



Overview Of Copyright Infringement And Statutory Exception Of Educational Use

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Abstract

Copyright is a multifaceted legal concept that plays a fundamental role in safeguarding the rights of creators and balancing them with the public interest. This equilibrium is achieved by granting creators exclusive control over their intellectual and artistic works while allowing for specific exceptions and limitations, particularly in the context of educational and scientific endeavors. The time has come to reaffirm the integrity of copyright, which has faced divisive debates in recent years. It is essential to recognize that protecting both creators and consumers of creative works ultimately serves the public interest.

This research paper gives an overview into the intricate relationship between creators' interests and the broader public interest, with a specific focus on exceptions to copyright infringement and fair use for educational purposes. It investigates the evolving landscape of copyright exceptions and assesses their current impact. The research problem revolves around the need to attain a balance between copyright protection and the principles of "access" in its various forms.

The study examines the evolving nature of copyright exceptions, especially in the realm of educational use, and their implications. It seeks to unravel the complexities arising from the interaction between copyright and other fundamental rights such as privacy, free expression, cultural diversity, cultural development, the right to access information, the right to education, and the emerging right to development. These rights introduce additional layers of complexity and necessitate a delicate equilibrium within the realm of intellectual property protection.

Further, this study emphasizes the need to reassess and gain a deeper comprehension of the intricate dimensions of copyright law and its relationship with the wider legal context. It urges for cooperative initiatives aimed at creating well-defined principles and guidelines that both safeguard creators and facilitate education, research, and knowledge accessibility. This collective effort ensures that copyright remains true to its essential purpose of nurturing creativity and the dissemination of knowledge.

Keywords: Copyright, Infringement, Fair dealings, Statutory-exceptions, Educational use

Introduction:

Copyright is a legal concept that assures creators certain rights in exchange for their intellectual and artistic creations. These rights, as defined by the World Intellectual Property Organization, strike a balance between the interests of the creators and the public good. Copyright not only gives creators exclusive control over their works but also includes rules for public access and the societal benefit derived from these works. To ensure fairness and serve the common good, copyright imposes exceptions and limitations on creators. These restrictions evolve with society's development and requirements, allowing for the free use of works without the author's permission or payment for specific purposes. These limitations are essential for the advancement of society, especially in fields like science and education.

The essence of this restriction is that those cases are enshrined in the legislation when works can be used without an author's permission and without paying remuneration, but for the purposes strictly specified by law. Many such restrictions are especially connected precisely with educational and scientific activities (Alakurt, 2015; Rogers et al., 2009)¹

The time has arrived to restore copyright to its full integrity. Contrary to the divisive debates that have arisen in recent years, it's crucial to recognize that safeguarding both authors and users of creative works serves the public interest. We must acknowledge that both creators and consumers of content depend on a functional copyright system. This article aims to analyse and work for finding research basis for a principled framework for international copyright limitations and exceptions. The argument presented in this paper is that, in terms of principles, copyright has always aimed to achieve a balance between protection and the concept of "access" in various forms. However, this equilibrium, which was paramount in the core thought of framers of the 1886 Berne Convention for the Protection of Literary and Artistic Works, may have been somewhat overlooked in subsequent revisions of the Convention. It was eventually supplanted by a "test," the three-step test, which was designed to restrict individual lawmakers' ability to create limitations and exceptions that maintain this balance.

The intricacy of this endeavor underscores the growing challenge of copyright as it interacts with rights that extend beyond its traditional scope. These rights include privacy, the principles of free expression and cultural diversity, as well as cultural development, the right to access information, the right to education, and the emerging right to development. Each of these rights implies the necessity of finding a delicate equilibrium within the realm of intellectual property protection (Daniel J. Gervais, 2008)².

Thus, the present paper intends to analyze the issue of conflict between creators' interest and the interest of people with relation to exceptions of Copyright Infringement or fair use under educational purposes and to evaluate the effects of such exemptions in present form.

¹Exceptions to Copyright for Scientific and Educational Purposes" Roza Iosifovna Sitdikova, Ekaterina Sergeevna Starostina, Elvina Rustemovna Kashapova, and Sergey Alexandrovich Baryshev, International Journal of Higher Education, vol. 9, no. 8 (2020), online published: October 31, 2020.

² Vanderbilt University Law School, Scholarship@Vanderbilt Law, 2008. Daniel J. Gervais, "Making Copyright Whole: A Principled Approach to Copyright Exceptions and Limitations."

