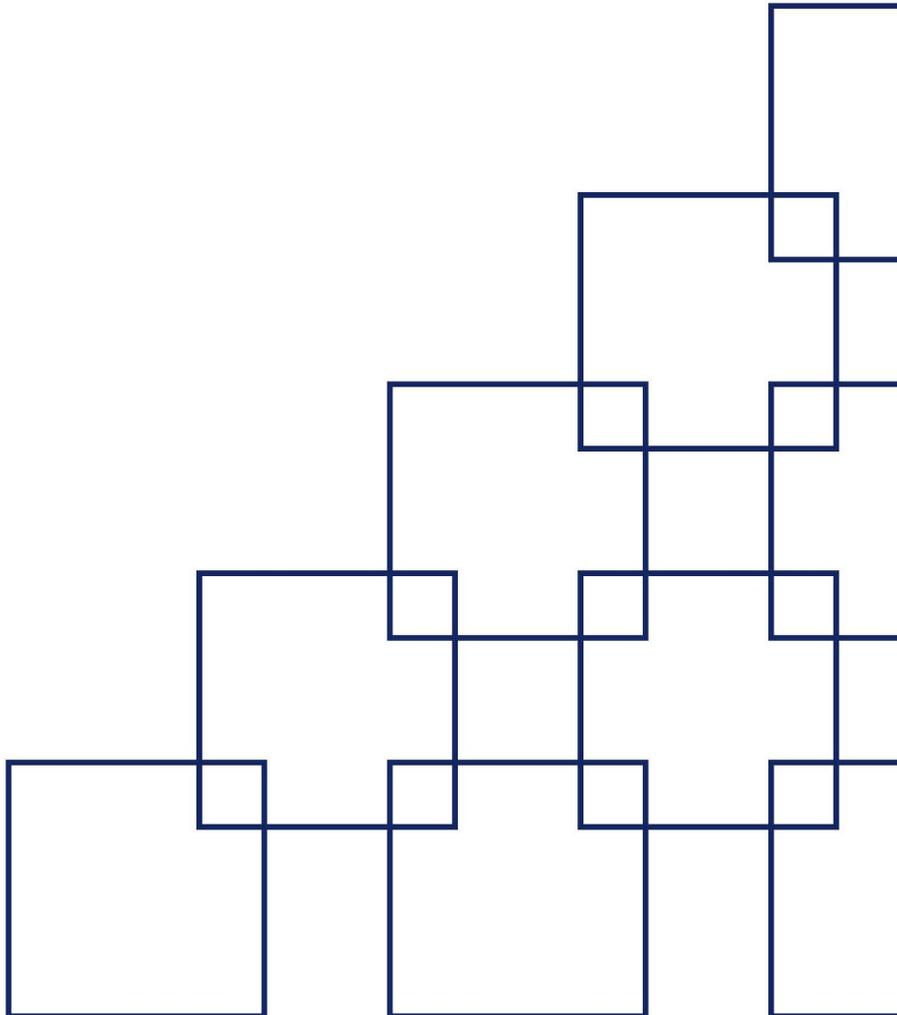


# **Unregulated representatives in the UK Intellectual Property system: Evidence of harm and a call for investigation**

June 2023



# Executive summary



The UK intellectual property (IP) system has historically been an envied piece of legal and economic infrastructure the world over. Our system has allowed businesses to monetise their intellectual assets, and protect the consumers that use goods and services that depend upon them.

However, our system is coming under strain. The increasing presence of unqualified, and therefore unregulated, representatives in the UK IP system is causing disruption to processes and case management, leading to delays and higher costs for consumers. These unregulated representatives purport to have the ability to represent others at the Intellectual Property Office (IPO), but in reality are often based overseas with no understanding of UK IP law and a simple PO box serving as their UK headquarters.

The issues caused by these individuals are on the rise due to regulatory loopholes created by Brexit and seized upon by firms in other jurisdictions. The basic principle of consumer fairness, that the services you advertise must be the services you can provide, has sadly been lost.

This paper explores the harm caused by these individuals to consumers, setting out data that attempts to quantify the damage caused.

The findings of our research include:

1. Consumers of the UK IP system are facing higher costs, delays and disruption to business as a result of unregulated representatives.<sup>1</sup>
2. These issues are getting worse.<sup>2</sup>
3. Over 90% of responding Chartered Trade Mark Attorneys believe the IPO should take action on this issue.<sup>3</sup>

The Chartered Institute of Trade Mark Attorneys (CITMA) has developed the following proposal to tackle this issue through the adoption of international best practices.

**CITMA believes that in order to represent someone other than yourself at the IPO, you must:**

have a UK address for service; and

be regulated by an appropriate UK body, namely Chartered Institute of Patent Attorneys, Chartered Institute of Trade Mark Attorneys, The Law Society, The General Council of the Bar, The Chartered Institute of Legal Executives, Law Society of Scotland or The Law Society of Northern Ireland;

or

be an employee representative of the company, or any subsidiary, holding company or subsidiary of such holding company (defined by section 1159 of the Companies Act 2006), which is the applicant or the holder of the right in question.

