



Australian Copyright Council submission to the Senate Legal and Constitutional Affairs Legislation Committee's Inquiry into the Copyright Amendment Bill 2025

28 November 2025

The Australian Copyright Council acknowledges the Traditional Owners and Custodians of the lands on which our office is located, the Gadigal people of the Eora nation, and all Traditional Owners of Country throughout Australia. We pay our respects to all Elders past and present, and recognise their continuing great, creative and cultural expressions.

1. The [Australian Copyright Council](#) (the **ACC**) is grateful for the opportunity to make a submission to the Senate Legal and Constitutional Affairs Legislation Committee's (the **Committee**) [Inquiry into the Copyright Amendment Bill 2025](#) (**Senate Inquiry**).

About the Australian Copyright Council

2. The ACC is an independent, non-government, not-for-profit, community legal service dedicated to promoting understanding of copyright law and its application. The ACC works to foster collaboration between content creators and consumers, representing the peak bodies for professional artists and content creators working in Australia's creative industries.
3. The ACC is a unique organisation:
 - it is the only dedicated copyright expert organisation in Australia
 - its focus is on copyright as it applies to all art forms, and
 - it provides advocacy, advice and information on copyright issues.
4. The ACC has [24 affiliate member organisations](#),¹ encompassing over a million writers, composers, visual artists, designers, photographers, film directors, performers, choreographers, producers, publishers, record labels and architects working in the Australian creative industries. The ACC understands that some of our [affiliate members](#) are making their own submissions to the Senate Inquiry endorsing the Copyright Amendment Bill 2025 (**Amendment Bill**).
5. As part of its services, the ACC provides [information](#), [education](#), [training](#) and free, [written legal advice](#) to those who fall within its guidelines including creators, the staff of libraries, archives, galleries, museums and educational institutions.²
6. As a creator dedicated organisation, the ACC actively advocates to state, territory and federal governments on behalf of its [affiliate members](#) for the contribution of creators to Australia's

¹ See Appendix 1.

² See Appendix 2.



culture and economy. The ACC believes a society's culture flourishes when its creators are secure in their right to benefit from their creative work.

Background

7. The Senate Inquiry comes after:

- the Attorney General's 2023 Ministerial Copyright Roundtables, including the Attorney General Department's (the Department) Outcomes Papers on:
 - [Orphan Works](#),³ and
 - [Remote Learning](#),
- roundtable meeting on 11 September 2024 and the release of the Department's Orphan Works Scheme – Design Options paper. The ACC provided comments on that paper.⁴
- Department's round table meeting on 12 February 2025 to discuss the Department's January 2025 Orphan Works Scheme "Proposed Design" paper. The ACC provided comments on the paper.⁵
- Department's 20 October 2025 meeting regarding what was then the draft Copyright Amendment Bill 2025: Orphan Works
- Consultation with the Department regarding what was then referred to as the Copyright Amendment (Remote Learning and Other Measures) Bill 2025: remote learning (Remote Learning Bill). The ACC provided comments on the draft bill.⁶

8. The ACC comments on the Amendment Bill as currently drafted.

Schedule 1 – Orphan works

9. The ACC understands that the policy intent of the proposed orphan works scheme (**Proposed Scheme**) is to facilitate the publicly beneficial good faith use of genuinely orphaned materials by removing or reducing legal risks for good faith users without unreasonably prejudicing the interests of the owners of copyright in the material, including their ability to assert their rights if they come forward.⁷
10. So, any derogation of copyright owner rights under the Proposed Scheme must be for clearly articulated public policy reasons and comply with Australia's obligations under the relevant international treaties including the 'three-step test' of the Berne Convention.⁸
11. The existing copyright framework already provides access to orphan works through:
- the **limited duration** of copyright protection – that is, after the designated period, copyright material falls into the public domain and may be used by all for all purposes

³ Published on 18 December 2023 after the 4 December 2023 Fourth Round Table on Copyright. See [High-level summary of the Fourth Roundtable on Copyright | Attorney-General's Department \(ag.gov.au\)](#).

⁴ Australian Copyright Council comments, Orphan Works Scheme – Design Options paper 30 September 2024 (**ACC Design Options Comments**), available on request.

⁵ Australian Copyright Council submission, Orphan Works Scheme – Proposed Design Paper 26 February 2025 (**ACC Proposed Design Paper**) available on request.

