criteria are set out below:

- Uses its resources efficiently, economically and effectively, avoiding waste and extravagance;
- Plan to use its resources on an affordable and sustainable path, within agreed limits;
- Carry out procurement and project appraisal objectively and fairly, using cost benefit analysis and generally seeking good value for the Exchequer as a whole;
- Use management information systems to gain assurance about value for money and the quality of delivery and so make timely adjustments;
- Avoid over-defining detail and imposing undue compliance costs, either internally or on its customers and stakeholders;



- Have practical documented arrangements for controlling or working in partnership with other organisations as appropriate;
- Use internal and external audit to improve its internal controls and performance.

The PCA has a Government Banking Services administered bank account. Expenses are payable electronically, using BACS in accordance with Managing Public Money. The PCA has adopted the expenses policy of DBT, its sponsor department. Expenses should be submitted for processing not later than four weeks after the expense is incurred.

27. Accountant and auditor

The PCA contracts with accountants to prepare independent annual accounts and financial statements. The Comptroller and Auditor General examine, certify and report on the financial statements in accordance with the SBEE Act 2015.

28. Data management

The PCA has processes in place consistent with the requirements of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. A Memorandum of Understanding (MoU) with BEIS was signed in April 2022 in respect of the data controller and data processor relationship. The MoU will be updated by DBT and agreed by the PCA reflecting the departmental changes to the overall IT provision and ongoing maintenance and support. This is for finalisation before the current MoU expires in December 2025.

In line with the MoU regular monthly PCA and Integrated Corporate Services IT review meetings have been held, which have been particularly informative as DBT has been working to improve its IT service offering to Partner Organisations.

29. Management of interests and business appointments

The PCA has a policy for the declaration and management of interests in place for all staff.

30. Statement by the PCA

I have considered the evidence that supports this governance statement, and I am assured that the office of the PCA has effective systems of control in place to support the appropriate delivery of my statutory functions.

Therefore, I have no disclosures of control or funding weaknesses to make for the 2024-25 financial year.



Fiona Dickie
Pubs Code Adjudicator

15 December 2025



Remuneration and Staff Report

Overview

This remuneration and staff report provides details of the remuneration policy and amounts awarded to the PCA for the reporting year and is a key part of demonstrating accountability to Parliament.

31. Remuneration policy

The PCA does not have any direct remuneration responsibilities and there are no off-payroll engagements for senior officials with significant financial responsibility.

The PCA's remuneration is determined by the Secretary of State for DBT under Schedule 1 to the SBEE Act 2015 and as such she receives a Civil Service pension.

The PCA is a Ministerial appointment, designated as a Statutory Office Holder and is a corporation sole.

Throughout 2024–25 the majority of the PCA office team were seconded from public sector organisations. There was a 0.2 FTE equivalent person seconded from a private law firm for the entire year and from October 2024 until 31 March 2025 an additional 0.2 FTE person was seconded from the same law firm under the same framework agreement.

The PCA is a pensionable position. Pension commitments for secondees to the office of the PCA are met by their home departments. Remuneration decisions are taken by the relevant home department of the secondees.

Remuneration (salary*, other pension costs, pensions) (subject to audit)

Senior staff	Year	Salary £'000	Bonus payments £'000	Pension benefits (to the nearest £1,000)	Total £'000
Fiona Dickie	2024–25	150–155	0	59	210–215
	2023–24	145–150	0	57	200–205
***Katharine Diamond	2024–25	0–0	0	0	0 – 0
(SCS 1)	2023–24	70–75	0-5	24	100–105

"Salary" includes gross salary; overtime, reserved rights to London weighting or London allowances; recruitment and retention allowances; private office allowances and any other allowances to the extent that is subject to UK taxation.

The PCA is a ministerial appointment and payment and is through the DBT payroll. VAT is charged on all salary invoices.



*** Katharine Diamond left the PCA on 15 January 2024. Had she remained with the PCA until 31 March 2024 her estimated FTE salary would have been £110-115.

Bonus payments to SCS staff are discretionary and are used by Directors of Government Departments to recognise specific, significant contributions to the organisation throughout the year.

This report is based on accrued payments made by the PCA and is thus recorded in these accounts. No allowances, bonuses or benefits in kind other than pension benefits set out below have been made to the Adjudicator. Gifts and hospitality are recorded in the PCA's Gifts and Hospitality register.

32. Cash Equivalent Transfer Values (CETV)

CETV is the actuarially assessed capitalised value for the pension scheme benefits accrued by a member at a particular point in time. The benefits valued are the member's accrued benefits and any contingent spouse's pension payable from the scheme. A CETV is a payment made by a pension scheme or arrangement to secure pension benefits in another pension scheme or arrangement when the member leaves a scheme and chooses to transfer the benefits accrued in their former scheme. The pension figures shown relate to the benefits that the individual has accrued as a consequence of their total membership of the pension scheme, not just their service in a senior capacity to which the disclosure applies.

The figures include the value of any pension benefit in another scheme or arrangement when the member transfers to the Civil Service pension arrangements. They also include any additional pension benefit accrued to the member as a result of their buying additional pension benefits at their own cost. CETVS are worked out in accordance with the Occupational Pension Schemes (Transfer Values) (Amendment) Regulations 2008 and do not take into account any actual or potential reduction to benefits resulting from Lifetime Allowance Tax which may be due when pension benefits are taken.

HM Treasury published updated guidance on 27 April 2023; this guidance will be used in the calculation of 2024-25 CETV figures.

Real increase in CETV (subject to audit)

This reflects the increase in CETV that is funded by the employer. It does not include the increase in accrued pension due to inflation, contributions paid by the employee (including the value of any benefits transferred from another pension scheme or arrangement) and uses common market valuation factors for the start and end of the period.

	Accrued pension at age 65 as at 31 March 2025 and related lump sum £'000	Real increase in pension and related lump sum at pension age £'000	CETV at 31 March 2025 £'000	Restated CETV at 31 March 2024 £'000	Real increase in CETV £'000
Senior staff					
Fiona Dickie	20 – 25	2.5-5.0	366	289	42



33. Civil Service Pension Scheme

Pension benefits are provided through the Civil Service pension arrangements. From 30 July 2007, civil servants may be in one of five defined benefit schemes; either a final salary scheme (classic, premium or classic plus); or a whole career scheme (nuvos or alpha).

