

# **BFI FUTURE PLAN: NEW HORIZONS FOR UK FILM**

## **RESPONSE FROM THE BRITISH SCREEN ADVISORY COUNCIL (BSAC)**

# 12 June 2012

**Executive Summary** 

- The BFI should balance its longstanding cultural remit with its new industrial remit and work on the understanding that the cultural value of film is inseparable from industrial policy objectives.
- The BFI should develop industrial policy objectives in partnership with the commercial sector over the coming months focusing on how funds can be deployed to strengthen UK film businesses.
- In the next draft of the Future Plan, each proposal should be linked, where possible and appropriate, to key performance indicators in order to allow for an accurate assessment of success in the future.
- Funds should be focused on areas where there is market failure, leveraging investment from other parties where possible.

### Introduction

The British Screen Advisory Council (BSAC) has been active in the arena of film policy for many years, including playing an instrumental role in securing the tax credit, and following the announcement of the closure of the UK Film Council (UKFC), providing advice to Government on the key functions previously carried out by the UKFC and responding to Lord Smith's call for evidence for his Film Policy Review. In responding to the current BFI Future Plan consultation, BSAC is able to call on a wide range of film industry expertise through a membership which encompasses all the sectors in the audiovisual value chain.<sup>1</sup> We understand that the need to respond to Lord Smith's Film Policy Review and to begin the process of implementing the BFI's strategy has necessitated a short consultation period with top line proposals broadly setting out what the BFI plans to do. This has made it difficult in

<sup>&</sup>lt;sup>1</sup> A list of our membership is available here <u>http://www.bsac.uk.com/membership-list.html</u> BFI Future Plan: New Horizons for UK Film

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some places to see what is intended by the proposals. Given the above, BSAC has provided views on the specific proposals contained within the Future Plan document. However, we are keen to continue work over the coming weeks in order to feed into the next iteration of the Future Plan on areas where we feel more in-depth analysis is needed such as policy on skills provision and production. We hope that this work will be helpful and look forward to meeting with colleagues at the BFI as our ideas develop.

#### **Overall assessment**

To what extent do you agree or disagree that the three strategic priorities are the right ones for us to focus on for the next five years?

Which priority do you think is the most important for us to focus on?

#### Is there anything else you want to say about our plans for the next five years?

We welcome the publication of the BFI's Future Plan 2012-2017 as it provides an opportunity to shape policy with the intention of strengthening the UK film sector over the medium to long term. The emphasis on consultation taken by Lord Smith's Film Policy Review Panel and now the BFI has been positive for the industry as it has ensured that a variety of voices across sectors and regions is being heard. This is vital as a Future Plan for the success of the film industry must have the support of those working within it.

In our response to Lord Smith's Film Policy Review, BSAC set out the principles which we believe should be used to shape future film policy given the current economic climate and austerity measures under which public institutions must operate. We argued that 'spreading the money too thinly would result in little or no impact being felt. In our view, limited public funds should be directed to areas where there is both market failure and where Government intervention will have a lasting beneficial effect (capable of being measured).'<sup>2</sup> We therefore welcome the BFI's acknowledgement that there is not enough money available to achieve everything, and the decision to take action on three strategic priorities with an emphasis on collaboration with partners, especially given that in any event, the BFI cannot alone secure the development of a sustainable UK film industry. There remains a danger, however, that the impact of the funds is weakened as they are spread too thinly across a very wide range of activities and aims, and that some proposals run the risk of duplicating existing structures and activity. We understand that the ambition of the BFI to achieve real change for the sector in a number of areas is not in alignment with the resources available to it. In this first phase response the BFI has, somewhat inevitably, set out a broad brush vision. We believe that in the next phase the BFI needs to provide more flesh on the bones of its proposals and, where possible and appropriate, set out clear and measurable targets so that the industry is able to benchmark progress in the coming years. In particular, we would welcome clarification in relation to objectives relating to the film education offer and industrial objectives concerning