Research Problem:

The research problem at hand revolves around the intricate relationship between creators' interests and the interests of the public, particularly in the context of exceptions to copyright infringement or fair use for educational purposes. Copyright is a multifaceted legal concept that balances the rights of creators with the public good. It grants creators exclusive control over their intellectual and artistic works while also incorporating provisions for public access and societal benefits. Exceptions and limitations are an integral part of copyright law, evolving with societal development to allow the free use of copyrighted works for specific purposes. Many of these exceptions are closely associated with educational and scientific activities.

The primary objective of this research is to investigate the evolving landscape of copyright exceptions, particularly in the context of educational use, and assess the impact of these exemptions in their current form. The debate surrounding copyright's role in protecting creators while serving the common good has intensified in recent years. As the concept of "access" to creative works gains prominence, it is imperative to understand the principles underlying copyright law and how they have evolved over time. Furthermore, the study aims to explore the complexities and challenges posed by the interaction between copyright and other rights, including privacy, free expression, cultural diversity, cultural development, the right to access information, the right to education, and the emerging right to development. These rights introduce additional layers of complexity and necessitate the delicate balance within the realm of intellectual property protection.

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This research problem delves into the evolving landscape of copyright exceptions, especially in the realm of educational use, and examines the impact of these exceptions. It seeks to understand how copyright, in its pursuit of a balance between creators' interests and public access, interacts with other fundamental rights and the implications for the broader intellectual property landscape.

Research Objectives:

1. Examine the Evolution of Copyright Exceptions
2. Evaluate the Impact of Copyright Exceptions with reference to case law.
3. Analyze the Intersection of Copyright and Fundamental Rights

Research Questions:

1. How have copyright exceptions evolved over time, especially in the context of educational and scientific applications?
2. What is the practical impact of existing copyright exceptions on creators, users, and society at large?
3. How does copyright intersect with and affect fundamental rights, such as privacy, free expression, cultural diversity, and the right to education?

History:

The History of Copyright can be categorized with three distinct generations.

First Generation: This era commenced with the invention of the printing press and concluded in England with the passing of the Statute of Anne in 1710, and in much of Europe towards the close of the 18th century. During this period, individual privileges were granted to publishers and authors.

Second Generation: This generation began with the world's first legislative efforts to protect authors' rights. Notably, it included the Statute of Anne of 1710 in England, the Federal Copyright Act of 1790 in the United States of America, and the Literary and Artistic Property Act of 1793 in France. The origins of this generation can be traced to the French Decree of 28–30 March 1852. An important distinction was that the Statute of Anne of 1710 did not differentiate between "citizens" and "foreigners" for publishing in England, while the Literary and Artistic Property Act of 1793 in France extended legal protection to both "foreigners" and "nationals." This generation marked the inception of general legislation to protect authors' rights and set the stage for conventions and treaties between various nations.

Third Generation: This generation began in the late 19th century and laid the foundation for formalizing and standardizing copyright statutes at the international level. The demand for more comprehensive protection of authors in this generation led to crucial developments in copyright law history that remain significant today. From the International Copyright Convention of 1886 to the Marrakesh Treaty of 2013, this generation addressed copyright law issues at both broad and detailed levels. In this era, independent India enacted its first Intellectual Property (IP) statute, the Copyright Act of 1957, which came into effect in January 1958. Since its enactment, the copyright statute and regulations have undergone multiple amendments to adapt to contemporary demands and further safeguard the interests and rights of authors.

Definitions:

Copyright (or author's right) is a legal term used to describe the rights that creators have over their literary and artistic works. Works covered by copyright range from books, music, paintings, sculpture, and films, to computer programs, databases, advertisements, maps, and technical drawings³.

Exceptions are 'certain acts not to be infringement of copyright'. It involves acts considered as fair use or exempted from being considered wrongful as per the Copyright Protection statutes.

They are uses authorised by law or available by compulsory licensing. It also involves material used for Education i.e. any acts (uses) to convey instruction and to study such as teaching, exercises, exams, etc. as well as Research i. e. any acts (uses) necessary to gather and discover information⁴.

The Copyright Act of 1957 does elaborate upon fair dealings in Sec. 52 of the Act.

