**Out-of-Commerce, Out of Mind: Widening Public Access to Out-of-Commerce Copyright Works in Film Archives through the DSM Directive**

Film Archives Research Data; Copyright Law; Out of Commerce Works; Cultural Heritage

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**Context**

This dataset comes from research that aimed to understand to what extent Art. 8 of the EU Copyright in the Digital Single Market Directive 2019 can successfully benefit film archives and the existing practices of film archivists in widening public access to film heritage. This research complemented the existing literature, through conducting doctrinal and empirical research that generated the necessary understanding of how Art. 8 is likely to be understood and used by film archives.

This research found that there are terminology uncertainties, a lack of cultural heritage institute funding, a lack of legal education and knowledge, and competing archival priorities that could hinder the use of Art. 8 in film archival practice. Ethnographic studies were conducted to explore existing film archival practices and therefore how the out-of-commerce provisions might best be incorporated into these practices. The UK’s national film archive the BFI, the Netherland’s national film archive EYE, and a regional UK film archive MACE, were the chosen film archives.

**Methodology**

Ethnographic research was conducted alongside doctrinal and comparative research. Ethnography was conducted in the film archives as this enabled a richer understanding of existing practices, challenges and knowledge.

It involved spending time with the group being studied, and observing the behaviour, interactions, rituals, and comments. Ethnographic research was conducted at three film archives: the BFI, EYE and MACE. During the ethnographic studies, observations about behaviours were recorded, semi-structured interviews were conducted, observations were made on written documents, and on the codes and rules of the archive (both implicit and explicit).

Fundamental to ethnography is the method of participant observation by the researcher of the chosen group or site.[[1]](#footnote-1) This method involves observing the people or setting, in an open way that acknowledges the role and intention of the researcher. Ethnography also requires notetaking of observations, of comments overheard, of the researcher’s own thoughts, of things to follow up on, etc.

The ethnographic research was conducted between March 2019 and May 2019. In total, just under 6 weeks was spent across the three film archives. The length of time at each archive varied according to what the film archive was able to accommodate logistically. A month was spent at the BFI, of which the majority of this time was spent at the Head Office. A week was spent at EYE, at which time was spent between the EYE museum building and the Collection Centre. Two days were spent at MACE, all at one site.

Interviews were conducted in a semi-structured manner, with set questions to ask each participant. The participant’s answers then shaped the flow and content of the interview. Many hours were spent in the six weeks on site reading policy documents, touring the sites, viewing the collections, informally speaking with employees of the archive and observing the daily practices of the archives. Notes were made on these activities in the notebooks, and this time is in addition to the interview and conversation hours noted.

The interviews were transcribed verbatim where this was possible, if a recording device was used. Each interview participant was given the choice as to whether they wished an audio recorder to be used and most of them asked that they not be recorded. In these cases, detailed notes where taken during the interview and these notes clarify what are exact quotations and what has been paraphrased.

The data gathered during the ethnographic research was analysed using discourse analysis. Discourse analysis involves coding the texts, to identify emergent themes. The interviews were individually coded. They were coded to initially identify emergent themes and discourses (or meanings) of copyright, and other topics. There is subjectivity in this coding as the researcher is interpreting the meaning and significance of what was said or observed. The coding themes used, were chosen with the specific focus on out-of-commerce works.

An iterative process was employed when open coding the interview transcripts and notes, in that the codes emerging in each transcript where continuously reviewed against one another. This was to identify overlap or replication of code themes, as well as to identify content most relevant to out-of-commerce works.

**Data**

# Indicative Interview Questions

What is your background, and how did you come to work in this film archive?

Can you tell me about your role and what your job entails on a regular basis?

What projects are you working on at the moment?

Is there a copyright or “rights management “policy, as far as you are aware?

Is there an access policy, as far as you are aware?

Does copyright/ “rights management” affect your work? If so, in what ways?

Do you feel comfortable dealing with copyright issues/ “rights issues” as they come up?

How would you describe the way copyright is handled in the archive?

Do copyright restrictions on a film ever prevent you from being able to provide access to it?

Are there certain individuals who handle copyright issues and requests?

Is the term “out-of-commerce works” one you are familiar with?

Are you aware of approximately how many films in the collection are in copyright, but are not available anywhere else to access?

What percentage of the films in the collection does the archive own the copyright for?