⁶ Australian Copyright Council response, Copyright Amendment (Remote Learning and Other Measures) Bill 2025: remote learning (Remote Learning Bill) 26 February 2025 (**ACC Remote Learning response**) 29 September 2025 available on request.

⁷ See Attorney General's Department's Orphan Works Scheme – Design Options Paper at p.2.

⁸ Berne Convention Article 9(2) and see ACC Design Options Comments, paragraphs 36-40.



- a network of **existing exceptions** for designated uses and/or designated purposes, particularly for the education and cultural sectors.

12. In the context of the existing copyright framework, the need for an orphan works scheme is not, in the ACC's view, entirely clear. However, as an orphan works scheme has been deemed necessary, the ACC supports the introduction of the Proposed Scheme subject to the issues raised below.

What constitutes an 'orphan work'?

13. The ACC supports a definition of an 'orphan work' that is limited to material where the copyright owner/s cannot be 'identified and located at the time of the infringing use'⁹. The ACCs note the Amendment Bill's reference to 'copyright material' which includes both 'works' and 'subject matter other than works'.¹⁰
14. Under Australia's *Copyright Act 1968* (Cth) (**Copyright Act**), material that may be protected by copyright falls into two broad categories – works' and 'subject matter other than works'.
15. 'Works'¹¹ comprise:
- **literary works** e.g. text-based material e.g. journal articles, novels, poems, song lyrics, computer programs and compilations
 - **artistic works** e.g. paintings, drawings, cartoons, sculpture, craft work, architectural plans, photographs, maps and plans
 - **dramatic works** e.g. choreography, screenplays, plays and mime pieces
 - **musical works**: that is, the music itself, separately from any lyrics or recording.
16. 'Subject matter other than works'¹² comprise:
- **cinematograph films**: the visual images and sounds in a film, video or DVD are protected separately from any copyright in works recorded on the film or video, such as scripts and music
 - **sound recordings**: the recording itself is protected by copyright, in addition to, for example, the music or story that is recorded
 - **broadcasts**: TV and radio broadcasters have a copyright in their broadcasts, which is separate from the copyright in the films, music and other material which they broadcast, and
 - **published editions**: publishers have copyright in their typographical arrangements, which is separate from the copyright in works reproduced in the edition (such as poems, illustrations, or music).

So, material that is protected by copyright as a type of 'subject matter other than works', may contain one or more copyright protected 'underlying works'.¹³

17. Where there are likely to be multiple copyright owners and all but one are known, the material cannot, by definition, be an 'orphan work'. As such, the ACC suggests that the Proposed Scheme not apply in those circumstances. This limitation may be effected by industry

⁹ Copyright Amendment Bill 2025 (**Amendment Bill**) Cl. 116AAB(1).

¹⁰ Copyright Act, 1968 (Cth) (**Copyright Act**) s 10.

¹¹ Copyright Act, Part III.

¹² Copyright Act, Part IV.

¹³ For more information, see Australian Copyright Council fact sheet, [An Introduction to Copyright in Australia](#).



guidelines or ministerial legislative instrument.¹⁴

Limited liability (exception to copyright infringement) vs limited remedies

18. Owners of copyright material¹⁵ have (for the duration of copyright protection¹⁶) exclusive rights in their material including the right to:
 - make a copy (**reproduce** the material)
 - make the material public for the first time (**publish** the material), and
 - **communicate** the material to the public (e.g. broadcasting, streaming, downloading, etc.)
19. Use of copyright material in any of these ways, without the copyright owner's permission is an infringement of copyright (unless an exception applies).¹⁷
20. Consistent with Australia's international obligations and respect for the rights of creators and copyright holders, it is the ACC's position that any proposal for an orphan works scheme must be considered in the context of the existing copyright framework, ensuring that access to copyright material is not conflated with use without remuneration.
21. As a result, the ACC supports a limitation of remedies approach to the use of copyright material in reliance on an orphan works scheme, rather than such use being treated as an exception to copyright infringement. The ACC therefore supports the framing of the Proposed Scheme as a scheme that acknowledges that the use of orphaned material remains an infringement of copyright while providing that, subject to the satisfaction of conditions under clause 116AAE of the Amendment Bill, a copyright owner has limited remedies for past use of their material.
22. As outlined in the Explanatory Memorandum to the Amendment Bill:

... while a user under the scheme may still be infringing copyright by using the work without the permission of the copyright owner (who cannot be identified or located after a reasonably diligent search), as long as the conditions of the scheme are met the remedies that may be sought by a copyright owner, if later identified or located, for the infringing use are limited by the scheme.¹⁸
23. The ACC also agrees that the burden of proof must be on the defendant to ensure that the conditions of the Proposed Scheme are satisfied,¹⁹ as it is the defendant that seeks to rely on the Proposed Scheme and use copyright material without permission.