Magnitude of the Issue:

The Berne Convention offers a clear framework for defining copyright rights, but it largely leaves exceptions, other than those related to "public information," unregulated on the international stage. These unregulated exceptions might now be subject to the scrutiny of the three-step test. This situation raises two important issues. First, as protection extends to new forms of commercializing human creativity with unclear or unspecified exceptions, it becomes challenging to define the proper boundaries for these rights in a globalized world. The lack of clarity has been evident on the internet, where social norms clash with unclear national and international exceptions, leading to a need for enforcement. This may result in increased infringement.

The second issue stems from the lack of clarity in copyright law due to the sudden involvement of individual end-users in the internet age. These users must navigate rules about what they can or cannot do legally with copyrighted materials, which may conflict with established practices of non-commercial sharing and content reuse, particularly in the "remix culture." Educators and content creators face challenges due to the lack of clarity or adaptability of exceptions.

The lack of clarity is, in part, a consequence of the mostly unregulated nature of limitations and exceptions at the international level. A comprehensive study of limitations and exceptions across national legal systems would provide insights into this unregulated space. Identifying commonalities might offer a basis to argue that a

³ WIPO, "Copyright (or Author's Right), <https://www.wipo.int/copyright/en/>

⁴ WIPO, "Limitations and Exceptions in Copyright Law for Educational and Research Activities", Prof. Raquel Xalabarder, July, 2019 (https://www.wipo.int/edocs/mdocs/copyright/en/ompi_da_sdo_19/ompi_da_sdo_19_education.pdf)

"subsequent practice in the application of the treaty"⁵ has emerged, influencing the interpretation of the Berne Convention.

Balancing copyright, whether from an economic or utilitarian perspective, is essential to achieve its objectives. Adequate protection is necessary to encourage new works and ensure commercial dissemination without stifling creativity or causing excessive welfare costs. The public interest must be considered in this balance, ensuring that copyright protection aligns with the overall welfare of society, which includes authors' rights.

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Without the balance the creators are under an economic and moral loss for their creations merely under the defence of the exception of fair dealing under "educational purpose". The limit of educational purpose has nowhere been mentioned creating ambiguity which does hamper the rights of the creator adversely.

From the perspective of copyright, culture operates in a reciprocal manner: it serves as the fundamental foundation from which all creators derive inspiration for their work, and, in return, their creations enrich and broaden the culture. This dynamic has become more intricate with the global spread of web culture, yet a significant portion of cultural influence remains tied to local contexts. It has been observed that the defence of Educational purpose to showcase fair dealing has been inappropriately used by numerous individuals as well as the institutions.

International & National Laws:

There are various treaties and conventions administered by WIPO some of the prominent ones are:

"Berne Convention for the Protection of Literary and Artistic Works: The Berne Convention, adopted in 1886, deals with the protection of works and the rights of their authors. It provides creators such as authors, musicians, poets, painters etc. with the means to control how their works are used, by whom, and on what terms. It is based on three basic principles and contains a series of provisions determining the minimum protection to be granted, as well as special provisions available to developing countries that want to make use of them."⁶

"WIPO Performances and Phonograms Treaty: The WIPO Performances and Phonograms Treaty (WPPT) deals with the rights of two kinds of beneficiaries, particularly in the digital environment: (i) performers (actors,

⁵ Daniel J. Gervais, "Making Copyright Whole: A Principled Approach to Copyright Exceptions and Limitations," 2008 Vanderbilt U. L. Sch. Scholarship@Vanderbilt Law.

⁶ <https://www.wipo.int/treaties/en/ip/berne/>

singers, musicians, etc.); and (ii) producers of phonograms (persons or legal entities that take the initiative and have the responsibility for the fixation of sounds)”⁷.

“WIPO Copyright Treaty (WCT): The WIPO Copyright Treaty (WCT) is a special agreement under the Berne Convention which deals with the protection of works and the rights of their authors in the digital environment. In addition to the rights recognized by the Berne Convention, they are granted certain economic rights. The Treaty also deals with two subject matters to be protected by copyright: (i) computer programs, whatever the mode or form of their expression; and (ii) compilations of data or other material ("databases")”⁸.

Besides these there are various other treaties like Beijing convention, Marrakesh Treaty etc to facilitate the regulations of IP related issues.

The Copyright Act of 1957, an Indian copyright law, addresses various aspects of copyright, including fair dealing for educational purposes. The Act includes provisions that allow for fair dealing with copyrighted works for educational use. This means that under certain conditions, limited portions of copyrighted material can be used without the need for permission or payment to copyright holders.