Can you tell me what sort of activities in the film you would deem non-commercial, or commercial? (I give examples of selling DVDs, online VODs, on YouTube with advert revenue if they need some examples.)

How does the archive distinguish between commercial and non-commercial uses?

How does the archive see the out-of-commerce provisions being incorporated into its existing practices and policy?

Do you know approximately how many more films the archive could make available if the out-of-commerce provisions were incorporated?

Is there an active collective management organisation/ collecting society for film, or a group that you feel is capable of becoming a representative CMO? If so, does the archive currently interact with them? ​

Do you think that the out-of-commerce provisions will likely entail a search similar to that of the orphan work diligent search? If so, would this impact the effectiveness of the provisions for the archive?

Are there any concerns you have regarding how rightholders could be impacted by out-of-commerce works being used, or any negative reactions from them?

Do you think the archive would make use of the 'fall back' exception that will allow CHIs to use the out-of-commerce works in their permanent collections for non-commercial purposes where there is no representative CMO?

What period of time do you think would need to lapse before a work is deemed out-of-commerce? Do you think that a cut-off date would be useful for film archives?

**Interview Transcripts**

# Coding Themes

The below are the initial coding themes used to code the interview transcripts and notes:

ABCD- Copyright fear/ wariness

ABCD – Orphan Works Directive and orphan works

ABCD- Specialist knowledge and roles

ABCD- Non-commercial/ Commercial use

ABCD- Out-of-commerce works definition, including cut-off date

ABCD- Out-of-commerce works beneficial to film archive

ABCD- Rightholders

ABCD- CMO

ABCD- Reputational harm and risk

ABCD – Copyright clearance

ABCD – Copyright internal processes

Coded Interview Transcript 1

*(This was a semi-structured pre-arranged interview. The participant did not wish to be audio recorded. Direct quotations where indicated, the rest I have paraphrased from notes taken during the interview, as closely to the original as possible. Some comments have been removed, if they would prevent P from being anonymous.)*

Key:

*M: The Researcher*

*P: The Participant*

Coding themes:

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ABCD- Out-of-commerce works beneficial to film archive

ABCD- Rightholders

ABCD- CMO

ABCD- Reputational harm and risk

ABCD – Copyright clearance

ABCD – Copyright internal processes

ABCD – Financial concerns

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P is the Head of Archive Access, all enquiries come through them. P has been at the archive for about six and a half years.

*[P’s background and history removed, to maintain anonymity. The daily routine has been removed for similar reasons, as it would also potentially identify other research participants.]*

P divides some of their role with another person (D). “With archive sales commercially – commercial clients are on my radar, and not D’s. It’s the bread and butter of the archive really”. D deals with public requests, people looking for their films of their Grandad, etc.

P notes that the archive often works with academics and researchers – “we work a lot with students; students want to use our films in their films." They also have non-profit projects, exhibitions, and non-profit screenings. The archive provides free viewing appointments to the public to see anything in the archive. P notes that the archive can also digitise this for them.

[Discussion relating to rates removed for commercial reasons]

There are also commercial clients, including feature films, businesses, documentaries, some BFI projects as well. There are “more BBC documentaries and talking head shots etc. Not as many features as we would like”. P notes that the archive has built up regular commercial clients and upgraded their website to appeal to commercial clients. “We aimed our processes on the top, and then the same processes trickle down to the non-profits.”

P notes that ITV material amounts to 70/80% of their sales and is their “main bread and butter”. P commented on the “really nice relationship “they have with the rights team at ITV and that the ITV team are “very stream-lined.”

3rd party copyright, especially with advertising, they want you to guarantee that they’re covered against any 3rd party. But our policy doesn’t do that, they won’t cover 3rd party. For the UFH project, the archive had to clear 3 party rights for that. “I feel confident about saying this now, about not offering an indemnity against 3rd party. I used to really worry this.” P said the archive does not have any of the ITV contracts, so they have “no idea who owned what. So, we make people clear that themselves! This seems to come up case less and less, but advertising “is a different kettle of fish”.

“It’s all about risk assessment, which we have to pass onto them”. P notes that regular clients understand that risk. “Everyone in the team is very sensible and knowledgeable. They always double-check with someone else”.

