



## Cost of regulation: transparency of reporting

Chartered Institute of Patent Attorneys,  
Institute of Trademark Attorneys and the  
Intellectual Property Regulation Board

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## 1. Introduction

### Why are we doing work on the cost of regulation?

1. Establishing the cost of regulation in legal services is important because these costs are borne by businesses and ultimately by consumers. Establishing an evidence base about the cost of regulation can help the LSB and the approved regulators review any areas of regulation that appear disproportionately costly relative to any benefits derived from those regulations.
2. These reports do not set out to analyse the income and expenditure of each approved regulator, but simply to understand what information is made publicly available in this area. Alongside these reports the LSB is publishing a paper which summarises the overall findings of its cost of regulation project and sets out next steps.

### What's this report about and how does it fit in?

3. Our research<sup>1</sup> has found concern among legal sector businesses about the cost of regulation, but little understanding about what these costs pay for. In particular, a number of respondents did not know what they paid for via their annual practising certificate fee, which makes up a significant element of the total regulatory burden. To help improve transparency around these costs, the LSB has produced a report for each regulator providing a basic analysis of its costs using information which is available in the public domain, but located in different places. We have used publicly available information only at this stage so we can understand what can be done with what is readily available, before discussing with each regulator what more may be required.
4. Specifically, each report aims to:
  - shine a spotlight on the publicly available information about the costs of the regulator concerned (including the LSB), to enhance accountability to the profession for these costs
  - show historic cost trends for each regulator over a five-year period
  - highlight where greater transparency of the regulator's costs is needed
  - help the board of regulators hold its executives to account for the level of its spend, and for the level of information about its costs which is publicly available
  - provoke and inform wider discussion of what effective and efficient regulation should look like.
5. What this report does not do is seek to make any assessment of the benefits derived, proportionality of cost, compliance costs within a business or costs/benefits of being in one regulatory regime or another, whether there are quasi regulatory costs, differential costs of insurance or any other cost.

## **A key finding**

6. Considering the approved regulators as a whole, compiling this information proved far more challenging and time-consuming than it should have been. The LSB recognises that it has not previously set requirements in this area, and further that each regulator will have reasons for deciding on the content and format of the financial information that it publishes. Nonetheless, the LSB was disappointed by the level of available information, which has frustrated our efforts to present as full a picture of the cost of the regulators as we would have liked.

## **Next steps**

7. These reports are part of our wider project on the costs of regulation, which has also involved (as mentioned above) research asking providers for their views on the value for money of regulation and in-depth research to collect estimates from providers of their costs of compliance. Alongside the reports on each regulator on transparency of reporting the LSB is publishing its overall findings, drawing together the conclusions from the different strands of our work and setting out what we intend to do in light of these conclusions. It has been challenging to bring together the information on the cost of each regulator from publicly available sources. There is a clear need to improve the level and quality of published information about regulatory costs. Over the coming months, we will be working, together with the approved regulators to ensure more data is available.