However, the Act doesn't specify an exhaustive list of conditions or situations where fair dealing for educational purposes is permitted. Instead, it provides a framework that permits educational use on a case-by-case basis, taking into account factors like the purpose of the use, the nature of the work, the amount used, and the effect on the market value of the work. In essence, it aims to attain a balance between the rights of copyright owners and the interests of education.

It's essential to consider the specifics of the Act and consult legal experts or guidance documents to understand the exact conditions under which fair dealing for educational purposes is allowed in India.

Comparative study:

International laws regarding fair dealing in copyright vary by country. However, there are some common principles that underlie many of these laws. Fair dealing or fair use provisions in copyright laws typically allow for the limited and reasonable use of copyrighted material without the need for permission from or payment to the copyright holder. The purpose is to balance the rights of copyright owners with the interests of the public, education, research, and free expression. The principles of fair dealings commonly involve:

1. Purpose and Character of the Use: Educational purposes often involve the use of copyrighted material for teaching, research, scholarship, or other non-commercial endeavors.

The transformative nature of the use is a significant factor. If the material is transformed through commentary, criticism, parody, or analysis, it may lean towards fair use.

⁷ <https://www.wipo.int/treaties/en/ip/wppt/>

⁸ <https://www.wipo.int/treaties/en/ip/wct/>

Non-profit educational institutions typically have greater leeway in using copyrighted material compared to commercial entities.

Nature of the Work: The nature of the copyrighted work plays a role. Factual or non-fictional works may be more permissible for educational use compared to highly creative or fictional works. Published works are generally more accessible for educational use compared to unpublished or highly confidential materials.

Amount Used: The portion of the copyrighted work used is a critical factor. While there's no specific threshold, using small portions or excerpts rather than substantial parts of the work is generally considered more favorable.

However, even the use of a small portion may not be permissible if it constitutes the "heart" of the work.

Effect on the Market: Educational use should not significantly impact the market for the original work. If the use substitutes the need for the original work, thus affecting its market potential, it's less likely to be considered fair use. If the copyrighted material is readily available for purchase or licensing for educational purposes, the use may be less defensible under fair use.

Attribution or Acknowledgment or credits: Providing proper attribution or credits is important in demonstrating good faith and respect for the original creator's rights. While attribution alone doesn't make an unauthorized use legal, it's a factor that can weigh in favor of fair use, especially when combined with other transformative elements. Failure to provide proper attribution may weaken the argument for fair use, but it doesn't necessarily constitute infringement on its own.

It's important to note that the specific provisions of fair dealing or fair use can vary significantly from one country to another. For example, the United States has "fair use" laws, while other countries like Canada and the United Kingdom have "fair dealing" laws. The application of these laws is subject to interpretation by courts, and each case is considered on its individual merits. It is advisable to consult the copyright laws and guidelines in a particular country to understand the legal framework for fair dealing in that jurisdiction. Educational use copying had become a source of significant disagreement, surpassing even the debates around library photocopying. Educators were in favor of a broad exception for educational copying, but this stance faced strong opposition from publishers and author groups. In the 1965 Supplementary Report, it was suggested that educational use copying should be addressed through the fair use doctrine, a recommendation later adopted by Congress in the 1976 Act.

However, educators were able to shape the fair use provision in several ways. First, they successfully defended the inclusion of teaching, scholarship, and research as three of the six favored uses. Second, they

convinced Congress to add "(including multiple copies for classroom use)" after "teaching" in the list of favored uses. Third, they supported language directing courts to consider whether the use had a commercial nature or was for nonprofit educational purposes as part of the purpose-of-the-use analysis. Fourth, they advocated for the omission of limiting language, specifically, "to the extent reasonably necessary or incidental to a legitimate purpose" from the fair use provision.

Due to the deep divide over educational use copying, some members of Congress suggested that educators and publishers engage in negotiations to establish a set of fair use guidelines specifically for educational copying.

Fair use serves as a mechanism to resolve conflicts that emerge in various modern technology-related cases in the United States today. However, this was not its original intent. Fair use originally developed as a means to restrict the reach of U.S. copyright law, primarily to strike a balance between conflicting interests in situations where subsequent creators made productive use of an original author's work to produce something new. Over the past four decades, fair use has assumed a growing significance in allowing copyright law to address and adjust to new technological complexities that were not anticipated by lawmakers.

