

# Pubs Code Adjudicator Strategy 2025–2027

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## Introduction



The Pubs Code Adjudicator (PCA) promotes fairness in the relationship between tied tenants and pub-owning businesses with more than 500 tied pubs in England and Wales. Six pub companies are regulated: Admiral, Greene King, Marston's, Punch Pubs, Star Pubs and Stonegate. The PCA's first strategy (2022–2025) established a clear foundation for effective regulation and tenant protection, including improving stakeholder engagement, providing an efficient arbitration service and supporting the delivery of the PCA's regulatory duties and functions.

This strategy sets out the PCA's vision and priorities for October 2025 to September 2027, building on our achievements to date. The strategy is informed by stakeholder consultation and the evolving context of the sector, reflecting the challenging external environment in which the industry operates. Eighteen responses to the consultation on our draft objectives were received from industry stakeholders (see annex below). Our three draft strategic objectives were supported by the majority of those who expressed a view. We have developed the priorities and milestones within these objectives, taking into account stakeholder feedback.

#### Our three strategic objectives are:





## Strategic context

The PCA remains focused on delivering the statutory Code principles which drive our mission to protect fairness in the tied tenant relationship. To support the effective delivery of the PCA's objectives as laid down by parliament in legislation, it is important that the PCA's strategy is informed by the context in which the pubs industry operates, and changes in the way technology is being used.

The external environment is complex and challenging for the pubs industry. The PCA can support efficiency in the industry by regulating proportionately, streamlining our processes and communicating clearly. In addition, emerging digital technologies offer new opportunities that can be explored to support effective and efficient regulation, including improving tenant engagement and understanding of Code rights.

Alongside the development of this strategy, the Department for Business and Trade has been conducting its three-yearly statutory review of the Pubs Code and the PCA, covering April 2022 to March 2025, alongside a post-implementation review of the Pubs Code regulations. This strategy has been designed over a two-year period to provide sufficient flexibility to allow the PCA to effectively respond to change.

The diagram below illustrates how the PCA's legal and external context informed the development of our strategy.





## Code principles

- 1. Pub companies deal with tied tenants fairly and lawfully
- 2.Tenants are no worse off than if they were free of tie

#### **PCA** mission

"Protecting fairness in the tied tenant relationship"

## Strategic objectives

Effective Exploring Streamlining regulation innovation delivery

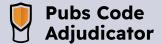
### **External** environment

Complex, changing and challenging

Stakeholder views

Stakeholder feedback





## **Strategic Objectives**

## 1. Effective regulation



We will deliver our statutory objectives, driving fairness in the tied tenant relationship and working with pub-owning businesses and stakeholders across the sector. Our focus will be on:

- Maintaining independent, expert regulation that raises standards
- Driving a culture of positive compliance and good practice within pub-owning businesses
- Seeking insights from stakeholders to inform our regulatory activity, including tied pub tenants, tenant groups, pub-owning businesses and wider industry bodies
- Targeting regulation to maximise impact and tackle key risks to tenant fairness
- Ensuring regulatory processes are proportionate and minimise unnecessary burden





## 2. Exploring innovation



We will embrace technological change to enhance our regulatory approach and support better outcomes for tenants and the industry. Our priorities include:

- Harnessing intelligence and evidence to drive quality, support risk-based regulation and promote transparency
- Exploring the benefits of new technologies, including artificial intelligence
- Developing our work with industry specialists and professional advisers to enable tenants to more easily access Code rights
- Enhancing our digital presence to improve our services and promote tenant awareness of Code rights
- Ensuring regulation enables, rather than stifles, innovations in pub-owning businesses such as digital improvements in support provided to tied tenants







## 3. Streamlining delivery



We will ensure our regulatory activities are both effective and efficient, supporting value for money. We will communicate clearly about the outcomes the Code seeks to achieve and provide clarity for those we regulate. We will do this by:

- Reviewing and streamlining regulatory information, working with pub-owning businesses and other stakeholders to ensure clarity and accessibility
- Delivering high-quality, accessible arbitration, including bringing our arbitration service in-house, ensuring value for money
- Focusing our handling of enquiries to increase the impact on good regulatory outcomes and tenant fairness
- Supporting the implementation of any regulatory changes arising from government's statutory and post-implementation reviews of the Code and PCA
- Monitoring and reporting on progress through published annual reports



Streamlining delivery



## Responding to stakeholder feedback

This strategy has been shaped by feedback from stakeholders across the sector, and we are grateful to all those who took the time to share their views with us.

Key themes raised in consultation included the importance of stakeholder engagement; ongoing concerns about the handling of repairs and dilapidations; arbitration quality and processes; and tenant access to professional advice. Feedback also reflected the wider economic challenges faced by the industry at the current time, including the impact on tenant wellbeing, and the need for targeted, risk-based regulation, greater use of and access to data and reduced regulatory burden.

