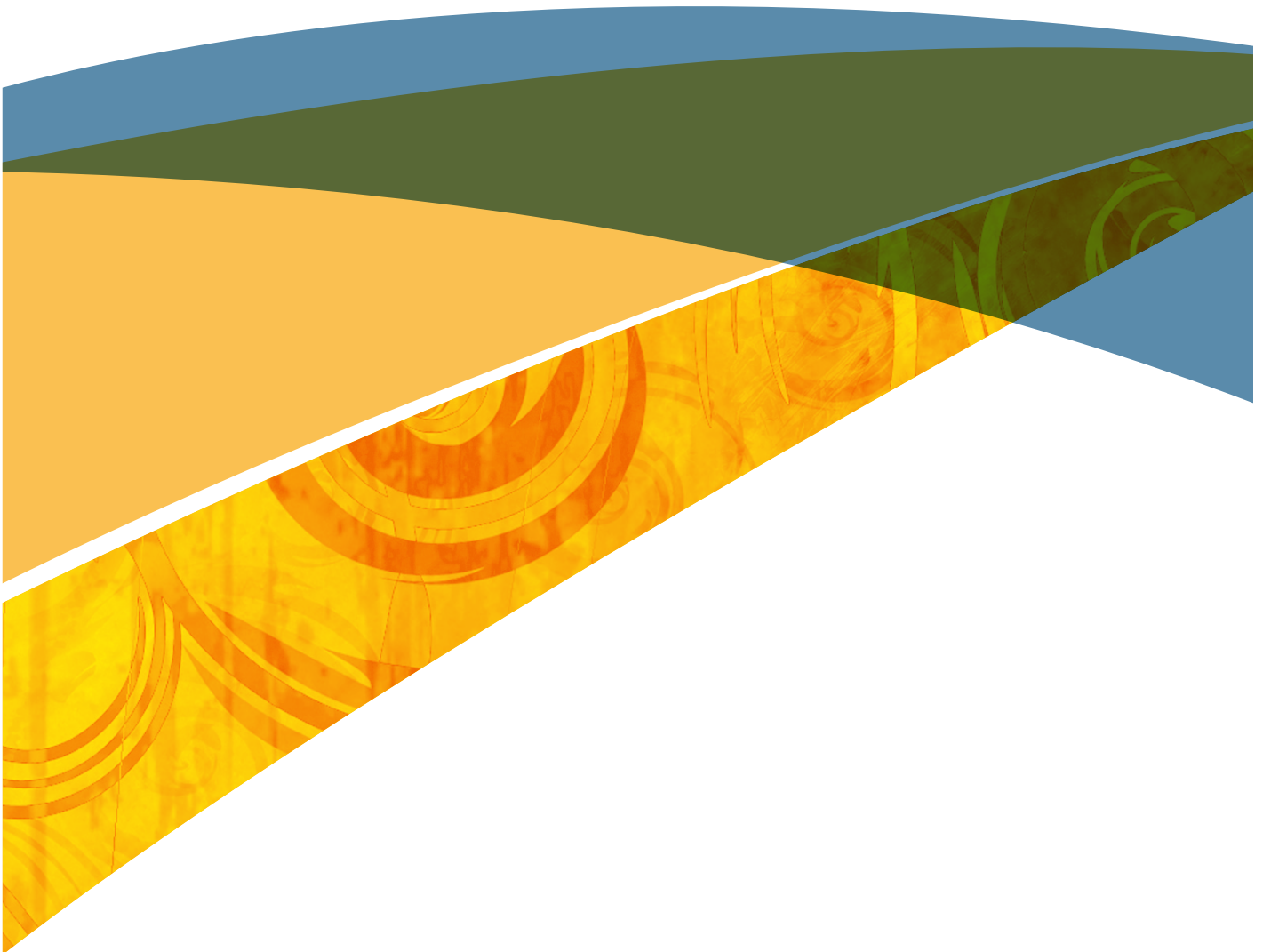
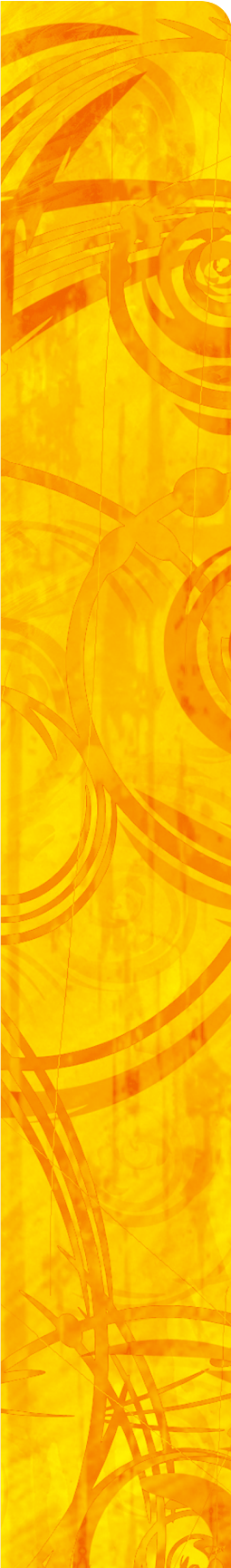