<sup>&</sup>lt;sup>2</sup> Film Policy Review: Submission from BSAC, p3 <u>http://www.bsac.uk.com/2011.html</u>

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skills and training, and audience building, which we feel have been confused in some aspects of the Plan. We are also keen that the BFI clarify the nature of the relationships it envisages with its partners, as this represents a key function of the delivery of many proposals. BSAC welcomes the fact that the BFI is separately undertaking to produce key performance indicators relating to the proposals in the Future Plan which will be extremely useful in accurately measuring the success of the BFI's strategy over time.

The BFI as the new lead body for film is in the midst of undergoing a transformation. The BFI's venerable cultural legacy means that it is in a good position to continue to deliver on its longstanding remit for education and heritage, and to implement a unified film education offer founded on excellence. However, in order to deliver on the industrial remit previously carried out by the UK Film Council (UKFC), it will need to acquire a high level of business acumen, industrial expertise and experience. The process of reviewing film policy in the UK represents an important opportunity to assess previous industrial policy relating to film, and for the BFI to lead on the implementation of a new set of policies in order to maximise the beneficial impact of the public funds available. The BFI should carefully balance its longstanding cultural remit, with its new industrial remit. As we have previously stated, a film policy characterised by an artificial dichotomy between 'culture' and 'commerce' is unhelpful.<sup>3</sup> Therefore, the BFI's thinking will need to be based on an understanding that the cultural value of film is inseparable from industrial policy objectives. We feel that the current draft Future Plan fails to outline a robust industrial policy. We understand that the first phase of the BFI's strategy necessarily sets out high level principles rather than detailed proposals, however, we feel there is too little discussion of the competitive challenges that the UK film business faces. An attempt to strengthen UK film businesses must be informed by the global commercial context in which UK businesses operate. We hope that the next iteration of the Plan will provide further details in this respect. Measureable objectives should be set for both cultural and industrial policies in order to allow an analysis of the BFI's success in educating and meeting the needs of audiences, and in meeting the needs of the industry, in terms of talent development, skills provision and production.

In order for the BFI to successfully implement a film policy which facilitates the increased success of British films and film businesses, it will need to build its capacity for successful commercial risk-taking and for undertaking focused partnerships to build a critical mass of investment and to maintain world class skills. There is a need for an ongoing conversation with industry to help the BFI to achieve this. We are pleased that the BFI is utilising industry expertise through several working groups running concurrently with the consultation process to drill down on the details of the main proposals. As indicated, BSAC plans to undertake further work in order to provide some possible policy solutions on production and skills in order to feed into the next iteration of the Future Plan. We are keen to work with the BFI in shaping its strategy and hope that providing the consensus view of our cross-sectoral membership will be helpful in doing so.

<sup>&</sup>lt;sup>3</sup> Beyond the UKFC: Report and recommendations to Government, BSAC, p3

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# Strategic Priority 1: Expanding education opportunities and boosting audience choice across the UK

To what extent do you agree or disagree that our overall approach to expanding education opportunities and boosting audience choice across the UK by investing in education, learning and audiences is the right one?

Which proposals do you think are the most important in ensuring we achieve the overall aim of this priority?

Is there anything else you want to say about this priority?

### Education

In our response to the Film Policy Review, BSAC supported the rationalisation of the current film education offer to make it more streamlined and efficient. We therefore support the proposal to create a unified film education offer for 5-19 year olds. We welcome the intention to provide exposure to film in general, and British film in particular, to all school children for their pleasure and enrichment. We appreciate that as a by-product, future audiences are being developed. However, we would encourage a clearer statement of objectives for the new film education offer, clarifying how and the extent to which it aims to educate young people about film, to boost future audiences, to ready young people for future careers in the industry, and/or to use film as a means of teaching essential analytical and life-skills. It may be that the film education offer intends to fulfil all of these objectives. However, there is no acknowledgement in the Plan that the objective to provide a cultural education to all children which is inclusive of film may differ from the skills and training needs of the industry. For example, the Film Academy aims to identify talented young people and offer them training in particular roles, however, the fact that this proposal comes under the strategic priority of education confuses this aim. We encourage the BFI to clarify its objectives with regard to education, boosting audiences, and skills and training, and to build on its cultural legacy to produce a film education offer based on excellence. In considering the best way to deliver a unified film education offer, one should focus on the functions that are required and the objectives to be achieved rather than on the current organisational landscape.