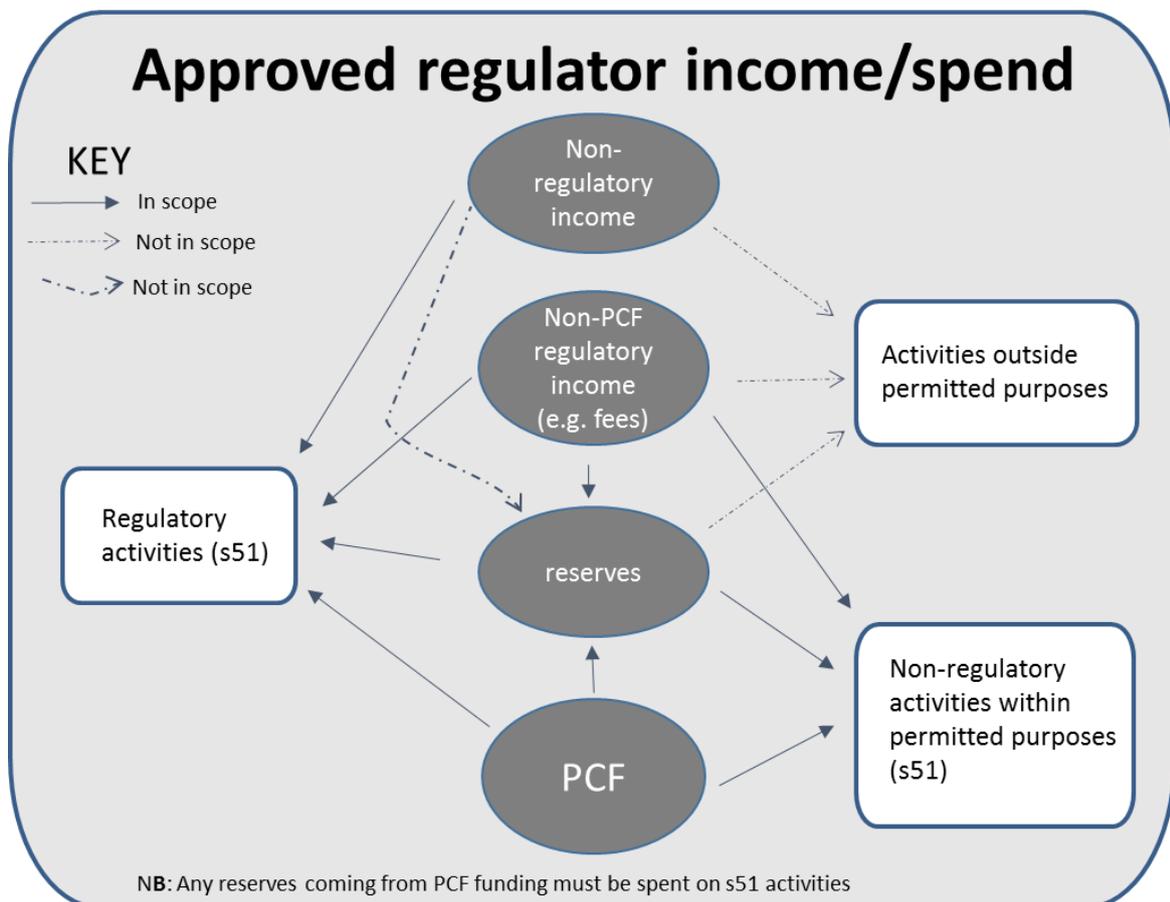
## **About the figures in this report**

8. In this work, the LSB has focused on money raised via the practising certificate fee (PCF), other regulatory income and non-regulatory income which funds regulatory activities. As set out in the graphic overleaf, any non-regulatory income which funds activities outside of the permitted purposes of section 51 of the Legal Services Act 2007 is out of scope. In the case of IPReg there are no purposes that are out of scope.
9. The charts in this report cover the period between 2010 and 2014, as all regulators have published data for this period. The cost profiles of some regulators may have changed since then. The compilation of the charts was undertaken by the LSB and the regulators were given an opportunity to check the charts for accuracy and provide relevant additional contextual information prior to publication.
10. The structures of the regulators vary, their regulated communities are different and these bodies' activities differ in scope and complexity. Regulators' fee charging mechanisms also vary although all are scrutinised and approved by the LSB. This may change between years and may also affect year on year

comparisons between regulators and within the regulatory regime. All this means that it would be misleading to use the charts to compare one regulator directly against another.

11. A list of charts in the report is set out overleaf. References to the source material are highlighted in the data tables and can be found at the back of the document.

### Diagram setting out scope of transparency of reporting analysis



## List of charts used in this report

Ref	Name of Chart	Purpose of Chart
A1	Number of patent attorneys and trade mark attorneys on the register	This chart indicates the size of the regulator for contextual purposes based on the number of individuals it authorises. Patent and trade mark attorneys must have a current practising certificate to be authorised to carry out reserved legal activities.
A2	Chart A2 - Number of authorised firms	This chart indicates the size of the regulator for contextual purposes based on the number of firms it authorises. Firms must be authorised to carry out reserved legal activities.
B1	PCF – individual – one register	This chart indicates the direct cost to the profession of the regulator based on the annual PCF for individuals listed on one register.
B2	PCF – individual – both registers	This chart indicates the direct cost to the profession of the regulator based on the annual PCF for individuals listed on both registers.
C1	Administrative expenses relative to PCF income and other income	This chart indicates operating cost relative to fee income and other income. Other income streams may be used to subsidise the cost of regulation.
E1	IPReg’s actual budgetary spend for regulatory functions	This chart provides an illustrative overview of allocated spend for categories of regulatory activity.

## 2. Background to IPReg

12. The Intellectual Property Regulation Board (IPReg) was set up in 2010 by the Chartered Institute of Patent Attorneys (CIPA)<sup>2</sup> and the Institute of Trade Mark Attorneys (ITMA)<sup>3</sup> to be the independent regulatory body for the Patent Attorney and Trade Mark Attorney professions. IPReg regulates individuals and entities in England and Wales. From 1<sup>st</sup> January 2015 IPReg has licensed alternative business structures (ABS)<sup>4</sup>. For more information about IPReg, please see its website.<sup>5</sup>
13. The time series in this report covers the period between 2010 and 2014. However, the market that IPReg regulates has continued to change since then.
14. Ideally all figures in the fact box below concerning authorised persons or firms would be current as of January 2016. However, it has only been possible to find published material for entities. Instead, for individuals, this report includes the most recent published figures and notes the date of each figure alongside the relevant figure. Note the most recent annual report covers the 2015 calendar year.

### IPReg Fact Box (January 2016)

No. authorised persons: (Individuals only)	1,769 patent attorneys <sup>6</sup> (as of 01/04/2015) 581 trade mark attorneys <sup>7</sup> (as of 01/04/2015) Dual registered: 291 <sup>8</sup> (as of 01/04/2015) Total number of attorneys: 2,641 <sup>9</sup> (as of 01/04/2015)
Reserved legal activities:	<ul style="list-style-type: none"> <li>• The exercise of a right of audience</li> <li>• The conduct of litigation</li> <li>• Reserved instrument activities</li> <li>• The administration of oaths</li> </ul>
Entity regulator:	Yes - 225 <sup>10</sup> (as of 19/01/2016)
Licensing authority:	Yes - 12 <sup>11</sup> (as of 30/06/2015)
Employees:	1 full time, 5 part time <sup>12</sup>
Operational Expenditure (Budget for Jan-Dec 15)	Operational expenditure (excluding levies): £608,520 <sup>13</sup>