Intellectual
Property
Office

Government response to the consultation on reducing the duration of copyright in certain unpublished works





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Executive summary

This document provides a summary of the responses received to each of the questions asked by the consultation on reducing the duration of copyright in certain unpublished works. The questions aimed at uncovering the possible effects of the policy, including the number of potentially affected works, how such works are currently used, and the scope for controlling the impact of any changes.

The Government received a range of responses from various interested parties. Although many respondents were supportive of the Government's proposed measures, a number of respondents raised some concerns with the policy and its potential negative impact on owners of copyright works. The Government recognises these concerns and as a result has decided not to take action in this area at this time, but will instead seek further views from affected parties.

In the interim, a number of recent reforms have sought to make access and use of copyright works, including unpublished works, easier:

- In June 2014 the Government introduced exceptions to copyright, allowing libraries, archives and museums to conduct a range of activities, including archiving and preservation, as well as offering access to copyright works on their premises at dedicated electronic terminals, for research and private study.
- In October 2014, the Government launched an Orphan Works Licensing Scheme. This gives cultural institutions the opportunity to reproduce and increase access to a wide range of culturally important works, including many unpublished works. This scheme has been introduced alongside the EU Directive which allows cultural heritage organisations to digitise certain orphan works for display on their website.

Introduction

Due to the complex transitional provisions in Schedule 1 to the Copyright, Designs and Patents Act 1988, some very old unpublished works are protected by copyright in the UK until 2039, even though their authors may have died hundreds of years ago.

This is a problem for museums, libraries and archives, and the general public, who may wish to make use of these works, which due to their antiquity and unpublished nature are often of cultural or historical interest.

In 2013 Parliament approved powers to remove these complex rules so as to reduce the duration of copyright in certain unpublished works. This power was introduced with a view to simplifying copyright law in the UK and encouraging the publication of previously unpublished works, while continuing to protect copyright owners for an appropriate period.

On 31 October 2014 the government launched a consultation on whether regulations should be brought forward under this power. The consultation ran for 6 weeks and closed on 12 December 2014.

43 organisations and individuals made submissions to this consultation. This document is a summary of these responses, and outlines the Government's next steps.

The Government is grateful to all who contributed to this consultation.



Summary of responses

Q1. Do you own any works subject to the 2039 rule or hold any in your collection? If so, how many?

Many respondents to the consultation indicated that they were in possession of works subject to the 2039 rule. The number of such works held by some institutions is substantial, totalling hundreds of thousands of works, and in some cases maybe even millions of works. For example, the Imperial War Museum estimates that almost all of the 1.75 million works in their collection are unpublished, and many, if not most, of these will be subject to the 2039 rule.

Q2. If you hold copyright works in your collection, please describe the rights clearance process at your institution, along with cost estimates if possible.

