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Dear Mr Suban,

**CONSULTATION ON DRAFT NATIONAL POLICY FOR THE PROVISION
AND MANAGEMENT OF LEARNING AND TEACHING SUPPORT MATERIAL**

The IPA is the international federation of national publishers associations, representing all aspects of book and journal publishing from around the world. Our 55 members represent book and journal publishers (paper and digital) from over 50 countries. Established in 1896, IPA's mission is to promote and protect publishing and to raise awareness for publishing as a force for economic, cultural and political development.

IPA is an industry association with a human rights mandate. The IPA Educational Publishers Forum also has been monitoring educational and procurement policy issues around the world since 2010. The IPA "What Works?" conferences are events dedicated to identifying public policies that actually improve educational outcomes. The next conference, to which you are cordially invited, will take place on 16 April 2015 in London.

The publishing industry has been providing teachers and students with learning materials for centuries. In recent decades publishers have incorporated ebooks, online resources, open educational resources into their offerings. We are familiar with the success and failures of a broad range of public policies with respect to the procurement of learning and teaching support material. The attached comments on your draft policy are informed by this experience.

We would be delighted to answer any questions or provide further information should you find this helpful.

Yours sincerely,


Jens Bammel
Secretary General

Draft National Policy for the Provision and Management of Learning and Teaching Support Material

1. Introduction:

The International Publishers Association notes that the quality of textbooks and other teaching and learning material is of the highest importance in developed and emerging countries, where the lack of qualified teaching staff means that the educational progress often relies heavily on the quality of the books in the hands of the children.

Policy changes in this area should therefore not be taken lightly. Any substantial change must be carefully prepared, the policy objectives spelled out, piloted, and objectively assessed. This is particularly true where procurement policy changes may impact on the eco-system that provides a country with its educational content.

One book per child per subject per learner:

At the heart of any policy must be the commitment to a universal provision of a minimum set of high quality textbooks for core subjects, chosen by the teachers or schools themselves to suit individual requirements. Time and again, around the world, the following principles have proven to be most effective means to reach this goal in different educational policy settings:

1. The best educational material comes from local entrepreneurial publishers operating in a competitive marketplace. Managing and supporting local educational publishers is an important educational procurement policy objective.
2. Educational market places are created through devolved funding and procurement processes that allow many publishers to compete in an effort to provide textbooks to as many schools as possible. The sales and promotion process provides teachers not only with choice, but with free training and counsel on how best to make use of these books.
3. Digital technology can solve specific educational problems, but remains a tool in the hand of teachers. It is ineffective without content of the highest quality.
4. Government publishing, or government provided single resources, never provide effective, up-to-date, diverse and innovative textbooks.
5. Single textbook systems or limitations on textbook choice always stunts quality. Where there is no choice, the only choice becomes the smallest common denominator. This policy is conducive to corruption and is only used as a last resort by countries unfortunate not to have developed a local publishing industry to cater for local needs.
6. Open Educational Resources have for decades served as useful complementary material to textbooks. They have not been able to replace textbooks, because they are inherently unsustainable and their pedagogical quality unreliable. In education the “barely good enough” content that sponsors or volunteers provide, is not good enough.
7. Where an education market is destroyed by or damaged by government policies, government becomes responsible for the provision of content. This has always lead to low quality outcomes at the expense of pupils.

In the light of the above “home truths” IPA would like to make the following specific comments on the issues raised in the consultation paper:

2. Copyright and textbooks:

IPA acknowledges that physical textbooks purchased by the state should be its property, even though rental mechanisms have proven to be more cost efficient in some countries. The copyright must, however stay with the original publisher. Publishing markets which provide publishers with single lump sums against all their rights tend to be difficult to sustain. Dependence on foreign publishers, who can produce for governments around the world, then becomes a real risk.

Government procurement policies must safeguard that those who present textbooks must own the relevant rights in the content. There should be no unauthorised content in textbooks.

3. Quality Assurance

All learning content must be scrutinised by the same vetting process. The process must be open, transparent, reasoned, open to appeal and re-submission. The objective must be to enable many suppliers, in particular local publishers and other suppliers, to provide appropriate content. No content that is appropriate should be rejected on the grounds that the number of books are arbitrarily limited.

Open educational resources (OER) should be assessed following the same criteria as “commercial” textbooks. Students deserve quality content irrespective of how it is financed. Particular care must be given in OER resources to copyright ownership, to the pedagogical quality, the compliance with the national curriculum and the absence of political, ideological or religious bias.

4. Single core textbook in a national catalogue

In education one size never fits all. From experience IPA knows that the designation of a single textbook per core subject and year will not lead to the best possible educational outcome. Firstly such a process raises the stakes for individual publishers. A winner-takes-all process is conducive to corruption. It does not allow innovative approaches to be tested, does not allow books to be catered for specific pedagogical styles, regions, genders, cultural or social backgrounds. It favours large established providers and makes it very hard for young, inexperienced and innovative providers to grow and develop. In practice the lack of choice for teachers and students reduces the effectiveness of the teaching process. Books go to waste where they are determined, for a variety of reasons, to be unsuitable by the teachers. Ultimately it hurts the educational outcome.

Single core textbook selections destroy the textbook market. It leaves few large players, if any. Innovation and diversity are reduced.

5. Two tier procurement model

The policy to centralise procurement of core learning material is misguided. The assumption that this is the most effective way to reduce costs is not borne out by experience. Cost efficiencies are not only achieved by ongoing competition on price, but through a series of measures that help strengthen the efficiency of national distribution: using commercial distributors, reducing VAT to zero, book rental or leasing schemes, encouraging reuse in schools etc.

6. Increasing book retention

As mentioned before, rental and leasing schemes are an effective way to either increase retention, or to incentivise educational publishers to increase the reuse of their books. Making this part of a commercial arrangement with educational publishers shifts the problem from a complex policy issue, to a simple supplier problem that the supplier can find their own solutions for.

7. Conclusion

Similar, to telephone companies, Internet service providers or even food producers, educational publishers have made it their business to supply an essential service to the public. Educational publishing requires great investment, skill and experience. These publishers therefore know and understand the needs of teachers in classrooms. They want their books not only to be purchased, but to contribute to a successful learning outcome. Enlightened educational procurement policies will seek to harness the power of a competitive educational content market place to the advantage of students and educational outcomes. This means that government policies must ensure that there is an open and competitive market place where small and local educational publishers can cater even for the educational needs of minorities or pupils in changing circumstances.

International Publishers Association

Please consult with us, and our South African member, the Publishers Association of South Africa, as you develop your national educational procurement policy.