## General notes to IPReg figures

15. Data for this report has chiefly been drawn from four different sources. Wherever possible, financial data comes from IPReg's Annual reports and financial statements. However data for 2013 has been sourced from the financial statements for the year ended 31 December 2014 as this report includes 2013 data and no report for 2013 was found. The IPReg website shows the latest set of financial statements. Financial statements from earlier years are available from Companies House and are in the public domain for transparency purposes.<sup>14</sup> Financial statements for 2011, 2012, 2013 and 2014 are also published on the LSB's website alongside IPReg's PCF applications.
16. Secondly, documents published on IPReg's website setting out actual spend vs budget for all relevant years have been used for budget data where the data wanted was not included in the annual reports and financial statements. For this budget data, the figures for 2010 are also available on the LSB website alongside IPReg's annual PCF application. PCF application documents have also been used for data on PCF levels.
17. Thirdly, information published on IPReg's website has been used for the number of patent and trademark attorneys as well as the number of entities regulated by IPReg.
18. Where tables in this report include data from different sources this has been clearly stated in the introductory text before each table. Explanatory text also highlights where different data sources may not be directly comparable which leave data series as indicative only.
19. IPReg's PCF and accounting year follows the calendar year so data from all IPReg's annual reports and financial statements and PCF applications refer to the same time period.

### 3. Transparency charts

#### A. Number of individuals and firms authorised by IPReg

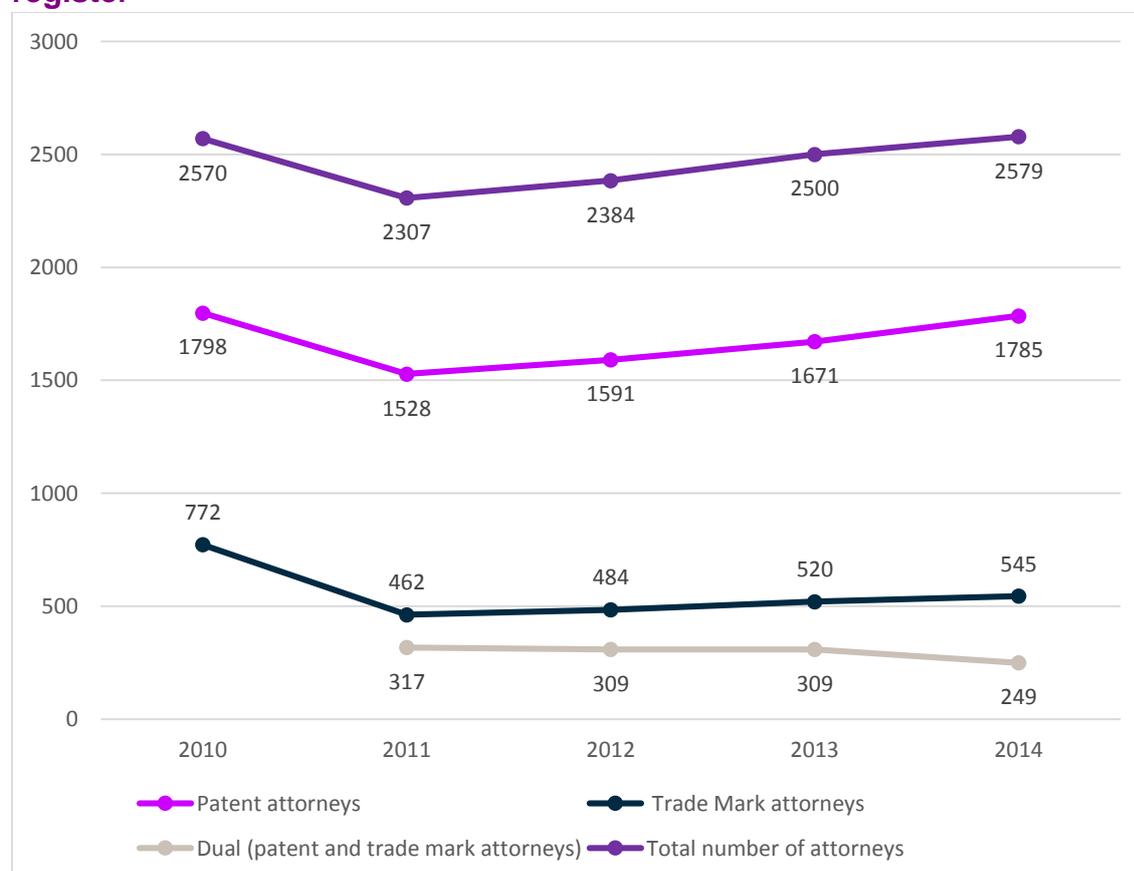
20. The cost of a regulator must be considered relative to the number of individuals or firms that it authorises. Therefore, before this report sets out data on costs, Table 1 and Chart 1 and 2 overleaf provide information about the number of attorneys and firms authorised by IPReg. Costs drivers also include, where applicable, the volume of regulatory activity that is undertaken, infrastructure investment which may take several years to produce a return on investment, financial policies within regulators to create or reduce reserves and operation improvements. In this report we have not sought to investigate the factors, nor to analyse or comment on their impact in any particular regulator.
21. Every year trade mark attorneys and patent attorneys must renew their practising certificate with IPReg to continue to be authorised to carry out reserved legal activities.
22. The number of authorised patent attorneys holding a single practising certificate increased by 16.82 per cent between 2011 and 2014 from 1,528 to 1,785. The number of authorised trade mark attorneys increased by 17.97 per cent between 2011 and 2014 from 462 to 545. It is also possible to be authorised to practise both as a patent and trade mark attorney. This group has decreased by 21.45 per cent between 2011 and 2014 from 317 to 249. The number of authorised firms increased by 20.44 per cent between 2011 and 2014 from 181 to 218.
23. Table A1 uses data from IPReg's website on the number of individuals and firms regulated by IPReg. The data for individuals is accurate as of 1 April each year and the data for firms is accurate as of 31 December each year. The data for dual registered attorneys is only available from 2011 and as such it is likely that the number of patent attorneys, trade mark attorneys and the total number of attorneys for 2010 stated in Table A1 is higher than the actual figure would have been after adjusting for individuals authorised in both fields. As such all percentages are based on 2011 to 2014 figures only to allow for a fair comparison.