Many respondents to the consultation indicated that the rights clearance process for 2039 works can be very time-consuming and is usually unsuccessful. The difficulty in clearing rights for such works is mainly due to the difficulty encountered in identifying the relevant rights holders in works which are often very old, with very many 2039 works being considered ‘orphan works’ (works for which the copyright owner cannot be traced). As such, rights clearance for these works is a disproportionately resource-intensive process.

Estimates of the time taken to clear the rights in a particular work ranged from 15 minutes to half a day, and cost estimates were between £4.38 and £46 per work¹. These estimates covered both works which fall under the 2039 rule and those which do not.

Two illustrative examples of the costs associated with rights clearance were provided, which involved collections held by the Victoria and Albert Museum:

In the first example, a curator spent 35 days clearing rights in 2,000 twentieth century posters. The curator subsequently requested permission to use over 850 of these works. Due to the multiple rights holders within each work, 1,150 enquiries were made in a bid to identify rights holders and secure permission to use the works. Over a period of five months, the rights were cleared for only 250 of these works.

In the second example, the time taken to secure permission to use 270 images in the catalogue for the exhibition “British Design: 1948 – 2012 Innovation in the Modern Age” was 120 working days. This resulted in staff costs of approximately £4,800.

¹ These figures are for rights clearance only, and do not include resulting licence fees. One respondent provided a ballpark figure of £70 per work for both rights clearance and licence fees taken together.

Q3. Does the 2039 rule impact on this process, and if so, how?

Many respondents, including those from educational establishments and the cultural heritage sector, indicated that the 2039 rule had a negative effect on the rights clearance process, representing a significant drain on resources and acting as a hindrance to the online distribution of their collections. Respondents noted that this was particularly the case for older works, where it is more difficult to identify the legitimate rights holder.

Many respondents stated that the 2039 rule made identifying whether a work was protected by copyright unnecessarily complicated. As a result of this rule, copyright duration is dependent on a number of factors, such as the date of creation of the work, the date of death of the author, whether publication had occurred and, if so, when. For many published works, however, the only information that is usually needed is the date of death of the author.

One respondent from the cultural heritage sector also noted that in cases where a potential rights holder has been found, it is often the case that they are unable to say with certainty that they own the rights in a work or are in a position to grant permission to use a work.

Some respondents indicated that the rights clearance burden was simply too onerous for them to undertake at all, and it was felt that their only option was to take a risk-based approach: either use the works at the risk of legal action, or simply not use them at all.

Some respondents suggested that the presence of these complex transitional provisions risked damaging respect for copyright as it made the law appear to be acting as a bar to the spread of knowledge, as opposed to being a mechanism for rewarding creativity.

Q4. If you are the copyright owner of a work subject to the 2039 rule, do you agree with this policy as outlined in this consultation document?

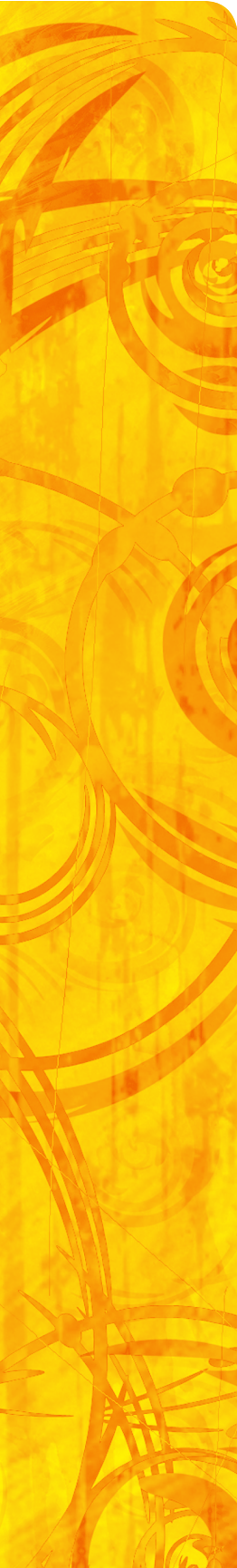
Many respondents from the educational and cultural heritage sectors indicated that they owned the copyright in a number of 2039 works, both through the creation of works and through assignation of copyright. Such institutions were unanimously supportive of the proposed changes despite the resulting loss of these rights, as such loss would be offset by the benefits of allowing improved access to historically and culturally important materials.