This proposal will ensure that consumers of the UK IP system will receive proper, timely and accurate legal advice, saving them from the needless delays and associated costs overruns caused by the growing presence of unregulated representatives.

In addition, this proposal will put the consumer first, giving them access to redress in the event of complications by ensuring that all representatives are compliant with the standards and redress mechanisms of an appropriate regulator.

While simple in nature, this proposal has already been adopted by comparable IP systems around the world, including the United States and European Union, in order to protect their consumers from individuals who cannot deliver the services they advertise.

However, while our proposal is readily adoptable, we encourage the IPO to first launch its own investigation into this issue to ensure a thorough understanding of the challenges facing its consumers.

It is time for the UK to act to safeguard the consumers of the UK IP system and protect this vital piece of economic infrastructure.

**Rachel Wilkinson-Duffy**  
**President**  
**Chartered Institute of Trade Mark Attorneys**

# Introduction

---

The UK is home to one of the world's pre-eminent intellectual property systems, acting as an envied and exemplary model to the international community. Businesses, creators and innovators alike rely on the system to invest, grow and flourish.

This robust and dependable system is a key reason why industries with high use of IP rights contribute £166.5 billion to the UK's gross value added every year. <sup>4</sup>

The key features of the system should allow UK businesses to monetise their IP and protect the consumers that use goods and services that rely on it. This is no longer the case. Unqualified, and therefore unregulated, individuals are representing others in IP matters - resulting in harm to UK businesses and the IP system that helps support them.

This paper explores the damage caused when a business engages someone who holds themselves out as having the necessary expertise in trade mark matters, but in reality does not. We hope that this case, and the data and evidence within, highlights the need for further investigation of the harm caused by unregulated representatives by the IPO.

To assess the harm CITMA caused by unregulated representatives CITMA has:

1. Commissioned research organisation Enventure Research to survey Chartered Trade Mark Attorneys, assess their experience and collate case studies.
2. Investigated the top filers at the IPO for signs of unusual market behaviour.
3. Reviewed the steps taken in other jurisdictions to tackle the harm caused by unregulated representatives.

**industries with high  
use of IP rights contribute  
£166.5B  
to the UK's gross value added  
every year.**

The findings of these actions speak for themselves and are discussed in the report below.

There is clear evidence that unresponsiveness, procedural mistakes and a general lack of knowledge by unregulated representatives are all contributing to increased costs and wider disruption to consumers of the UK intellectual property system. Furthermore, the problem is getting worse.

In order to protect consumers action must be taken and we encourage the IPO to investigate this issue further as a matter of urgency and adopt CITMA's internationally recognised proposals to protect consumers.

# Unregulated and unqualified representatives

---

Allowing unregulated representatives who do not understand the relevant law and IP system to act for consumers of the UK IP system is causing significant harm.

Representatives that are regulated by an appropriate UK body are subject to stringent codes of conduct. These codes require them, amongst other things, to only advise on matters within their own expertise or competence, to take out appropriate professional indemnity insurance and to provide a complaint handling procedure.

Unregulated representatives do not have to abide by these standards and requirements.

The key benefits of engaging appropriately regulated representatives are:

- a. The consumers of these legal services receive proper legal advice and guidance on all aspects of their case early on, resulting in the filing of trade mark applications that are timely, fit for purpose and well managed. Regulated representatives are more likely to ensure proper coverage is obtained and to encourage settlement at dispute, saving time and costs for the consumer. Allowing unregulated representatives to act on matters not within their competence or expertise results in the consumer receiving poor advice and being subjected to errors and omissions in advice and process.
- b. The consumers of these legal services have access to redress if and when things do go “wrong” as they can do from time to time, which is not the case when an unregulated representative is engaged. Consumers of regulated representatives can complain to the appropriate regulator and seek remedial action and compensation. Regulated representatives have professional indemnity insurance in place for when things go very badly wrong. Unregulated representatives are not required to have either a complaints procedure or insurance.
- c. If things do go very badly wrong with a regulated representative, the consumer is protected as the regulatory bodies have the power to disbar/strike off a regulated representative which in certain cases can include notifying the IPO that the representative’s authorisation to act should be withdrawn. The consumer of an unregulated representative is not protected in this way – the unregulated representative can continue to act with impunity.