**Table A1 - Number of patent attorneys and trade mark attorneys on the register**

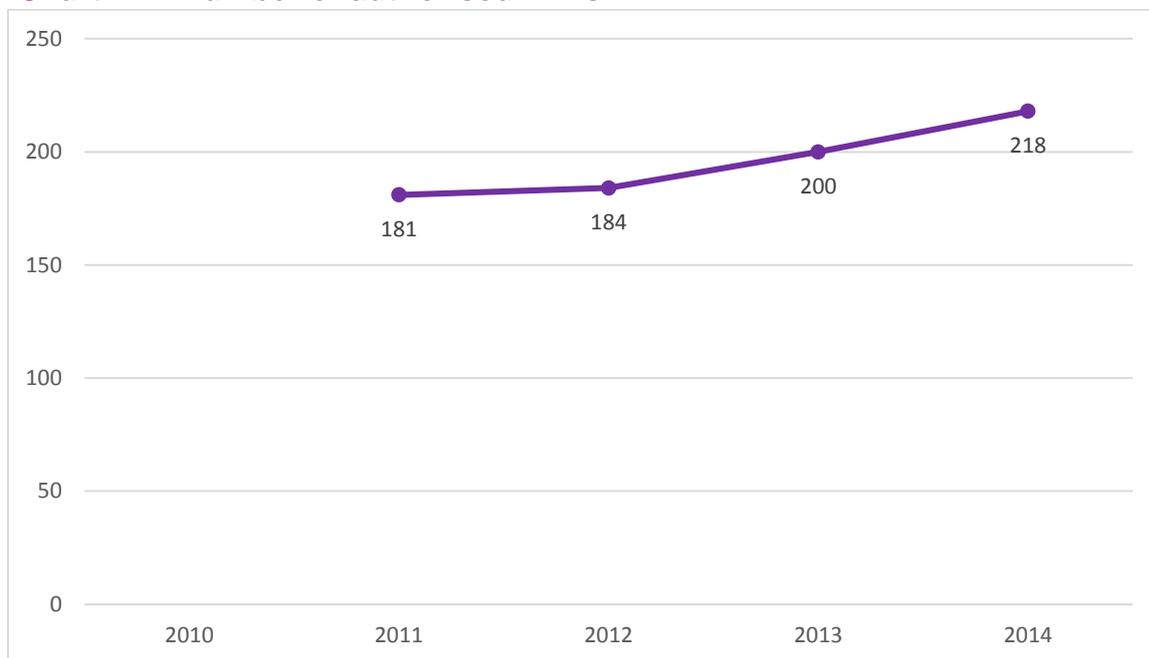
	2010*	2011	2012	2013	2014	% change 2011 - 2014
Patent attorneys	1,798 <sup>15</sup>	1,528 <sup>16</sup>	1,591 <sup>17</sup>	1,671 <sup>18</sup>	1,785 <sup>19</sup>	+16.82%
Trade mark attorneys	772 <sup>20</sup>	462 <sup>21</sup>	484 <sup>22</sup>	520 <sup>23</sup>	545 <sup>24</sup>	+17.97%
Dual (patent and trade mark attorneys)	-	317 <sup>25</sup>	309 <sup>26</sup>	309 <sup>27</sup>	249 <sup>28</sup>	-21.45%
Total no of attorneys	2,570 <sup>29</sup>	2,307 <sup>30</sup>	2,384 <sup>31</sup>	2,500 <sup>32</sup>	2,579 <sup>33</sup>	+11.79%
Authorised firms	-	181 <sup>34</sup>	184 <sup>35</sup>	200 <sup>36</sup>	218 <sup>37</sup>	+20.44%

\* Figures for Patent and Trade mark attorneys for 2010 include attorneys that are dual registered

