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Kennedy Humphreys
Policy Adviser
Department for Culture, Media and Sport
2-4 Cockpur Street
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Dear Mr Humphreys

Re: BBC Digital Curriculum Proposal

As a leading commercial publisher in the UK education market, Nelson Thornes has a keen interest in the development of a lively and diverse market for electronic learning resources for UK schools. We therefore wish to take this opportunity to respond to the BBC's plans to develop a Digital Curriculum, to be funded by the licence fee and delivered free of charge to schools, as put forward in the BBC proposal of 3 May 2002 and related documents.

Nelson Thornes is a subsidiary of the Amsterdam-based publishing and information group Wolters Kluwer. The group has subsidiaries in many European countries working, like Nelson Thornes, to offer a rich array of resources which support and enhance the learning process. Whilst we currently generate most of our revenues from printed product, we are investing heavily in the technology and know-how needed to offer attractive and effective electronic resources. We believe that learning in the future will naturally be based upon personal tuition supported by both printed and electronic resources.

In this context, we are excited by the government's proposals to develop a Curriculum Online, and by its plans to give schools the means – both financial and in terms of training and guidance – to make electronic resources a natural part of the diet of teachers and pupils. We already produce many such resources, and have plans to invest further in their development. We know that we will succeed in selling our electronic products to schools only if they are truly effective in supporting the learning process.

We have grave reservations over the BBC's plans to enter this market with £150m of licence fee money. We believe that, if the BBC's plans are approved as they stand, they will act as a severe deterrent to us and companies like ours. We and our competitors will be less likely to invest significant sums in electronic learning resources, and the result of approving the BBC's proposal in its current form will be a reduction in the variety of resources available to help children learn.

To amplify our concerns, I would draw your attention to the detailed response of the **Digital Learning Alliance**, of which we are a member. I also wish to endorse the response of the **Publishers' Association**, of which we are also a member.

The key points on which we feel the BBC proposal falls short are as follows:

1. Scale and focus

The BBC's investment of £150m for content is unduly weighted towards coverage of National Curriculum subjects for the 5-16 age-range – the very area that would be most likely to be well provided for by commercially developed content. The proposition as it stands will duplicate material which is already available in the market, and will constrain further development. The BBC should use its unique market position and funding mechanism to develop content for minority subjects and specialist areas less likely to be catered for by commercial players. It should focus on providing resources for home learning, post-16 and lifelong learning, where an engaging BBC offering could enhance the nature of teaching and learning. This emphasis would reflect consumer preferences expressed within the BBC's own research. We understand that it would also reflect the views of the e-learning Task Force; furthermore, it would address an area where the commercial sector has to date produced only limited product offerings.

2. Curriculum Coverage

The BBC intends to develop content to cover up to 50% of the learning outcomes in a given subject. Our view is that this level of coverage will exceed the needs of teachers in the foreseeable future, and will therefore discourage the uptake of any other resources for which payment needs to be made. Again, the result will be a uniform diet of BBC resources in schools up and down the country. We urge that the BBC reconsider its activity within core subjects, and that outside these subjects, they very significantly reduce the scope of their coverage. This will in itself free up funding for the development of complementary material for home learning, post-16 and lifelong learning.

3. Promotion

We urge that the BBC should not be allowed to use its unparalleled marketing reach to promote its own services. Variety must be allowed to flourish, and no commercial player can match the reach of the BBC.

4. Commercial exploitation

Through placing constraints on the access of commercial providers to publicly funded assets, and through the stated policy of working with BBC Worldwide as a partner of choice, the BBC's proposals establish a favoured role for Worldwide in commercially exploiting those assets. We believe that resources developed using the licence fee should be available to commercial providers on equal terms to Worldwide. Furthermore, we believe that Worldwide should further narrow its commercial intentions to the provision of manuals and similar

material which directly support use of the BBC's Digital Curriculum materials, so that they do not stray into areas already well served by the commercial sector.

5. The BBC's Virtual Learning Environment (VLE)

We have concerns that the proposed BBC VLE will become a de facto standard in schools, again to the detriment of choice and innovation. We urge that the BBC be constrained to work within the framework of open standards to be established by the DfES for the schools market. We urge the BBC to move away from their proposed free-to-air VLE as soon as practical commercial alternatives are available.


6. Accountability

We urge that strong mechanisms be put in place to monitor and control the BBC's activities in this sector. We are concerned that the proposed Content Advisory Board, with its proposed remit to review and advise, will not be sufficient to guide the day-to-day activities of BBC teams working on the Digital Curriculum; furthermore, there appears to be no intended mechanism to review and safeguard the operation of a free and active commercial marketplace alongside the BBC's funded activities.

Finally, I would raise the issue of demand-side funding for the content needed to make the government's Curriculum Online plans a reality. We have been impressed by the DfES's engagement with the commercial sector over COL, and are heartened that funding is being put into the market. At present, however, this funding is limited to one-year funding for England only – not a sufficient basis for us and our competitors to invest confidently the millions required to make COL content a long-term part of the educational fabric of the UK. We urge that longer-term funding be announced as soon as possible, and that funding for the Nations be brought into play alongside the English funding.

In summary, we urge the Department to reject the BBC's Digital Curriculum proposal as it stands. We urge the BBC to consider fundamental changes to its plans in order to enrich, rather than compete with, the diversity of educational resources which are now available and which will be developed by the commercial sector in the coming years. We willingly undertake to work with both government and the BBC in determining what these fundamental changes should be.

Yours sincerely



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