



British Equity Collecting Society Ltd

# ANNUAL TRANSPARENCY REPORT

2024-25



Company Number: 03547531

BECS, 22 Tudor Street, London, EC4Y 0AY

**British Equity Collecting Society Ltd.**  
**Annual Transparency Report for year ended 30<sup>th</sup> April 2025**

The non-executive Directors of BECS, as detailed in section 6, have been appointed by the Members of BECS to provide the supervisory function over BECS as required by the Regulations.

The Supervisory Board of BECS present this Annual Transparency Report<sup>1</sup> to the Members of BECS for consideration at the Annual General Meeting of the Members of BECS, to take place from 1pm on Tuesday 2<sup>nd</sup> December 2025.

### **The Collective Management of Copyright (EU Directive) Regulations 2016**

This transparency report relates to BECS's financial year ended 30 April 2025 and has been published in accordance with the Collective Management of Copyright (EU Directive) Regulations 2016 (the "Regulations").

The Directors' Report and Financial Statements for the year ended 30 April 2025 shall be deemed part of this Report for consideration by Members of BECS.

### **Audit and Publication**

The directors of BECS have appointed Moore Kingston Smith LLP of 5 Godalming Business Centre, Woolsack Way, Godalming, Surrey, GU7 1XW to audit the accounting information referred to in this report for the purposes of compliance with Regulation 21 (2) of the Regulations<sup>2</sup>. Moore Kingston Smith LLP have performed work in accordance with the International Standard on Related Services (ISRS) 4400 (Revised) 'Engagements to perform agreed-upon procedures regarding financial information' and 'The Agreed Upon Procedures for the Audit of the Annual Transparency Report' as published by the Intellectual Property Office.

Individual Statements have been made by each non-executive Director to support the publication of this Annual Transparency Report, including all declarations of conflicts of interest made and approved by the Board of Directors and noted in the company's Register of Interests.

Once adopted by the Members of BECS, this Annual Transparency Report will be published alongside the Directors' Report and Financial Statements<sup>3</sup> on the BECS' website<sup>4</sup> at [www.becs.org.uk](http://www.becs.org.uk) for the purpose of reporting the activities of the company during the financial year ended 30 April 2025.

The Annual Transparency Report along with the Directors' Report and Financial Statements will remain available on the BECS website for at least 5 years<sup>5</sup>.

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<sup>1</sup> Regulation 21 (1) (a)

<sup>2</sup> Regulation 21 (2) (b)

<sup>3</sup> Regulation 21 (4) (a)

<sup>4</sup> Regulation 21 (1) (b)

<sup>5</sup> Regulation 21 (1) (c)

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**AUDITORS' REPORT TO THE DIRECTORS OF BRITISH EQUITY COLLECTING SOCIETY LIMITED**

We have performed the procedures agreed with you and enumerated below with respect to the annual transparency report of British Equity Collecting Services Limited for the year ended 30 April 2025. Our engagement was undertaken in accordance with the International Standard on Related Services applicable to agreed-upon procedures engagements. The procedures were performed solely for the purpose of your compliance with Regulation 21(2)(b) of the Collective Management of Copyright (EU Directive) Regulations (2016) and are summarised in guidance issued by the Intellectual Property Office to Auditors in October 2017.

The procedures are set out in Annex A: Agreed upon procedures for the audit of an annual transparency report of the "Guidance on the collective management of Copyright (EU Directive) Regulations 2016: annual transparency reports and audit" issued by the Intellectual Property Office in October 2017.

Solely on the basis of the above procedures we report that:

We carried out the procedures as set out in Annex A: Agreed upon procedures for the audit of an annual transparency report of the "Guidance on the collective management of Copyright (EU Directive) Regulations 2016: annual transparency reports and audit" issued by the Intellectual Property Office in October 2017. There were no errors or exceptions found as a result of our testing.

Because the above procedures do not constitute engagements made in accordance with International Standards on Auditing (UK) or the International Standard for Review Engagements (UK and Ireland), we do not express any assurance on the annual transparency report for the year ended 30 April 2025.

**Use and purpose of our report**

Our Report is prepared solely for the use of British Equity Collecting Society Limited and solely for the purpose of its compliance with Regulation 21(2)(b) of the Collective Management of Copyright (EU Directive) Regulations (2016). It may not be relied upon by British Equity Collecting Society Limited for any other purpose whatsoever. Our Report was not prepared for the benefit of any party other than British Equity Collecting Society Limited. Shipleys LLP neither owes nor accepts any duty to any other party (including any copyright owner, heirs to copyright owners, agents or licensees) and shall not be liable for any loss, damage or expense of whatsoever nature which is caused by their reliance on our Report.