**Chart A1 - Number of patent attorneys and trade mark attorneys on the register**



**Chart A2 - Number of authorised firms**



## B. Practising certificate fee (PCF)

24. A direct cost of regulation for attorneys and firms authorised by IPReg is experienced when they renew their practising certificate or pay their annual periodical fee for their licence. Income from this source is used in part to fund the cost of regulation for IPReg. Fee income is also used to fund the statutory levies for LSB and the Legal Ombudsman.
25. IPReg charges a fee for the practising certificate which authorised individuals hold in order to carry out reserved legal activities in England and Wales. IPReg also charges entities, whether traditional firms or alternative business structures, a fee to authorise them to carry out reserved legal activities in England and Wales.
26. IPReg holds two registers: one for patent attorneys and another for trade mark attorneys; where relevant authorised individuals must be listed on one or both registers depending on whether they practise as either a trade mark attorney or patent attorney only or as both. The individual practise fee is based on the fee paying category and also whether the attorney is on one or both registers. The registered body fee is the same regardless of whether the registered body is on one or both registers with an additional charge per employed registered attorney or unregistered professional providing legal services. Sole traders employing others will have a fee based on whether they are on one or both registers with an additional charge per employed registered attorney or unregistered professional providing legal services. The fees for all categories increased in 2011 but have stayed flat since then.
27. For Table B1, the figures for PCF income are from IPReg annual reports and financial statements based on a calendar year reporting period. Figures for PCF rates are all from the PCF application for the 2014 PCF year. Reporting conventions mean it is not possible to provide a breakdown of total PCF income across individuals and entities, or to calculate an average fee across all entities. In 2012 and 2013 IPReg received separate ring-funded income collected from registered bodies only to fund their licencing application. To reflect this situation the PCF income figure for 2012 as stated in the 2012 financial statements have been reduced by the amount of this ring-fenced income as documented in the 2012 annual report<sup>38</sup>.

**Table B1 - Individual PCF and baseline firm fee**

Accounting year	2010	2011	2012	2013	2014
PCF Income	£472,699 <sup>39</sup>	£573,720 <sup>40</sup>	£588,916 <sup>41</sup>	£611,361 <sup>42</sup>	£632,070 <sup>43</sup>
Individual fees <sup>44</sup>					
One or two registers	One register		Both registers		
PCF year	2010	2011 - 2014	2010	2011 - 2014	
Attorneys who are retired, inactive or are employed solely in industry	£125	£140	£200	£225	
All Other Attorneys	£150	£170	£250	£280	
Sole Traders	£250	£280	£350	£400	
Sole trader (employing others) – Base	£250	£280	350	£400	
Entity fees <sup>45</sup>					
PCF year	2010		2011 - 2014		
Firms – Base	£250		£280		
Plus registered attorneys employed in entities	£50		£55		
Plus unregistered Professionals employed in entities	£200		£225		

**Chart B1 - PCF – individual (one register)**



**Chart B2 - PCF – individual (both registers)**



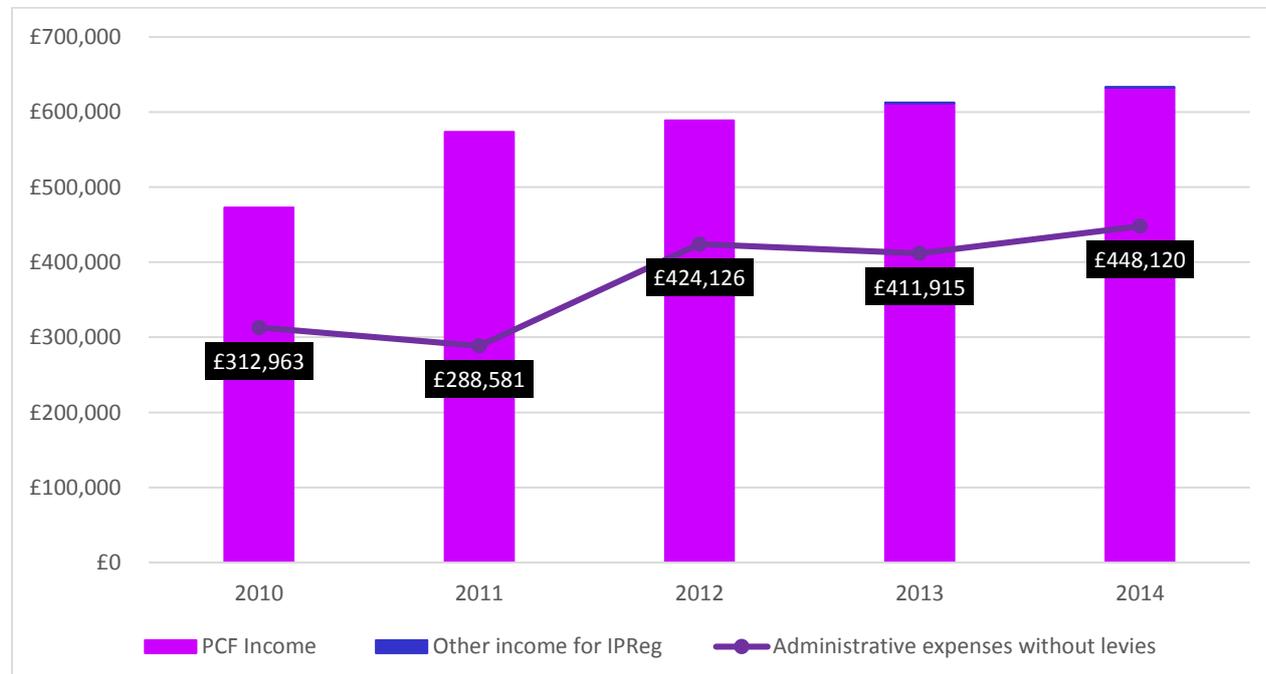
### C. Operating cost relative to PCF income and other income

