

# COMMENTS ON PROPOSED CHANGES TO PUBLIC LENDING RIGHT

July 2016



Dear PLR team,

Thank you for asking us to comment on your proposed improvements to PLR.

As you know, the Society of Authors is a trade union representing over 10,000 members. Our members are strong supporters of PLR and we lobbied hard for the recent extension of PLR to remotely lent ebooks and audiobooks. Our members are very supportive of the PLR team and the services provided to members.

However, the PLR systems are now showing their age and we support the plans of the British Library to modernise the service and put it on a footing that will ensure its continued growth and development.

We believe that any improvements must comply with some fundamental rules:

- There must be no increase in the administration fee taken from the authors' pot. If any funds are needed to modernise the system we suggest that they come from the BL or that Government is approached for a one-off payment for the administrative costs: we would be happy to support a claim for any such payment.
- Authors and users should be fully consulted.
- There should be no disruption to services during the implementation of improvements.

In relation to the particular improvements you mention:

1. *Incorporate remote e-book public library loans into the scheme.* The recent change in legislation (to the Digital Economy Act) now brings the remote loan of e-books into scope for PLR alongside print and audio books.

Obviously this is a critical and important task. We are surprised that you have omitted that the scheme has also been extended to remotely lent audio books. We do not believe that the current registration procedures on the PLR website are clear enough to facilitate registration. As you know, many e and audio books do not have ISBN numbers and it is not clear what unique identifiers you need. Furthermore many books are given different numbers for each host platform so it is important to develop systems which allow authors to register their work easily and without having to make multiple registrations for every title. For both physical and e books and audio books it would be helpful if systems were developed so that authors did not have to register titles or identifying numbers which do not attract payments (see below). The SoA is working with PLR to try to resolve these issues but they are of real concern as it is essential that this project is implemented to time and that all eligible titles, editions and formats are registered before the first payments are made: this will be a huge task.

2. *Capture loans data for all types of books directly from public libraries.* Increasing the existing sampling method and providing a richer, more detailed picture of the loans made in public libraries around the UK.

This would be enormously welcomed: in the modern age it should not be necessary to rely on sampling when the vast majority of the necessary data for making PLR payments is already captured digitally.

3. *Explore options for automating enrolment of authors' books.* Easing the administrative burden on registered authors by adding new titles to their PLR records as they are published using data from the British National Bibliography and our catalogue records.

See 1 above. We believe that this is critically important. The obvious way forward would be to develop a system whereby, instead of each author having to register EACH title separately for every edition, format and identifying number, they only had to register works which the office knew had been made available for qualifying loans (a 'pull' rather than a 'push' system). Authors logging in should be able to search from a drop down list of all titles and ISBNs which have been lent and claim their own. Alternatively if an author registered one title it should be treated as a claim in all formats, irrespective of differing ISBNs. Obviously, once registered to a particular author the list should be retained so that the exercise did not have to be repeated each year: only updates would be necessary. Again, the BL and libraries collect this information so there should be no need for authors to repeat work that has already been done with all the inherent risks of errors and omissions. We understand that ALCS has developed a similar system and we suggest liaising with them to see how this might work. Luckily, Tony Bradman, the chair of ALCS is a representative on the PLR Advisory Committee.

*4. Upgrade the PLR infrastructure to make it more efficient and easy to use. Building on the excellent service the PLR team provides, we want to upgrade IT and deliver efficiencies that can increase the proportion of PLR's budget that goes into the author fund.*

Again: we wholly agree with this aim.

*5. To deliver these improvements we plan to move PLR from its current office at Stockton on Tees to the Library's main site in the north of England, at Boston Spa, near Wetherby. While remaining a separate entity within the Library, with its own ring-fenced budget, PLR will share the benefits of the British Library's Cataloguing, IT and Estates teams which will create the infrastructure to underpin the new and improved service*

We understand that this will involve redundancies and job losses. We would ask that you deal sensitively with all staff and that you work carefully to ensure that the collective experience and expertise of the team is recorded and transferred. We would also wish to thank the members of the Stockton team who have provided an excellent service to our members over more than 30 years.

There are some issues not mentioned in the above list where we would welcome improvements. These include:

1. Initial registration: the present requirements seem overly bureaucratic and we ask that these be considered and simplified as far as possible.
2. Website and author interface: as well as upgrading internal systems, communication with authors, ease of systems and speedy responses should be essential features of any new system.

Please do not hesitate to contact us if you need any further information.

Nicola Solomon, Chief Executive  
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[www.societyofauthors.org](http://www.societyofauthors.org)

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