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### **Submission to DCMS regarding the BBC's Digital Curriculum proposal**

The BBC has, and should continue to have, an important role to play in education. However, the Digital Curriculum proposal in its present form is deeply flawed and should not be approved without significant changes.

When teachers are asked: “would you like free high quality curriculum content?” the answer is, obviously, “yes”. There is no doubt that schools need high quality curriculum content. There is also no doubt that the BBC is capable of producing such content, given enough time and money, and that it is a trusted brand. However, this approach completely fails to address the most important question, which is: “what is the best way to ensure that high quality curriculum content is available to schools at a price they can afford?”

A long term solution depends on the development of a vibrant market capable of attracting the investment and talent needed to create world-class digital learning resources. The core curriculum subjects provide the best commercial opportunities and are currently the only areas where significant private sector investment in digital learning resources can be justified. A competitive market will ensure:

- Schools have a choice
- Prices are kept low
- Innovation and creativity can flourish

The private sector educational publishing industry provides world-class print materials for schools. There are several high quality competing offerings available for each subject area and age range. The only reason a wider range of material is not yet available in electronic formants is that schools have, until recently, not demanded it. But there is no evidence to suggest that the market for digital learning materials is any different. Given teacher demand and Government funding there is every reason to believe that teachers, parents and pupils will be as well served by the commercial sector with digital learning materials as they have been for very many years with print materials.

There is no evidence or convincing argument that Digital Curriculum is addressing areas of market failure. The market is immature and the obstacles to its development are to do with infrastructure, teacher training and teaching practice - not a lack of willingness or ability in the private sector to provide high quality digital learning resources.

There is no evidence or convincing argument that free curriculum content from the BBC will stimulate the market or lower the cost of entry. The terms on which the BBC proposes to commission content from third parties are unattractive to creative publishing companies as they would be left with no, or at best minimal, interest in the resulting material. While there are companies out there that will do work for hire, these terms will do nothing to encourage the development of a private sector e-learning industry that is prepared to innovate, invest and take risks.

There is no evidence or convincing argument that that use of BBC material by private sector companies will reduce the costs. Even if the terms are reasonable, the process for gaining the right to use BBC material is likely to be cumbersome and slow: it is very easy effectively to prevent the use of BBC material through delays in granting permission and placing bureaucratic obstacles in the way of would-be licensees

It seems clear that the BBC's proposal is aimed at securing the continuation of and further increases in the licence fee and that it needs to go through the motions of consulting with the private sector in order to gain authorisation from DCMS to develop a new service using licence fee payers' money. It seems equally clear that once the BBC realised the strength of the opposition from commercial companies to the Digital Curriculum proposal they commissioned PriceWaterhouseCoopers ( at a very late stage in the process) to provide evidence that Digital Curriculum would not harm the private sector. The resulting Market Assessment is transparently one-sided: PWC were not allowed to talk any private sector companies and were therefore not in a position to assess with any authority whether or not the BBC's contribution would be distinctive or what the impact on private sector companies would be if the Digital Curriculum plans were to be approved.

The concessions the BBC has apparently made to commercial companies in setting out how content funding would be allocated across the curriculum, offering to commission 50% of the content externally and to make BBC material available for use in commercial products fail to address the central issue: an investment of £150 million to create free curriculum content for schools will severely, and possibly fatally, damage the market.

Furthermore, through their complete editorial control of Digital Curriculum Content available through the proposed Virtual Learning Environment the BBC will have the ability strongly to influence the content teachers use and they will have a very powerful platform from which to develop and promote commercial products through BBC Worldwide. Even if the usual restrictions apply to TV and radio advertising, it is hard to imagine that BBC Worldwide will not have a huge advantage over other commercial companies in using Digital Curriculum materials to develop new products and in securing

online and catalogue advertising of products linked to Digital Curriculum through BBC websites, mailings, training programmes and exhibitions.

The BBC is in a unique position to provide learning resources that the commercial sector can not. It has a vast back catalogue of TV programming, much of which lends itself to on-demand delivery over the internet and the re-use of photography, illustration, audio, text and video assets to create education resource packs linked to TV programmes. For a fraction of the cost of the proposed Digital Curriculum, the BBC could create a unique digital learning resource that plays to its strengths, maximises the return to the licence fee payer and does not compete directly with private sector companies in the core curriculum areas.

There is now an opportunity for the BBC to work effectively with commercial companies. But the free material must be limited to those subject areas and formats in which it can complement and enrich rather than compete with private sector offerings. The current proposal, if approved, would squander this opportunity, cut off private sector investment and leave teachers, parents and pupils with a near monopoly provider of learning materials for the digital age. This must not be allowed to happen.

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