Conditions – reasonably diligent search: timing, record of searches, notice

24. The ACC supports the requirements in the Proposed Scheme that:
 - (a) a 'reasonably diligent search' must be done prior to the use of the copyright material – i.e. undertaken a 'reasonable period before the infringing use'²⁰

¹⁴ See Amendment Bill cl. 116AAE(8)(g).

¹⁵ See Australian Copyright Council fact sheet, [Ownership of Copyright](#) for a general discussion of ownership of copyright materials.

¹⁶ See Australian Copyright Council fact sheet, [Duration of Copyright](#) for a comprehensive list of differing duration periods for different copyright materials.

¹⁷ For more information, see Australian Copyright Council fact sheet, [Infringement: What Can I Do?](#)

¹⁸ Explanatory Memorandum paragraph 6.

¹⁹ See Amendment Bill cl. 116AAD(5).

²⁰ Amendment Bill cl. 116AAE(3).



(b) details of the search be kept for a 'reasonable period', and

(c) notice of use must be 'given in a clear and reasonably prominent manner.'²¹

25. The Explanatory Memorandum states that 'notice may be given before or at the time of the use' but there may be circumstances where it may be appropriate to provide advance notice of the intended use including for unpublished and/or 'personal, cultural or other potentially sensitive material.'²²
26. The ACC's position regarding unpublished material and Indigenous cultural and intellectual property is set out below (paragraphs 28 - 39).
27. More generally, the ACC considers that a relevant matter for the purposes of cl. 116AAE(8) should be whether other substitutable material could have been used in place of the orphaned work²³.

➤ Unpublished material

28. The Proposed Scheme applies to unpublished materials. It is the ACC's preferred position that unpublished materials be excluded from any orphan works scheme.²⁴ It may be that such a limitation may be clarified by ministerial legislative instrument²⁵.
29. The right to publish copyright material (make it available to the public for the first time) is the only means by which a copyright owner can seek to exercise control of when, how and if their material is first made available to the public.
30. Whilst the Explanatory Memorandum outlines that, the 'publication of, or the doing of any other act in relation to, an orphan work by a user under the scheme will not result in the work being 'published' for the purpose of section 29 of the Act',²⁶ the practical effect of using the material is likely to result in its publication.
31. To extinguish a copyright owner's exclusive right to publication on the basis that material is deemed to be an 'orphan work' is not consistent with an approach that respects the rights of creators/copyright owners. Our current copyright framework already includes a network of exceptions that balances those rights against access to cultural materials in the public interest. The ACC reiterates that 'access' must not be conflated with use without remuneration.
32. Amendments to the Copyright Act in 2019 mean that copyright will expire in unpublished materials.²⁷ That is, all material (including unpublished material) will eventually enter the public domain and be available for all to use, without permission and for all uses.
33. To permit the dissemination of unpublished materials under the Proposed Scheme, effectively results in the exercise of a copyright owner's right to publish.²⁸ The risk to creators of Indigenous Cultural and Intellectual Property (ICIP) is further compounded.

²¹ Amendment Bill cl. 116AAE(7).

²² Explanatory Memorandum paragraph 30.

²³ This may be done by ministerial legislative instrument – see Amendment Bill cl. 116AAE(8)(g).

²⁴ ACC Design Options Comments, paragraphs 41-45.

²⁵ Amendment Bill cl. 116AAE(8)(g).

²⁶ Explanatory Memorandum paragraph 12.

²⁷ See ACC fact sheet, [Duration of Copyright](#).

²⁸ Copyright Act s 31(1)(a)(ii).



