

IPReg's 2027/28 business plan and 2027 budget: IP Inclusive consultation response



1 Introduction

These submissions are made by the IP Inclusive initiative, in response to IPReg's 15 July 2026 consultation on its 2027/28 business plan and 2027 budget and practising fees proposals.

They are made on behalf of the UK-based IP professionals – including many registered patent and trade mark attorneys – who support IP Inclusive in its efforts to improve equality, diversity, inclusion (EDI) and wellbeing across the UK's IP sector.

2 The draft 2027/28 business plan

2.1 Strategic objectives

We would like to see diversity and inclusion given greater prominence in IPReg's proposed new strategic objectives.

Encouraging a diverse profession remains one of the over-arching regulatory objectives under the Legal Services Act 2007. Diversity and inclusion contribute to standards in professional practice, leading to better decision making, reduced risk and higher productivity as well as to improvements in staff retention and wellbeing. They promote consumer access to justice, by enhancing professionals' understanding of a wider range of client needs. Through all these things, they can also be used to help promote the value of a regulated profession.

We appreciate that IPReg's ongoing Education Review is intended to improve access to the patent and trade mark professions, removing unnecessary barriers to entry and enabling a more diverse intake. But this on its own will not create *sustainable* improvements in diversity levels. Those responsible for recruiting future attorneys need to be receptive to the new talent they might acquire through improved access, and moreover willing to recruit it; their businesses must treat new recruits inclusively, value them equally, develop and promote them fairly. These are outcomes that IPReg can, and should, promote in its regulatory capacity, downstream of the point of access to the professions and within the requirements it makes of attorneys once registered.

Accordingly, we believe IPReg's 2027/28 business plan should spell out that encouraging diversity will be part of the "high standards" it pursues as well as key to the public confidence and access to justice it promotes. Diversity is a strand that should be woven into IPReg's wider strategic objectives – as indeed it is woven, and admirably so, into the Education Review – rather than treated as a standalone issue.

We also recommend that the gathering of EDI data within the regulated professions – and its use to inform, evaluate and shape regulatory interventions – should be specifically mentioned in the business plan infographic (page 14 of the consultation document). It is, we believe, just as important to IPReg’s work as the gathering of market intelligence from the professions’ consumers.

2.2 Education, training and qualification

We are delighted that IPReg’s Education Review remains a key part of its 2027 plans. We have been grateful for the opportunity to be involved, and to provide input not only into the review process but also, through the wider IP Inclusive community, into the intelligence it gathers. We applaud the emphasis on diversity, equity, inclusion and belonging within the framework of the review, as well as IPReg’s intention to commission an independent equality impact assessment on the draft outputs. It is vital to ensure that both existing and new qualification pathways are as accessible as possible and do not introduce any unnecessary barriers to entry or impediments that could disadvantage particular groups. We are therefore pleased that IPReg intends to use its work on diversity to inform its education workstreams, in order to widen participation and progression in the regulated professions.

We are also pleased that IPReg intends to work with stakeholders on its accreditation requirements for new qualification pathway options. We stand ready to help with EDI-related aspects of this work, in particular regarding the needs of under-represented groups such as disabled and neurodivergent candidates and those who are parents, expectant parents or carers. As ever, we would stress that accessibility should be a key requirement of accredited education and assessment providers, ideally as part of a structured EDI policy and a focus on fair and equitable processes. This is as important for new qualification pathways such as the proposed patent scientist/engineer apprenticeships as it is for the existing routes to qualification.

We agree that IPReg’s education-, training- and qualification-related activities have the potential to improve diversity within the regulated professions. However, as above, developments at the point of entry could have limited value unless underpinned by appropriate regulatory measures downstream. Hence our recommendation that diversity be referenced in the wider strategic objectives and not merely in connection with education- and qualification-related projects.

2.3 Diversity data gathering

We were delighted to see IPReg launch another diversity survey this year, as well as its inclusion of questions relating to inclusivity, wellbeing and more general workplace culture. We hope that response levels were good, and look forward to seeing the results.

It is hugely important that this type of data be kept up to date, not only for IPReg’s equality impact assessments but more generally to measure its progress on, and shape its influence over, diversity in the regulated professions. Such data provides a valuable benchmark for professionals and their businesses within the sector, as well as for consumers. We remain of the view that for the patent and trade mark professions, it is the regulator that is best placed to gather it.

We therefore urge IPReg to continue to repeat its diversity survey on a regular basis, at least on a two-year cycle and ideally as part of its annual registration process. As discussed at 2.1 above, we believe this important aspect of IPReg's work should be mentioned in its business plan.

2.4 Diversity initiatives

We applaud IPReg's continuing support for diversity initiatives. We believe it is important that the patent and trade mark professions continue to work to improve diversity, inclusivity and accessibility, even in the face of external pressures, to ensure they can attract and retain the best professionals and provide a high quality service to their clients.

