



David Burgess
Intellectual Property Office
21 Bloomsbury Street
London WC1B 3HF
United Kingdom

5 April 2012

Dear Mr Burgess

Intellectual Property Office: Consultation on Copyright

I am writing on behalf of GuildHE in response to the recent consultation undertaken by HM Government on copyright matters.

GuildHE is one of the two recognised representative bodies for Higher Education in the UK. It is a Company Limited by Guarantee and a Charity. It was founded in 1967 as the Standing Conference of Principals, registered as a company in 1992 and became GuildHE in 2006. Currently it has 34 members/associate members. These include publicly funded higher education providers including universities, university colleges, and specialist higher education institutions, a smaller number of private providers of higher education plus some further education colleges offering higher education programmes. The full list of members is at: <http://www.guildhe.ac.uk/en/members-list/>

Alongside Universities UK in the Universities UK/ GuildHE Copyright Working Group, we represent higher education institutions within our membership in negotiations with the Copyright Licensing Agency on the higher education copyright licence.

I am writing now to express our support for the response submitted by Universities UK to the consultation on copyright. The issues raised in the consultation were discussed extensively within the Universities UK/ GuildHE Copyright Working Group and the points made have our full support. Many of the institutions that GuildHE represents are smaller in scale and so the burdens involved in complying with and administering collective copyright licences, over and above the costs of the licence, can have a particularly heavy impact. In addition our membership includes a number of specialist higher education institutions in the field of art and design or performance. The proposals to bring all types of copyright work within the scope of fair dealing and to ensure that educational exceptions are 'technology neutral' are particularly welcome in these areas.

There is a clear interest for all higher education institutions in being able to undertake text and data mining for non- commercial research and being able to draw on quotations or

extracts from works of all kinds (including films, sound recordings and artistic works) for purposes of teaching or analysis. We also attach considerable importance to securing more flexibility in being able to meet the needs of students with disabilities. And, of course, in any changes to copyright, we feel it will be imperative to ensure that copyright exceptions cannot be overridden by separate contracts or licensing arrangements.

These issues, and other issues raised in the consultation, are discussed further in the response submitted by Universities UK – and we would wish to associate ourselves fully with the detail of that response.

I hope this is helpful but please let me know if you need any further information or would like to discuss.

Yours sincerely,

Helen Bowles,

Deputy Chief Executive, GuildHE

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