➤ Materials including ICIP

34. The ACC notes the government's explicit recognition of the centrality of First Nations arts and culture as Pillar 1 of [Revive](#) 'Recognising and respecting the crucial place of First Nations stories at the centre of Australia's arts and culture',²⁹ in developing further initiatives for the protection of First Nations cultural work.
35. ICIP refers to First Nations peoples' traditional arts and culture such as traditional knowledge and cultural expressions, ceremonies and sacred material.
36. ICIP use may be subject to community permission, or the nature of the material is such that use or exhibition beyond the relevant community may be forbidden by the community owning or acting as custodians of that ICIP.
37. Whilst the Explanatory Memorandum outlines that higher search standards may apply to orphaned copyright materials containing ICIP³⁰, once such material is used, modes of redress under the Amendment Bill may be inadequate or inappropriate.
38. Note that the condition requiring consideration of the 'actual or likely impact of the infringing use on the copyright owner or owners'³¹ as a factor in compliance with the Proposed Scheme, is inadequate in context of the broader implications of using ICIP where community interests are not recognised.
39. To the extent that the Proposed Scheme seeks to consider 'industry guidelines',³² such guidelines must align with the requirements of any standalone ICIP legislation and be in line with Office for the Arts' (OFTA) consultation on standalone ICIP legislation.³³

Interaction with statutory licences

40. The education sector (and government) has the benefit of being able to rely on the statutory licences set out in the Copyright Act allowing use of copyright material for certain special purposes – such as copying by educational institutions or governments³⁴.
41. The statutory licence scheme provides educational institutions³⁵ with access to all copyright material without having to seek the permission of individual copyright owners and without those rights holders being able to opt out or refuse to allow use of their material under those licences.³⁶
42. As the statutory licence allows use of all copyright material without permission that necessarily includes orphan works. Those that can rely on the statutory licence (educational institutions, government) do not therefore need to make any enquiries about the copyright owner of the materials they propose to use under that licence. For educational institutions that removes the burden on staff to check the status of works.
43. Statutory licence fees are not a pay per use arrangement but a blanket fee for all copyright materials negotiated so that the fees already factor in use of orphan works.

²⁹ [Revive](#) pp 21-35.

³⁰ Explanatory Memorandum paragraph 27a.

³¹ Amendment Bill cl. 116AAE(8)(d).

³² Amendment Bill cl. 116AAE(8)(f).

³³ [New stand-alone legislation to protect ICIP—Topics for discussion | Office for the Arts](#).

³⁴ Copyright Act, Part IVA Division 4 and Part VII Division 2. For more information, see Australian Copyright Council fact sheet, [Education: Copyright Basics](#).

³⁵ This submission focuses on educational institutions only.

³⁶ See Copyright Agency's submission to the Senate Inquiry, a draft copy of which the ACC has seen for an explanation of the operation of the statutory licence for text and images.



44. The Explanatory Memorandum states that the intent of the Proposed Scheme is to ‘open up access to a larger collection of cultural, historical and educational works held by our cultural and educational institutions for the benefit of researchers, educators, students, family historians, creators and the wider Australian community’.
45. The Proposed Scheme is therefore not intended to impact on existing licensing arrangements³⁷. For the avoidance of doubt, it is the ACC’s view that this should be made clear (through ministerial legislative instrument) – that is, that those that can rely on a statutory licence should be excluded from relying on the Proposed Scheme.

Artificial Intelligence – AI training

46. The ACC notes that the Explanatory Memorandum’s specific reference to ‘bulk use of copyright materials’³⁸ and the unlikelihood that the training of ‘large language models or other generative AI’ would be done under the scheme given the search and notice requirements for each orphaned work.
47. The Proposed Scheme is not limited to specific user groups (e.g. cultural sector institutions) so would not exclude AI companies from seeking to rely on the scheme. However, it is unlikely that they would seek to rely on the Proposed Scheme given the compliance requirements.

Moral rights

48. The moral rights of creators are separate to the economic rights of a copyright owner.
49. The moral rights of a creator (author) of a work include the right:
 - of **attribution** of authorship which arises when, amongst other things, the work is reproduced in material form,
 - not to have their work **falsely attributed**. This includes crediting the wrong person as the creator of a work, and
 - of **integrity**, which is the right not to have their work treated in a derogatory way which may prejudice the creator’s honour or reputation.³⁹
50. Moral rights are therefore about a creator’s relationship to their work and are inextricably associated with an individual creator’s ‘honour and reputation’.
51. The ACC supports the Explanatory Memorandum’s specific acknowledgement that the scheme does not ‘impact the moral rights of the copyright owner whose material may be used under the Proposed Scheme’.⁴⁰

Schedule 2 – Remote Learning

52. Section 28 is in **Part II (Interpretation)** of the Copyright Act and allows for the live performance and communication of works or other subject-matter in the course of educational instruction, to a class, provided that the educational instruction is not conducted for profit.

