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19 July 2002

FAO Secretary of State for Culture, Media and Sport,

BBC Digital Curriculum – response to DCMS consultation 17 July 2002

As Managing Director of SAM Learning Ltd., a company that offer an online learning service for SATs, GCSE and A Level, I have a particular interest in the effect that BBC's Digital Curriculum will have on the fledgling market for digital learning resources in the UK.

Many industry colleagues feel that digital curriculum will effectively destroy the market and with it the Government's stated aim of making the UK a world leader in the development and use of such materials. This would be a tragic waste of a wonderful opportunity. Because with the right safeguards the BBC's digital curriculum could introduce a large new audience of teachers, learners and parents to digital learning resources and actually stimulate demand for both add-ons and completely new products and services. The result could be a vibrant and world leading market for digital learning resources.

Digital curriculum has the potential to promote a thriving market for digital learning resources, but only if key safeguards are built in at the outset to ensure fair competition and freedom of choice for school and the consumer. I have set out below some practical proposals, which I believe are necessary to safeguard competition, innovation and choice.

Numbering is taken from BBC's Frame of Reference document:

1.1 Scale and duration of spend

Poor value for money

BBC's Digital Curriculum does not represent good use of public funds and should be dramatically scaled back. The private sector can develop online educational services far more cheaply than the BBC.

For example the core content for SAM Learning's online service was originally developed for Freeserve and offered free on the Internet. Between April 1999 and April 2001 we received email from hundreds of users comparing us favourably to BBC Bitesize. But our total development cost was around £250,000 (in total) for 28 subjects (below) – a fraction of the BBC's development cost for Bitesize.

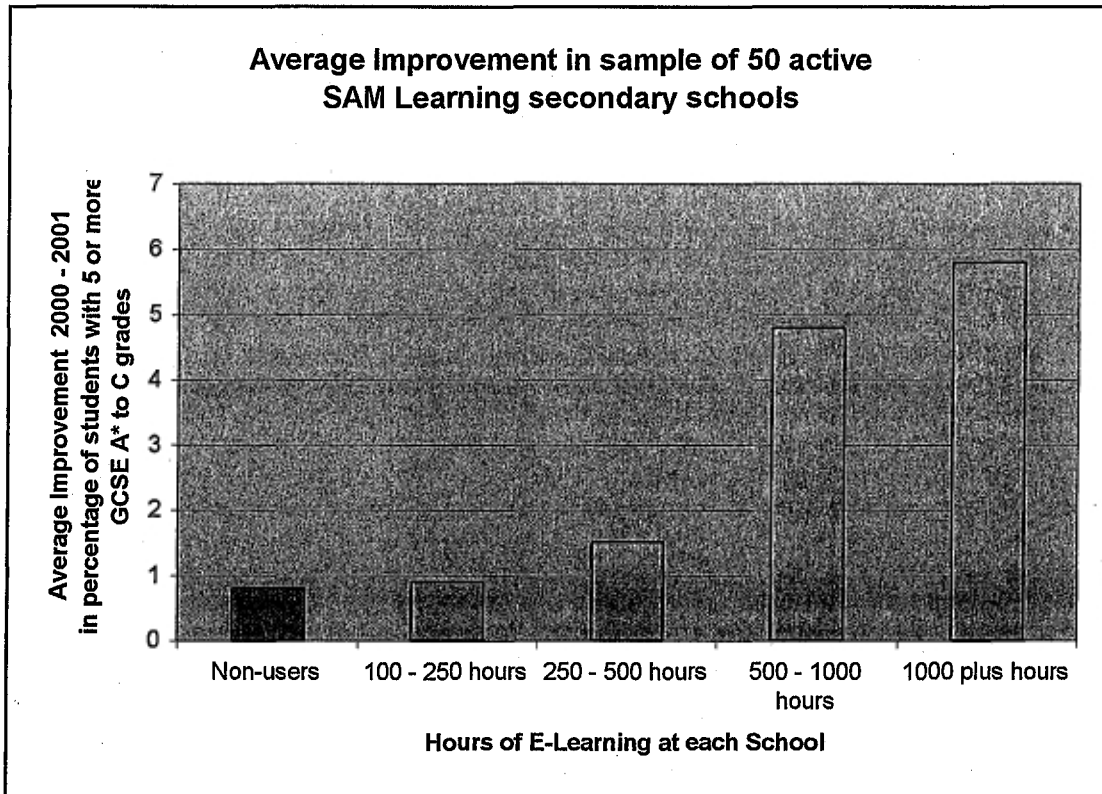
Age group	Subject
A Level	Maths (10 hrs), IT (10 hrs), Biology (10 hrs) Chemistry (10 hrs), Physics (10hrs) Geography (10 hrs), Bus. Studies (10 hrs)
GCSE	Maths (50 hrs), English (20 hrs), IT (10 hrs) Science (40 hrs), Biology (20 hrs) Chemistry (20 hrs), Physics (20 hrs) French (15 hrs), German (15 hrs), Spanish (15 hrs) Geog. (10 hrs), History (8 hrs), Bus. Stud. (6 hrs)
KS3 SATs	Maths (40 hrs), English (20 hrs), Science (30 hrs)
KS2 SATs	Maths (25 hrs), English (25 hrs), Science (25 hrs)
KS1 SATs	Maths (5 hrs), English (5 hrs)

In my professional opinion – based 8 years experience of developing market leading national curriculum software for CD ROM and Internet – the digital curriculum proposal could be developed by the private sector for less than a tenth of the price in the BBC's Frame of Reference.