# Unregulated and unqualified representatives: what is the harm?

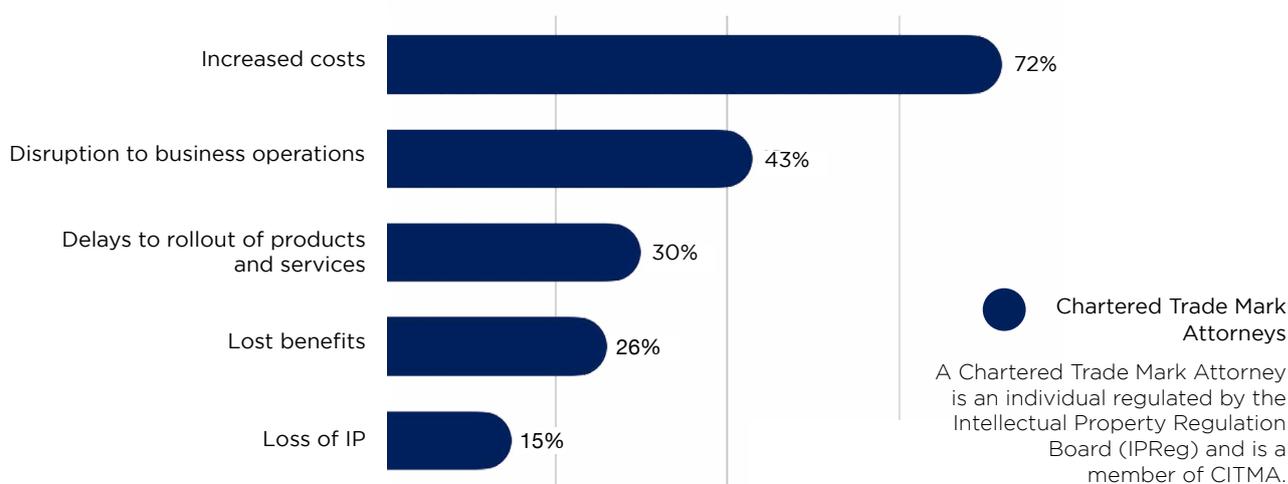
CITMA recently commissioned a survey of Chartered Trade Mark Attorneys on their experiences when interacting with unregulated representatives on the other side of proceedings, the effect it has on the efficiency of proceedings and the impact on businesses. The research was conducted by independent research company Enventure Research.

33% (280) of Chartered Trade Mark Attorneys responded to the survey<sup>5</sup> and the statistics speak for themselves. An overwhelming majority, 78% of respondents<sup>6</sup>, have experienced dealing with an unregulated and/or unqualified representative in the past three years.

We asked this group further questions about their experience and whether there have been any issues caused by unregulated and unqualified representatives.

## Have any of your clients experienced any of the following issues when dealing with an unregulated and/or unqualified representative in the last three years?

Base: Chartered Trade Mark Attorneys - Increased costs (239); Disruption to business operations (231); Delays to the rollout of products and services (230); Lost benefits (231); Loss of IP (229)  
Source: Enventure Research (2023)<sup>7</sup>



90%<sup>8</sup> of those Chartered Trade Mark Attorneys indicated that they have experienced delays to proceedings as a result of dealing with unregulated attorneys, with 59%<sup>9</sup> reporting average per case delays of sixteen days or more.

This is unsurprising given that 91%<sup>10</sup> reported unresponsiveness on the part of the unregulated representative, resulting in 40%<sup>11</sup> of respondents dealing with the other side's applicant directly.

Highlighting the unhappiness of rights holders towards their own unregulated representatives 33%<sup>12</sup> of attorneys indicated they had been contacted by the client of the unregulated representative directly to resolve issues with the case.

As evidence of the harm unregulated representatives are causing to businesses, 30% of those who have had dealings with unregulated representatives reported that their clients were forced to delay the rollout of new products and services that required IP protection<sup>13</sup> and 43% of respondents have reported disruption to client business operations.<sup>14</sup>

In terms of cash flow, this affects businesses costs.

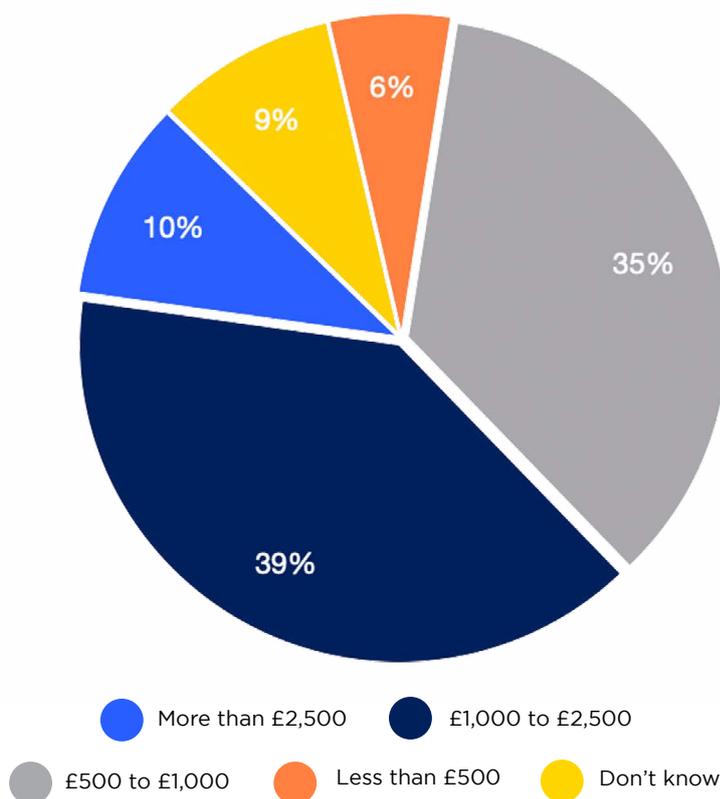
72%<sup>15</sup> of the attorneys have experienced increased costs for clients. In 49% of instances these increased costs amount to more than £1,000<sup>16</sup> - this does not factor in lost time.