³⁷ This is made clear in the Explanatory Memorandum in relation to section 28 at paragraph 8.

³⁸ Explanatory Memorandum paragraph 31.

³⁹ For more information, see Australian Copyright Council fact sheet, [Moral Rights](#).

⁴⁰ Explanatory Memorandum paragraph 12.



53. The purpose of section 28 is to aid in the interpretation of:

- for literary, dramatic or musical ‘works’:
 - section 31(1)(a)(iii) – which deals with a copyright owner’s exclusive right ‘to perform the work in public’. In very broad terms, anywhere outside of a domestic setting (e.g. a person’s home) is generally considered to be ‘in public’.⁴¹
 - section 31(1)(a)(iv) – ‘communicate to the public’
- for sound recordings:
 - section 85(1)(b) – dealing with cause the recording to be heard in public, and
 - section 85(1)(c) – to communicate the recording to the public, and
- cinematograph films⁴²:
 - section 86(1)(b) – dealing with cause the film to be seen and heard in public, and
 - section 85(1)(c) – to communicate the film to the public

54. In the ACC’s experience, there is no uncertainty about the good faith practical application of section 28 as currently drafted. Nor is the ACC aware of any litigated cases (nor any disputes) about the meaning of section 28 of the Copyright Act.

55. It is the ACC’s view that:

- section 28 already applies to both online and face-to-face classrooms (see paragraph 57 below)
- the reference to ‘teacher’ (in the absence of a definition in the Copyright Act) includes any person/individual who gives educational instruction, not just those who are qualified teachers.
- a parent or other person (in the class, virtual or otherwise) assisting the teacher or student in giving a performance in the course of educational instruction, falls within the ambit of a ‘person taking part in the instruction’ or a person ‘otherwise directly connected with the place where the instruction is given.’

56. Although section 28 is sometimes referred to as the ‘performance exception’, it is a deeming provision, rather than an exception. That is, if the requirements of section 28 are satisfied, the performance is **deemed** not to be ‘in public’ and so the copyright owner’s exclusive right of public performance does not arise. As a result, reliance on section 28 means that copyright owners are not entitled to remuneration for uses which come under the provision.

57. It is the ACC’s position that section 28, as currently drafted, does not seek to delineate between face-to-face teaching and online or remote learning. It is technology neutral. Remote learning occurs in the broader context of modern teaching and learning and the statutory and other licensing arrangements in place for educational institutions including:

- (a) under the [statutory education licence managed by Copyright Agency](#)⁴³:
 - (i) [copying and sharing of text and images](#) (from any source, including online), and

⁴¹ There is no definition of ‘in public’ in the Copyright Act, but it has been the subject of judicial interpretation looking at several factors including the nature and character of the audience. See the discussion in *Australasian Performing Right Association Ltd v Telstra Corporation Ltd* [1995] FCA 643; 60 FCR 221.

⁴² Copyright Act sections 28(4)-(6).

⁴³ See ACC fact sheet [Copyright Q&As for School Teachers: Copying, adapting and sharing text and images](#).



- (ii) [recording and sharing of lessons](#) (e.g. via a learning management system, education platform (e.g. Google classroom), or shared drive
- (b) the use of broadcast material – under the [statutory education licence managed by Screenrights](#)⁴⁴, and
- (c) the use of music – with the suite of [education licences available through APRA AMCOS](#)⁴⁵ covering both musical works (licensed by APRA AMCOS) and sound recordings (licensed by ARIA).