These institutions expressed the view that the 2039 rule provided no meaningful benefit to the majority of copyright owners. It was also noted that the continued protection of old works, including medieval manuscripts, created an extra, unnecessary level of complication to copyright law, which deterred people from making reasonable, and in many cases culturally important, uses of protected materials.

Several respondents also argued that the 2039 rule undermined the EU Copyright Term Directive² which is intended to harmonise copyright duration across the European Union. It was also noted that the 2039 rule created anomalies in the application of the EU Orphan Works Directive³.

2 Directive 2006/116/EC of the European Parliament and the Council of 12 December 2006 on the term of protection of copyright and certain related rights.

3 Directive 2012/28/EU of the European Parliament and the Council of 25 October 2012 on certain permitted uses of orphan works.



However, many respondents, especially those representing rights holders, were opposed to the policy, and instead argued that the 2039 rule should remain in force until it has expired. Some respondents argued that the removal of the 2039 rule would amount to a confiscation of property rights, and that it would not be appropriate for the Government to revoke a right which has already been granted. Several respondents to the consultation suggested that the removal of the copyright granted under the 2039 rule may not be permitted on human rights grounds as it could be deemed a deprivation of property.

Many respondents argued that works subject to the 2039 rule represent a significant source of income for rights holders, and many such rights holders will have made arrangements based on the expectation that the term of copyright will run until 2039. The Society of Authors indicated that the estate of one author has been in receipt of £100,000 over the last 25 years through licensing extracts of unpublished materials held by archives. Removal of the 2039 rule would potentially have deleterious effects on the revenue stream of such estates over the next 25 years.

UK Music provided an example of a composer's estate which has received more than £20,000 in royalties for a posthumously published work. A substantial fraction of the royalties has been received post 2005, which is the year that the work would have come out of copyright if the 2039 Rule had not applied.

It was noted by several respondents that this policy could have negative consequences for certain trusts that manage the rights of works created by deceased creators. An example was provided of the Ralph Vaughan Williams Charitable Trust, which manages the rights of works created by the composer Ralph Vaughan Williams. This trust uses the money it acquires through licensing use of the composer's works to support the work of British composers and to invest in further publication in Williams' music. It was argued that removal of the 2039 rule would result in many of Williams' works entering the public domain 11 years earlier than anticipated, which would impact upon the revenue stream of the trust.

One respondent argued that, even where an unpublished work is not currently being commercialised, it is not correct to state that the rights holder would not suffer harm if their works were brought out of copyright, as they would have lost the right to receive a licence fee if such a work were subsequently published by a third party.

Some respondents argued that there is insufficient economic evidence to justify the policy at this juncture. As outlined in the Government's impact assessment, it is not possible to fully monetise the effect of this policy as it is unknown exactly how many 2039 works exist and what proportion of these would undergo a rights clearance process. There was also uncertainty around the scale of benefits to society from publication of these works.

A number of those opposed to the revocation of the 2039 rule stated that they would not object to the removal of copyright from very old works, specifically those over 200 years old; however, it is not possible to say with certainty that all those holding works over 200 years old would be happy with a removal of copyright.

Also, not all groups representing rights holders were opposed to the Government's proposals. A submission received from the Publishers Association broadly supported the policy on the grounds that authors and publishers would face a less onerous rights clearance burden, especially when quoting from historical materials.

Q5. Having regard to the enabling power, do you agree with the Government's proposed approach?

Respondents from the cultural heritage sector were strongly in favour of the Government's proposed approach of removing the 2039 using the enabling power in Section 170 of the Copyright Designs and Patents Act 1988. It was reasoned that the use of this power would bring copyright duration in the UK more closely in line with the rest of the EU.

However, many respondents, especially those representing rights holders, were of the view that the Government should not utilise the enabling power for the reasons provided above.

