IP Federation's Response to the IPReg Consultation on the 2027/28 business plan and 2027 budget and practising fees (the "Consultation")

Introduction

The IP Federation[1] welcomes the opportunity to respond to the Consultation. It limits its comments to consultation questions 1 and 2 and this response primarily concerns the diversity initiatives raised in (or arising out of) the Consultation.

In response to Question 1, the IP Federation considers that the proposed 2027/28 Business Plan (contained within the Consultation) fails to include proper recognition of the importance of diversity, equality and inclusion in the profession. We consider that these are fundamental aspects of ensuring the profession continues to be credible and to grow successfully. Other comments are addressed below.

In response to Question 2, the IP Federation repeats its comments made in response to the IPReg Consultation on the 2026 Business Plan. The IP Federation considers that these comments should be kept in mind when releasing the results of the planned 2026 survey results. The IP Federation appreciates that the results of the 2024 survey have been updated to address the IP Federation's previous comments.

Question 1

The IP Federation considers that the need to encourage diversity, equity and inclusion in the profession is of fundamental importance to the credibility and growth of the profession, and believes that this should underpin a large proportion of the work of IPReg. The IP Federation considers that this should be made **explicit** in the 2027/28 Business Plan. Whilst IPReg's diversity initiatives are addressed in the Consultation, currently the Business Plan only alludes to "*supporting diverse and inclusive professions*" within the context of the Education Review. Diversity, equity and inclusion should not be considered solely in that context.

Ultimately, the IP Federation considers that the goal of improving diversity, equity and inclusion will be achieved by attracting diverse candidates from education. The IP Federation therefore considers that coordination with organisations which are promoting diversity (including social mobility) in STEM education is vitally important to this work. Reaching out to students from different backgrounds at school and in further education on the value/importance of IP is required. Co-ordinated engagement with the IP profession to help with such activity is necessary.

The IP Federation considers that to improve diversity, equity and inclusion efforts must be targeted – for example, the same solutions and support will likely not be

[1] The IP Federation aims to improve the IP framework to meet the needs of innovative industry by representing, nationally and internationally, the views of UK-based businesses. Its membership of influential IP-intensive companies has wide experience of how IP works in practice to support the growth of technology-driven industry and generate economic benefit. As a cross-sectoral industry organisation covering all technologies, the IP Federation is able to offer a viewpoint which is authoritative and balanced. Details of the IP Federation membership are given at the end of this paper.

applicable to improving issues concerning race and sexual orientation. Efforts should also be led by the data. To take just one example, according to the 2024 IPReg diversity survey results 0% of patent attorneys identified as black. Specific efforts need to be made to address this underrepresentation. It should be borne in mind that individuals may not always feel comfortable in providing personal data in response to such surveys.

The IP Federation supports the proposed continued analysis of the appropriate academic level of qualification for entrants into the patent attorney profession and its associated impact on diversity, equity and inclusion (paragraphs 13b and 14 of the Consultation). The IP Federation welcomes IPReg's commitment to advise on accreditation requirements for new qualification pathway options. We note however that reference is made to "the prospective patent scientist/engineer apprenticeship as a part-qualification route". For clarity the apprenticeship being proposed is not a part-qualification route, because not all apprentices undertaking this qualification are expected to become a UK and/or European patent attorney; some may do so, and others may choose to continue in their patent scientist/engineer role or may choose to springboard into a different role.

The IP Federation notes that IPReg has committed £20,000 to suitable diversity initiatives.[2] (see paragraph 24 of the Consultation). Annex C lists these as "Donations". The IP Federation would appreciate any greater granularity that can be provided on the allocation of the funds to allow an opportunity for the IP Federation and other interested parties to consider whether working together will provide tangible benefit for improving diversity, equity and inclusion within the profession. The IP Federation understands that IPReg is amenable to such collaborative efforts.

Further, the 2027/28 Business Plan references a number of Strategic Objectives and Strategic Outcomes. The IP Federation would welcome clarification on how achievement of the Strategic Outcomes will be measured in practice and when the Strategic Outcomes are expected to be achieved.

The IP Federation welcomes:

- the PII Sandbox mechanism (see paragraphs 19 and 20 of the Consultation) to encourage alternative insurer participation in the market.

- IPReg's willingness to work together with practitioners on the use of technology (including generative AI) and understanding its impact on legal IP services (see paragraph 31 of the Consultation).

The IP Federation considers it unreasonable that the Legal Services Board has not confirmed the finalised levy on legal regulators (see page 17 of the Consultation). The IP Federation considers that efforts should be made to ensure that the levy figure is confirmed and IPReg should consider whether a downwards re-adjustment of its practising fee would be appropriate if the final levy figure is less than the 9.24% increase budgeted for.

[2] Annex C appears to reflect this amount as £21,000

Question 2

The IP Federation repeats its comments made in response to the 2026 Business Plan, as follows:

> "In respect to the 2024 diversity data, the IP Federation notes that certain characteristics are recorded as follows in the draft equality impact assessment: "*Data for this characteristic is very limited and so we are unable to draw any conclusions from it*." The IP Federation considers that, in the interests of transparency, even limited data sets should be included, where available (even if it is considered that conclusions cannot be drawn). It may be for example that respondents are unprepared to provide this data due to stigmas in the profession which need to be addressed."

As noted above, the IP Federation is grateful that this comment has now been addressed in the data from the 2024 diversity survey. The IP Federation would appreciate similar data being made available in the next set of diversity data.

Concluding remark

The IP Federation is grateful for IPReg considering the comments in this Response and is available to discuss.

IP Federation
25 August 2026

IP Federation members 2026

The IP Federation represents the views of UK industry in both IPR policy and practice matters within the UK, Europe and internationally. Its membership comprises the innovative and influential companies listed below. The CBI, although not a member, is represented on the Federation Council, and the Council is supported by a number of leading law firms which attend its meetings as observers. It is listed on the joint Transparency Register of the European Parliament and the Commission with identity No. 83549331760-12.

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