BSAC welcomes the emphasis placed on talent development in training new entrants into the industry from across the UK. The investment of £1m per year from the Department for Education for the Film Academy represents a significant commitment to the future of the UK film industry. However, the precise objective of the Film Academy in relation to training talented young people to the level at which they can enter the industry, as opposed to using film as a means of education is unclear. The expectations of the BFI should also be clarified with regard to the number of new entrants to the industry which the Film Academy is expected to produce and how the BFI will identify the future supply needs of the industry. It has been reported that 5000 young people will initially be selected, and that the intention is from them, to select 200 outstanding candidates for a residential filmmaking course. If this

report is accurate, we are concerned by the scale of the Academy as the film industry is highly competitive and subject to oversupply in some areas. Training a high number of young people to a basic level will do little to advance them in the industry as the skills needs of the industry are for more highly skilled creative and technical talent. They are likely to need further support in order to ready them for careers in the industry. We are pleased that the BFI is consulting a range of stakeholders on its skills strategy through the Film Skills Council and look forward to further consultation with industry as the strategy is implemented. We recommend that the BFI works in partnership with organisations with a proven track record of success in training new entrants to the industry including the BBC and the industryaccredited higher and post-graduate providers of talent development such as the UK's film schools in order to implement a strategy which is based on existing success. The BFI should also look to partnerships in order to boost the investment provided by the Department for Education. Skills provision is discussed in more depth below under strategic priority two.

BSAC has previously argued that a robust policy to increase public awareness of the value of copyright is needed in order to create greater understanding that copyright is an asset, not simply a regulation. At present, the BFI's film education policy only refers to copyright as something educators must avoid breaching, which reinforces teachers' view of copyright as a barrier to access and use. It will help future generations to appreciate that copyright infringement and theft are undesirable and safeguard the success of the British film industry for them and for society, if such a policy were to be fully integrated into the BFI's proposed new film education offer.

#### **Audience choice**

BSAC welcomes the focus in the proposals in relation to boosting audience choice ensuring that audiences across the nations and regions including young and disabled audiences are given access to a broad range of cinema which may not be provided by commercial operators. As the primary public funder of film production in the UK, and with the intention to diversify British film production, it is fitting that the BFI should prioritise providing access to the public to watch films which have received public money, wherever they live and whatever their circumstances. We would welcome a clearer definition of what 'audience choice' means in the context of the BFI's proposals, whether it is a cultural imperative or a means to increase revenues for British film.

BSAC welcomes the emphasis on utilising digital technology to broaden access to film and filmed content. The success of recent initiatives such as live streaming of alternative content to networks of cinemas across the country have provided proof that audiences exist for such content outside of London. However, there is no clear appreciation within the document of the potential that digitisation of the UK cinema sector – due to reach completion in early 2013 – offers to reach a broader range of audiences with a more varied range of film content. The BFI's stated ambition of digitising 1000 community venues needs to work with the grain of current and potential commercial activity if this investment is to be truly additional and

this aim is to be achieved in the most cost-effective way. Lord Smith recommended that, in order to take full advantage of the opportunities that digital offers to reach new and wider audiences, flexibility on the part of exhibitors and third party consolidators around VPF deals is needed in order to ensure that independent distributors are not in a worse position than they would have been with 35mm prints. We understand that the DCMS will monitor this going forward.