From 01 April 2015 a new pension scheme for civil servants was introduced – the Civil Servants and Others Pension Scheme or alpha, which provides benefits on a career average basis with a normal pension age equal to the member's State Pension Age (or 65 if higher). From that date all newly appointed civil servants and the majority of those in service joined alpha. Prior to that date, civil servants participated in the Principal Civil Service Pension Scheme (PCSPS). The PCA is in the alpha scheme.

The accrued pension quoted is the pension the member is entitled to receive when they reach the higher of 65 or State Pension Age for members of alpha.

Further details about the [Civil Service pension arrangements](#) can be found on the website

These were introduced from 01 April 2015 and the PCA is in the new scheme.

34. Staff Report

Staff Costs (subject to audit)

The cost of staff remuneration was:

Staff costs inclusive of VAT	Year ended 31-Mar-25 £	Year ended 31-Mar-24 £
Wages and salaries	619,634	650,836
Social security costs	71,991	79,766
Other pension	154,808	166,111
Total	846,433	896,713

No member of staff has a permanent contract of employment with the office of the PCA. The PCA is a ministerial appointment under paragraph 3 of Schedule 1 to the SBEE Act 2015. The PCA is paid through the DBT payroll, which is recharged to the PCA, including VAT. All PCA staff are seconded from their home organisation. Home organisations should invoice the PCA on a quarterly basis for their employees' salary, ERNIC and pension contributions, and include VAT.

The PCA is not registered for VAT.

There have been no severance payments in the year (2023-24 Nil).

Average number of staff employed (subject to audit)

The average annual number of full-time-equivalent staff (FTE), including secondees from other government departments and other organisations was:



	2024-25	2023-24
Ministerial and public appointments	1.0	1.0
Other Staff*	8.33	7.25

(*) All other staff are secondees.

Staff composition including Diversity and Inclusion.

The SBEE Act 2015 allows the PCA to recruit staff on secondment from public or private sector organisations.

PCA staff numbers and composition of Ministerial and public appointments as at 31 March 2025 and 31 March 2024 are summarised in the table below.

	Total 31 March 2025		Total 31 March 24	
	Male	Female	Male	Female
PCA (Ministerial appt)	0	1	0	
Other staff (Public appt)	5	5	4	8

The PCA was supported by specialist advice. This included advice from legal services and accountancy support.

Staff are recruited on secondment from the public and private sector. The PCA has adopted applicable policies from DBT, ensuring it meets its commitments on equality and diversity, health and safety and wellbeing for staff working in the office. The PCA gives full and fair consideration to applications from disabled persons and will implement relevant policies for training and career development where necessary. However, Diversity and Inclusion data is held by the individual's home organisation and is not shared with the PCA.

Staff turnover

Staff turnover, as defined in the Government Reporting Framework, requires disclosure for all changes to staff and fixed-term contractors. During the reporting year one member of staff left the PCA and one new member of staff started.

In total this equated to 2 changes in staff in 2024-25 (2023-24:8). Disclosing the percentage change to staff turnover is not considered of benefit given the small numbers of staff involved.

Consultancy expenditure

Consultancy expenditure during 2024-25 was £63,852.75 (2023-2024 Nil).



Fair pay disclosure (subject to audit)

The range for staff remuneration for 2024-25 and the previous year 2023-24 is recorded below:

The range for staff remuneration is:	Min 0–5* Max 150–155	Min 0–5* Max 145–150
--------------------------------------	-------------------------	-------------------------

* Minimum remuneration reflects a staff member joined the PCA on the last day of the reporting year (31 March 2025).

The following table shows the percentage change from the previous financial year for salaries and allowances and for performance pay and bonuses payable in respect of the highest paid director, based on the midpoint of the salary band.

	2024-25 (£)	2023-24 (£)	Change %
Salary and allowances	152,500	147,500	3.4
Performance pay and Bonuses	0	0	0

The following table shows the average percentage change from the previous financial year for salaries and allowances and for performance pay and bonuses in respect of all employees taken as a whole, excluding the highest paid director.

	2024-25 (£)	2023-24 (£)	Change %
Salary and allowances	67,942.97	51,600	32
Performance pay and Bonuses	1,746.50	1,716	2

Reporting bodies are also required to disclose the relationship between the remuneration of the highest-paid director in their organisation and the lower quartile, median and upper quartile remuneration of the organisation's staff.

Total remuneration includes salary, non-consolidated performance-related pay and benefits in kind. It does not include severance payments, employer pension contributions and the cash equivalent transfer value of pensions.



	25 th percentile pay ratio	Median pay ratio	75 th percentile pay ratio
Pay and Benefits 2023-24	2023-24	2023-24	2023-24
Total pay and benefits (ratio)	3.7	2.5	2.1
Total pay and benefits (£)	40,234	59,216	69,268
Salary ratio	3.8	2.6	2.3
Salary (£)	38,886	55,933	64,019

	25 th percentile pay ratio	Median pay ratio	75 th percentile pay ratio
Pay and Benefits 2024-25	2024-25	2024-25	2024-25
Total pay and benefits (ratio)	3.9	2.6	2.2
Total pay and benefits (£)	39,372	57,743	70,559
Salary ratio	4.1	2.6	2.3
Salary (£)	37,611	57,743	66,909

Cost of living salary increases applied increase the differentials.

Exit packages (subject to audit)

Any exit packages would be the responsibility of home organisations seconding staff to the PCA. No exit packages were paid during the reporting period. (Nil in 2023–2024) and this has been subject to audit.

General Data Protection Regulation (GDPR)

The PCA has reviewed all contracts procured with third party organisations to ensure compliance with the General Data Protection Regulation 2018. No instances of non-compliance were identified.