28. Some approved regulators have other income from other sources such as training or corporate hospitality. This income may be used to reduce the cost of the PCF so that instead of collecting the entire cost of regulation from authorised individuals or authorised firms these regulators can collect less money from the profession than would otherwise have been necessary. Table C1 shows how much of the cost of regulation to the profession is reduced by other income generated by the regulator. This shows that the total fee income is between 99% and 100% of total income for IPReg between 2010 and 2014.
29. For Table C1 the PCF and other income figures are from annual reports and financial statements. Figures for administrative expenses, which are assumed to be the full expenditure of IPReg are from the same publications. Figures for the levies are actual year-end budget data for 2010, 2013 and 2014 but audited figures from financial statements for 2011 and 2012.
30. Table C1 includes a row showing administrative expenses minus IPReg's annual contribution to the LSB and Office for Legal Complaints (OLC), known as levies. The levies are factored in when setting the required PCF income and included within administrative expenses in IPReg's financial statements. As set out under section B, IPReg had a separate budget for income and expenditure for their project to become an ABS licencing authority. To reflect this the administrative expenditure figures included in the accounts has had expenditure solely for this project deducted in Table C1. More information on the ABS project can be found on IPReg's website.<sup>46</sup>
31. In 2012 and 2013 IPReg received separate ring-funded income collected from registered bodies only to fund their licencing application. To reflect this situation the PCF income figure for 2012 as stated in the 2012 financial statements have been reduced by the amount of this ring-fenced income as documented in the 2012 annual report. To reflect the true cost of IPReg's administrative expenses the levies have been deducted from the overall figure. To show the difference between the LSB running and set up costs these have been split out here despite appearing as a single figure in the source material. The LSB and OLC levies are presented differently in the accounts of each regulator. A separate report on the LSB's costs is being published alongside this one.
32. In 2011, 2012, 2013 and 2013 a proportion of the surplus was transferred to reserves.

**Table C1 - Administrative expenses relative to PCF income and other income**

	2010	2011	2012	2013	2014	% change 2010 - 2014
PCF Income	£472,699 <sup>47</sup>	£573,720 <sup>48</sup>	£588,916 <sup>49</sup>	£611,361 <sup>50</sup>	£632,070 <sup>51</sup>	+33.72%
Other income	-	-	-	£1,500 <sup>52</sup>	£1,600 <sup>53</sup>	+6.67% <sup>54</sup>
Total income	£472,699	£573,720	£658,409	£612,912	£633,670	+34.05%
Administrative expenses	£452,428 <sup>55</sup>	£402,830 <sup>56</sup>	£508,704 <sup>a57</sup>	£490,590 <sup>b58</sup>	£521,802 <sup>c59</sup>	+15.33%
LSB and OLC set up costs	£71,042 <sup>60</sup>	£28,315 <sup>61</sup>	£7,079 <sup>62</sup>	-	-	
LSB and OLC running costs	£68,423 <sup>63</sup>	£85,934 <sup>64</sup>	£77,499 <sup>65</sup>	£78,675 <sup>66</sup>	£73,682 <sup>67</sup>	+7.69%
Administrative expenses without levies	£312,963	£288,581	£424,126	£411,915	£448,120	+43.19%
% PCF income to all income	100%	100%	100%	99.76%	99.75%	

**Chart C1 - Administrative expenses relative to PCF income and other income**



<sup>a</sup> To calculate this figure the administrative expenses for 2012 has had expenditure for the ABS project deducted from them. (£609,868 – £101,164 = £508,704)

<sup>b</sup> To calculate this figure the administrative expenses for 2013 has had expenditure for the ABS project deducted from them. (£564,447 – £73,857 = £490,590)

<sup>c</sup> To calculate this figure the administrative expenses for 2014 has had expenditure for the ABS project deducted from them. (£557,432 – £35,630 = £521,802)

#### **D. Spend of the Approved Regulator on non-regulatory permitted purposes**

33. Part of the cost of regulation is where income from the individual practising certificate fee and the firm fee pays for the cost of permitted non-regulatory activities. ITMA or CIPA does not receive income to fund non-regulatory permitted purposes so no table has been produced for this report.

## E. Actual budgetary spend on regulatory functions over time

34. This report has so far attempted to establish the summary level costs of IPReg. This section of the report seeks to provide a breakdown of how IPReg divides its allocated expenditure between different regulatory activities. This section is included to give an understanding of the various activities that together add up to the cost of regulation. Some regulators publish more information about their regulatory functions than others and some regulators will change their reporting categories and change what is included within categories from year to year.
35. The figures included in Table E1 reflect actual budgetary spend as published on IPReg's website.

**Table E1 - IPReg's actual budgetary spend for regulatory functions**

Expenditure	2010	2011	2012	2013	2014
Staff costs	£120,098 <sup>68</sup>	£125,611 <sup>69</sup>	£154,282 <sup>70</sup>	£163,942 <sup>71</sup>	£230,167 <sup>72</sup>
Board, Chairman plus expenses	£76,486 <sup>73</sup>	£69,376 <sup>74</sup>	£66,478 <sup>75</sup>	£75,328 <sup>76</sup>	£74,435 <sup>77</sup>
Administration costs	£10,863 <sup>78</sup>	£15,660 <sup>79d</sup>	£17,883 <sup>80e</sup>	£17,680 <sup>81f</sup>	£24,859 <sup>82g</sup>
Projects	-	£1,869 <sup>83</sup>	£44,131 <sup>84</sup>	£24,612 <sup>85</sup>	£42,909 <sup>86</sup>
Running costs	£36,251 <sup>87</sup>	£28,843 <sup>88</sup>	£28,372 <sup>89</sup>	£39,057 <sup>90</sup>	£44,740 <sup>91</sup>
Disciplinary hearings	-	£800 <sup>92</sup>	£73,113 <sup>93</sup>	£50,076 <sup>94</sup>	£12,644 <sup>95</sup>
Registration admin to CIPA and ITMA (2014 IPReg Pro)	£69,265 <sup>96</sup>	£46,422 <sup>97</sup>	£39,867 <sup>98</sup>	£41,238 <sup>99</sup>	£18,366 <sup>100</sup>
<b>Total (excluding LSB/OLC levies)</b>	<b>£312,963</b>	<b>£288,581</b>	<b>£424,126</b>	<b>£411,915</b>	<b>£448,120</b>

