

Written evidence submitted by the British Photographic Council

Executive Summary

- Who we are and what we do
- Our mandate and representation
- Feedback to current level of business support
- What we want government to do

Who we are

1. The British Photographic Council is an umbrella organisation comprised of most of the various representative bodies in the UK which include professional photographers as their members. Its aims are to protect, develop and promote the rights and interests of photographic image-makers, and the bodies that represent them in the UK.
2. The Council represents these views to the Government, the European Commission and other relevant bodies either directly or through or with the co-operation of other bodies with similar aims.
3. Our collective membership of at least some 8,000 individual professionals, represented through our various member-organisations, has a wide client base of large- and small-scale businesses ranging from individual clients in the corporate sector to design groups, newspaper and publishing houses, music publishers and advertising agencies. Their work is published worldwide in magazines, newspapers, books and advertising campaigns and many sell their images as fine art through galleries, both in traditional spaces and online.
4. We also exist to improve and encourage best practice nationally and internationally on matters relating to the use of photography, and the employment and commissioning of representing photographic image-makers and the distribution of their work.

Feedback on the Government's business support measures to date

5. We welcome the steps government has taken thus far to address the crisis and to put some measure in place to support business.
6. However, we must express our deepest concern that of the schemes currently provided, there are large numbers of businesses that are not eligible for any support. These are small, micro-businesses – limited companies with a single director/shareholder, also referred to as Personal Service Companies.
7. The individuals running these businesses identify as being 'self-employed' yet are of course, technically employees of their own company. They often take a salary through a combination of PAYE and dividends. The current provisions by Government do not take account of dividends and it appears that individuals in this position are not being picked up or catered for in the Government's support plans.
8. Of our represented, collective members, we estimate that approximately half of them operate their businesses in this manner. That's a minimum of 4,000 businesses.

9. A recent survey by the Creative Industries Federation (CIF) revealed that over 50% of those who identify as self-employed and who responded to a poll carried out by them, have already had 100% of their work cancelled. This is nothing short of devastating.
10. The business support provided by Government to date is welcomed, *but* we must raise the issue of a large number of businesses being unable to claim, or being ineligible for, support in any manner. Individuals will operate small limited companies, or Personal Service Companies, because their clients and customers often prefer to trade on this basis for reasons of both contract and employment. These individuals are not catered for.
11. There will be large numbers of individuals who have set up businesses less than three years ago, and so may be disadvantaged. Particularly so, businesses that are less than one year old.

What we urge government to do

12. We urge Government to reconsider the cap on trading profits set at £50,000 and remove the requirement for at least 50% of income to have come from self-employment. It is well-known that careers in the creative industries lead to varied forms of employment and the parameters set out currently are exclusory to a great many individuals. It would make better sense to make support available to take into account any ongoing overheads, not just profits, particularly as in the ongoing circumstances of Brexit, many individual businesses in our sectors have seen their profits drop dramatically due to economic uncertainty, yet those businesses will still have overheads to pay for.
13. We want Government to allow for the inclusion of the tax return for year-end 2020 to be included in income calculations.
14. We want Government to allow the inclusion of dividends in addition to PAYE in the calculation of income for individuals who run Personal Service Companies.
15. We want Government to address the time-gap between now, when many individuals are rapidly running out of cash, and the time when this support might be available, as days, not weeks are what counts for the ability of many to survive.

The British Photographic Council (<http://www.british-photographic-council.org>)
c/o The AOP, Somerset House, South Wing, Strand, London WC2R 1LA

Co-signed by all our members, who are:

Association of Photographers (AOP)
British Institute of Professional Photographers (BIPP)
British Press Photographers Association (BPPA)
Chartered Institute of Journalists (CIOJ)
Editorial Photographers UK (EPUK)

Master Photographers Association (MPA)
National Association of Press Agencies (NAPA)
National Union of Journalists (NUJ)
Pro Imaging
Redeye
Royal Photographic Society (RPS)

30 March 2020