Alexander Report (IR35) tax arrangements of public sector appointees

All government departments and their arm's length bodies that employ individuals 'off payroll' for more than six months must report to HM Treasury about the financial arrangement, to make sure it is transparent and that the individual in question is paying the right amount of tax and National Insurance (NI). The office of the PCA reviews the way we make these appointments at the point of recruitment to ensure our processes are robust. We have the right to request assurances, and do so, from the individual in relation to monies received by HMRC. We can terminate any contract if these assurances are not provided.

Legislation came into effect from April 2017, which shifted the responsibility for deciding whether tax and NI are due from the individual contractor to the organisation for whom the contractor will work. The PCA ensured that arrangements were in place to determine if contractors are in or out of scope and that where relevant, arrangements are in place for the deduction of tax and NI.



During the reporting period the PCA had one off-payroll individual whose role was to review and manage the remaining twelve months of the 3 year “Rebalancing the Tied Pubs Trade” and design and develop the new 2 year Strategy 2025 – 2027. All PCA staff are secondees who pay tax and national insurance through their home Department’s payroll.

Table 1: For all off-payroll engagements as of 31 March 2025, for more than £245 per day and that last for longer than six months.	Pubs Code adjudicator
Number of existing engagements as of 31 March 2025	1
Of which:	
Number that have existed for less than one year at the time of reporting	1
Number that have existed for between one and two years at the time of reporting	N/A
Number that have existed for between two and three years at the time of reporting	N/A
Number that have existed for between three and four years at the time of reporting	N/A
Number that have existed for between four and more years at the time of reporting	N/A

Number of new engagements, or those that reached six months in duration, between 01 April 2024 and 31 March 2025.

Table 2: For all new off-payroll engagements, or those that reached six months in duration, between 01 April 2024 and 31 March 2025, for more than £245 per day and that last for longer than six months.	Pubs Code adjudicator
Number of existing engagements as of 31 March 2025	1
Of which:	
Number that have existed for less than one year at the time of reporting	1
Number that have existed for between one and two years at the time of reporting	1
Number that have existed for between two and three years at the time of reporting	N/A
Number that have existed for between three and four years at the time of reporting	N/A
Number that have existed for between four or more years at the time of reporting	N/A



Staff absence reporting

During the year the average number of working days lost to sickness across the PCA team for the 12 months to 31 March 2025 was 2.5 days. The PCA is committed to supporting the physical and mental health of the team and fostering wellbeing is a key element of our focus. A member of the PCA team continued as the PCA's mental health and wellbeing champion for the reporting year.

Staff policies and other employee matters

The PCA is committed to being a place of opportunities. We value and welcome diversity. We aim to develop all our staff to enable them to make a full contribution to meeting the PCA's strategic objectives, and to fulfil their own potential on merit. We will not tolerate harassment or other unfair discrimination on the grounds of sex, pregnancy or maternity, marital status, race, disability, age, religion or belief, gender reassignment or sexual orientation. All staff are encouraged to take additional training on disability awareness and are expected to undertake unconscious bias training to increase overall awareness. We support the use of a range of flexible working patterns to enable staff to balance home and work responsibilities; and we will treat people fairly, irrespective of their working arrangement.



Parliamentary Accountability Report

35. Parliamentary Accountability Disclosures (subject to audit)

The Adjudicator, as Accounting Officer, is responsible for the propriety and regularity of the public finances for which she is answerable and for keeping proper records.

The PCA has nothing to report in respect of the regularity of expenditure, which has been subject to audit including:

- losses and special payments (Nil 2023-24),
- remote contingent liabilities (Nil 2023-24),
- fees and charges (Nil 2023-24),
- income or gifts (Nil 2023-24).

36. For contingent liabilities see page 88, Note 11 Contingent Liabilities

The levy income is recognised to recover full costs of the PCA as shown in the Statement of Comprehensive Net Expenditure.

Details of the PCA's statutory reporting requirements are set out in the Performance Report (see page 25).

Wider government and Parliamentary input

The PCA is committed to meeting its wider duties as a public body and engaging with Parliament.

Parliamentary and Ministerial engagement

The Adjudicator met Justin Madders MP, Parliamentary Under-Secretary of State at the Department for Business and Trade on 11 September 2024.



Fiona Dickie
Pubs Code Adjudicator

15 December 2025



The Certificate and Report of the Comptroller and Auditor General to The Houses of Parliament

Opinion on financial statements

I certify that I have audited the financial statements of the Pubs Code Adjudicator for the year ended 31 March 2025 under the Small Business, Enterprise and Employment Act 2015.

The financial statements comprise the Pubs Code Adjudicator's

- Statement of Financial Position as at 31 March 2025;
- Statement of Comprehensive Net Expenditure, Statement of Cash Flows and Statement of Changes in Taxpayers' Equity for the year then ended; and
- the related notes including the significant accounting policies.

The financial reporting framework that has been applied in the preparation of the financial statements is applicable law and UK adopted international accounting standards.

In my opinion, the financial statements:

- give a true and fair view of the state of the Pubs Code Adjudicator's affairs as at 31 March 2025 and its net expenditure for the year then ended; and
- have been properly prepared in accordance with the Small Business, Enterprise and Employment Act 2015 and Secretary of State directions issued thereunder.

Opinion on regularity

In my opinion, in all material respects, the income and expenditure recorded in the financial statements have been applied to the purposes intended by Parliament and the financial transactions recorded in the financial statements conform to the authorities which govern them.

Basis for opinions

I conducted my audit in accordance with International Standards on Auditing (UK) (ISAs UK), applicable law and Practice Note 10 *Audit of Financial Statements and Regularity of Public Sector Bodies in the United Kingdom (2024)*. My responsibilities under those standards are further described in the *Auditor's responsibilities for the audit of the financial statements* section of my certificate.



Those standards require me and my staff to comply with the Financial Reporting Council's *Revised Ethical Standard 2024*. I am independent of the Pubs Code Adjudicator in accordance with the ethical requirements that are relevant to my audit of the financial statements in the UK. My staff and I have fulfilled our other ethical responsibilities in accordance with these requirements.

I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my opinion.

Conclusions relating to going concern

In auditing the financial statements, I have concluded that the Pubs Code Adjudicator's use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work I have performed, I have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Pubs Code Adjudicator's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

My responsibilities and the responsibilities of the Accounting Officer with respect to going concern are described in the relevant sections of this certificate.