Tim Hardy

Moore Kingston Smith LLP,

5 Godalming Business Centre, Woolsack Way, Godalming, Surrey, GU7 1XW

**Date:**

# British Equity Collecting Society Ltd.

## Annual Transparency Report for year ended 30<sup>th</sup> April 2025

### 1. BECS Members

All applicants for Membership of BECS are required to complete and sign a Performer Registration Form (or Performer Heir Registration Form) and Membership Agreement and provide proof of name and address. At the time of writing, BECS has 30,941 members.

Members assign the rights specified in the Membership Agreement to BECS whilst they remain in membership. They also accept a liability of £1 if BECS is dissolved whilst their membership is current. BECS does not currently operate any Extended Collective Licensing ("ECL") scheme.

BECS operates a **Code of Practice** relating to its activities. BECS's published Code of Practice includes details of the complaints procedure to be adhered to, should a complaint be made.

### 2. Governance Structure of BECS<sup>6</sup>

BECS is a private company limited by guarantee and has no share capital.

BECS has no subsidiary undertakings<sup>7</sup>.

BECS operates on a not-for-profit basis.

BECS is a collective management organisation for the purposes of the Regulations<sup>8</sup>. It is owned and controlled by its members being performers and their heirs.

### 3. Amounts deducted for the purposes of Social, Cultural and Educational services<sup>9</sup>

In accordance with company policy, BECS has not made any deductions for third party social, cultural or educational services during the financial year ended 30 April 2025.

### 4. Affiliations

During the financial year ended 30 April 2025, BECS has been a member of or affiliated to the following bodies and recorded respective expenses:

- British Copyright Council (BCC: [www.britishcopyright.org](http://www.britishcopyright.org))
  - o £ 1,485 as membership fees
- Societies' Council for the Collective management of Performers' Rights (SCAPR: [www.scapr.org](http://www.scapr.org)):
  - o £ 8,601 as membership fees
  - o £ 11,980 as fees for VRDB2
  - o £ 8,170 as fees for IPD

The above fees are based on BECS' membership numbers and collections.
- AEPO ARTIS ([www.aepo-artis.org](http://www.aepo-artis.org)):
  - o £ 6,325 as the year's contribution.

This charge is based on BECS' collections in the year.
- Creators' Rights Alliance (CRA: [www.creatorsrightsalliance.org](http://www.creatorsrightsalliance.org)):
  - o £ 650 as membership fees

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<sup>6</sup> Regulation 21 (4) (d)

<sup>7</sup> Regulation 21 (4) (e)

<sup>8</sup> Regulation 21 (4) (b)

<sup>9</sup> Regulation 21 (3) and 21 (4) (g)

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#### 4. Information on refusals to grant a licence<sup>10</sup>

BECS does not grant licences and therefore this information is not applicable.

#### 5. The Financial Statements for British Equity Collecting Society Ltd (company registration number 03547531) for the year ended 30 April 2025 including the Directors' Report form part of this Annual Transparency report.

The Financial Statements and the Directors' Report for the year ended 30 April 2025 include: -

- The total revenue for the year ended 30 April 2025
- The total costs incurred by BECS as administration costs
- A breakdown of personnel costs

A detailed breakdown of BECS' administration expenditure is as follows:

	2024/25	2023/24
	£	£
Directors salaries	127,409	99,645
Directors pension costs	48,273	52,304
Staff salaries and related costs	226,340	193,406
Office costs	69,418	66,925
Database materials / System Expenditure	61,961	64,880
Travel and subsistence	5,652	9,543
Communication / Lobbying costs	21,421	13,722
Affiliations	37,211	36,289
Sundry expenses	5,100	2,482
Legal and professional fees	19,905	24,288
Other consultancy expenses	0	50,379
Auditors' remuneration	20,000	17,140
Amortisation of intangible assets	1,974	1,954
Depreciation	2,188	688
Bank charges	2,242	2,635
	<b>649,094</b>	<b>636,280</b>

#### 6. Directors and officers

Procedures for the appointment of Directors are set out in the BECS Articles of Association which are published and made accessible on the BECS website at <http://www.becs.org.uk/articles-of-association>.