Q6. If you consider that the copyright in affected works should expire a fixed period after commencement of the regulations, how long should that period be?

Many respondents, including those within the cultural heritage institutions, were opposed to the idea of delaying the commencement of any regulations on the basis that the 2039 rule was itself a transitional provision, and introducing a new transitional period would merely perpetuate the current situation. Respondents from this sector requested that if a transitional period were to be introduced, it should be as short as possible.

One respondent noted that there was an argument for moving promptly to resolve the 2039 issue as this measure forms part of the Government's proposals for overcoming the issues posed by orphan works. As the 2039 rule has resulted in the creation of a large number of orphan works, they argued, it makes sense for this measure to be implemented as concomitantly as possible to the EU Orphan Works Directive and the domestic licensing scheme for orphan works, both of which came into force on 29 October 2014.

Rights holders and their representatives, however, generally favoured the introduction of comprehensive transitional provisions to allow rights holders enough time to make necessary arrangements regarding affected works. One respondent also suggested that any such provisions should be extended to cover works subject to an ongoing publication project which was not completed at the time the law changed.

Q7. Are you aware of any other works subject to the 2039 rule because of the 1775 Act, and have you any objection to abolishing these rights?

None of the respondents to the consultation raised any objections to abolishing the rights in works protected under the 1775 Act. The only remaining rights holder in such works (the Bodleian Libraries) indicated in their response that they had no desire to retain these rights any longer.



Q8. Do you consider that this policy would encourage or facilitate the publication of previously unpublished works?

Respondents from the cultural heritage sector were strongly of the view that the removal of the 2039 rule would result in the publication of previously unpublished works. It was argued that there would be a significant benefit to UK cultural heritage institutions if they were able to publish such works as it would allow these institutions to showcase their collections to the public more widely through online digitisation or print publications.

Representatives from libraries and archives also noted that a change in the law would allow them to provide members of the public with materials that could then be published. Currently, such institutions can only supply these materials to third parties where they have received a declaration that the works will only be used for non-commercial research or private study⁴.

Many respondents agreed that the 25 year publication right for previously unpublished works would act as a strong incentive for publication. However, it was noted by some that this would equate to replacing one form of protection (copyright) with another (publication right) which may ultimately undermine the purpose of the policy.

Some rights holders, however, suggested that the change in the law may result in a *reduction* in the number of works published as it would remove the financial incentives for publication.

Concerns were raised by several respondents that the removal of the 2039 rule could result in the hurried publication of poorly-edited or misattributed editions of previously unpublished works in order to secure the 25 year publication right in commercially valuable works (for example, previously unpublished manuscripts or correspondence from renowned authors). It was reasoned that such publication could come at the expense of other publishers who had invested time and money in producing a better quality edition of the work.

It should be noted that for the publication right to apply, the work must be published by or with the consent of the owner of physical medium in which the work is embodied or on which it is recorded⁵. As such, unauthorised publication by a third party would not prevent the legitimate owner of an unpublished work from publishing it at a later date and acquiring the publication right.

One respondent suggested that the recently introduced orphan works licensing scheme would allow use of many of the works subject to the 2039 rule, and that there may be scope to clear rights for certain affected works via extended collective licensing. The respondent noted that these measures have only been recently introduced by the Government, and it may be better to wait to see what effect they will have on the issue before legislating further in this area.

4 Section 43 of the Copyright, Designs and Patents Act 1988

5 Regulation 16(3) of the Copyright and Related Rights Regulations 1996 (SI 1996/2967).

Q9. Have you any plans to publish previously unpublished works following the implementation of this policy? If so, how many?

Many respondents from the cultural heritage sector outlined publication and digitisation projects which they are currently unable to undertake, but which would become possible if the law was changed. These included the publication of materials to commemorate certain key dates from the First World War, as well as participation in international digitisation programmes, such as the European online portal.

Conversely, many rights holders indicated that they would be less likely to publish works if the 2039 rule was removed as there was perceived to be less financial incentive to do so.