The going concern basis of accounting for the Pubs Code Adjudicator is adopted in consideration of the requirements set out in HM Treasury's Government Financial Reporting Manual, which requires entities to adopt the going concern basis of accounting in the preparation of the financial statements where it is anticipated that the services which they provide will continue into the future.

Other Information

The other information comprises information included in the Annual Report, but does not include the financial statements and my auditor's certificate and report thereon. The Accounting Officer is responsible for the other information.

My opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in my certificate, I do not express any form of assurance conclusion thereon.

My responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or my knowledge obtained in the audit, or otherwise appears to be materially misstated.

If I identify such material inconsistencies or apparent material misstatements, I am required to determine whether this gives rise to a material misstatement in the financial statements themselves. If, based on the work I have performed, I conclude that there is a material misstatement of this other information, I am required to report that fact.

I have nothing to report in this regard.



Opinion on other matters

In my opinion the part of the Remuneration and Staff Report to be audited has been properly prepared in accordance with Secretary of State directions issued under the Small Business, Enterprise and Employment Act 2015.

In my opinion, based on the work undertaken in the course of the audit:

- the parts of the Accountability Report subject to audit have been properly prepared in accordance with Secretary of State directions made under the Small Business, Enterprise and Employment Act 2015; and
- the information given in the Performance Report and Accountability Report for the financial year for which the financial statements are prepared is consistent with the financial statements and is in accordance with the applicable legal requirements.

Matters on which I report by exception

In the light of the knowledge and understanding of the Pubs Code Adjudicator and its environment obtained in the course of the audit, I have not identified material misstatements in the Performance Report or Accountability Report.

I have nothing to report in respect of the following matters which I report to you if, in my opinion:

- adequate accounting records have not been kept by the Pubs Code Adjudicator or returns adequate for my audit have not been received from branches not visited by my staff; or
- I have not received all of the information and explanations I require for my audit; or
- the financial statements and the parts of the Accountability Report subject to audit are not in agreement with the accounting records and returns; or
- certain disclosures of remuneration specified by HM Treasury's Government Financial Reporting Manual have not been made or parts of the Remuneration and Staff Report to be audited is not in agreement with the accounting records and returns; or
- the Governance Statement does not reflect compliance with HM Treasury's guidance.

Responsibilities of the Accounting Officer for the financial statements

As explained more fully in the Statement of Accounting Officer's Responsibilities, the Accounting Officer is responsible for:

- maintaining proper accounting records;
- providing the C&AG with access to all information of which management is aware that is relevant to the preparation of the financial statements such as records, documentation and other matters;
- providing the C&AG with additional information and explanations needed for his audit;



- providing the C&AG with unrestricted access to persons within the Pubs Code Adjudicator from whom the auditor determines it necessary to obtain audit evidence;
- ensuring such internal controls are in place as deemed necessary to enable the preparation of financial statements to be free from material misstatement, whether due to fraud or error;
- preparing financial statements which give a true and fair view in accordance with Secretary of State directions issued under the Small Business, Enterprise and Employment Act 2015;
- preparing the annual report, which includes the Remuneration and Staff Report, in accordance with Secretary of State directions issued under the Small Business, Enterprise and Employment Act 2015; and
- assessing the Pubs Code Adjudicator's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Accounting Officer anticipates that the services provided by the Pubs Code Adjudicator will not continue to be provided in the future.

Auditor's responsibilities for the audit of the financial statements

My responsibility is to audit, certify and report on the financial statements in accordance with the Small Business, Enterprise and Employment Act 2015.

My objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue a certificate that includes my opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Extent to which the audit was considered capable of detecting non-compliance with laws and regulations including fraud

I design procedures in line with my responsibilities, outlined above, to detect material misstatements in respect of non-compliance with laws and regulations, including fraud. The extent to which my procedures are capable of detecting non-compliance with laws and regulations, including fraud is detailed below.

Identifying and assessing potential risks related to non-compliance with laws and regulations, including fraud

In identifying and assessing risks of material misstatement in respect of non-compliance with laws and regulations, including fraud, I:

- considered the nature of the sector, control environment and operational performance including the design of the Pubs Code Adjudicator's accounting policies.



- inquired of management and those charged with governance, including obtaining and reviewing supporting documentation relating to the Pubs Code Adjudicator's policies and procedures on:
 - identifying, evaluating and complying with laws and regulations;
 - detecting and responding to the risks of fraud; and
 - the internal controls established to mitigate risks related to fraud or non-compliance with laws and regulations including the Pubs Code Adjudicator's controls relating to the Pub Code Adjudicator's compliance with the Small Business, Enterprise and Employment Act 2015 and Managing Public Money;
- inquired of management and those charged with governance whether:
 - they were aware of any instances of non-compliance with laws and regulations;
 - they had knowledge of any actual, suspected, or alleged fraud;
- discussed with the engagement team regarding how and where fraud might occur in the financial statements and any potential indicators of fraud.

As a result of these procedures, I considered the opportunities and incentives that may exist within the Pubs Code Adjudicator for fraud and identified the greatest potential for fraud in the following areas: revenue recognition, posting of unusual journals, complex transactions, and bias in management estimates. In common with all audits under ISAs (UK), I am required to perform specific procedures to respond to the risk of management override.

I obtained an understanding of the Pubs Code Adjudicator's framework of authority and other legal and regulatory frameworks in which the Pubs Code Adjudicator operates. I focused on those laws and regulations that had a direct effect on material amounts and disclosures in the financial statements or that had a fundamental effect on the operations of the Pubs Code Adjudicator. The key laws and regulations I considered in this context included Small Business Enterprise and Employment Act 2015, Managing Public Money, employment law and tax legislation.

Audit response to identified risk

To respond to the identified risks resulting from the above procedures:

- I reviewed the financial statement disclosures and testing to supporting documentation to assess compliance with provisions of relevant laws and regulations described above as having direct effect on the financial statements;
- I enquired of management, the Risk and Audit Committee concerning actual and potential litigation and claims;
- I reviewed minutes of meetings of those charged with governance and the Board and internal audit reports;
- I addressed the risk of fraud through management override of controls by testing the appropriateness of journal entries and other adjustments; assessing whether the judgements on estimates are indicative of a potential bias; and evaluating the business rationale of any significant transactions that are unusual or outside the normal course of business.