There is in the draft Plan too little emphasis on the opportunity digital platforms present to reach new audiences which may be geographically scattered, but can congregate around shared interests and tastes online. The digital age has meant that divisions between different means of distribution have broken down; film policy should not be restricted to the traditional silos which have now fallen away in the film business. The BFI should implement a more 'platform neutral' policy for offering a much broader choice to audiences rather than one based primarily around cinemas and the box office.

We believe that the key to audience development is the sustained and targeted investment of public monies into development, production and skills coupled with access for audiences to a range of films across platforms. The ability of audiences to 'discover' a range of films, especially online where there are a multitude of choices available and a lack of careful curation is crucial. 'Discoverability' must be at the heart of the BFI's multi-platform strategy.

We welcome the continuation of the P&A Fund as there is evidence that it provides films with wider geographical access to the public and that over the last decade films which have received P&A funding had a higher mean box office than comparable films which did not receive funding.

The BFI should be careful in implementing a policy which aims to produce a brand for British films. Whilst awareness of British film can be boosted through working with commercial providers across platforms, introducing a British film brand linking vastly different types of film, commercial offerings with niche fare, successful with weaker offerings, is unlikely to appeal to audiences. For similar reasons, the notion of a British Film Week, as opposed to an ongoing desire to support and showcase the best British films, is not widely supported. We would recommend that such a proposal not be implemented unless there is evidence to show that the introduction of a British brand would appeal to audiences.

# Strategic Priority 2: Supporting the future success of British film by investing in film development, production and skills

To what extent do you agree or disagree that our overall approach to supporting the future success of British film by investing in film development, production and skills is the right one?

Which proposals do you think are the most important in ensuring we achieve the overall aim of this priority?

Is there anything else you want to say about this priority?

# **Development and production**

BSAC strongly welcomes the proposal to increase support for production and development. We also welcome the proposal to invest in production across a range of genres, including animation, comedy, documentary and family films which have not previously received sufficient support. However, investing in genre films should not come at the expense of the ability of the gatekeeper to back the best films available so we are pleased that the BFI does not intend to introduce quotas or ring-fencing of funds. BSAC's response to the Film Policy Review highlighted script/talent development and production as the key areas where there is a demonstrable market failure and where intervention can have a lasting beneficial effect and recommended that public funds be targeted at these areas. Investment in development in particular is essential for 'new entrant filmmakers and culturally valuable projects of limited commercial upfront appeal to break through', which will be essential for the BFI to achieve its aim of enriching and diversifying British film production. Whilst we welcome the support indicated for the Film Tax Relief, we consider that support should also be extended to the EIS tax relief which is of significant importance to smaller independent films.

We are supportive of proposals to nurture talent across the UK but are unsure what the initiative to introduce UK-wide centres of excellence for talent development will involve. The strategy should enable more money to be spent in the regions and empower decision making on how the money should be allocated on a local level, which should have a positive effect on the diversity of people and projects in the sector. However, there must be a balance between enabling autonomous local decision making, and centralised control which guards against competitive use of monies between regions in an attempt to establish unsustainable creative clusters in each region. The physical presence of a number of centres for talent development across the UK will have a significant associated administration cost. Before implementing such a system, consideration should be given as to whether a policy to nurture talent across the regions and nations could be operated centrally. If the UK-wide centres of excellence are to take on the responsibilities of the defunct Regional Screen Agencies, it would be prudent to keep in mind the strengths and weaknesses of the previous system in order to ensure that the new centres of excellence work as efficiently as possible.