Q10. Are you affected by or aware of a situation where copyright works have been deposited with a third party on the belief that the 2039 provisions would remain in place to protect the work, and if so what is the likely impact to you of the policy?

Concerns were raised by some respondents that rights holders who had deposited works with third parties may find that they lose the ability to control publication of the works. It was suggested that any terms of deposit which dealt with the issue of copyright should be extended to also apply to publication right.

Respondents from the cultural heritage sector, however, stated that donors of unpublished materials are generally either unaware of the copyright status of the work or are happy for the material to be used by the institution in question. It was noted that such institutions would continue to abide by any conditions on re-use of materials set by the donor even if the law were changed.

Q11. Do you consider there to be any issues involving privacy or confidentiality in the content of works which were previously protected by copyright until 2039 but fall out of copyright as a result of this policy?

Many expressed that view that privacy, confidentiality and data protection are protected in the UK under specific legislation and are not the intended purpose of copyright law. Respondents from libraries and archives noted that privacy and confidentiality are of greater concern to such institutions than copyright law, and appropriate steps are already taken to restrict the use of private or confidential materials, regardless of the copyright status of the work.

Some respondents from the cultural heritage sector also noted that the standard term for copyright protection (life of the author plus 70 years) would generally be long enough to ensure that privacy issues would be minimal, and that they would be outweighed by the historical and cultural benefits of disclosing such works. Also, even if regulations were not enacted, this issue would still arise at the end of 2039 anyway.

One respondent noted that the decision made in 1988 to abolish perpetual copyright in unpublished works and replace it with the 2039 rule was of much greater importance with regard to the issues of privacy and confidentiality than the Government's current proposals. The changes made in 1988 effectively meant that unpublished works would no longer be prevented from entering the public domain, and this change removed what was effectively a perpetual right to privacy.

However, many respondents were concerned about the possible impact which this policy could have on privacy. They argued that allowing public access to works which were never intended to be publicly disclosed (e.g. private letters, diaries, etc.) risks violating the privacy rights of the individuals involved. Some respondents were of the view that allowing unpublished materials to enter the public domain for the first time may result in a raft of legal challenges related to the publication of private materials.

Q12. Do you consider that transitional provisions are required in respect of works subject to the 2039 rule but published after 1989?

Many respondents, including those from the cultural heritage sector, were of the view that transitional provisions should not be enacted in respect of works subject to the 2039 rule but published after 1989. It was reasoned that this would add an extra layer of complexity to the copyright system, which would negate the Government's stated aim of simplifying the law in this area, and would act as a barrier to harmonisation of copyright duration across the EU.

However, many other respondents expressed the view that transitional provisions would be required where works subject to the 2039 rule have been published after 1989. It was reasoned that, as rights holders would have published their works under the expectation that they would be protected until 2039, it would be unfair if they were subsequently deprived of this right, especially as the fact that the work was due to be protected until 2039 is likely to have been a factor in the rights holder's decision to publish. It was noted that many such works would be of significant commercial value (some examples are given under Q4, above), and curtailing their copyright term could significantly harm right holders' interests.

Several respondents suggested that a possible transitional arrangement would be to allow copyright protection to continue for works which were published at the time the new regulations were introduced, but to remove protection for those works which remained unpublished.

However, it was noted by several respondents that such transitional provisions would have resulted in greater complexity in the law as there would be different rules for works which were published post 1989 and those which were unpublished at the time the law came into effect.



**Q13. Should these regulations apply to unpublished sound recordings?
(Please give reasons for your answer.)**

Many respondents expressed the view that the regulations should apply to unpublished sound recordings on the basis that this would result in a greater degree of clarity and consistency across copyright law. One respondent noted that this course of action would be consistent with the recently implemented Hargreaves' Review, which focussed on ensuring that, as far as possible, copyright law is format-neutral.