In a particularly worrying point, 38%<sup>17</sup> of respondents stated they have been unable to recoup a cost award from an unregulated representative.

### On average per case, approximately how much have the increased costs incurred been for your clients?

Base: Chartered Trade Mark Attorneys (172)

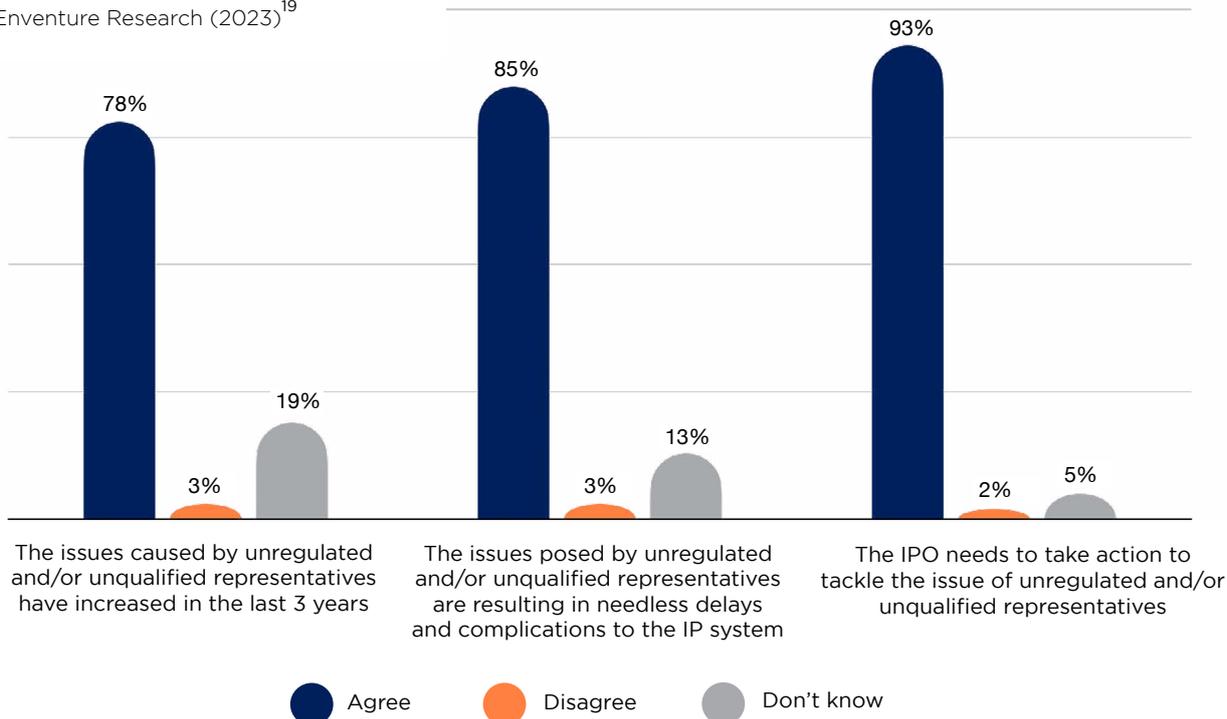
Source: Enventure Research (2023)<sup>18</sup>



## To what extent do you agree or disagree with the following statements?

Base: Chartered Trade Mark Attorneys (280)

Source: Enventure Research (2023)<sup>19</sup>



# Should the IPO take action?

---

Yes. 78%<sup>20</sup> of responding Chartered Trade Mark Attorneys have reported that the issues that flow from unregulated representatives are getting worse, with 85% of respondents agreeing that this is resulting in needless delays and complications to the UK IP system.<sup>21</sup>

If this problem is allowed to continue to worsen, it will mean numerous consumers of the UK IP system face substandard, and in some cases harmful, service and in turn damage the international standing of the UK IP system.

93%<sup>22</sup> of respondents agree that the IPO needs to take action to tackle the issue of unqualified and unregulated representatives.

The following case studies are an all too familiar occurrence in the UK IP System.

## **Case Study: Increased costs due to unregulated representatives An IP lawyer based at a full service law firm in London**

---

The holder of an existing UK trade mark registration effectively ended up paying two sets of legal fees to oppose a similar mark filed by an unregulated representative – their own fees as well as a hefty “contribution” to the applicant’s fees, directly as a result of an unqualified representative.

The unregulated representative did not appear to have any knowledge of correct procedure for standard and straightforward communication with the IPO, and even when assisted by the other side’s IP lawyer directly, did not act on that assistance. This caused delays and additional costs for the earlier right’s holder..