“But just because we’re cleared it doesn’t mean we should do it”. – So, I still always check with the depositor, “our priority is the depositor and the collection, over money”. It took me a while to learn that, given that the role [her job] is about commercial generation.

“Charity is now having to be commercial, it’s always been really difficult for us”. “We always want to do more in the community, but the reality is we have to keep the lights on, so we need to be commercial.”

Job security – “I was always warned about that when I started. I’m not as worried now but we’re all still really worried.” Archive sales – some months we make nothing on licence fees, some we make more. “We can never rest easy; we never feel fine. It’s the nature of the beast.”

For out-of-commerce works, “the time aspect is an issue”. P commented that the Orphan Works Directive is “not helpful” for the archive.

“It’s difficult, as we need to generate revenue, so the non-commercial uses for out-of-commerce works doesn’t help with that. It’s great from a public point of view, but the archive needs to be able to provide access, so we need commercial revenue to keep going.”

People very rarely say no to providing access, once you’ve explained the situation and that we won’t make millions from it.

“We focus on material we can clear. If it would take weeks to clear rights for something, we’d say the rights issue is too problematic.” –especially when researching for other people. “I know I don’t have the time to research that, so I know to go nowhere near it.”

Defunct film companies – too difficult to research them and to clear the rights. It’s sad, because these films are still really important.

“Our priorities are unfortunately driven by income. Commercial jobs have to be bumped to the top of the list.” But often we can then put it online for the public, so it does feed into helping the public.

“For me, it’s always about the human story, that’s our history on there.”

The archive is asked for footage for a lot of true-crime documentaries, “mostly reopening of cases”. For example, child abuse cases in the police or historic abuse. “It’s more common than you’d think… at least a few each year”. “Copyright takes on a whole other level with this. ITV whizz it to their legal departments. It’s really important, we are evidence! ...It’s not all fluffy here. We hold a lot of news, so it’s not all fluffy”.

“We’re the keeper of the material, so we need rightholder permission”.

Copyright procedures:

Knowledge has been built up over time and the database will list rightholders were known. Identifying rights, that’s the first port of call. “There’s no particular protocol in place, we all just know what to do”.

I then go into the depositor file, to look back through the paper trail – I do the due diligent search. I always have a conversation with [two individuals at the archive] if there are any issues. A lot of the procedures are sensible and common sense. And lots is done on a case-by-case basis, so “a stringent policy in place doesn’t work for everything.”

“I’m the one who deals with copyright”.

P cleared all the rights for the UFH project. It’s “a lot of stress, but it was fine. As the rounds went on, it got a lot easier as we understood what they wanted from us.” UFH rights clearance “felt like a full-time job. I dedicated half a day for it for a very long time.” A lot of it was ITV, so it was an easy department, but often it took days contacting people. “It could take months and months for some of them, waiting to hear back from people.” P noted that the films that contained music and maps and Crown Copyright, they went to [two individuals at the archive] to decide if they needed to remove things, etc.

P explained that some rightholders “cropped up again and again” and that it “always takes longer with new rightholders”, “but I was quite new then, so I was still learning.” The archive gave the depositors copies of their materials, as a courtesy. There is still a back catalogue of those, which the archive is still working through now. “Promotional films are always the most difficult. And we had quite a few now for promotional. They just don’t understand what we are, as a film archive.”

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Coded Interview Transcript 2

*(This was conducted via emailing the list of questions and received the document back with these answers, due to staff unavailability at the time of my visit to the archive)*

Key:

*M: The Researcher*

*P: The Participant*

Coding themes:

ABCD- Copyright fear/ wariness

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ABCD- Specialist knowledge and roles

ABCD- Non-commercial/ Commercial use

ABCD- Out-of-commerce works definition, including cut-off date

ABCD- Out-of-commerce works beneficial to film archive

ABCD- Rightholders

ABCD- CMO

ABCD- Reputational harm and risk

ABCD – Copyright clearance

ABCD – Copyright internal processes

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M: What is the copyright clearance process for films at EYE? Are other people involved in the copyright clearance process, or would that all be done by you?

P: That depends what you consider “clearance”. If you mean getting permission from known rights holders, that is also being done by multiple colleagues from various departments. Such as archival loans, sales, programming etc.

If you mean establishing the rights status (in or out of copyright, orphaned) or looking for rights holders, that’s something that really only I do at the moment.

