



The professional association for those who are involved in advancing education through the appropriate use of information and communications technology

NAACE Response to the application by the BBC for a Digital Curriculum Service

Background

NAACE is the UK professional association for those who are engaged in supporting schools in their use of ICT. Its members are LEA Advisers and Inspectors, Advisory Teachers, Independent Consultants, trainers and others whose role is to provide schools with advice on their effective use of ICT. NAACE has 900 members employed in a wide range of settings and many have responsibilities that include the development or deployment of online content for the benefit of learners.

NAACE welcomes the opportunity to comment on the application made by the BBC to provide a licence fee funded Digital Curriculum Service. The Association believes that ICT has a crucial role in learning and is pleased to recognise that the BBC shares its vision.

As the key professional association for ICT in education, NAACE has been closely involved with the development of Curriculum Online. At the invitation of DfES the association is represented on all the working groups that have been specifying all aspects of the proposed service.

This response is based on consultation with members and reflects a close awareness of the issues that surround the development of interactive learning resources. We fully support the DfES proposals for Curriculum Online and look forward to the provision of a wide range of content by both commercial suppliers and public bodies including the BBC. Whilst we are fully aware of the potential value of the BBC's contribution, we are also conscious of the concerns expressed by existing commercial providers.

The BBC Charter and Agreement

Our comments on the BBC's proposals are framed in line with the list of points enumerated in the letter from Kennedy Humphreys dated 23rd May 2002. In relation to the first main point, which refers to the requirement for compatibility with the BBC's Charter and Agreement, a number of issues are listed. We believe that the only issue that raises a concern is that of "distinctiveness". We refer to this matter below. Other than this we are content that the proposed new service is compatible with the BBC's primary public service role.

Market impact

The second main point focuses on market impact. Currently, the education sector benefits from a market place in which a wide range of well established companies operate. This dynamic market is recognised by the PricewaterhouseCoopers Market Assessment report commissioned by the BBC, and is exemplified by the huge range of exhibitors at the annual BETT show that

increases in size and coverage year by year. It is worth noting that the significance of the market is such that it is not unusual for the Secretary of State for Education and Skills to deliver the opening Keynote Address at this show. The market has developed over the past twenty years, often as a result of government initiatives, and produces curriculum focussed materials that are innovative, well received in schools and of international reputation. One of the more recent developments has been the emergence of Regional Broadband Consortia that seek not only to provide the infrastructure, but also to develop, commission or enable access to appropriate content. The BBC will need to form an effective relationship with these and other agencies.

We believe that the proposals, as currently framed, will have an impact on these commercial services that is more likely to be negative than positive. Notwithstanding the views expressed in section VIII of the Market Assessment report, and recognising the uncertainty voiced by PriceWaterhouseCoopers, it is difficult to envisage a situation where other content producers would not be forced to withdraw from the market were a significant volume of free resources to become available to schools. Reducing the market in this way would inevitably stifle the innovation and creativity that has been the hallmark of this industry for the last twenty years.

Electronic Learning Credits

NAACE welcomes the DfES funding in England for electronic Learning Credits (eLCs) which will have a partial balancing effect in enabling schools to purchase digital learning resources in the commercial market. We are not persuaded that the availability of eLCs will entirely mitigate the effect of a significant volume of free resources available from the BBC, but they will certainly help. One issue of concern to us is the probability that schools will simply replace spending from existing budgets with eLC spending which, currently at least, is less than the national spend. We will certainly urge DfES to increase its allocation of funding to eLCs in the coming years and we will be encouraging schools to continue to spend from within their own budgets.

Regional diversity

NAACE has members in Wales, Scotland and Northern Ireland where, at present, there are no directly equivalent proposals to the eLCs which will be available to schools in England. Central and school spending on ICT in education in these countries has been significant in the recent past and there are other initiatives in place which may mitigate the effect on the commercial market of the BBC's digital curriculum. In some areas, such as the production of high quality curriculum materials available for use in both first and second language Welsh language, the intervention of the BBC may be highly beneficial. In Northern Ireland, for instance, the BBC holds much local archive content which is likely to be of great value for schools. Colleagues in Scotland believe that there is much scope for the BBC to develop learning materials specifically tailored to the Scottish curriculum. The Secretary of State will need to take into account the regional diversity of financial support for ICT in schools when considering the likely impact on the commercial market across the United Kingdom.

Scope of the service

NAACE believes that the size and scope of the proposed BBC coverage is above the threshold at which competing services are likely to be damaged. The proposal to limit the service to cover just 50% of learning objectives is at first sight modest. However, some areas of the curriculum are not amenable to this teaching and learning methodology so the figure, in fact, represents a

far higher proportion of the curriculum that can be usefully delivered by online interactive resources. In addition, we do not perceive all learning objectives to be of equal weight and the possibility of selecting those that are broadest in scope or easiest to address would have a disproportionate impact on the BBC's initiative. These factors are likely to give the BBC undue dominance. This could be addressed by remodelling the coverage proposed by the BBC, and requiring the BBC to invest in research and development of the use of ICT to support learning in those areas not traditionally impacted by the technology.

Distinctiveness of the service

Having studied the BBC proposals we are not persuaded that the Digital Curriculum Service as currently specified offers materials that are sufficiently distinctive from those already available, or being developed, to warrant approval. The service would certainly be distinctive by nature of its size, but we do not see that as an adequate case for distinctiveness in the context of this application. What is more important is that the products themselves should be distinctive. Were the Secretary of State to consider approval then she would require solid evidence that the planned service offers specific and significant innovative features not found in digital materials that are currently on offer to schools.

Virtual Learning Environment

In addition to curriculum content, the proposals include references to a BBC virtual learning environment (VLE), with limited functionality, that provides schools with a simple system for managing digital resources. It would leave schools free to adopt a more comprehensive VLE enabling access to a wider range of resources from a number of suppliers. Such VLEs are likely also to address schools' needs to assess the progress of learners, record this in association with other existing recording and reporting mechanisms, and for intelligent routing of students through modules of work. Whereas the intentions for the BBC VLE do not present an issue we do however note that the BBC documentation makes reference to "the initial VLE" and to extensions to the proposals. We believe that the Secretary of State should require that any development to the VLE, as currently envisaged, would be subject to further approval. We are anxious that a fully functional BBC VLE should not become the de-facto standard simply because both it and a large amount of content are free. In this respect, the arguments about innovation with respect to content also apply to VLEs.

Value for money

We also wish to comment on a further issue that relates to the value of service to the public - that is, value for money. The proposals do not describe how materials would be revised to maintain their currency. Experience demonstrates that innovative offerings tend to grow and develop in response to the needs of learners. Commercial producers have an incentive to keep materials up to date and to develop them to reflect market conditions. We recommend that the Secretary of State requires the BBC to indicate how materials would be reviewed and refreshed during the lifetime of the project.

NAACE believes that the BBC has the potential to become a major player in the provision of electronic learning resources for schools. However, this must be achieved in a way that does not prejudice the existing dynamic market. NAACE is confident that this can be realised in a way that builds on established success and brings real benefit to schools.

Further information

Further information about NAACE and clarification of any points raised in this response may be obtained from:

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