I communicated relevant identified laws and regulations and potential risks of fraud to all engagement team members and remained alert to any indications of fraud or non-compliance with laws and regulations throughout the audit.

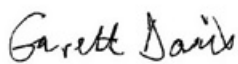
A further description of my responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: www.frc.org.uk/auditorsresponsibilities. This description forms part of my certificate.

Other auditor's responsibilities

I am required to obtain sufficient appropriate audit evidence to give reasonable assurance that the expenditure and income recorded in the financial statements have been applied to the purposes intended by Parliament and the financial transactions recorded in the financial statements conform to the authorities which govern them. I communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control I identify during my audit.

Report

I have no observations to make on these financial statements.



Gareth Davies
Comptroller and Auditor General
National Audit Office
157-197 Buckingham Palace Road
Victoria
London
SW1W 9SP

16 December 2025



Pubs Code Adjudicator Accounts and Financial Statements for the year ended 31 March 2025

Format of the accounts

These accounts have been prepared in accordance with the direction from the Secretary of State for the Department, for Business and Trade (DBT).



Statement of Comprehensive Net Expenditure for the year ended 31 March 2025

	Note	2024-25 £	2023-24 £
Expenditure			
Staff costs	2	846,433	896,713
Other expenditure	3	954,162	950,830
Depreciation	5	10,736	10,765
Interest expense	10	1,250	1,351
		<u>1,812,581</u>	<u>1,859,659</u>
Income			
Other income	4	(1,812,581)	(1,859,659)
Net expenditure		<u>–</u>	<u>–</u>
Total comprehensive net expenditure for the year		<u>–</u>	<u>–</u>

The notes on pages 76 to 89 form part of these financial statements.

There was no other comprehensive expenditure.



Statement of Financial Position as at 31 March 2025

	Note	As at 31-Mar-25 £	As at 31-Mar-24 £
Non-current assets			
Property, plant and equipment	5	122,275	133,011
Total non-current assets		122,275	133,011
Current assets			
Receivables and other assets due within one year	6	40,569	33,534
Cash and cash equivalents	7	1,272,238	2,194,787
Total current assets		1,312,807	2,228,321
Total assets		1,435,082	2,361,332
Current liabilities			
Contract liability	8	(839,419)	(1,847,123)
Trade and other payables	8	(474,320)	(382,596)
Lease liabilities	10	(10,270)	(10,170)
Total current liabilities		(1,324,009)	(2,239,889)
Total assets less current liabilities		111,073	121,443
Non-current liabilities			
Lease liabilities	10	(111,073)	(121,443)
Assets less liabilities		–	–
Taxpayers' equity			
Income and expenditure reserve		–	–

The notes on pages 76 to 89 form part of these financial statements.



Fiona Dickie
Pubs Code Adjudicator 15 December 2025



Statement of Cash Flows for the year ended 31 March 2025

		2024-25 £	2023-24 £
Cash flows from operating activities	Note		
Net operating expense		–	–
(Increase)/decrease in receivables	6	(7,035)	48,083
Decrease in payables	8	(915,980)	(2,004,298)
Non-cash transactions		10,736	10,765
Lease interest	10	1,250	1,351
Decrease in accrued income		–	550,000
Net cash outflow from operating activities		(911,029)	(1,394,099)
Cash flows from financing activities			
Payment of lease principal	10	(11,520)	(11,521)
Net cash outflow from financing activities		(11,520)	(11,521)
Net decrease in cash and cash equivalents in the year	7	(922,549)	(1,405,620)
Cash and cash equivalents at the beginning of the year		2,194,787	3,600,407
Cash and cash equivalents at the end of the year		1,272,238	2,194,787

The notes on pages 76 to 89 form part of these financial statements.



Statement of Changes in Taxpayers' Equity

	Income and expenditure reserve £	Total reserves £
Balance as at 31 March 2023	–	–
Changes in Taxpayers' Equity		
Comprehensive net expenditure for the year	–	–
Balance as at 31 March 2024	–	–
Changes in Taxpayers' Equity		
Comprehensive net expenditure for the year	–	–
Balance as at 31 March 2025	–	–

Funding arrangements for 2024-25.

The Secretary of State approved the imposition of a levy in 2024-25.

The notes on pages 76 to 89 form part of these financial statements.



Notes to the Financial Statements for the year ended 31 March 2025

1. Accounting policies

These financial statements have been prepared in accordance with the direction from the Secretary of State for the Department for Business and Trade (DBT) and the 2024-25 Government Financial Reporting Manual (FReM). The accounting policies contained in the FReM apply International Financial Reporting Standards (IFRS) as adapted or interpreted for the public sector context. Where the FReM permits a choice of accounting policy, the accounting policy which is judged to be the most appropriate to the particular circumstances of the PCA for the purposes of giving a true and fair view have been selected.

The particular policies adopted by the PCA for the purpose of financial reporting are described below. They have been applied consistently in dealing with items that are considered material to the accounts.

The annual accounts have been prepared as directed by the Secretary of State for DBT and certified by the Comptroller and Auditor General in accordance with paragraph 15 of Schedule 1 of the SBEE Act 2015; and have been laid before Parliament by the Secretary of State. The Small Business, Enterprise and Employment Act 2015 (SBEE Act 2015) is the legislation under which the PCA is established and the act from which her powers derive.

Accounting convention

These accounts have been prepared under the historical cost convention.

The financial statements are prepared in sterling, which is the functional currency of the PCA. Monetary amounts in these financial statements are rounded to the nearest £.

New standards, amendments, IFRIC interpretations and new relevant disclosure requirements

For the preparation of these annual accounts, the following new or amended standards are mandatory for the first time for the financial year beginning 1 January 2024.

