

Tip Sheet

Guidelines for Creating a Copyright Compliance Policy

Practical steps for businesses to comply with copyright law

Your decision to invest in an Annual Copyright License from CCC shows your organization's desire to comply with copyright law. To assist you in achieving that goal, we developed the following guidelines for drafting and implementing a copyright compliance policy and a sample policy that you can tailor for your own organization's use.

Before creating your policy

1. Consult your organization's copyright experts, including corporate librarians and legal counsel to gain a better understanding of any existing company policies and your company's use of copyrighted works.
2. Solicit input from representatives from other departments within your company (like human resources, sales, marketing, research, and general management) to understand the ways your company uses copyrighted materials, internally and externally.
3. For questions about your CCC license(s) or other products held by your organization, contact your CCC account representative or solutions@copyright.com

Once the policy is defined

1. Convey the policy to company employees throughout your organization via email, the company intranet, company-wide meetings, etc.
2. Incorporate the policy into new employee welcome kits, existing employee manuals, or other guidebooks.
3. Continue to educate employees about copyright and content use, especially as your organization engages with AI tools and other new technologies.
4. Periodically evaluate and update your copyright compliance policy to ensure it is current and meets your organization's needs.



Literary works: blogs, books, cartoons, emails, letters, magazines, memos, newspapers, newsletters, trade journals, training materials, and other written material, in paper or digital format.



Computer software: computer program or an "app" that is used directly (e.g., downloaded) or indirectly (e.g., online; SaaS) in a computer or handheld electronic device.



Pictures, graphical works, and sculptures: three-dimensional artworks like sculptures and other creations; two-dimensional works like paintings, cartoons, graphical images, maps, and photographs, in paper or digital format.



Architectural works: buildings and the like.



Sound recordings and accompanying words: recorded or performed on compact discs, phonographic records, podcasts, or other media.



Audiovisual works: motion pictures, multimedia presentations, demonstrations and slideshows, in analog or digital format.



Dramatic works and accompanying music: plays and screenplays, regardless of the medium in which performed or displayed.



Pantomimes and choreographic works: dance and mime performances.

Resources for permission to use copyrighted works

Text copyright resources

- Association of American Publishers, Inc., www.publishers.org
- Copyright Clearance Center, Inc., www.copyright.com
- International Federation of Reproduction Rights Organisations, www.ifrro.org
- National Writers Union, www.nwu.org
- U.S. Copyright Office, www.copyright.gov

Non-textual copyrighted works

Music

- American Society of Composers, Authors and Publishers, www.ascap.com
- Broadcast Music, Inc., www.bmi.com
- Recording Industry Association of America, www.riaa.com

Photography/Design

- American Society of Media Photographers, www.asmp.org
- Graphic Artists Guild, www.gag.org

Software

- The Business Software Alliance, www.bsa.org
- Software & Information Industry Association, www.siiia.net

Movies

- Copyright Clearance Center, Inc., www.copyright.com/mplicense

General

- U.S. Copyright Office, www.copyright.gov

These resources are provided for informational purposes only and are not endorsed by and do not necessarily reflect the opinions or beliefs of CCC or any of its employees, directors, or other representatives. The resources provided herein are provided "as is" and no representations are made that any content in the relevant resources are error-free.

A Sample Copyright Compliance Policy

There is no one-size-fits-all copyright compliance policy. Each organization should create a policy that is tailored to fit the needs of their organization. We developed the sample copyright policy, below, to help you get started with your company's copyright compliance policy.

A. Statement of Corporate Values

[Note: This statement may be tailored to fit with or complement your existing statements of principles, such as respect for the individual, community service, human rights, etc.]

We at [Company Name] recognize and respect intellectual property rights and are committed to fulfilling our moral and legal obligations with respect to our use of copyright-protected works.

B. Statement of Corporate Obligations Regarding Copyright

[Note: This statement can be used to inform your employees about how the organization complies with copyright law and what resources the company may have in place for employees to support copyright compliance.]

