

IPReg: 2026 Business Plan, 2026 Budget and Practising Fees consultation

1. The Chartered Institute of Trade Mark Attorneys (CITMA) is responding to the consultation by IPReg on their 2026 Business Plan, Budget and Practising Fees in its capacity as an Approved Regulator, as defined in the Legal Services Act 2007 (the Act) and as the representative body for Chartered Trade Mark Attorneys and the wider trade mark and design profession. We are grateful to IPReg for the opportunity to comment.
2. Our response answers the specific questions asked in the consultation.

Question 1. What are your views on the proposed business plan?

3. Many of the activities within the 2026 business plan are a continuation of the activities set out in the 2024/25 and 2025/26 business plan and therefore we generally support the proposed plan.

Driving forward the work on education

4. We have provided commentary on the Education Review through previous business plan consultations and in various meetings with the review team to date. We ask that IPReg continues to reflect on this feedback as the review progresses. We are generally supportive of the review, which is a major undertaking and a significant project for IPReg. The proposal to utilise some of the financial reserves to fund the project appears to be a sensible approach, as it will help to limit increases in practising fees.
5. We welcome the proposal to introduce an Expert Advisory Group and an Expert Reference Group. These seem like sensible groups to establish and support the review. The establishment of these groups should help to manage risks such as scope creep and escalating costs. We would be keen for CITMA to have appropriate representation on both groups as well as continue our dialogue with the review team through the established channels.

Thematic reviews – Follow up work on transparency of costs information

6. We support the approach set out by IPReg, following the review taken by Frontier Economics into the effectiveness of the transparency requirements and the recommendations made. Given that compliance is perceived to be high, it seems proportionate not to implement all the recommendations at this stage, but instead to continue monitoring. The new guidance should further ensure there is awareness of the requirements and a high compliance rate.

Assessing the impact of the PII Sandbox

7. We support the proposal to continue to monitor the Sandbox. We would strongly recommend consultation on any proposals before changes are considered when looking further into the approach taken on PII.
8. PII remains an important protection for clients who use a regulated firm / regulated attorney and any changes needed to be carefully considered.

Diversity

9. We are pleased to see a continued ring-fencing of reserves for diversity initiatives. It is important for IPReg to support and align with the broader work of the IP profession in this area.
10. We are pleased to see the commitment to undertake a diversity survey in 2026, building on previous surveys carried out. The regularity of undertaking a diversity survey will help ensure that more robust data is available, providing a stronger basis for meaningful action. We remain available to assist IPReg with their work in this area and look forward to the publication of the survey results.

Responding to LSB consultations and related work

11. We remain concerned about the volume of work emanating from the LSB, which requires significant time and resource from IPReg in order to comply. The volume of work is contributing to the rising cost of regulation.

Encouraging innovation in the provision of IP legal services

12. We are encouraged to see that IPReg intends to work collaboratively with CIPA, CITMA and other legal regulators to understand the way AI and technology is being used and how they can further support the delivery of legal services.
13. The collaboration and engagement so far has been positive. We fully support a collaborative approach, which will help to ensure that regulation does not create barriers to adoption while also putting in place appropriate safeguards. This balance is essential to enable the regulated community and the wider profession to use AI with confidence.

IPReg's team, office and Board meetings

14. We note the plan to recruit to a new governance and compliance post. We would welcome further information about this post to understand what the role entails and why there is a need for resource in this area at this time. Please also see our comments below in respect of the budget.

Question 2. Do you have any evidence of the impact that each of these proposals will have on different categories of individuals or firms? In particular, do you have any evidence of the potential impact on the diversity of the profession? Do you have any comments on the Equality Impact Assessment at Annex B?

15. We do not have any evidence regarding the impact of the proposals on different categories of individuals or firms, nor do we have any comments on the Equality Impact Assessment.

Question 3. What are your views on the proposal to increase practising fees by 3.4%?

16. In previous responses to practising fee consultations, we made it clear that we hoped for a reduction in practising fees, all things being equal, in future years. This expectation was supported by the LSB, which anticipated that the cost of regulation would decrease over time. It is therefore concerning to see the growing proportion of the budget (reported at 7% in the consultation) required to meet the LSB levy, which has been increasing significantly above the rate of inflation.
17. Our overall position remains that we wish for the cost of regulation to reduce, however we consider the proposal to increase practising fees by 3.4% to be a reasonable approach for 2026.
18. We hope that, in future years, IPReg will be able to lower or freeze fees to help reduce the cost of regulation. We would welcome further information from IPReg ahead of the next budget and practising fee cycle on how it intends to achieve this, given the continued year-on-year increases. We request that this topic be included on the agenda for the relevant meetings of the Regulatory Forum.

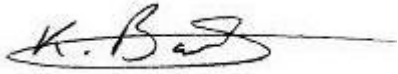
Question 4. What are your views on the proposed 2026 budget at Annex C?

19. There are a few lines within the budget where we would welcome further information and transparency from IPReg.
20. *Implementation of Board Meeting Solution* which has a budget of £20,000 (£0 in 2025). What is the solution and what does it intend to do? Why is this needed? What efficiency savings will it result in?
21. *Legal & Professional Costs* which has a budget of £58,500 (£30,500 in 2025). What is the reason for the £28,000 increase for 2026?
22. *Administrative Staff* which has a budget of £119,500 (£83,750 in 2025). The supporting narrative indicates the planned addition of an “Operations Director”, but this is not specifically mentioned in the consultation unless this is the “governance and compliance post” referred to in paragraph 32? Can more information on the rationale for the Operations Director position be provided and is this the sole reason for the £35,750 increase in this budget line for 2026? If the Operations Director position is separate to the new governance and compliance post, is the new governance and compliance post also covered by the administrative staff budget line or is it covered within the £22,450 increase in the *Regulatory Officers* budget line? Further information about the roles and the increases in these two budget lines would be welcomed.

Question 5. Do you have any comments on the draft Practising Fee Regulations at Annex F?

23. We have no comments on the draft regulations.
24. We would be happy to discuss any of these points further with representatives from IPReg if it would be of assistance.

For and on behalf of the Chartered Institute of Trade Mark Attorneys

A handwritten signature in black ink, appearing to read 'K. Bader', with a long horizontal flourish extending to the right.

Keven Bader
Chief Executive

3rd September 2025