The directors who served on the BECS' Board during the year ended 30 April 2025 were:

- Jean Rogers (Chair)
- Natasha Gerson – deceased 27 Jul 2025
- Peter Barnes
- Fiona Branson
- Jo Cameron Brown
- Ryan Early
- Kevin Francis
- Louis Rolston - resigned 3 Dec 2024
- Tayyiba Nasser

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<sup>10</sup> Regulation 21 (4) (c)

All directors are non-executive Directors except for Tayyiba Nasser who is an executive director.

No remuneration was paid for the services of any non-executive Director during the year. The following Directors received payments made by BECS in respect of their rights as Performers and as reimbursement of expenses<sup>11</sup>:

	<b>Performers’ Remuneration</b>	<b>Expenses</b>
Peter Barnes	24	0
Jo Cameron Brown	226	392
Ryan Early	126	325
Tayyiba Nasser	0	365
Jean Rogers	35	85
Louis Rolston	431	144

The executive director’s remuneration is detailed in section 5

BECS paid £2,561 for insurance to cover its Directors and Officers against liabilities in relation to their duties to the company.

## **7. BECS Activities in the year<sup>12</sup>**

A summary of activities during the financial year is set out below:

### Collections and Distributions

The principal activity of BECS is the collection and distribution of audio-visual rights revenue on behalf of its membership. BECS did not undertake any activities unrelated to collective rights management.

Collections for distribution to our members this year amounted to £9.64 million, slightly higher than last year’s figure of £9.34million. 12,893 members received at least one payment in the year, either directly or via their agent, from BECS.

### UK Withdrawal from the EU

Following UK’s withdrawal from the EU, performers are losing out on statutory payments from certain countries. As previously reported, collective management organisations (CMOs) in France, Belgium, and several other (less financially significant) territories have ceased payments to BECS. This affects either UK national performers or performances in UK productions. These CMOs interpret their national laws—which vary across Member States—as prohibiting remuneration for the use of our members’ work, on the basis that the UK is now considered a “Third Country” and does not provide reciprocal remuneration to EU performers.

BECS is actively pursuing multiple avenues to address this issue. We have obtained legal advice from a leading expert in the field, which strongly supports our position. Based on international treaties and CJEU case law, the cessation of statutory payments to UK audiovisual performers—or to performers in UK productions—is not compliant with EU or international law.

We are currently in dialogue with the relevant CMOs and are also engaging with the UK Intellectual Property Office (IPO), which continues to raise this issue in its regular meetings with its EU counterparts. In parallel, we are campaigning for legislative changes in the UK that would establish reciprocity—further details on this are provided below.

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<sup>11</sup> Regulation 21 (4) (f)

<sup>12</sup> Regulation 21 (4) (b)

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### The Smart Fund

In September 2023, BECS participated in the Culture, Media and Sport Select Committee's Inquiry into Creators' Remuneration, highlighting the precarious nature of AV performers' income and the importance of payments for ongoing use of their work overseas. We raised concerns about the cessation of payments from certain countries due to Brexit and the lack of reciprocal remuneration for private copying.

All participants supported the introduction of the Smart Fund—a proposed scheme to compensate rightsholders when individuals make private copies of copyrighted content on devices like phones or laptops. Funded by a small levy on manufacturers and importers of such devices, the scheme would not affect consumers or taxpayers. Similar systems exist in 45 countries, and BECS members already benefit from them internationally. In fact, private copying remuneration from abroad is currently BECS' largest source of collections.

Introducing a similar system in the UK would create a vital new revenue stream for performers, support cultural projects, and enable BECS to make reciprocal payments to overseas CMOs—helping to resolve the payment issues that have arisen since Brexit.

The Committee published its report on 10 April 2024 and recommended that Government work with the UK's creative industries to introduce a statutory private copying scheme within twelve months. The Government published its response to the Committee's Report in November 2024, which stated, "Although we are not ruling out the introduction of a private copying exception and levy, we believe that further evidence is needed to better understand current user behaviour. The Intellectual Property Office (IPO) will therefore meet with representatives from the UK's creative industries to discuss how to strengthen the evidence base on private copying, both domestically and in relation to trade."

BECS and other members of the Smart Fund campaign have been obtaining evidence from our counterparts in other countries which have conducted detailed research studies which demonstrate the type and extent of private copying which takes place in those countries and have met with the IPO and provided them with these. The next step is likely to be commissioning a study of private copying behaviour in the UK.