As a matter of moral integrity and adherence to copyright law, [Company Name] sets forth these policies for all employees:

1. No employee of [Company Name] may reproduce any copyrighted work in print, video, or digital form, or use such copyrighted works for AI-related activities or in connection with AI tools or systems (e.g., as part of an input or query, incorporated as part of AI-generated outputs, etc.) in violation of the law. Original works are considered protected even if they are not registered with the U.S. Copyright Office or any registering agency outside the U.S. and even if they do not carry the copyright symbol (©). Copyrighted works include, but are not limited to: printed articles from publications, electronic articles in online publications, online videos, movies, TV and radio programs, recorded music performances, images, training materials, manuals, documentation, software programs, databases, websites, and blogs. In general, the laws that apply to printed materials also apply to visual and digital formats such as websites, streaming media, music downloads, mobile apps, CDs, and DVDs.
2. [Company Name] holds an Annual Copyright License [and Multinational Copyright License] from Copyright Clearance Center (CCC), which enables employees of [Company Name] within [and outside] the United States to lawfully reproduce and distribute content, in print or electronic format, as needed within the company. Under the license [Company Name] employees can copy and internally distribute excerpts from newspapers, magazines, journals, and other copyright-protected works licensed by CCC as often as needed, provided that the license may not be used as a replacement for subscriptions or primary purchases of the published materials. Employees can also e-mail articles of interest to other employees, share articles by posting them on our company intranet sites, store articles in shared folders, and scan content when a digital original is not available. The license also authorizes employees to provide a single print or electronic copy to a client or prospect upon his or her direct request for further information relating to [Company Name's] products or services, and to submit copies to government agencies as required to support regulatory submissions. Please note that the license applies only to the works in CCC's online catalog (available in the RightFind software made available by CCC) and that, except for the limited external uses described above, the rights provided are for internal use at [Company Name] only.

[Additional language if organization wishes to include details regarding the rights related to AI-related uses allowed under the organization's Annual Copyright License]

As part of [Company Name's] Annual Copyright License, employees may also use certain content internally in connection with [Name and/or description of Company's AI tools or internal system]. Employees may use lawfully acquired content as inputs to [Company's AI tool or internal system], use the outputs generated by [Company's AI tool or system] within the organization, store content for future reference, and retrieve copies of the training set for quality control. Employees may also use outputs generated by [Company's AI tool or internal system] as part of regulatory submissions. Please note that the license applies only to certain works in CCC's online catalog (as designated in RightFind) and that, except for the limited external use described above, the rights provided are for internal use at [Company Name] only.

[Additional language if organization holds a Motion Picture License separately or in combination with the Annual Copyright License]

[Company Name] holds a Motion Picture License ("MPL") from CCC, which enables employees of [Company Name] in the United States to show copyright-protected videos, movies, and TV shows ("Videos") for the purpose of employee training, internal sales presentations, and company meetings, as needed within the company. Under the license, employees may show videos by the listed theatrical distributors and producers from ANY legally obtained source, including DVDs purchased at retail, videos downloaded from iTunes, or videos streamed from websites like hulu.com™ and Netflix™ that are authorized outlets of motion picture content and TV shows. To verify if a video is covered under the MPL, simply determine who the distributor of the video is and look it up in the distributors and producers list available at www.copyright.com/landing/mpl-lookup/.

3. To obtain permission to reproduce copyrighted works outside of [Company Name] and/or to use such works in ways that are not covered by our license or other prior agreements, employees should request permissions online at CCC's Marketplace website at marketplace.copyright.com, or contact the Rights and Licensing Department of the copyright holder. Questions on specific procedures should be directed to the [Title], who serves as our copyright officer.
4. [Company Name] designates [Title] as the copyright officer to administer our company's copyright policy. [Title] at [Company Name] can help you determine whether a work is covered by our CCC license and how to handle any special copyright issues. Questions concerning copyright procedures, including fair use, should be addressed to [Title].



C. Instructions for Handling Copyright Infringement

[Note This section may be tailored to outline your organization's procedures on how employees should respond to a potential copyright infringement, such as how employees can notify the appropriate internal stakeholders if they discover a potential copyright infringement.]

[Company Name] expects its employees to be responsible consumers of copyrighted materials. We also encourage employees to educate their peers on copyright compliance. If any employee witnesses a potential copyright infringement, please bring the matter to the attention of the individual as well as to our [Title], who serves as our copyright compliance officer. Employees who illegally duplicate copyrighted works may be subject to disciplinary action up to and including termination.



About CCC

A pioneer in voluntary collective licensing, CCC advances copyright, accelerates knowledge, and powers innovation. With expertise in copyright, data quality, data analytics, and FAIR data implementations, CCC and its subsidiary RightsDirect collaborate with stakeholders on innovative solutions to harness the power of data and AI.

Learn more about our licensing, content, and data solutions:

U.S. organizations:

🌐 copyright.com/acl

✉ solutions@copyright.com

Outside U.S. organizations:

🌐 rightsdirect.com/mcl

✉ solutions@rightsdirect.com