

**From:** [Barbara McLean](#)  
**To:** [Section52CDPA](#)  
**Subject:** Transitional arrangements for repeal of s52 CDPA response (Archives and Records Association)  
**Date:** 06 December 2015 21:29:35

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To whom it may concern,

**Re: IPO consultation into the transitional arrangements for the repeal of section 52 Copyright, Designs and Patents Act**

N.B. This submission has been prepared by the Legislation and Standards Working Group of the Archives and Records Association (ARA). ARA is the professional body for archivists, archive conservators and records managers in the United Kingdom and Ireland working in the public, private and third sectors. The Legislation and Standards Working Group represents the interests of ARA's members by providing comment on, and engaging in, consultations on legislation and related matters. This submission is made on behalf of ARA and all future correspondence should be directed to ARA's Chief Executive, John Chambers, at [REDACTED].

**1. In response to the final bullet point on page 5, section 17: 'Are there any other issues which the guidance should cover which are not listed?'**

As a general point, there ought to be an acknowledgement that the Archive sector may also be affected by the repeal of Section 52 and changes in the transition period. The actual issues encountered will be similar to those affecting museums and licensing institutions.

**2. Bullet point 3 on page 5, section 17: 'Should a longer or shorter transitional period than six months be adopted [...]?'**

The Archive sector may benefit from a longer transition period, to have enough time to address all the relevant issues.

Best wishes,

Barbara McLean  
Legislation and Standards Working Group Secretary