“Our client opposed a recently filed trade mark, filed through an an unregulated representative. The applicant was a recently incorporated company, its representative had a strikingly similar name to a foreign trade mark firm.

“In exchanges with us, the representative has displayed little-to-no understanding of UK trade mark laws or practice, asking us basic questions such as how to amend trade mark specifications and whether the IPO charges fees for amending a specification.

“We corresponded with the representative ahead of the opposition deadline, even reaching an agreement on an amended specification and received promises to obtain a letter of undertaking from the applicant.

“None of this materialised. Our client has had to bear the IPO opposition fees as well as our legal fees, and also the cost of protracted correspondence with the applicant’s representative.

“Solely in order to bring the dispute to a conclusion, our client agreed that we could explain to the applicant’s representative how to make a simple specification amendment request to the IPO. Even though this assistance was provided, the amendments were not filed.

**Case Study:**  
**Damage to the IP System**  
**A Trade Mark Attorney at Haseltine Lake Kempner**

---

The system is allowing legitimate businesses which bring value to the UK economy to come to harm from entities whose IP is represented by unregulated representatives, with nothing more than an address.

It also reflects poorly on the systems supporting businesses to invest in the UK.

“I have never encountered a case where the course of proceedings has been littered with so many procedural errors, during a recent case dealing with an unregulated representative

“This even includes all of the cases I have acted in involving litigants in person.

“Each error – whether missing deadlines, filing the incorrect forms, not copying us with correspondence, filing documents at random points during the proceedings, failing to address IPO objections - resulted in us having to carry out work at our client’s expense and, cumulatively, this has been significant.

“Our client is a company that clearly values the UK market; it recently successfully litigated in the Intellectual Property Enterprise Court.

“Its experience before the IPO in this case is disappointing and reflects poorly on our country’s business infrastructure.

“This issue would not have arisen if, as a minimum, all professional representatives were required to operate in person in the UK, rather than remotely through a postal address. This would benefit all businesses who operate in the UK.”

**78%** of responding Chartered Trade Mark Attorneys have reported that the issues that flow from unregulated representatives are getting worse,



**93%** of respondents agreeing that the IPO needs to take action to tackle the issue of unqualified and unregulated representatives

## **Case Study:**

### **Consumers finding new representation due to poor services delivered by unregulated representatives A Chartered Trade Mark Attorney at Edwin Coe**

---

A UK-based innovator could have lost her trade mark registration due to an unregulated attorney. Thankfully a UK Chartered Trade Mark Attorney was able to help, but this was no thanks to the system.

The UK business owner had filed a trade mark using an agency that comprised of all foreign-based directors. According to IPO records, the Agent of Record did not make mention of the agency they were supposed to be working at, they used their name.

“My client had not heard anything about her application so checked the IPO website and found that a TM7A form (notice of threatened opposition) had been filed. The client had not heard anything about this from her own advisors, so contacted the IPO, who told her that a copy of the TM7A had been sent to her named representative.

“My client tried to call her advisors, but no-one was picking up calls. Her application was published in July and the TM7A was filed late August 2022.

“The client was advised by the IPO to find a trade mark attorney on the CITMA website, and found my firm. We heard from her in October.

“We took over responsibility for the mark in early October, and immediately contacted the IPO, and was sent the correspondence concerning the opposition dated in August notifying the original representative of the TM7A.

“I was also sent a copy of the TM7 (notice of opposition), which was filed in October, plus the accompanying letter sent by the IPO. Both the letter relating to the TM7A and the actual opposition TM7 were sent to the existing representative.

“My client did not ever hear from her original advisor about the TM7A. In the morning of 14th October, my new client emailed me to say that she had now heard from her previous representative, who was only then alerting her to the opposition, and looking for fee to represent her in the opposition proceedings.

“I suggested she go back to the original representative to say that a new advisor had been retained for the application, and to close their file.

“Although they did notify about the opposition, it meant my client lost the opportunity to negotiate following the submission of the TM7A.

“She was actively in the process of putting her business in place to find distributors of her new innovative product, and was none-the-wiser as to the threat of opposition. The system should not allow this to happen.

“The way this had been handled by the original representative put her business and the product launch in jeopardy and their negligence would have had no redress, something which her business might not have recovered from.”

# What is the scale of the problem?

The UK is being used as a registration hub by foreign businesses - a location to register despite having no intention to do business in the jurisdiction. On the surface, this may appear a positive development demonstrating the growth and vibrancy of the UK system.

However, by submitting their applications through unregulated representatives with no operational place of business in the UK, these foreign businesses are inadvertently crowding out domestic businesses and causing harm to consumers of the UK IP system.