In our response to the Film Policy Review, BSAC argued that the most effective way of increasing the likelihood of more successful films being produced, is to make the most significant determinant for the allocation of Lottery monies the applicant demonstrating a potential paying audience commensurate with the recoupable investment in the film. This would be subject to the exercise of discretion in relation to projects generated by new talent and projects that appear to be more culturally than commercially valuable. We therefore welcome the BFI's proposal to investigate how to structure Lottery awards to encourage producers and distributors to work together in partnership to maximise audience potential and revenues. If the BFI were to encourage deeper and earlier distribution and sales support through the allocation of Lottery awards under certain conditions, this would be likely to have a positive impact on recoupment of revenues, and therefore on the success of the British film industry. The successful application of this policy will rest on the exercise of the BFI's expertise in requiring levels of distribution support to suit given projects, and in ensuring that the producer's position is not weakened by the partnership. It would also be useful for the BFI to provide a definition of a 'British' film in this context. The introduction of support for test screenings and audience research for individual films should also enable producers to gain a clearer picture of where their audience lies.

We welcome the BFI's aim for 'UK film businesses to have prospered and achieved increased growth overall'. In our response to the Film Policy Review, we noted that the fragmented infrastructure of the British film industry means that 'stand alone independent production companies tend not to be able to achieve the scale necessary to finance their own films, instead being obliged to pre-sell the rights in their work to third parties, sacrificing the upside'. We therefore welcome the proposal to strengthen film businesses by reviewing the producer equity position and considering how all recouped funding could be reinvested in future filmmaking. We would urge the BFI to commit to implementing this proposal in consultation with industry. However, this measure alone does not constitute a robust industrial policy in the context of the challenges the UK faces in terms of global competition and technological change. We would recommend that any measures introduced in these areas should be accompanied by key performance indicators relating to the strength of UK production companies and an ongoing detailed analysis by the Research and Statistics Unit of the success of such measures. As we have indicated, there is a debate to be had about the way in which BFI funds are deployed to incentivise successful commercial risk-taking in production and distribution, which we feel has not been given sufficient consideration. We would like to see an in-depth discussion with industry going forward on issues such as how Lottery awards could be used to strengthen film businesses and to create a more vertically integrated industry. As stated above, we will undertake to develop our thinking concerning possible policy solutions, including the 'lock box' proposal, for example, and look forward to working with the BFI on this.

We welcome the BFI's proposals to develop and invest in an international strategy to support inward investment and exports, and to increase funding to the British Film Commission (BFC). Maintaining inward investment production activity is essential to sustaining our indigenous industry as it provides crucial critical mass in terms of talent and facilities. In our response to the Film Policy Review, we recommended that if the BFC is to fulfil the remit with which it has been tasked, it must be properly funded. This remains the case. Another key element in maintaining inward investment is ensuring that the UK remains competitive in the level of creative talent and skilled technicians we can offer. A key part of an international strategy must be to ensure that our facilities and skills are of the highest possible standard. We are pleased that a strategy on the export of British films, talent and services is also to be developed as the export market is often key to the financing structure and profitability of indigenous British production. There has recently been a lack of leadership in terms of export policy as the function was not transferred to the BFI when the UKFC was closed which has created uncertainty. We believe that modest resources directed to raising the profile of British films in international markets and film festivals have had a positive effect in the past and should continue to do so.

We are pleased that a portion of the BFI's budget has been set aside to support the continued work of the Research and Statistics Unit as we believe that the data it provides is essential for industry practitioners and in shaping and evaluating film policy. On a related point, we would encourage the BFI, wherever possible, to facilitate the sharing of non-commercially sensitive information and expertise with the production community. For example, in relation to co-production, we understand that currently only those benefiting from Lottery awards have access to expertise in this area.

#### Skills

BSAC welcomes the emphasis placed in the Plan on the importance of high level skills development to the competitiveness of the UK film industry globally. As the BFI acknowledges, developing world class creative talent and training highly skilled technicians is essential if the UK is to maintain its competitive advantage in attracting inward investment productions, and in order to sustain our indigenous industry. We believe it should be a key priority of the BFI's skills strategy to partner with industry and key stakeholders to make the case to Government and Higher and Further Education bodies to establish core support for the UK's key world-class film schools. The Skillset Film Academies, the National Film & Television School (NFTS), London Film School (LFS) and Screen Academy Scotland produce new entrants into the industry with high level creative talent and world class skills through MA courses geared to industry demand which are not available elsewhere. The UK's world-class film schools are the only film schools in major film producing countries not to receive sustainable funding or have access to capital to upgrade their facilities. We recommend that Government maintain funding for the Film Academies and hope that the case for much needed capital investment in the Schools will be seriously considered.