We are also pleased that IPReg plans to continue to work with, and contribute to, cross-sector work on EDI. IP Inclusive's success has demonstrated that a collective and collaborative approach to designing, implementing and evaluating EDI-improving measures, in a largely receptive environment such as that of the patent and trade mark professions, can be both impactful and cost-effective. We have much to learn from one another and from the wider legal sector, as well as from experts outside. We stand ready to help in any way we can.

3 The proposed 2027 budget

We are pleased to note that the proposed 2027 budget includes £21,000 for supporting diversity initiatives in the regulated community, and that this is underpinned by the continuing £20,000 diversity initiatives reserve.

For transparency, we recommend that IPReg publicise how the £21,000 it budgeted for diversity initiatives in 2026 was spent. Its 2026 diversity survey was financed separately, as are diversity-related aspects of the Education Review. There are no specific diversity-related projects in the proposed 2027 business plan. It would be appropriate, therefore, for IPReg to clarify what additional projects or causes have received – or might in future receive – funding from its diversity budget and their likely impact on the regulated professions.

We very much appreciate and thank IPReg for the £5,000 donation it provided towards IP Inclusive's operating costs in 2025, and hope that similar contributions will be possible in both 2026 and 2027. This is, however, only a proportion of the sum allocated for supporting diversity initiatives. As in the past, IP Inclusive – in particular through its communities¹ and Careers in Ideas outreach campaign² and their respective contacts – would welcome the opportunity to work with IPReg to ensure that the 2027 diversity budget is appropriately spent.

Should there be any remaining funds from those allocated to diversity initiatives in the 2026 budget, IP Inclusive would of course be extremely grateful for an additional donation. Our work is key to the

¹ See <https://ipinclusive.org.uk/community/>

² See <https://careersinideas.org.uk/> and <https://ipinclusive.org.uk/careers-in-ideas/>

sector's approach to EDI and, through collaboration, can greatly assist IPReg in achieving its regulatory objective to encourage an independent, strong and diverse profession.

IP Inclusive relies totally on donations. These typically come from individuals and businesses in the IP sector, from relevant membership bodies such as CIPA, CITMA, FICPI-UK and the IP Federation, and from other key stakeholders such as IPReg. We very much hope that IPReg will continue to help fund IP Inclusive during 2027, and indeed that it will feel able to raise the level of financial support it provides for our valuable cross-sector EDI work.

4 The proposed 2027 practising fees

We have no comments on IPReg's proposed increase to the practising fees in 2027, other than those made at 5.2 and 5.3 below regarding the availability of (a) the discretionary waiver in cases of hardship (the continuance of which we welcome) and (b) the "not in active practice" fee category (the scope of which we would like to see clarified). We believe these two measures help increase inclusivity in the regulated professions, enabling them to embrace and nurture a wider range of people, and in turn contribute to the sector's independence, strength, diversity and effectiveness.

The commencement date at the end of the draft Practice Fee Regulations (Annex F) would appear to need changing.

5 The equality impact assessment (EIA)

5.1 The evidence base

We note that this year's EIA is based on relatively old data from IPReg's 2024 diversity survey. We are glad that the survey has been repeated this year and look forward to seeing the promised updated EIA once the new survey results are available.

We are aware that IPReg gathers a significant amount of data, from its diversity surveys, on the socioeconomic backgrounds of its registrants. Whilst social mobility-related factors are not "protected characteristics" within the meaning of the Equality Act 2010, they can nevertheless be relevant to diversity within the patent and trade mark professions. We recommend, therefore, that IPReg also consider the potential impact of its practising fee changes on groups from lower socioeconomic backgrounds. We especially recommend that this be considered as part of the equality impact assessment carried out on the Education Review proposals.

5.2 The discretionary fee waiver

We are pleased that the discretionary fee waiver is to remain in place. Its scope appears to be sufficiently broad to encompass professionals who – for example because of a disability or caring (including parenting) responsibility – are still able to work to at least some extent but are nevertheless suffering financial hardship and finding practising fee levels problematic. Subject to the

comments below, we see this as a sensible and proportionate way for a regulator of IPReg's size to guard against detrimental effects on specific groups, in particular those for which it has relatively little statistically significant data.

5.3 Availability of the “not in active practice” fee category

As in our 2025 consultation response³, we would like IPReg's confirmation that this fee category is also available to attorneys whose capacity to practise is affected by a temporary disability, illness or caring responsibility. A clear public statement about its scope – including for registrants on parental or adoption leave – would provide further evidence of IPReg's commitment to a diverse, inclusive and supportive regulatory regime and would help reduce negative impacts in the context of two of the protected characteristics: disability and gender.

With regard to the impact on gender, people who identify as women are still proportionately more likely to be carers and more likely to reduce their working hours to provide unpaid care⁴. Women may also experience menopause-related conditions that temporarily affect their working arrangements. Both of these often happen at times of their lives when they occupy more senior roles, which is where the gender imbalance seems to be at its greatest in the patent and trade mark professions.