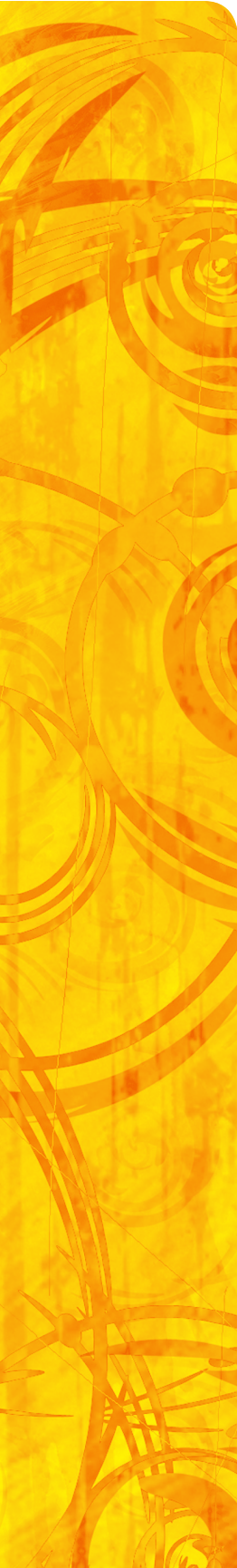
Some respondents from the cultural heritage sector noted that many libraries and archives hold thousands of sound recordings which could be utilised if the 2039 rule was abolished. Although use of these materials would be permitted under certain copyright exceptions, these generally only permit uses for the purposes of non-commercial research or private study, and preclude commercial publication or online digitisation.

However, several stakeholders raised concerns as to how removal of the 2039 rule would impact on the 'session fund' for session musicians introduced by EU Directive 2011/77/EU⁶. It was suggested that the publication of unpublished sound recordings could displace existing recordings of the same work from which session musicians receive royalty payments.

Respondents from the music industry were strongly opposed to the inclusion of sound recordings in this policy. It was noted by one respondent that the 2039 rule only applies to sound recordings from the period 1957 – 1989, and so the policy rationale behind bringing very old works into the public domain would not apply so strongly for such recordings.

Several respondents also noted that record companies typically control access to unpublished music recordings, and removal of the 2039 rule would not make these works available to the public. In fact, the removal of a financial incentive to publish these recordings (there is no publication right for sound recordings) will most likely result in these works not being published at all. It was put forward that the best way to ensure the dissemination of music recordings would be by retaining the financial incentives provided by the 2039 rule. It was also argued that removing this rule may result in record companies being forced to release material before the 2039 regulations came into force, thus securing an additional 70 years of protection. This could place an unnecessary burden on record companies by compelling them to make a hasty audit of their archives to determine which recordings were suitable for publication before the 2039 rights expired.

6 Directive 2011/77/EU of the European Parliament and the Council of 27 September 2011 amending Directive 2006/116/EC on the term of protection of copyright and certain related rights. The 'session fund' provisions contained within this Directive were implemented into UK law as Section 191HB of the Copyright, Designs and Patents Act 1988.



Q14. Are you the owner of relevant sound recordings, or the copyright in them? If so, are you able to share information about the present state of the market for unpublished sound recordings?

As noted above, some museums and archives indicated that they held thousands of sound recordings, many of which would fall within the scope of the 2039 rule. Such recordings were not just of musical works, but included oral history recordings, conference proceedings, as well as birdsong, the sounds of steam trains and of military hardware. Many of these would qualify as orphan works as it would be impossible to ascertain who made such recordings. Although these respondents were unable to provide a detailed analysis of the market for unpublished sound recordings, they reasoned that such recordings have remained unpublished on the basis that there is very little market value in their publication, and so harm to rights holders of taking these works out of copyright would be minimal.

Respondents from the music industry provided some useful information on the market for unpublished sound recordings. For example, one major record label spends £2.25m - £3m per year on re-mastering sound recordings and processes 750 - 1000 recordings each year. Without the 2039 rule, it is argued, this label would have no commercial incentive for further investment in this process.

Also, one respondent suggested that there are record companies which specialise in licensing access to master recordings, a business model which could be adversely affected by removal of the 2039 rule.

One respondent also noted that the biggest selling album of the week of 10th November 2014 was "The Endless River" by Pink Floyd, which sold 139,351 copies. This album consisted solely of outtakes from previous recording sessions for an album released 20 years ago. Although this particular work would not have been subject to the 2039 rule, it is a useful example of the commercial demand that exists for previously unpublished sound recordings.