In BSAC's response to the Film Policy Review, we recommended that the limited funds available for training should be directed to developing creative talent and high level competitive technical skills in areas which the market is not providing, in particular, focusing on skills related to new technologies. We are therefore pleased to see the BFI's proposal to invest in digital skills, 3D, HD and VFX, which is in line with Creative Skillset's Bigger Future initiative. We recommend that the BFI work with industry and relevant stakeholders when deciding how funds should be invested in these areas, taking into account also the recommendations of the Livingstone-Hope Next Gen report. In our response to the Film Policy Review, BSAC recommended that the Film Skills Fund be restored to previous levels as the cuts made have forced a major scaling back of activity limiting investment in areas with skills gaps such as new technology and some craft and technical skills. This remains the case. It is important to recognise that new technology does not only affect skills relating to 3D and VFX, for example, but affects skills provision across the workforce, for example, a director or producer will also need to be trained in new technologies. Furthermore, the BFI's skills strategy should also be cognisant of the fact that skills provision for film increasingly overlaps with other industries such as high end television and video games.

We are concerned that creating a new skills fund in order to support 5000 individuals across the breadth of the film sector may not be the best use of public money in terms of skills development. According to the most recent Skillset/UK Film Council Feature Film Production Workforce Survey in 2008, 10,564 people work in the UK film industry in production and distribution (38% of the workforce, the remaining 62% working in the exhibition sector). Therefore, the number of those to be supported is likely be too great to have a significant impact for industry as there will not be sufficient funds to train them to a high enough level. Supporting 5000 individuals to improve their employability is the equivalent of approximately half of the entire production and distribution workforce. The UK film industry is a highly skilled industry and skills gaps occur where there are not enough individuals with the creative excellence or high level technical skills required. In our view, focusing on fewer individuals to fill specific skills gaps for world class creative talent and high level skilled technicians would have a greater effect on the global competitiveness of the UK film industry. The BFI should have a role, in liaison with Creative Skillset, in assessing the skills and training needs of the sector and identifying skills gaps, working with established providers of training and skills with a track record of success to ensure that industry shares in a skills strategy to meet its needs. As mentioned above, we understand that the Film Skills Council is working on the BFI's skills strategy concurrently with the consultation, and we hope that industry more widely will have a chance to feed into their thinking.

BSAC welcomes the BFI's proposal to invest in new and diverse talent to help deliver a 20% increase in under-represented groups across the UK film sector. Setting a measureable objective is a positive step towards tackling this issue. As well as investing in diverse talent, the BFI could work in partnership with the Sector Skills Councils to tackle the practice of unpaid internships, which privilege young people from affluent backgrounds, and therefore, represent a barrier to diversity in the industry.

We are also supportive of the proposal for the BFI to encourage investment in business development and entrepreneurial skills working with relevant stakeholders and industry. BSAC has previously called for basic business skills to become a core part of the secondary

curriculum and for business skills and entrepreneurialism to be integrated into media-related tertiary education courses.<sup>4</sup>

# Strategic Priority 3: Unlocking film heritage for everyone in the UK

To what extent do you agree or disagree that our overall approach to unlocking film heritage for everyone in the UK to enjoy by investing in preservation, digitisation, interpretation and access is the right one?

Which proposals do you think are the most important in ensuring we achieve the overall aim of this priority?