However, the same is not the case in India. Considering the diverse population in India, reservation systems, Backwards class categorization and related unequally spread resources despite the era of technological advancements the fair dealing phenomenon is being used wrongfully than not under the defense of the educational purpose and affecting the rights of the Creators adversely. It requires the prominent classification of fair use and unfair dealing to protect the rights of both the sides viz. Society at large as well as the creator and his human rights.

Role of Judiciary:

The role of the judiciary in cases promoting copyright protection, particularly concerning exceptions for educational use, is pivotal in balancing the rights of creators, copyright holders, and the broader public interest. Here are the key aspects of the judiciary's role;

Interpreting Copyright Laws: The judiciary plays a crucial role in interpreting copyright laws, including the exceptions for educational use. Judges are responsible for interpreting the statutory language to determine the scope of these exceptions and how they apply to specific cases.

Fair Use Doctrine: In many jurisdictions, including the United States, the fair use doctrine is a critical component of copyright law. Judges have the responsibility to apply a multi-factor test to determine whether a specific use qualifies as fair use. This involves assessing factors like the purpose and character of the use, the nature of the copyrighted work, the amount used, and the effect on the market.

Setting Precedents: Judicial decisions in copyright cases set legal precedents that guide future cases. Landmark decisions can significantly impact how copyright law, including exceptions for educational use, is applied.

Determining the Scope of Educational Use: Courts often must clarify what constitutes educational use. They may need to decide whether specific activities, such as classroom copying, fall within the scope of the exception.

Balancing Interests: Judges must balance the rights of copyright holders with the public's interest in education and access to knowledge. This involves considering the impact of a decision on creators, educational institutions, and society at large.

Adapting to Technological Changes: With the advent of digital technologies and the internet, the judiciary plays a critical role in adapting copyright law to address new challenges and opportunities in education. This includes addressing issues related to online education, digital libraries, and open educational resources.

Enforcement of Copyright Laws: Courts have the authority to enforce copyright laws, which may involve issuing injunctions or awarding damages in cases of copyright infringement, including in educational contexts.

Clarifying Ambiguities: Copyright laws, including exceptions, can be complex and open to interpretation. The judiciary can help clarify ambiguities through their decisions, providing guidance for educational institutions, creators, and the broader public.

That can be briefly put as the judiciary's role in cases involving copyright protection and exceptions for educational use is multifaceted. It requires a delicate balance between protecting the rights of copyright holders and facilitating educational access to copyrighted materials. Courts have the responsibility to interpret the law, set precedents, and adapt to changing educational landscapes to ensure copyright law remains relevant and effective in the digital age.

In *The Chancellor, Masters & Anr. vs Rameshwari Photocopy Services & Ors* on 9 December, 2016 it was held by the Delhi HC that 'no triable issue on fact arises' it also stated that "the fairness in the use can be determined on the touchstone of 'extent justified by the purpose'. In other words, the utilization of the copyrighted work would be a fair use to the extent justified for purpose of education"⁹

Regarding 'publication' and 'reproduction,' the Division Bench adopted a more restricted interpretation of 'public' concerning the specific market for publications, as opposed to the perspective held by the Single Judge Bench. Nevertheless, it asserted that 'publication' involves a profit element, which it determined was absent. This conclusion was based on the observation that during the relevant period, the average cost for photocopies was 50 paisa per page, while Rameshwari Photocopy had agreed to charge only 40 paisa per page. Additionally, it emphasized that if 'reproduction' encompasses the plural form, it cannot be argued that producing multiple copies, which amounts to 'publication,' is not allowed. Although the question of Bulk Photocopies for students as per the instructions of a teacher mostly for numerous years and having been repeatedly done remains unanswered. The Non-follow up by the plaintiffs may not attribute to the assumption of them being satisfied. On the one hand there have been the question of future generations and

⁹The Chancellor, Masters & Anr. vs Rameshwari Photocopy Services & Ors on 9 December, 2016 Indian Kanoon, Section 5 in The Copyright Act, 1957, <https://indiankanoon.org/doc/114459608/>

there is a violation of the rights of the Plaintiffs as there could be a misinterpretation setting misnomer to the students with respect to less cautious or ignorance about the rights of creators while learning. The Students or the photocopy services were never made aware about the norms and regulations with respect to the Copyrights and regulations with respect to fair dealings. The mentioned case law also fails to highlight the same.