Of the eight representatives who filed the most applications at the IPO in 2022, three are UK entities with Chinese directors only and a fourth appears to use an address where other similar companies are based. Together they account for an astonishing 4,609 applications - far beyond the norm for other filers as the table of top 30 filers at the IPO in 2022 illustrates.<sup>23</sup>

## Table of Top 30 Filers at the IPO in 2022

Source: Reading, R. (2023) Trade mark trends of 2022, CITMA Review

	REPRESENTATIVE	APPLICATIONS		REPRESENTATIVE	APPLICATIONS
1	IPP Master	1,363	16	Withers & Rogers	623
2	Stobbs	1,360	17	Wilson Gunn	616
3	Goldstar Compliance Ltd	1,319	18	Boult Wade Tennant	614
4	HGF	1,157	19	Trademark Eagle	562
5	Murgitroyd	1,040	20	Akossule	558
6	Isabelle Bertaux	1,038	21	Haseltine Lake Kempner	529
7	Axis Professionals Ltd	993	22	Forresters	519
8	Yayipcom	934	=	Kilburn & Strode	519
9	Marks & Clerk	915	24	Trade Mark Wizards	502
10	Barker Brettell	860	25	Cleveland Scott York	495
11	CEJR	854	26	Page, White & Farrer	470
12	Trama Legal S.R.O / Law & Tech	817	=	Stevens Hewlett & Perkins	470
13	D Young	738	28	J A Kemp	462
14	Lane IP	709	29	Appleyard Lees	453
15	Bird & Bird	639	30	J&P Accountants Limited	448

 Unusual market activity

'**IPP Master Limited**' with an address for service at a residential location in Pontypridd, Wales, has one director who is a Chinese national. It filed **1,363 UK trade mark applications** for clients at the IPO in 2022, mostly for applicants whose business operations are based in China. It filed more applications than any other representative all year. Companies House lists its nature of business as providing software development and photocopying amongst other items, as well as the activities of patent and copyright agents.<sup>24</sup>

'**Goldstar Compliance Ltd**' filed **1,319 trade mark applications** at the IPO by the end of 2022. It was registered with Companies House on 8th December 2021. The company has a sole director, a Chinese National, who is resident in China. The nature of business is listed as a tax consultancy and office administration services.<sup>25</sup>

'**Yayipcom**' filed 934 trade mark applications and appears to be using an address that is not recognised by Royal Mail. No such company exists on Companies House records, although there is an active company with a single director based at a very similar address.<sup>26</sup>

These representatives at the IPO in 2022 have managed to go right to the top of the list for volume of applications filed despite having company records that are extremely unusual in terms of the market and despite having no easily ascertainable regulated representatives.

Many of the non-UK representatives, including EEA-based attorneys, filing trade mark applications in 2022 have a PO box, serviced office or residential address as their address for service.

The question then is why the UK permits its public resource to be utilised for commercial activity that does not take place in the UK and instead in fact slows down the ability of legitimate UK innovators to speedily and cost-effectively protect their brands?

This activity undermines the accuracy and integrity of the UK trade mark register. With so many potentially spurious registrations being accepted onto the register, UK businesses can inadvertently be blocked from registering their IP, or incur significantly higher costs than is necessary.



# Worldwide context

---

The problem of unregulated representatives undermining the efficient functioning of IP systems is not confined to the UK. However, other countries are tackling the issue more effectively making the UK an increasingly attractive target for such activity.

Until recently the U.S. trade mark system had only limited barriers to foreign applicants filing directly, or via unregulated representatives, and faced similar challenges to the UK system.

The United States Patent and Trademark Office (USPTO) observed “a significant increase in the number of applicants who are not fulfilling their legal and ethical obligations to file accurately and in good faith”.

The USPTO responded to the problem in 2019 by changing their rules to require all foreign-domiciled trade mark applicants, registrants, and parties to contentious proceedings to be represented by an attorney licensed to practice law in the United States.<sup>27</sup>

The USPTO’s decision to act reflects a widespread recognition in the United States that intellectual property is of security, as well as of commercial, importance. The changes to the US IP system have not made the US a closed economy; rather, by strengthening its IP system, users in the US can have greater confidence in the US system’s ability to protect their business interests.

The European Union Intellectual Property Office (EUIPO) goes further; requiring that representatives be qualified in the European Economic Area (EEA) must be an EEA citizen and have a proper place of business in the EEA.<sup>28</sup>



Post-Brexit the UK declined to adopt corresponding standards, resulting in a glaring disparity whereby representatives based in the UK as well as UK nationals based in the EEA are unable to represent clients before the EUIPO, whereas EEA representatives can act before the IPO simply by using a PO box or residential address in the UK.

The UK’s reluctance to restrict unregulated representatives from accessing the UK IP system, whilst other advanced economies tighten their protections, makes the UK an increasingly attractive option for those seeking quick, low cost trade mark registrations in a leading economy. This comes at a cost to users of the UK system, by driving up the price of doing business in the UK as our data above has shown.

The safeguards put forward by CITMA are in line with those in place in other advanced economies.

Making these changes would signal the importance the UK places on safeguarding the reputation of the IP system and shielding consumers in the UK from unnecessary costs and administrative burdens.

# Why have these issues developed?

---

There appear to be a number of separate reasons that have come together to explain the emergence of this growth in unregulated and unqualified representatives.

Firstly, there has clearly been an influx of registrations from overseas, largely China, as highlighted above.