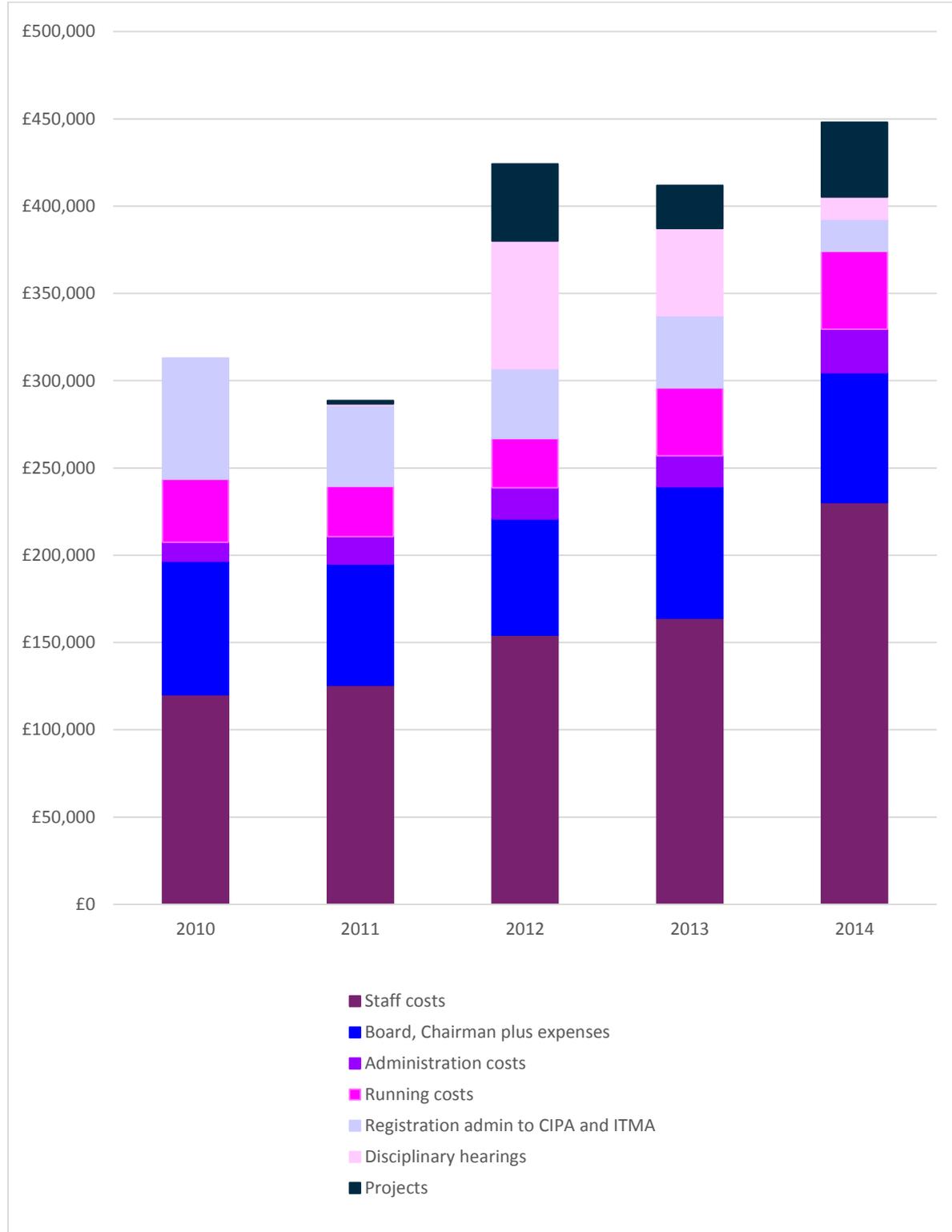
<sup>d</sup> Corporate tax of £95 deducted. For more information on this please see Financial Statements for ye 31-12-2011 see income & Expenditure Account on page 5 and also Note 5 on page 8. (£1 rounding difference)

<sup>e</sup> Corporate tax of £212 deducted. For more information on this please see Financial Statements for ye 31-12-2012 see Income & Expenditure Account on page 7 and also Note 5 on page 10. (£1 rounding difference),

<sup>f</sup> Corporate tax of £316 deducted. For more information on this please See Financial Statements for ye 31-12-2014 see Income & Expenditure Account on page 6 and also Note 5 on page 9.

<sup>g</sup> Corporate tax of £358 deducted. For more information on this please See Financial Statements for ye 31-12-2014 see Income & Expenditure Account on page 6 and also Note 5 on page 9.