### Actors Earnings Survey

BECS commissioned a survey about actors' earnings and contracts, which was carried out independently by the academic research team, CREATE, at the University of Glasgow. This was a vital survey to provide numbers and proof for our lobbying activities to improve actors' rights and commensurate earnings. Launched in Mar'24, we had a great response from our members. After careful analysis of the results, the report was released in October 2024<sup>13</sup> with key highlights being:

- Despite surging profits for streaming platforms, actors' earnings were well below the typical (median) UK worker's earnings, and below the full-time minimum wage.
- Majority of performers believe that both the value of initial fees is decreasing in real terms and that the value of residuals and royalties they receive under contract are decreasing.
- Continued shrinking of bargaining power, exploitative practices and increased use of buyout contracts in the industry.
- AI being the newest threat to displacing performers, with the fear of performers' image, voice and overall persona being replicated and used without their consent.

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<sup>13</sup> [www.create.ac.uk/project/dealing-with-creators-project/2024/06/16/creators-hub/](http://www.create.ac.uk/project/dealing-with-creators-project/2024/06/16/creators-hub/)

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We have drawn on these findings to strengthen our lobbying efforts aimed at protecting and enhancing actors' rights; helping to secure a more sustainable income in a profession where success is often concentrated among a few big players.

### AI

In December 2024, the Government launched a consultation on Copyright and Artificial Intelligence, closing on 25 February 2025. Recognising both AI and the creative industries as central to its growth strategy, the Government outlined three objectives: improving transparency between sectors, enhancing rightsholders' control and remuneration, and ensuring AI developers have access to high-quality training material.

The consultation acknowledged that many AI models are trained on publicly available online content without licences - often breaching copyright and excluding creators from the value generated. Due to a lack of transparency, creators cannot enforce their rights, while AI developers cite legal uncertainty in the UK as justification for training models abroad.

Four policy options were proposed:

Option 0: Maintain current law.

Option 1: Require licensing for all AI training.

Option 2: Introduce a broad data mining exception for commercial use.

Option 3: Introduce a data mining exception for commercial use which allows rightsholders to reserve their rights, supported by transparency measures.

The Government favoured Option 3. However, BECS and many in the creative sector argue that creators should not have to opt out to protect their work. There is currently no practical mechanism for reserving rights, and individual creators cannot control online copies of their work. BECS supports Option 1, with added transparency obligations for AI developers.

BECS also raised concerns that audiovisual performers may not benefit from licensing if rights are controlled by producers. If so, statutory measures would be needed to ensure fair compensation via CMOs.

The consultation also addressed digital replicas and likeness rights. BECS believes legislative intervention is necessary to give individuals control over such uses, requiring informed written consent and stronger enforcement of data protection laws.

At the time of writing, the IPO was still analysing the approximately 11,500 responses they received to the consultation.

### Beijing Treaty on Audiovisual Performances (BTAP)

The last consultation regarding how to implement the BTAP, with respect to the optional elements of the Treaty took place in late 2023. BECS responded, advocating the introduction of some statutory remuneration rights for performers (to augment, not replace, the residuals they receive under their contracts) which cannot be waived or assigned to producers and supplied evidence about how well this works in other countries.

The IPO asked us some follow up questions, to which we responded. Since then, there has been a hiatus on this, due first to the election and then to all the work being done in government and by the IPO in relation to AI. Unfortunately, this has caused ratification of Beijing to be deprioritised. However, the UK is obliged under various international trade agreements to make all reasonable efforts to ratify the Beijing Treaty and BECS continues to lobby for this.

### BECS Office move

In February 2025, BECS moved offices to 22 Tudor Street, London EC4Y 0AY.



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### 8. Revenues

Total revenue for the year is shown in the Directors' Report and Financial statements for the year.

### 9. Distribution Policy

BECS' Members have seen and approved the Distribution Policies applied by BECS and the Collective Management Organisations from which BECS received payments of Performers Remuneration for the purposes of proposing and (subject to required approvals) making distributions to BECS Members. The approved Distribution Policies are referred to on the BECS website [here](#).

### 10. Allocations to categories of right holders<sup>14</sup>

Each BECS member assigns certain exclusive rights to BECS to enable BECS to exercise the "Mandated Rights", including the right to collect and distribute "Performers Remuneration" (as defined in the BECS Membership Agreement and Articles of Association respectively).