M: Does EYE have a copyright or intellectual property policy; and an access policy? If so, could you explain the process?

P: There are no policies as in written manifests or anything like that. But everybody within the organisation is (made) aware that copyrighted material cannot be used without the proper clearance. In case of doubt, colleagues usually ask me. Especially when in doubt about the applicability of copyright exceptions (as you might know, we do not have “fair use” in the Netherlands, but a fixed set of exceptions). Access to material that is still in copyright is only open to rights holders (regarding their own material) and third parties who have acquired the rights holders’ permission unless permission is not required such as under the in-situ exception.

M: Approximately what percentage of EYE's collection do you own the copyright for?

P: If you mean for works that are still protected, it’s a very, very small percentage. I can’t say for sure, but it can’t be more than 1 or 2 percent if that.

M: How does EYE see the out-of-commerce provisions being implemented into its existing practices and policy?

P: Hopefully our legislation will contain a cut-off date, so that it will be easy to establish when a work is OOC. As we do not have a CMO for film, we can benefit from the fall back exception. This will mean that a large portion of the films in our archive will presumably be OOC. Downside is these films can then only be used online on our websites. So, we will put them on our new vod [video on demand] platform to view for free and our YouTube channel, corporate website etc.

M: Do you know approximately how many more films could EYE make available if the out-of-commerce provisions were implemented?

P: As said, presumably quite a few if the new legislation contains a cut-off date.

M: How does EYE distinguish between commercial and non-commercial uses of a work; and commercial and non-commercial activities?

P: We don’t as such. Of course being a foundation under Dutch law means we cannot make a profit, so all our activities could be considered “non-commercial”.

M: Is there an active collective management organisation/ collecting society for film in the Netherlands, or a group that you feel is capable of becoming a representative CMO? If so, does EYE currently interact with them? ​

P: No there is not.

M: Do you think that the out-of-commerce provisions will likely entail a search similar to that of the orphan work diligent search? If so, would this impact the effectiveness of the provisions for EYE?

P: No we think and hope there will be a cut-off date.

M: What period of time do you think would need to lapse before a work is deemed out-of-commerce? Do you think that a cut-off date would be useful for film archives?

As said, yes very useful. We have heard proposals for twenty years, but that seems unrealistic. Likely the rights holders would collectively oppose such a proposal. But forty years could work.

M: Are there any concerns you have regarding how rightholders could be impacted by out-of-commerce works being used, or any negative reactions from them?

P: We would never consider anything OOC if we were in contact with the rights holder(s), even if it would fit the bill. So we do not expect any negative reactions in that respect. We also do not believe any negative impact for rights holders given the opt-out options given to them.

M: Do you think EYE would make use of the 'fall back' exception that will allow CHIs to use the out-of-commerce works in their permanent collections for non-commercial purposes where there is no representative CMO? (How risk adverse would you be in using this provision? Do you think this provision could potentially impact on existing relationships with commercial partners and right holders?)

P: As said, yes. Risk relatively non-existing. See answer to previous question.

M: Any other thoughts or potential benefits/ concerns you have relating to out-of-commerce works for film archives.

P: We believe that especially when a cut-off date is elected, this whole OOC business could be beneficial for film archives. And more so for Eye as we are launching our vod [video on demand] platform and this means we will be able to offer a substantial part of our collection to view for free.

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Coded Conversation 3

*(This conversation was informal and involved an orientation of the building and the teams. I did not record it, as part of the conversation was during walking around the building and some whilst informally talking. Direct quotations where indicated, the rest I have paraphrased from notes made at the time, as closely to the original as possible.)*

Key:

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*P: The Participant*

Coding themes:

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ABCD- CMO

ABCD- Reputational harm and risk

ABCD – Copyright clearance

ABCD – Copyright internal processes

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P explained that prior to 2014, there was nothing written down in the Rights team regarding policies and procedures etc. Historically, there has been “anecdotal, subjective decision-making” over the years. P noted that usually this had worked, but it was hard when staff left to understand historic decision-making and rationales. Not clear what had happened, or why.

It was also clear from reviewing older files etc. in relation to implementing the Orphan Works Scheme that there had been legal and factual “misunderstandings” regarding rights ownership. P commented that there is a “huge amount of detective work” in their role, as it has been hard to keep clear and accurate records of decisions, like due diligence. P noted that a lot of decisions or facts are made during “informal conversations”, and often no record is kept of these (as it does not seem important to do so at the time).