Q15. Do you agree that the likely impact of this policy in respect of sound recordings is minimal (whether as a benefit or a cost)?

Libraries and archives were generally of the view that there would be considerable benefits to including sound recordings within this policy. Significant research potential could result from making this material free to use. Removing copyright protection for 2039 works would also result in a considerable reduction in costs to libraries, archives and researchers, both as a result of a reduction in rights clearance burdens as well as by allowing academics and students to access materials digitally, without having to travel to the library or archive in which the material is held.

Several respondents noted that sound recordings are not always of copyright protected works, such as literary or musical works. As noted above, many recordings held by libraries and archives are of sounds which would not qualify for copyright protection, and many recordings would be of works for which copyright protection had expired (for example, actors reading a play by Shakespeare or a recording of an orchestra playing 18th Century music).

Given the nature and age of the majority of unpublished sound recordings, respondents from the cultural heritage sector considered that removing protection for unpublished sound recordings would have negligible impact on rights holders.

Respondents from the music industry suggested that there would be a significant negative impact from removing the 2039 rule. As mentioned above, many respondents were concerned that record companies would no longer have a commercial incentive to disseminate previously unpublished sound recordings, thus preventing the public from gaining access to them. As such, it was argued that the policy would result in disbenefits to both the record companies (through loss of the commercial incentive to disseminate recordings) and to the public (through less unpublished material being disseminated).

Next steps

Despite the benefits of the policy to the potential dissemination of cultural heritage and wide support from that sector, a number of groups representing copyright holders raised legitimate concerns about the impact the policy would have on the commercial exploitation of copyright works. The Government has, therefore, taken the decision not to take forward the proposals outlined in the consultation at this time.

Although many consultation respondents were supportive of the measures proposed by the Government, a number of genuine concerns about the impact on copyright owners were raised as part of the consultation, which require proper consideration. These issues ranged from the impact on existing and potential commercialisation of 2039 works by rights holders, to potential conflict with the European Convention on Human Rights. In light of these issues, the Government does not consider that the policy should be taken forward as originally proposed

Although the Government remains strongly of the view that steps need to be undertaken to enable the use of historically and culturally important works subject to the 2039 rule, it does not believe that legislation should be made without further consideration of the issues raised during the consultation.

The Government intends to meet with interested parties in the near future to discuss concerns raised during the consultation, and to explore the possible direction of future work in this area.

In the interim, a number of recent reforms have sought to make access and use of copyright works, including unpublished works, easier:

- In October 2014, the Government launched an Orphan Works Licensing Scheme. This gives cultural institutions the opportunity to reproduce and increase access to a wide range of culturally important works, including many unpublished works. This scheme has been introduced alongside the EU Directive which allows cultural heritage organisations to digitise certain orphan works for display on their website.
 - In June 2014 the Government introduced exceptions to copyright, allowing libraries, archives and museums to conduct a range of activities, including archiving and preservation, as well as offering access to copyright works on their premises at dedicated electronic terminals, for research and private study.
-



Annex A – List of respondents

Andrew Chapman

Abhimayu Singh

Archives and Records Association

Arts Council England

Association of Authors' Agents

BBC

BFI

Birmingham Archives

Bodleian Libraries

BPI

British Copyright Council

British Library

Cambridge Centre for Christianity Worldwide

Claydon House Trust

DACS

IAML

Imperial War Museum

Jeremy Wilson

Jerwood Library of the Performing Arts

LACA

Lambeth Palace Library

Law Society of Scotland

Mr Justice Arnold

Music Publishers' Association

Musicians' Union

National Library of Scotland

National Library of Wales

National Museum Directors' Council

National Records of Scotland

Pact

Publishers' Association

Richard Meredith

Sheffield University

Society of Authors

The Seven Pillars of Wisdom Trust

The Wellcome Trust

Tim Padfield

Tom Rivers

UK Music

University of Leicester

University of Reading

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