- Classification of Liabilities as Current or Non-current – Amendments to IAS 1 Non-current Liabilities with Covenants – Amendments to IAS 1
- Lease liability in a sale and leaseback – Amendments to IFRS 16
- Supplier finance arrangements – Amendments to IAS 7 and IFRS 7

The amendments listed above did not have any material impact on the amounts recognised in prior periods and are not expected to significantly affect the current or future periods.



The PCA has also not adopted any standards early but has considered future changes in standards.

a) IFRS 17 Insurance contracts

IFRS 17 became mandatory from 1 January 2023, with early adoption permitted. Application of IFRS 17 for Government departments was expected to apply from the 2023-24 financial year. This has now been deferred for Government departments until the 2025-26 financial year.

IFRS 17 is not expected to have a material impact on the financial statements.

b) IFRS 18 Presentation and Disclosure of Financial Statements

The objective of IFRS 18 is to set out requirements for the presentation and disclosure of information in general purpose financial statements to help ensure they provide relevant information that faithfully represents an entity's assets, liabilities, equity, income and expenses.

IFRS 18 will become effective from 1 January 2027 and is not expected to have a material impact on the financial statements. IFRS 18 will be incorporated into the FReM for accounting periods starting on or after 1 April 2028.

c) IFRS 19 Subsidiary without Public Accountability

The objective of IFRS 19 is to specify the disclosure requirements an entity is permitted to apply instead of the disclosure requirements in other IFRS Accounting Standards.

IFRS 19 will become effective from 1 January 2027. However, this standard has not yet been endorsed by the UK Endorsement Board (UKEB) and has not yet been considered by the Financial Reporting Board (FRAB). Therefore, it is not known when the standard will become effective for government bodies and the PCA will consider the impacts of implementing these standards once endorsed by UKEB and FRAB.

IFRS 16 Leases

IFRS 16 Leases provides a single lessee accounting model, requiring lessees to recognise assets and liabilities for all leases. the PCA's policy has been to recognise right-of-use assets and corresponding lease liabilities by applying the provisions of IFRS 16 as interpreted for public sector in the FReM.

The PCA Policy is to:

- apply IFRS 16 to tangible assets. These are assets with a physical substance such as buildings.
- apply IFRS 16 practical expedients on short term and low value leases as mandated by the FReM.
- separate lease and non-lease components and apply IFRS 16 to lease components only unless it is not practical or cost effective to make the distinction.



Practical expedients for short term and low value leases

- a lease term of up to 12 months is considered short term.
- an underlying asset value of up to £2,000 is considered low value. This is consistent with the PCA capitalisation threshold on purchased assets.

In line with IFRS 16 and FReM, the value of short term and low value leases shall be disclosed in the notes to the financial statements.

IFRS 16 requires that the PCA also recognise interest payable on the lease payments, based on an interest rate applied to the lease liability outstanding balance. Under IFRS 16, cash repayments of the lease liability are split into a principal portion (which reduces the amount of the lease liability) and a notional interest payable portion which is chargeable to the statement of comprehensive net expenditure over the term of the lease.

Where it is not possible to determine the interest rate implicit in a lease agreement, the rate used is based on guidance from HM Treasury.

IFRS 16 requires lessees to separate out rent charges from service charges, where this can be done without unnecessary expense. The PCA has separated out the rent element from the service charge element and has capitalised only the rent element. Service charges are expensed separately and treated as running costs.

For new leases after 1 April 2022, where the lease is less than 12 months or within the low-value threshold of £2,000, the lease payments are charged to the statement of comprehensive net expenditure. At the commencement date of any new lease, the PCA will measure the lease liability at the present value of the lease payments. Right-of-use assets added after 1 April 2022 will be measured initially at cost, which will usually be equal to the initial measurement of the lease liability.

In scope leases

Leases of tangible assets that do not qualify as short term or low value are recognised in the financial statements by recording a right-of-use asset and corresponding lease liability in the statement of financial position.

Lease liability

The lease liability is calculated as the total value of lease payments not yet made, discounted to present value using an appropriate interest rate.

The appropriate interest rate is the rate implicit in the lease. Where the rate implicit in the lease cannot be readily determined, the incremental borrowing rate will be used.

The incremental borrowing rate for government departments is set by HM Treasury and communicated in HM Treasury PES paper releases. On transition to IFRS 16, this rate was 0.95%.

The total value of lease payments excludes irrecoverable VAT. Irrecoverable VAT is expensed as it falls due. The current lease on 23 Stephenson Street is not subject to VAT.



Remeasurement of lease liabilities

The lease liability is remeasured using a revised interest rate where there is a change in the scope of the agreement.

Where there is an adjustment to lease payments resultant from rent review dates contained within the agreement, the remeasurement will use the original interest rate.

Right-of-use asset

The right-of-use asset includes:

- the present value of the lease liability.
- initial direct costs.
- payments made on or before the commencement date of the lease.
- estimated restoration (dilapidations) costs.
- cash lease incentives as a reduction to the total value of the right-of-use asset.

In line with the FReM, dilapidation costs relating to leases transitioning to IFRS 16 on 1 April 2022 were not included in the right-of-use asset calculation.

The PCA occupies a small footplate of DBT estate in 23 Stephenson Street, Birmingham and dilapidation costs will be attributed to DBT and therefore do not form part of the PCA financial statements for any new leases from 1 April 2022.

Depreciation

Right-of-use assets will be depreciated in line with the lease term and under the provisions of IAS 16.

Expenditure

All expenditure is recognised on an accrual basis. Purchases of capital items over £2,000 will be recognised in the accounts as an asset and appropriately depreciated or amortised. Property, Plant and equipment in these financial statements relates solely to leased assets.

Income

The different income streams are laid out below.

General Levy

Per IFRS 15 we have assessed the contract to be the SBEE Act 2015. The purpose of the levy is to fund the PCA's main activities, therefore, the performance obligation is all the obligations on the PCA under the Act. The levy is only recognised as income to the extent that it is spent on discharging the PCA's functions. The transaction price is therefore represented by all the PCA's costs of performing the obligations. The levy is approved for a particular financial year and received in cash from the pub-owning businesses. Any excess cash received over expenditure is returned to the pub-owning businesses in the following year and is therefore recognised as a contract liability at the reporting date. The revenue is recognised over the year, as the performance obligations are satisfied. Levy received is disclosed as income in Note 4, Income.