# Is there anything else you want to say about this priority?

BSAC supports the BFI's focus on preserving, digitising, interpreting and facilitating access to the UK's film heritage as a strategic priority. We previously recommended that the BFI should work to 'ensure that as much as possible of our screen heritage remains available to as many users as possible'.<sup>5</sup> Digital technology offers the opportunity for wide-spread access for the public to the rich variety of films and television programmes held in the UK's national and regional archives, we are therefore pleased that the BFI intends to work with partners to provide increased access to film heritage on a multi-platform basis. The preservation, digitisation, and facilitation of access to, film heritage is an extremely expensive process which has previously suffered from a shortage of investment on the part of Government. The Screen Heritage UK (SHUK) strategy has focused on identifying significant collections and working to preserve them, as well as taking steps to increase access by launching the Search Your Film Archives website. However, shortage of funding has meant that the focus has necessarily been on preserving film stock before it degrades and is lost, rather than on ensuring wide-spread access across platforms. Lack of funding has also meant that some of the regional public archives have found it difficult to sustain a viable collection, and are often dependent on volunteers. We are therefore pleased to see increased investment proposed in this area, with emphasis placed on interpreting and facilitating access to screen heritage across multiple platforms, as well as on the care and preservation of the UK collections. However, the fact that the BFI does not own the rights to much of the material it may wish to make available must clearly be taken into account in plans to increase audience access to the archive. We would encourage the introduction of key performance indicators in order to assess the impact of the monies invested in preservation, interpretation, digitisation and access to the UK's film heritage.

BSAC has previously asserted that clearing rights should not be a stumbling block to digital preservation. We have welcomed the need for an exception to copyright to permit preservation of audiovisual material in our response to the recent consultation on copyright as part of the Government's work to implement the Hargreaves Review of intellectual property

<sup>&</sup>lt;sup>4</sup> Creative Industries Council Skillset Skills Group Consultation: Submission from BSAC, p4-5

<sup>&</sup>lt;sup>5</sup>BSAC response to Film Policy Review, p13

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and growth.<sup>6</sup> BSAC first supported making provision for such an exception in light of the Gowers Review of intellectual property in 2006. There should be no further delay in ensuring that preservation activities can be undertaken without the need to clear rights. We also welcome a limited extension of certain exceptions to rights to facilitate use of audiovisual material in education. However, more general public access to archive material must be sensitive to the interests of right holders. We therefore welcome the proposal in the BFI Future Plan to work with right holders to explore a spectrum of mechanisms for access. The proposed UK Register of Film Heritage will be very important in ensuring that right holders are easier to find and may make facilitating access to content which must be licensed by them easier. Improved data about rights will be useful as the Government's proposals for a possible Digital Copyright Exchange and a solution to permit use of orphan works are developed. BSAC's position on these issues is more fully explained in our recent response to the Government's copyright consultation.

Future policy relating to the UK's film heritage should be cognisant of the fact that, as a result of convergence in the digital age, distinctions between screen material and print material are becoming increasingly blurred. Future generations of librarians will need to show the same care for key film, video and audio material as they do now for text and art. Monies will be best invested where there is a reasonable assurance of sustainability and local support. Film archives have historically come under the aegis of the film industry rather than the archive sector. However, in Scotland and Wales, the national archives have been integrated into the respective national libraries, and in the English regions, the North West Film Archive has partnered with Manchester Metropolitan University where the Archive's collections have been placed alongside other collections of publicly held content within the University's library service. Such partnerships allow archives to extend their accessibility to the community for educational purposes as well as to commercial users. However, the drain on resources and space to the university sector means that regional archives in these partnerships still suffer from under-funding and must seek project funding externally in order to attempt to meet their costs. There is a continuing role for the BFI and Creative England as the lead bodies in this area to work in partnership with other funders, such as the university sector, to provide financial support for the regional archives going forward.

<sup>&</sup>lt;sup>6</sup> The BSAC response to the Consultation on Copyright can be found here <u>http://www.bsac.uk.com/2012.html</u> BFI Future Plan: New Horizons for UK Film