58. The ACC appreciates the clarification that the Amendment Bill is ‘not intended to impact existing licensing arrangements, which support the creative and media sector’s important contribution to education.’⁴⁶
59. So, to the extent that Amendment Bill clarifies what the ACC understands to be the current application of section 28, the ACC has no further comment on the Amendment Bill.
60. The ACC notes however that some sectors are reported to regard this amendment as a ‘first step’.⁴⁷
61. The ACC strongly opposes the introduction of the Amendment Bill as a means to leverage demands for further unremunerated access to copyright material including for recording of lessons which is beyond the scope of the legislative intent of section 28 and its interpretative function. That is, any unintended consequences which permit ‘acts beyond the scope of ... s 28 and which would otherwise be subject to remuneration under statutory licences’⁴⁸ (or other licences), must be avoided.
62. The recording and sharing of lessons for example, is covered by the statutory licence available to educational institutions.⁴⁹ The ACC believes that it would be against the underlying principles of copyright to allow an interpretation of section 28 that effectively seeks to subsume the rights of reproduction and communication within the performance right, and may be seen as an attempt to undermine the remuneration available under the statutory and other licences. This, in turn, may impact Australia’s international obligations.

Conclusion

63. Australia’s copyright regime provides existing pathways for access to copyright material, including orphan works, striking an appropriate balance between the rights of copyright owners to exploit their copyright material and public policy considerations seeking to limit those rights through sector-specific licensing schemes and exceptions that serve certain public policy purposes. The creation of a fair, workable orphan works scheme must align with the existing public policy and not attempt to overshoot, derogating from owners’ rights.
64. The ACC supports the Amendment Bill to the extent that it seeks to limit bad faith uses of orphaned copyright material. Some clarity in relation to unpublished works and ICIP is, however, necessary, for example through industry guidelines or ministerial legislative instrument.

⁴⁴ See ACC fact sheet, [Copyright Q&As for Teachers: Copying and sharing broadcasts under the statutory licence](#).

⁴⁵ See ACC fact sheet [Copyright Q&As for School Teachers: Performing, recording, copying, and sharing music](#)

⁴⁶ Explanatory Memorandum, paragraph 8.

⁴⁷ [Copyright bill passes, but schools urge deeper reform | The Educator K/12](#) by Brett Henebery 10 Nov 2025, the Educator Australia (online).

⁴⁸ See [Copyright Amendment Bill 2006 Supplementary Explanatory Memorandum](#) paragraph 119 p 24.

⁴⁹ See for example ACC fact sheet [Copyright Q&As for School Teachers: Copying, adapting and sharing text and images](#).



65. Whilst the ACC does not regard the Amendment Bill's changes to section 28 as being required, the ACC supports the Amendment Bill's provisions, acknowledging the intention to clarify its current applicability, only. The ACC cautions the Committee to avoid any further expansion of a non-remunerable provision.
66. The ACC thanks the Committee for considering this submission. If the Committee has any further queries or requires further information, please let us know.

Eileen Camilleri
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Australian Copyright Council

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Appendix 1

Australian Copyright Council Affiliates

as at 28 November 2025

The Australian Copyright Council's views on issues of policy and law are independent, however and seeks comment from the organisations affiliated to the ACC when developing policy positions and making submissions to government. As at the date of this response, the [Australian Copyright Council affiliates](#) are:

1. [Aboriginal Artists Agency Ltd](#)
2. [APRA|AMCOS](#)
3. [Ausdance National](#)
4. [Australia New Zealand Screen Association](#)
5. [Australasian Music Publishers Association Ltd](#)
6. [Australian Cinematographers Society](#)
7. [Australian Guild of Screen Composers](#)
8. [Australian Institute of Architects](#)
9. [Australian Publishers Association](#)
10. [Australian Recording Industry Association](#)
11. [Australian Screen Directors Authorship Collecting Society Limited](#)
12. [Australian Society of Authors](#)
13. [Australian Writers Guild Authorship Collecting Society \(AWGACS\)](#)
14. [Big Studio Movie Licence](#)
15. [Copyright Agency](#)
16. [Design Institute of Australia](#)
17. [Illustrators Australia](#)
18. [Image Makers Association Australia](#)
19. [Media Entertainment & Arts Alliance](#)
20. [Musicians Union of Australia](#)
21. [National Association for the Visual Arts](#)
22. [Phonographic Performance Company of Australia](#)
23. [Screen Producers Australia](#)
24. [Screenrights](#)



Appendix 2

ACC Guidelines

A core part of the Australian Copyright Council's (ACC) activities is our [free written legal advice service](#). This unique service is targeted primarily to those working in the creative industries and members of our affiliate organisations. Staff members of the organisations listed below are also eligible:

- educational institutions
- arts and cultural organisations
- libraries
- museums
- galleries
- archives.