

Abstract

The main purpose of this diploma thesis is to analyse and compare originality in EU and UK copyright law. Proper understanding of originality is crucial mainly because it exists as the most essential requirement for grand copyright protection worldwide. However, the interpretation of originality is problematic and fragmented. The thesis is divided into two main parts. The first part introduces Anglo-American copyright and continental *droit d'auteur* and puts it into the context of international copyright law with an emphasis on the concept of copyright harmonization in the European Union. In the last sub-chapter of the first part, the paper introduces copyright work as the subject-matter of copyright protection. In the second part, the thesis focuses on originality and its concept in EU and UK copyright law. In this part the author analysis relevant legislation, flagship ECJ case law and important judgments of the British courts concerning the interpretation of originality. Furthermore, the author also adds considerations *de lege ferenda*. Least but not last, the work addresses future challenges regarding originality mainly in the context of the development of modern technologies and explains the need to strike a compromise in originality test within the European Union regardless of whether the UK leaves the Union or not.