The BFI used to have an Information department, and they used to keep the History Distribution Doc (I think this was the name). It had been regularly updated, but “this has now fallen to the wayside”. P has tried to validate some of the information in the document.

In relation to out-of-commerce works, P believes there is “potentially a huge benefit to the BFI”, and the BFI sees the OOC works as potentially being very valuable for their H22 project.

P commented that the BFI and film heritage are seen as “creative industries” rather than “cultural heritage”. DSM invite them to the creative industry groups and discussions, and not to the cultural heritage ones with museums and libraries, etc. I asked why this is, and P looked unhappy and said that film “isn’t viewed as art or cultural heritage” by the wider Gov. P commented that “film gets left behind because it’s a complex beast”. Film is viewed as a “commercial or industry”, when often this is not the case.

*M Observations:*

*There are approximately 570 people working at the BFI, as many staff work off-site or with flexi-working etc. The Stephen Street head office is split over 3 floors of office-workers, a ground floor level open to the public and a basement level with two screening rooms and meeting rooms.*

*Each of the three floors of offices is designed and laid out in the exact same way, with open-plan working and communal places to work in an “agile” manner – including small pods for independent working, sofa seating areas with laptop tables, a large central meeting table with screens, and 3 smaller meeting rooms that are closed off with doors, and these can be booked out.*

*The teams sit in central shared desktop hubs of approximately 8 desks laid out in 2 rows of 4 desks on the same hub, with each person having a desktop and two screens. P noted that although there are now 9 people within the R&C team (and only approximately 4 when they started), the team is only allocated 6/7 desks as it is assumed people will sometimes work from home/ work in other spaces on site etc. The top 2 floors of the building are rented to businesses for revenue, and they have nothing to do with the BFI. The UK Oscars office is on the ground floor of the building, along with meeting rooms, seating areas and a restaurant open to staff and the public.*

The BFI is involved with copyright “at every stage of the process, as a user, creator, owner, licenser, funder etc.”

Copyright exception uses – there have been “interesting discussions about this recently at the BFI” regarding the 2014 copyright changes. The IPO tends to focus on the user’s use of an exception, not the right holder’s view. Often people approach the BFI wishing to use materials, not knowing about the copyright exceptions. P commented “there is not much conversation between these groups” (or even internally at the BFI depending on which team someone is in, and therefore whether the BFI is the copyrighter owner/ has provided access or the one wishing to acquire the copyright to a film. There “needs to be congruence between the two”. P commented that it “depends on who you ask” and that people rely on “historic rationales” internally to determine what is acceptable copyright compliance.

There is no copyright policy at the BFI.

The BFI owns the rights in about 1% of the collection.

There was both an external and internal review of copyright processes and systems about 1 year ago. They spoke to people across various BFI departments (but not all, including Education “for some reason”) to ask people whether they come across rights often, where they look for info, etc. 277 issues were found, including functional issues, data issues and technical issues. P said it was a “fairly comprehensive review”.

People are “quite nervous” in the BFI about copyright and about “saying things and sharing whether decisions worked”. P used to be “hesitant” but is no longer hesitant. P commented that an “agreed, basic kind of approach” to copyright and rights is needed, but that this is difficulty when there is misunderstanding and ignorance of copyright “across the board”. P commented that rightholders “need to be more educated about what they’re signing away”.

The BFI is an observer member of the Film Archives UK group. P is currently working with them to set up a copyright group and would “love to get sector agreement on copyright positions”. In relation to being sued for breach of copyright regarding films, P noted that it wasn’t ever really an issue for them. P said they do “have trouble with photographers, but not film really”.

The BFI does engage in some enforcement, issuing takedown notices on YouTube. CVP tool on YouTube allows you to perform multiple, immediate takedowns on YouTube. This also gives the infringing account a ‘strike’ on their channel. The BFI “usually only does it for full films”. They are not overly proactive with monitoring YouTube, but they recommend there are “probably quite a lot” of films the BFI owns or licenses that have been uploaded without permission. P thinks they should be more proactive for the smaller film makers, as they need the money and illegal uploads can really negatively affect smaller film makers. P commented that there is a “difficulty” with people seeing the BFI (as a charity) issuing takedown notices for copyright breach or for films that breach the BFI Player’s terms of use.