We have strengthened our commitments as appropriate across these different areas and will continue to engage openly and transparently with our stakeholders.





## **Delivering the strategy**

The plan below sets out key milestones we want to meet in order to achieve our three strategic objectives over the two-year strategy period, October 2025 – September 2027. Progress against these milestones will be monitored and reported publicly within the PCA's annual reporting process. Our annual report also includes delivery against key performance measures relating to the effective delivery of core regulatory processes, such as arbitration, breach reporting, enquiries handling and compliance monitoring.

We look forward to continuing to work with stakeholders across the industry over the coming years to ensure that the Pubs Code protects fairness in the tied tenant relationship.





## **Delivery Plan**

| Strategic<br>Objective  | Year 1<br>(Oct 2025 - Sept 2026)  | Year 2<br>(Oct 2026 - Sept 2027)   |
|-------------------------|---|--|
| Effective<br>Regulation | <ul> <li>Continue to develop our engagement with pub-owning businesses, tenants and stakeholders through roundtables, meetings and visits</li> <li>Use tenant survey and stakeholder insights to inform regulatory priorities, e.g., further work on repairs and dilapidations</li> <li>Make targeted regulatory interventions that drive compliance, using transparency as a tool to good practice</li> <li>Support pub-owning businesses to share good practice examples to promote positive compliance culture across all six regulated businesses</li> <li>Review and streamline the annual compliance reporting processes</li> </ul> | <ul> <li>Continue regular engagement and feedback with stakeholders</li> <li>Monitor and report on progress against regulatory priorities</li> <li>Ensure the annual compliance reporting process supports continuous improvement and consider how compliance data may be shared more widely</li> </ul>                      |
| Exploring Innovation    | <ul> <li>Improve intelligence capture, analysis and reporting to support risk-based regulation</li> <li>Explore the impact of AI tools internally</li> <li>Enhance our digital presence and tenant engagement through website improvements</li> <li>Develop our engagement with professional advisers (e.g. surveyors, lawyers, accountants) to support tenant awareness</li> </ul>   | <ul> <li>Develop PCA use of AI and digital tools</li> <li>Understand how pub-owning business' approaches to digital innovation and AI can support and impact on compliance</li> <li>Move appropriate regulatory processes online</li> <li>Develop the support that we provide to professional advisers to tenants</li> </ul> |



| Strategic<br>Objective   | Year 1<br>(Oct 2025 - Sept 2026)   | Year 2<br>(Oct 2026 - Sept 2027)   |
|--------------------------|--|--|
| Streamlining<br>Delivery | <ul> <li>Bring PCA arbitration service back in-house</li> </ul>  | <ul> <li>Implement further improvements to Pubs</li> <li>Code arbitration as appropriate</li> <li>Publish more bite-sized and engaging tenant information</li> </ul> |
|                          | <ul> <li>Review stakeholder feedback on arbitration rules and determine next steps</li> <li>Review and update regulatory information in consultation with pubowning businesses and other stakeholders</li> <li>Make tenant information more accessible, considering new products and bite-sized formats</li> </ul> |  |
|                          |  |  |
|                          |  | - Implement any regulatory changes in relation to the statutory and post-implementation review   |
|                          |  |  |
|                          |  | – Develop new strategy for<br>October 2027 onwards   |
|                          | <ul> <li>Focus enquiries handling to increase the<br/>impact on good regulatory outcomes,<br/>tenant fairness and promote sources of<br/>tenant wellbeing support</li> </ul>   |  |
|                          | <ul> <li>Respond to statutory and post-<br/>implementation review outcome</li> </ul>   |  |





## **Annex**

The draft consultation was shared with regulated pub-owning businesses and wider industry stakeholders. We would like to thank all pub-owning businesses and industry stakeholders who responded to the consultation to support the development of this strategy:

- Admiral Taverns
- Association of Valuers of Licensed Property (AVLP)
- British Beer & Pub Association (BBPA)
- British Institute of Innkeeping (BII)
- BII accountancy panel chair
- BII legal panel chair
- Campaign for Real Ale (CAMRA)
- Campaign for Pubs
- Federation of Licensed Victuallers Associations (FLVA)
- Forum of Private Business
- Greene King
- Licensed Trade Charity (LTC)
- Marston's
- Pub Governing Body
- Pub is the Hub
- Punch Pubs
- Royal Institution of Chartered Surveyors (RICS)
- Society of Independent Brewers and Associates (SIBA)





Pubs Code Adjudicator

Website: www.pubscodeadjudicator.org.uk

Email: office@pubscodeadjudicator.gov.uk