Second, European firms have taken advantage of Brexit and established limited offices here in the UK.

Finally, there has been a growth in home grown, unregulated British representatives.

This is not merely an administrative issue. The current system is doing real economic harm to the consumers of the UK's regulatory regime – those are, the genuine trade mark holders who rely on the advice they are receiving.

Our innovators are now increasingly having to wade through unnecessary red tape and are then forced to engage with unregulated representatives in order to fight for their rights. This all adds significant cost, time and human resource onto real British businesses and businesses from overseas that are looking to invest in the UK.



# Alignment of proposals with wider strategies

---

## **The Legal Services Act 2007 ('LSA') and the Trade Mark Act 1994 ('TMA')**

The LSA and TMA quite rightly place consumer protection and regulation right at the heart of their objectives, alongside the creation of appropriate registries and sanctions for practitioners.

However, unqualified and unregulated representatives fall outside the scope of these pieces of legislation – meaning there is no recourse for consumers harmed by individuals that purport to be expert in the area but in reality do not have even a basic understanding of relevant processes.

The regulatory regime surrounding the provision of advice in the IP space should not undermine the principles established in the LSA and TMA. Consumer protection should be at the heart of the system's regulatory arrangements – but at present, the very opposite is the case. CITMA's proposals would rectify this disparity and ensure that where similar risks are present to consumers in related activities there should be similar regulatory outcomes.

## **IPO Strategy 2018 and 2022**

CITMA's asks are aligned with the IPO's 2018 Strategy, specifically in regards to the IPO's commitment to provide "Timely, reliable and quality services" as the IPO, by...

working with our customers to understand what they:

1. Value about the IPO and what they need.
2. Comparing our services to other leading offices, benchmark excellence and set a clear path to achieving it .
3. Eliminating the patent backlog and manage the surge in demand for trade marks and designs.

As set out in prior sections, the presence of unregulated representatives is causing delays and increased costs to users of the system. This stands in direct contrast to the IPO's commitment to offer the very best service and to efficiently manage the IPO's workloads and backlog.

Furthermore, when comparing the UK's IP system with the U.S. or European regimes, the UK is very clearly the outlier. By failing to take action against unqualified and unregulated representatives, this is not in line with the "benchmark excellence" described.

The most recent iteration of the IPO Corporate Strategy sets out the IPO's ambition to:

"be completely customer-focused in delivering services that are easy to use, operate to class-leading standards and change to meet future needs. We will provide creators and innovators with the tools that allow them to use IP to its full potential and inspire further innovation and creativity."

This paper has shown the costs, delays and disruption caused by the current system as a result of rising levels of unqualified and unregulated representatives. Addressing this important and very real issue would therefore be in line with the ambition stated above.

Finally, as CITMA's survey has shown, the unhappiness among the users of the current IP system indicates that the IPO should take note of the concerns of its customers and stakeholders. As has been highlighted: 93% of respondents agree that the IPO needs to take action to tackle the issue of unqualified representatives.

## **The Economic Crime and Corporate Transparency Bill**

This Bill, which is currently proceeding through the parliamentary process, provides a legislative package intended to prevent the abuse of UK corporate structures and tackle economic crime.

Clause 29(3) of the Bill places greater scrutiny on registered office address that are provided for UK companies. These addresses must be "appropriate". An office address is considered "appropriate" if documents sent to it by Companies House could reasonably be expected to come to the attention of a person acting on behalf of the company.

As we have demonstrated in this document, in many cases, unregulated representatives frequently use PO box addresses that are unmonitored. To ensure alignment with wider government plans on company registration the IPO should consider regulating IP representatives in a similar manner.



# Conclusion

---

The issues identified in this report are creating an unenviable user experience. Unnecessarily complicated cases, wasted time, significant delay and additional cost are tarnishing an otherwise gold standard trade mark system.

The UK is very much the outlier in allowing unregulated persons to represent the consumer, and this is harming consumers, businesses and ultimately the economy.

CITMA has identified a simple solution in line with precedent set by international counterparts. These changes would make a substantive contribution to addressing the harms explored in this paper.

**To re-iterate CITMA's ask:**

**In order to represent someone other than yourself at the IPO, you must:**

Have a UK address for service;

and

be regulated by an appropriate UK body, namely Chartered Institute of Patent Attorneys, Chartered Institute of Trade Mark Attorneys, The Law Society, The General Council of the Bar, The Chartered Institute of Legal Executives, Law Society of Scotland or The Law Society of Northern Ireland;

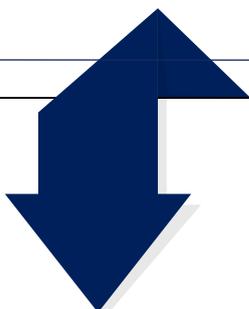
or

be an employee representative of the company, or any subsidiary, holding company or subsidiary of such holding company (defined by section 1159 of the Companies Act 2006), which is the applicant or the holder of the right in question.