BECS does not currently recognise any monies collected for distribution that it considers as non-distributable. As at 30 April 2025 BECS had £7.3 million recorded as distributable to members. The full amount is recognised as a current liability. £5.9 million of this (less admin fees) was allocated for distribution in June 2025, and a further £216K (less fees) is expected to be allocated in November 2025. The remaining balance of £1.2m is outstanding either because we await further information to enable payment or is below our minimum individual payment threshold (£10 for BACS and £50 for International WIRES).

Once source amounts have been allocated to individual members' accounts, it is not currently technically possible to analyse total amounts attributed to rights holders but not yet distributed by the financial year in which the amounts were collected (as required by regulation 21 4 (j)) due to the huge volume of individual transactions.

BECS allocates all monies received for distribution to members within 9 months of the end of the financial year in which the rights revenue was collected, unless there are objective reasons preventing BECS from doing so. All allocated monies are ordinarily distributed as soon as they reach the payment threshold.

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<sup>14</sup> Regulation 21 (4) (j)

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### 11. Management Fees<sup>15</sup>

BECS' bilateral agreements cover a range of rights relevant to local national legislation. The table below gives a breakdown of the monies collected by region and by the type of right. The rights are described in more detail on our website: [www.becs.org.uk/payments/#income-sources](http://www.becs.org.uk/payments/#income-sources).

BECS' total deductions for administering performers' rights payments during the year ended 30 April 2025 was £856,000. This is £100k lower than the maximum 10% deduction rate as agreed by the BECS Membership.

Region	Amount Collected	Private Copying	Lending / Rental	Communication to Public	Broadcasting	Retransmission	Making Available	Other Adjustment	BECS Fee deducted
Belgium	1,068,671	906,509	23,187	0	0	138,975	0	0	100,000
Colombia	2,964	0	0	2,964	0	0	0	0	0
Denmark	278,235	36,780	0	0	0	241,455	0	0	27,000
Ecuador	8,816	0	0	0	0	0	8,816	0	0
France	176,807	176,807	0	0	0	0	0	0	0
Germany	2,908,552	2,137,599	43,003	437,147	1,428	289,341	0	34	250,000
Hungary	124,677	55,744	0	68,933	0	0	0	0	0
Italy	870,208	189,456	0	0	483,968	0	196,750	33	80,000
Netherlands	2,705,344	1,020,044	66,619	270,795	1,340,026	0	2,338	5,523	260,000
Peru	46,430	0	0	0	0	0	46,430	0	0
Portugal	16,273	8,610	0	7,663	0	0	0	0	0
Spain	1,345,884	337,004	282	135,867	435,910	298,000	138,669	153	130,000
Switzerland	92,132	92,132	0	0	0	0	0	0	9,000
<b>Grand Total</b>	<b>9,644,992</b>	<b>4,960,686</b>	<b>133,090</b>	<b>923,369</b>	<b>2,261,331</b>	<b>967,770</b>	<b>393,004</b>	<b>5,742</b>	<b>856,000</b>

### 12. Income arising from Investment of Rights Revenue<sup>16</sup>

Bank income received by BECS from holding monies on behalf of BECS Members pending distribution as authorised together with company funds amounted to £373,653.

With the approval of BECS' Members, the company used the interest earned to meet approved management costs, rather than allocating the monies for distribution to members.

### 13. Relationships with other Collective Management Organisations

Below is a list of sister CMOs that BECS has active Bilateral Agreements with as at the end of April 2025:

- |                               |                                 |
|-------------------------------|---------------------------------|
| 1. Belgium – PlayRight        | 10. Spain – AISGE               |
| 2. France – ADAMI / SAI       | 11. Sweden - COPYSWEDE          |
| 3. Denmark – FILMEX           | 12. Romania – CREDIDAM          |
| 4. Netherlands – NORMA        | 13. Chile – CHILEACTORES        |
| 5. Italy – Nuovo IMAIE        | 14. Colombia – Colombia ACTORES |
| 6. Germany – GVL              | 15. Ecuador – UNIARTE ACTORES   |
| 7. Hungary – EJI              | 16. Peru - IAP                  |
| 8. Switzerland - SwissPerform | 17. Panama - ASDAP              |
| 9. Portugal – GDA             | 18. Mexico - ANDI               |

<sup>15</sup> Regulation 21 (4) (i)

<sup>16</sup> Regulation 21 (4) (h)