Findings: It is thus observed that the evolution of copyright law, especially concerning exceptions for educational purposes, presents a complex interplay between the rights of creators and the broader interests of society. Copyright, as a legal concept, aims to achieve a delicate balance between protecting intellectual property and ensuring public access to knowledge. This equilibrium has been disrupted, particularly in the digital age, leading to contentious debates and legal challenges.

The lack of clarity in international copyright laws, especially concerning unregulated exceptions, has created a policy vacuum. This ambiguity has profound implications in the digital realm, where social norms often collide with unclear national and international exceptions. Consequently, the need for enforcement grows, and misunderstandings surrounding fair use, especially in educational contexts, have arisen. The defense of "educational purpose" is misused, leading to conflicts between creators' economic and moral rights and society's right to access information and education.

Judicial interpretation and precedent-setting play a crucial role in navigating these complexities. Courts worldwide face the challenge of interpreting laws that were not originally designed for the digital age. They must balance the rights of creators, educational institutions, and the public. In this delicate balancing act, courts need to clarify ambiguities, adapt to technological advancements, and ensure that the spirit of fair use is upheld.

Addressing these challenges necessitates a nuanced understanding of copyright's historical evolution and its intersection with fundamental rights. International agreements like the Berne Convention provide a framework, but they lack specificity concerning exceptions, leaving room for diverse interpretations. It is imperative for legal frameworks to adapt, considering the growing influence of digital technologies on education and information dissemination.

Moving forward, it is essential for legislators, legal scholars, and policymakers to engage in comprehensive dialogues that consider the multifaceted nature of copyright. Collaborative efforts are needed to establish clear guidelines and principles that protect the interests of creators while promoting education, research, and access to knowledge. Such efforts will ensure that copyright continues to serve its fundamental purpose: fostering creativity, innovation, and the dissemination of knowledge while respecting the rights and needs of both creators and society at large.

Suggestions & Conclusion

In conclusion, the evolution of copyright law, especially in the context of educational exceptions, involves a delicate balance between creators' rights and broader societal interests. The digital age has disrupted this equilibrium, leading to complex debates and legal challenges. Ambiguities in international copyright laws have created a policy vacuum, particularly concerning unregulated exceptions, and this lack of clarity has significant implications in the digital world, where societal norms clash with unclear legal boundaries. As a result, enforcement challenges and misunderstandings around fair use, especially in education, have emerged. The misapplication of "educational purpose" defence has led to conflicts between creators' rights and society's right to access knowledge and education. Judicial interpretation and setting precedents are essential in navigating these complexities. Courts worldwide must interpret laws not originally designed for the digital era, striving to balance the rights of creators, educational institutions, and the public. They must clarify ambiguities, adapt to technological advancements, and uphold the principles of fair use. Addressing these challenges requires a nuanced understanding of copyright's historical evolution and its intersection with fundamental rights. While international agreements like the Berne Convention provide a framework, they lack specificity regarding exceptions, leaving room for varied interpretations. It is crucial for legal frameworks to adapt to the influence of digital technologies on education and information dissemination. Looking ahead, it's imperative for legislators, legal scholars, and policymakers to engage in comprehensive dialogues that consider the multifaceted nature of copyright. Collaborative efforts are needed to establish clear guidelines and principles that protect creators' interests while promoting education, research, and access to knowledge. Such endeavors will ensure that copyright continues to fulfill its fundamental purpose of fostering creativity, innovation, and the dissemination of knowledge while respecting the rights and needs of both creators and society at large.

Suggestions:

- Sensitization: Addressing desensitization to copyright issues.
- Define and Delimit Concepts: Providing clear definitions and boundaries for key copyright concepts.
- Avoid Blunt Defense: Encouraging a nuanced approach to copyright defense.
- Challenge Generalizations: Questioning the broad use of "educational purpose."
- Restrict Infringement: Imposing constraints on traditional and advanced infringement methods.
- Raise Awareness with respect to implications of infringement: Educating learners and educators about copyright infringement, how it can be protected and what could be the effects of non-protection in primitive years of using references.
- Affordable Education: Ensuring accessible education with required resources and carefully administered contracts.
- Congressional Intent: Interpreting and aligning with the legislative purpose.

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