Chart E1 - IPReg's actual budgetary spend for regulatory functions



## F. Unit cost

36. One way to analyse the cost of regulation to authorised persons is to calculate the unit cost of a regulator relative to the size of its regulated community. This is calculated by dividing the total expenditure by the number of authorised individuals. However, unit costs should be treated with a high degree of caution as they are not comparable from regulator to regulator as the scope and complexity of the activities of each regulator is different, for example IPReg authorises both individuals and entities. The make-up of the regulated community can also be diverse.
37. Based on readily available data the LSB has been unable to calculate a unit cost for IPReg. While the report includes data on the number of entities that IPReg regulates expenditure data is, understandably, not divided according to individuals and firms, which means that calculating a unit cost is not possible

## References

- <sup>1</sup> LSB research website, The regulated communities' views on the cost of regulation, <https://research.legalservicesboard.org.uk/wp-content/media/Cost-of-Regulation-Survey-Report.pdf>
- <sup>2</sup> Chartered Institute of Patent Attorneys (CIPA) , <http://www.cipa.org.uk/>
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- <sup>4</sup> IPReg website, Licenced bodies, <http://ipreg.org.uk/pro/practice-development/licensed-bodies/> (webpage accessed 21/01/2016)
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- <sup>10</sup> IPReg website, We are the regulatory body of Patent Attorneys & Trade Mark Attorneys, list of registered entities, accessed 21/01/2016, <http://ipreg.org.uk/>
- <sup>11</sup> Page 14, looking ahead, paragraph 3, Annexes 6-10, submitted alongside PCF application to LSB in October 2015, [http://www.legalservicesboard.org.uk/Projects/independent\\_regulation/PDF/2015/20151027\\_Annexes\\_6\\_10.pdf](http://www.legalservicesboard.org.uk/Projects/independent_regulation/PDF/2015/20151027_Annexes_6_10.pdf)
- <sup>12</sup> Page 17, The IPReg team, Annexes 6-10, submitted alongside PCF application to LSB in October 2015, [http://www.legalservicesboard.org.uk/Projects/independent\\_regulation/PDF/2015/20151027\\_Annexes\\_6\\_10.pdf](http://www.legalservicesboard.org.uk/Projects/independent_regulation/PDF/2015/20151027_Annexes_6_10.pdf)
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<sup>92</sup> Disciplinary hearings, Budget/Actual comparison, Year ended 31 December 2011, [http://ipreg.org.uk/wp-content/files/2012/09/Budget\\_v\\_actual\\_12me\\_Dec\\_2011\\_website.pdf](http://ipreg.org.uk/wp-content/files/2012/09/Budget_v_actual_12me_Dec_2011_website.pdf)

<sup>93</sup> Disciplinary hearings, 2012 Budget plus Reserves brought forward v Actual year ended 31 December 2012, [http://ipreg.org.uk/wp-content/files/2012/09/2012\\_Budget\\_v\\_Actual\\_ye\\_31\\_Dec\\_2012\\_comparison\\_website.pdf](http://ipreg.org.uk/wp-content/files/2012/09/2012_Budget_v_Actual_ye_31_Dec_2012_comparison_website.pdf)

<sup>94</sup> Disciplinary hearings, 2013 Budget plus Reserves brought forward v Actual year ended 31 December 2013, <http://ipreg.org.uk/wp-content/files/2016/03/2013-Budget-v-Actual-ye-31-December-2013.pdf>

<sup>95</sup> Disciplinary hearings, 2014 Budget v Actual to 31 December 2014, <http://ipreg.org.uk/wp-content/files/2016/03/2014-Budget-v-Expenditure-ye-31-12-14-website.pdf>

<sup>96</sup> Total of registration admin costs to CIPA and ITMA, Actual 12 mths to 31 Dec, 2010, Actual Budget Comparison,

[http://www.legalservicesboard.org.uk/Projects/pdf/application\\_to\\_lsb\\_2012\\_fees\\_comparison\\_2010\\_annex\\_9.pdf](http://www.legalservicesboard.org.uk/Projects/pdf/application_to_lsb_2012_fees_comparison_2010_annex_9.pdf)

<sup>97</sup> Total of registration admin costs to CIPA and ITMA, Year ended 31 December 2011, [http://ipreg.org.uk/wp-content/files/2012/09/Budget\\_v\\_actual\\_12me\\_Dec\\_2011\\_website.pdf](http://ipreg.org.uk/wp-content/files/2012/09/Budget_v_actual_12me_Dec_2011_website.pdf)

<sup>98</sup> Total of registration admin costs to CIPA and ITMA, 2012 Budget plus Reserves brought forward v Actual year ended 31 December 2012, [http://ipreg.org.uk/wp-content/files/2012/09/2012\\_Budget\\_v\\_Actual\\_ye\\_31\\_Dec\\_2012\\_comparison\\_website.pdf](http://ipreg.org.uk/wp-content/files/2012/09/2012_Budget_v_Actual_ye_31_Dec_2012_comparison_website.pdf)

<sup>99</sup> Total of registration admin costs to CIPA and ITMA, 2013 Budget plus Reserves brought forward v Actual year ended 31 December 2013, <http://ipreg.org.uk/wp-content/files/2016/03/2013-Budget-v-Actual-ye-31-December-2013.pdf>

<sup>100</sup> Total of registration admin costs, 2014 Budget v Actual to 31 December 2014, <http://ipreg.org.uk/wp-content/files/2016/03/2014-Budget-v-Expenditure-ye-31-12-14-website.pdf>