Any remaining balance is presented as contract liability in Note 8, Trade payables and other liabilities.

The Secretary of State approved the imposition of a levy for the period of the 2024-25 financial year. The levy is recoverable as a debt by the pub-owning businesses.

Arbitrations

Per IFRS 15 we have assessed the contract to be the SBEE Act 2015, and the performance obligation stated under s.48. The transaction price is the fees and expenses incurred by the PCA, which are allocated in full to the performance obligation. Amounts received for arbitrations are disclosed as income in Note 4, Income. Amounts receivable in respect of incomplete arbitrations is shown as a contract asset in Note 7, Receivables and other assets.

Over the year the PCA has exercised her statutory power to appoint an alternative arbitrator in all cases and enabling the office to focus on the PCA's regulatory priorities. The costs of arbitration are recognised in full over the course of the arbitration based on the enforceable right of the arbitrator to receive payment for performance completed to date and paid direct to the appointed arbitrator.

Investigations

The PCA has the discretion to charge the applicable pub-owning businesses the full costs of an investigation which results in a finding that the Code has been breached. Any income associated with the recoverable costs of an investigation is a variable consideration. Until the investigation has been completed and findings published, there is uncertainty in respect of income from costs recovery. Income from the recovery of investigation costs is recognised at the point the PCA becomes entitled to recover them. Any income received from the recovery of investigation costs is taken into account in determining the general levy rebate (i.e. contractual liability) at the end of the financial year. Costs incurred during investigations are recognised in full during the course of the investigation as expenditure.

As above, the SBEE Act 2015 is the relevant contract, and the performance obligations are stated under s. 59(1). The transaction price is the costs of the litigation to the PCA, recognised as costs are incurred. The amount to be recovered is presented in the financial statement as accrued income.

Going concern

The PCA is a statutory body with ongoing duties and powers and with facilities for funding. Fiona Dickie is appointed as the Pubs Code Adjudicator until May 2027.

The PCA is funded by a levy on the businesses it regulates. The levy can be imposed with Secretary of State consent. The PCA received consent to raise the 2025-26 levy on the six pub-owning businesses it regulates on 18 July 2025 and as such the accounts have been prepared on a going concern basis.

Financial instruments

Financial instruments are initially measured at fair value plus transaction cost.



The categorisation of financial assets and liabilities depends on the purpose for which the asset or liability was held or acquired. Management determines the categorisation of assets and liabilities at initial recognition and re-evaluate this designation at each reporting date.

The categorisation of financial assets is determined based on both the business model and nature of the contractual cash flows.

Financial assets

The PCA holds financial assets, which comprise of cash at bank and other receivables which are held at amortised cost.

These are non-derivative financial assets with fixed or determinable payments that are not traded in an active market. Since these balances are normally expected to be realised within 12 months of the reporting date, there was no material difference between fair value, amortised cost and historical cost.

The PCA applies the simplified approach to measuring expected credit losses, which uses a lifetime expected loss allowance. To measure the expected credit losses, trade receivables are grouped based on days overdue.

Financial liabilities

The PCA holds financial liabilities, which comprise of payables and a contract liability. The contract liability relates to unspent levy funds brought forward, that are netted off against the levy amounts due in future periods. Since these balances are expected to be settled within 12 months of the reporting date, there are no material differences between fair value, amortised cost and historical cost.

Reserves

Income and expenditure reserve

The Adjudicator accounts for the PCA's accumulated surplus or deficit as either a contract liability or contract asset. In the current and previous year, the PCA's expenditure has equalled its income, so the income and expenditure reserve is nil.

Expenditure

All expenditure is recognised on an accruals basis. Purchases of capital items over £2,000 will be recognised in the accounts as an asset and appropriately depreciated or amortised. Property, plant and equipment in these financial statements relates solely to leased assets.

VAT

As the PCA is not registered for VAT, all input VAT is irrecoverable and therefore charged via invoices to expenditure. The costs stated in Note 2 "Staff Costs" and Note 3 "Other Expenditure" on pages 82 and 83 are inclusive of VAT.



2. Staff costs (inclusive of VAT)

The cost of staff remuneration was:

	2024-25 £	2023-24 £
Staff costs inclusive of VAT		
Wages and salaries	621,748	650,836
Social security costs	72,010	79,766
Other pension	152,675	166,111
Total	846,433	896,713

No member of staff has a permanent contract of employment with the office of the PCA. The PCA is a ministerial appointment under paragraph 3 of Schedule 1 to the SBEE Act 2015. The PCA is paid through DBT payroll which is recharged to the PCA, including VAT. All other staff of the PCA are seconded from their home organisation. Home organisations invoice the PCA for their employees' salary, ERNIC and pension contributions, and include VAT where appropriate.

There have been no severance payments in the year. For more information and for staff numbers refer to the Remuneration and Staff Report on page 56.



3. Other expenditure

	2024-25 £	2023-24 £
Accountancy fees	23,640	18,423
Arbitration case management & Alternative arbitrators ¹	40,701	32,640
Annual licence fees	1,213	1,189
Audit fees	50,000	35,500
Bank charges	455	1,163
Independent assessor fees	367	600
IT software & consumables	229,077	295,379
Legal and professional fees ²	46,347	31,771
Raising tenant awareness including the tied tenant survey & outreach events	234,675	172,082
Printing, postage & stationery	10,611	10,420
Procured legal resource ³	207,363	321,609
Recruitment	1,827	2,160
Regulatory strategy	64,542	335
Rental costs	29,799	19,751
Staff training	7,077	4,863
Subscriptions	2,118	669
Travel & subsistence	4,350	2,276
Total other operating invoiced charges including VAT at 20% where applicable	954,162	950,830

- 1 The PCA let a contract in December 2021 to The Chartered Institute of Arbitrators (CI Arb) and these costs are included here. More information can be found on pages 22 and 23.
- 2 Invoiced legal costs received in year for external legal work. Invoiced GLD and Counsel costs up to 31 March 2025 have been paid and are included here.
- 3 Includes procured legal staff under the Crown Commercial Service Legal Services Panel.