The draft EIA in Annex B to the consultation paper states that “Prior to consultation, we have not identified any evidence that the level of the fee or the proposal to increase it could discriminate against or unfairly disadvantage attorneys with protected characteristics.” The “protected characteristics” do not include caring responsibilities, but as described above they can be closely linked. Such issues can therefore be highly relevant to the accessibility of, and equality of opportunity within, the regulated professions.

An obvious, and proportionate, way to address any unfair disadvantage to members of the regulated community who are temporarily disabled, or who are carers, would be to ensure the scope of the “not in active practice” category accommodates those registrants. This could significantly increase diversity within the sector and also help the professions to retain experienced and valuable practitioners who might otherwise be inclined to leave the register.

As a longer-term measure, we urge IPReg to consider setting a lower level of practising fee for attorneys who work part-time. This too would reduce the risk of disadvantage to disabled people, carers, parents and – at least in the present cultural climate – those who identify as women.

³ See <https://ipinclusive.org.uk/wp-content/uploads/2026/02/250827-ipreg-2026-budget-consultation-ip-inclusive-response.pdf>

⁴ See, for example, <https://www.carersuk.org/press-releases/international-women-s-day-2024-10-facts-about-women-who-are-unpaid-carers/>, the 2021 ONS census data at <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/unpaidcarebyagesexanddeprivationenglandandwales/census2021> and a 2025 House of Commons research briefing (<https://commonslibrary.parliament.uk/research-briefings/cdp-2025-0213/>) regarding the issues and inequalities faced by unpaid carers

There is one further point that we urge IPReg to address in order to reduce negative impacts in the “pregnancy and maternity” category. At present, according to the EIA, “Anyone on maternity leave can apply to IPReg to be put in the ‘not in active practice’ category with an associated reduction on practising fees”, but *“the fees are not reimbursed if the change occurs mid-year”* (emphasis added). This strange system is, we submit, incompatible with IPReg’s assertion that there is “no” potential for negative impact on this group. Pretty much every such change will occur “mid-year”; there will be very few registrants for whom a period of maternity leave begins on exactly the same date that they pay their practising fee. The lack of access to reduced fees for a potentially large part of a year could significantly disadvantage people who are on maternity leave and unable to practise during that period.

In the interests of equity and equality, we strongly recommend that IPReg make this particular provision more equitable by reimbursing fees pro rata where a move to a non-practising situation – for any reason – occurs mid-year.

6 About IP Inclusive

IP Inclusive is an association of individuals and organisations who share a commitment to improving equality, diversity, inclusion and wellbeing throughout the UK’s IP professions. Its founding organisations were the Chartered Institute of Patent Attorneys (CIPA), the Chartered Institute of Trade Mark Attorneys (CITMA), the IP Federation and The UK Association of the International Federation of Intellectual Property Attorneys (FICPI-UK), with active support and involvement from the UK Intellectual Property Office. The founding organisations do not have any ownership or control of IP Inclusive.

Our supporters span the IP-related professions and include patent and trade mark attorneys and paralegals, their business support colleagues, IP solicitors and barristers, and other professionals who work in or with intellectual property. Many CIPA and CITMA members are actively involved in the initiative, as are their organisations, which support us as Charter signatories and/or donors.

Our work, which is overseen by the governing body IP Inclusive Management⁵, includes:

- A voluntary best practice Equality, Diversity and Inclusion Charter⁶, which currently has 157 signatories from across the IP professions, and an associated “Senior Leaders’ Pledge”⁷.
- The “Careers in Ideas”² campaign, which works to raise awareness of, and improve access to, IP-related careers in order to diversify the pool from which the professions recruit.
- Networking and support “communities”¹ for under-represented groups and their allies, which currently include our Women in IP community; IP & ME for professionals from

⁵ See <https://ipinclusive.org.uk/ip-inclusive-management/>

⁶ See <https://ipinclusive.org.uk/about/our-charter/>

⁷ See <https://ipinclusive.org.uk/the-ip-inclusive-senior-leaders-pledge/>

minority ethnic backgrounds; IP Ability for disabled and neurodivergent professionals and for carers; IPause for professionals affected by the (peri)menopause; IP Futures for early- to mid-career professionals; and IP Out for LGBTQ+ professionals. Similar networks for business support professionals and for men in IP are also now in gestation.

- EDI- and wellbeing-related resources, training, news and information, which we disseminate through our website, events and regular updates to our supporters⁸.

Our Lead Executive Officer Andrea Brewster is a Chartered Patent Attorney, a former CIPA Council member and President, and now an honorary member of CIPA. In the past she has served on the Institute's Education and Business Practice Committees. She is regulated by IPReg but not currently in active practice.

For more information about IP Inclusive, please visit our website at <https://ipinclusive.org.uk/>, or email contact@ipinclusive.org.uk.

24 August 2026

⁸ See <https://ipinclusive.org.uk/resources/>, <https://ipinclusive.org.uk/newsandfeatures/>, <https://ipinclusive.org.uk/events/> and <https://ipinclusive.org.uk/stay-in-touch/>