The BBC's approach to learning is unproven

Can the BBC show evidence that their approach raises achievement? It's rumored in the industry that the BBC's has evidence that students using their service actual DID WORSE than the control group.

By contrast, in a study of 50 secondary schools using SAM Learning prior to GCSE exams in Summer 2001, schools that used SAM Learning consistently improved 6% on average their percentage of pupils with 5 or more A*-C Grades compared with the previous year.



More recently we've worked with four LEA partners (Nottingham City, Knowsley, Oldham and Worcestershire) prior to Summer 2002 GCSEs. We'll be analyzing the results in the next couple of months and hope to learn more about how and why e-learning can help raise the achievement of students.

If the BBC is put in a monopoly provider position innovative companies like SAM Learning will be pushed out of the market. Already, we're losing orders from schools and LEAs 'waiting to see what the BBC will do'.

E-learning is very new. It was only seven years ago that the first CD ROMs for GCSE revision – including ours – appeared. So it's far from obvious which approaches to learning will work best for different students. It would be profoundly wrong at this early stage to kill-off choice and innovation to gamble everything on one (unproven) solution by the BBC. The BBC's ambitions should be scaled back leaving more room for the private sector.

1.3 ELCs

Funding for digital learning resources developed independently of the BBC should be guaranteed into the future. Not just for one year as with the existing ELC scheme.

3.2 Content Categories

The BBC proposes to spend their development budget 25% on core subjects, 35% on non-core subjects and 40% on minority subjects. But commercial players are already handling core and non-core subjects, so why should the BBC use public funds to tackle these subjects at all?

3.3 50% Backbone

There is limited access to computers during curriculum time. 50% of learning outcomes will cover all the practical needs of teachers for digital learning resources. They'll use conventional resources for the rest. I suggest a backbone comprising 20% of learning outcomes would leave much more room for other providers.

The BBC proposes to develop 'innovative distinctive materials'. I would like them to commit to NOT duplicate approaches already being pioneered in the private sector. In the case of SAM Learning this means our trademarked learning method of exam practice using pen and paper that is self-assessed by pupils using on-screen match mark schemes.

4.1 External commissioning

What room will there be for innovative approaches to learning such as SAM Learning that differ from the BBC's approach?

5.1 Publishing commissioning plans

The BBC promise to publish indicative development plans three years in advance. But it's not just a matter of the BBC managing their commissioning process efficiently. The BBC's development plan – including sample materials – should be freely available NOW to end the uncertainty that is currently strangling inward investment and forcing companies to put development plans on hold.

6.2, 6.3, 7.3 Access to Materials

I would like the relationship between sections 6.2, 6.3 and 7.3 to be clarified.

Why should commercial providers, such as SAM Learning be limited in the amount of digital curriculum materials we can use within our services? The BBC proposes to build digital curriculum with public money. Approved third parties should be allowed to 'add value for teachers and learners and extend choice by offering innovative contexts and complementary materials in an integrated way' AND add VLE/MLE functionality to ALL digital curriculum materials for the benefit of teachers and learners?

7.2 Extending the 'initial BBC VLE'

It will be sorely tempting for the BBC to extend the initial VLE, especially when they're planning anyway to develop registration, personalization and user tracking for independent learners. They leave the door open to this in 7.2. But what is the justification of using public funds for this when there are already at least ten VLEs on the market I'm aware of focused on the education market? BBC should not be allowed to extend the initial VLE at all.

8. Merchandise

BBC should fund the development, promotion, distribution and sale of add-on products and services without using public funds. Such products and services must be able to demonstrate that they can compete on equal terms with third parties with no cross-subsidy.

9. Advertising and Promotion

The BBC should not have free access to television, radio and press advertising (or preferential rates). Where there is promotion of add-on products within core materials, the BBC should not be allowed to position their own products and services more prominently than

those of third parties. For example, at the end of a TV program, there should not be a message 'a BBC book is available', but rather 'a variety of support materials are available'. The BBC and Granada should not have special access to technical information about the core materials or the Development Plan for core materials.

11.2 Accountability Framework

BBC have lost the confidence of the private sector

The BBC has not approached the digital curriculum project in a 'transparent way' (11.4) and there's evidence they haven't acted in good faith. For example:

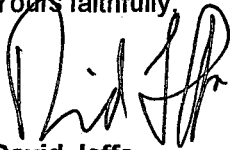
- (i) BBC have begun product development prior to obtaining DCMS permission
- (ii) BBC haven't published their development plan and sample materials thereby stifling investment and product development in the private sector
- (iii) BBC haven't published the underlying data behind their research findings
- (iv) BBC have refused to promote run PR stories on TV/Radio on the grounds that it may promote a third party they see as a competitor

The BBC has lost the confidence of the private sector. Therefore – if digital curriculum goes ahead – the accountability framework must be independent of the BBC. There should be an independent regulator applying independent open standards.

Independent Open Standards

Large public initiatives set standards. Standards created with public funds should be owned and controlled independently of the BBC. Otherwise there will be a tendency for the BBC to use control of standards to stifle competition, choice and innovation in favour of their own services. It is important for approved third party suppliers to be able to develop products and services that interact with digital curriculum materials by complying with published standards without having to go to the BBC for permission.

Yours faithfully



David Jaffa
Founder and Managing Director
SAM Learning Ltd.