This paper has shown the benefit of adopting these measures by attempting to quantify the harm currently being caused by unregulated representatives. CITMA believes that the data presented justifies further investigation of this issue by the IPO and the eventual adoption of our internationally recognised measures.

The Government's ambition is for the IPO to be the best office in the world to register and enforce IP, in turn helping "the UK to become the most innovative and creative country in the world". CITMA shares that ambition and looks forward to working with Government to make it a reality by addressing the harm caused by unregulated representatives.

# CITMA: Theory of Change



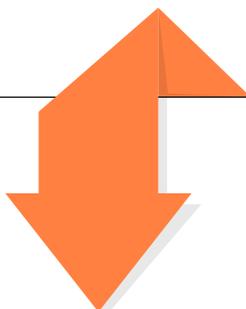
## Inputs

In order to represent someone other than yourself at the IPO, you must:

have a UK address for service;

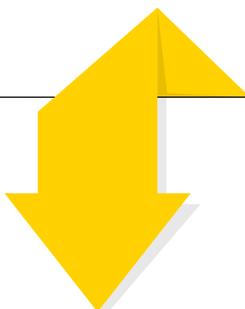
and be regulated by an appropriate UK body, namely Chartered Institute of Patent Attorneys, Chartered Institute of Trade Mark Attorneys, The Law Society, The General Council of the Bar, The Chartered Institute of Legal Executives, Law Society of Scotland or The Law Society of Northern Ireland;

or be an employee representative of the company, or any subsidiary, holding company or subsidiary of such holding company (defined by section 1159 of the Companies Act 2006), which is the applicant or the holder of the right in question.



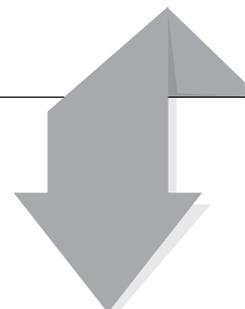
## Outputs

- Stronger consumer protection across the intellectual property system.
- Reduction in foreign applications that have no business reason to be filed in the UK.
- UK IP system brought in line with similar counterparts.



## Outcomes

- A more efficient IP system.
- Enhanced consumer protection for businesses using the services of qualified and regulated professionals.



## Impact

- Quicker for UK businesses to secure IP protection and rollout new services.
- Lower costs for UK businesses in securing their IP.
- Fewer delays for UK businesses in securing their IP.
- Better consumer protection for UK businesses.
- Improved economic security for the UK.

## Endnotes

1. Eventure Research. (2023). Experiences of unregulated and/or unqualified representatives survey. Pg 11: Available at: <https://www.citma.org.uk/asset/557AA91A-7594-45F9-AB4F7584250F44A2/>
2. Ibid Pg 19
3. Ibid Pg 19
4. Use of intellectual property rights across UK industries (2022) GOV.UK. Available at: <https://www.gov.uk/government/publications/use-of-intellectual-property-rights-across-uk-industries/use-of-intellectual-property-rights-across-uk-industries> (Accessed: 17th May 2023).
5. Eventure Research. (2023). Experiences of unregulated and/or unqualified representatives survey. Pg 7 Available at <https://www.citma.org.uk/asset/557AA91A-7594-45F9-AB4F7584250F44A2/>
6. Ibid Pg 8
7. Ibid Pg 11
8. Ibid Pg 10
9. Ibid Pg 15
10. Ibid Pg 9
11. Ibid Pg 16
12. Ibid Pg 16
13. Ibid Pg 11
14. Ibid Pg 11
15. Ibid Pg 11
16. Ibid Pg 13
17. Ibid Pg 17
18. Ibid Pg 13
19. Ibid Pg 18
20. Ibid Pg 19
21. Ibid Pg 19
22. Ibid pg 19
23. Reading, R. (2022) Trade mark trends of 2022, CITMA. Available at: <https://www.citma.org.uk/resources/trade-mark-trends-of-2022-review0323.html> (Accessed: 1st June 2023).
24. IPP Master Limited people - find and update company information. GOV.UK. Available at: <https://find-and-update.company-information.service.gov.uk/company/14503262/officers> (Accessed: 31st May 2023).
25. Goldstar Compliance Limited people - find and update company information. GOV.UK. Available at: <https://find-and-update.company-information.service.gov.uk/company/13788529/officers> (Accessed: 31st May 2023).
26. Companies House. GOV.UK. Available at: <https://www.gov.uk/government/organisations/companies-house> (Accessed: 31st May 2023).
27. Trademark rule requires domicile address for all filers and also requires foreign-domiciled applicants and registrants to have a u.s.-licensed attorney (2021) United States Patent and Trademark Office - An Agency of the Department of Commerce. Available at: <https://www.uspto.gov/trademarks/laws/trademark-rule-requires-foreign-applicants-and-registrants-have-us#:~:text=You%20must%20provide%20and%20keep,represent%20you%20be fore%20the%20USPTO> (Accessed: 17th May 2023).
28. Representatives. EUIPO. Available at: <https://euipo.europa.eu/ohimportal/en/representatives> (Accessed: 17th May 2023).