4. Income

	2024-25 £	2023-24 £
Levy raised	2,650,000	2,969,507
Contract liability	(839,419)	(1,111,448)
	1,810,581	1,858,059
Referral fee income	2,000	1,600
Total income	1,812,581	1,859,659

5. Property, Plant and Equipment

	Right of Use Buildings £
Cost	
Balance as at 1 April 2024 and 31 March 2025	154,512
Depreciation	
Balance at 1 April 2024	21,501
Charged in year	10,736
Balance at 31 March 2025	32,237
Net book value at 31 March 2025	122,275
Net book value at 31 March 2024	133,011
Asset financing	
Leased	122,275
Net book value at 31 March 2025	122,275



	Right of Use Buildings £
Cost	
Balance at 1 April 2023 and 31 March 2024	154,512
Depreciation	
At 1 April 2023	10,736
Charged in year	10,765
Balance at 31 March 2023	21,501
Net book value at 31 March 2024	133,011
Net book value at 31 March 2023	143,776
Asset financing	
Leased	133,011
Net book value at 31 March 2024	133,011

6. Receivables and other assets

Amounts falling due within one year

	2024-25 £	2023-24 £
Trade and other receivables	371	371
Other debtors	–	239
Prepayments	40,198	32,924
Total	40,569	33,534

Trade and other receivables are not past due nor impaired. The expected credit losses on trade and other receivables are not considered to be material.



7. Cash and cash equivalents

	2024-25 £	2023-24 £
Balance at 1 April	2,194,787	3,600,407
Net change in cash and cash equivalent balances	(922,549)	(1,405,620)
Balance at 31 March	1,272,238	2,194,787
The following balances at 31 March were held at:		
Government Banking Service	1,272,238	2,194,787
Balance at 31 March	1,272,238	2,194,787

8. Trade payables and other liabilities

	2024-25 £	2023-24 £
Amounts falling due within one year		
Contract liability – 2022-23	–	735,675
Contract liability – 2023-24	–	1,111,448
Contract liability – 2024-25	839,419	–
	839,419	1,847,123
Trade and other payables	7,458	20,307
Accruals	466,862	362,289
	474,320	382,596
Total	1,313,739	2,229,719

The contract liability solely relates to the unspent levy due to be returned to the pub-owning businesses. The accruals mainly relate to invoices for the secondment of staff and a more detailed explanation can be found in the Remuneration Policy on page 56.

9. Financial commitments

The PCA had no capital commitments (2024: £Nil). The PCA has a software license. The total future cost under the contract is £85,213 (2024: £111,084), with £36,391 (2024: £32,262) chargeable no later than one year and £48,822 (2024: £78,822) chargeable between one and five years.



10. Leases

IFRS 16 determines that a lease liability is recognised in the statement of financial position at the present value of the future minimum lease payments, discounted at the interest rate implicit in the lease, or incremental borrowing rate, along with a corresponding right-of-use asset.

The FReM mandates the PCA to use the modified retrospective approach without restatement of comparatives and with certain simplifications available upon adoption.

IFRS 16 defines the lease term as the non-cancellable period of a lease together with:

- a) periods covered by an option to extend the lease if the lessee is reasonably certain to exercise that option; and
- b) periods covered by an option to terminate the lease if the lessee is reasonably certain not to exercise that option.

The PCA utilised the practical expedient that permitted the application of IFRS 16 to existing operating leases only, and 1 lease that fell within the scope of IFRS 16:

- 23 Stephenson Street, Birmingham

The PCA entered into a service Memorandum of Terms of Occupancy agreement for rent and services for accommodation at 23 Stephenson Street, Birmingham on 18 August 2021 for a period of 15 years. The agreement contains a running break clause which can be triggered at any time with a 6 month notice period.

The agreement is subject to rent reviews in December 2025 and December 2030 and in line with the FreM, the cost model in IFRS 16 has been used as the appropriate proxy for initial measurement of the right of use asset.

The PCA has recognised a right-of use asset (ROUA) on transition (1 April 2022) at an amount equal to the remaining lease liability for the full term of the lease. This is because it has been concluded that the PCA is reasonably certain that it will not exercise the break clause before the end of the lease term.

The PCA has adjusted the value of the ROUA by the amount of any prepaid or accrued lease payments relating to the lease recognised in the statement of financial position immediately before 1 April 2022. In line with IFRS 16, non-recoverable VAT is excluded from the calculation of the lease liability and expensed as it falls due.

The right-of-use asset is depreciated on a straight-line basis over the term of the lease with depreciation being charged to the statement of comprehensive net expenditure.



	2024-25 £	2023-24 £
Office space		
No later than one year	11,520	11,520
Later than one year and not later than five years	46,082	46,082
Later than five years	70,859	82,379
Less: interest element	128,461	139,981
	(7,118)	(8,368)
Present value of obligation	121,343	131,613
Current lease liability	10,270	10,270
Non-current lease liability	111,073	121,343
Reconciliation of lease liabilities		£
Opening lease liability as at 1 April 2024		131,613
Interest charged in statement of comprehensive net expenditure		1,250
Lease payments made		(11,520)
Closing lease liability as at 31 March 2025		121,343

11. Contingent liabilities

As at 31 March 2025, there were no contingent liabilities (2024: £Nil).

12. Related party transactions

The PCA has had various material transactions with DBT, through the provision of payroll for the Adjudicator and ICT services.

Key management personnel are the members of the management board which include permanent staff. None of the PCA members of key management staff undertook any material transactions with DBT during the year, except for remuneration paid for their services – see the Remuneration and Staff report on page 56.



13. Events after the reporting period and Accounting Officer declaration

The Accounting Officer authorised these financial statements for issue on the date they were certified by the Comptroller and Auditor General.

In accordance with the requirements of IAS 10 'Events After the Reporting Period', post-Statement of Financial Position events are considered up to the date on which Accounts are authorised for issue. This is interpreted as the same date as the date of the Certificate Report of the Comptroller and Auditor General. There are no post-Statement of Financial Position events between the balance sheet date and this date.



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