Orphan works at the BFI have been “fudged”. The BFI doesn’t directly advertise that people can license them from the BFI, but if someone asks the BFI “quietly”, the BFI will license it to them. In such a case, the BFI won’t provide contractual indemnites or warranties, and will reserve the right to terminate the licence immediately if an original rights holder comes forward. The BFI “doesn’t encourage” the public to use the orphan works scheme with the IPO for a film, as it is too difficult. P noted that the scheme is “trying to do too many things”, and that the end result is “awkward”.

P commented that the orphan works scheme does not work with royalties, and that the film industry works on royalties. In relation to out-of-commerce works. P is concerned that it would be “a similar mechanism” to the orphan works scheme and would therefore “be a non-starter”. The BFI will lobby the IPO and the DCMS to make sure there is the “right appetite for this to work”.

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**Publicly accessible archival documentation from the film archives**

The following documents are publicly available policies or codes from film archives, or from film archival bodies. They were examined by the researcher to inform archival policies and practices, and as data-gathering prior to conducting the interviews, to shape the focus of the interview questions.

**FIAF** **(International Federation of Film Archives)**

FIAF, “FIAF Code of Ethics” FIAF, “FIAF Code of Ethics” Available at: <https://www.fiafnet.org/pages/Community/Code-Of-Ethics.html>

FIAF, “Agreement for the International Federation of Film Archives”, 17 June 1938. Available at: <https://www.fiafnet.org/images/tinyUpload/History/FIAF-History/Digitized-documents/Constitutional-papers/Original%20FIAF%20Agreement.pdf>

These documents from FIAF provide contextual background to FIAF, its aims and mission statement. In the Code of Ethics, it sets out its approach towards respecting the copyright status of film works within film archives.

**FAUK (Film Archives UK)**

FAUK, “The Film Archive Forum’s Statement of Principles” FAUK. Available at: < <http://www.filmarchives.org.uk/wp-content/uploads/2013/03/mhoving_historypt2.pdf>>

This document from FAUK sets out its approach towards respecting the copyright status of film works within film archives. It is very similar to FIAF’s Code of Ethics. The FAUK Statement is applicable to UK film archives.

**BFI (UK’s national film archive)**

BFI, “BFI Showcases A Haul Of Missing Believed Wiped TV Rediscoveries Plus Festive Fun At The TV Panto” (BFI, 2019) Available at< https://www.bfi.org.uk/sites/bfi.org.uk/files/downloads/bfi-press-release-bfi-showcases-haul-of-missing-believed-wiped-tv-rediscoveries-plus-festive-fun-tv-panto-2019-11-12.pdf>

This document from the BFI sets out its Missing Believes Wiped campaign, in which film thought lost are discovered, digitised and saved. This document was very useful in understanding the scale of the out of commerce works within the archival collection.

**EYE (Dutch national film archive)**

Bout, L. “Dealing With Orphan Works: A Dutch Film Archive’s Perspective” Conference Presentation, EYE Filmmuseum, July 2017. Available at: < <http://diligentsearch.eu/wp-content/uploads/2017/11/L-Bout-presentation-orphan-works-a-film-archives-perspective.pdf>>

This document from EYE’s internal legal officer sets out the approach taken by EYE in relation to copyright compliance with orphan works.

**MACE (Media Archive for Central England, regional film archive in the UK)**

MACE, “Access Policy”. Available at < <https://www.macearchive.org/sites/default/files/downloads/MACE_Access_Policy.pdf>

MACE, “Acquisition and Disposal Policy”. Available at < https://www.macearchive.org/sites/default/files/downloads/MACE\_Acquisition\_Disposal\_Policy.pdf>

MACE, “Cataloguing And Documentation Policy” Available at < https://www.macearchive.org/sites/default/files/downloads/MACE%20\_Cataloguing\_Documentation\_Policy.pdf>

These documents from MACE provide contextual background to MACE, its aims, mission statement, archival access procedures, acquisition procedures for depositing film works in the archive, and its cataloguing procedures. These are very clear and helpful documents.

1. Dan Welch 'Ethnography', in Dale Southerton (ed.), Encyclopedia of consumer culture (SAGE Publications, 2011) p 553 [↑](#footnote-ref-1)