AUSTRALIAN**PUBLISHERS**ASSOCIATION

Response to the Australian Universities Accord Interim Report

The Australian Publishers Association (APA) – which represents more than 200 Australian publishers, producing over 90% of Australia's $2 billion annual book industry turnover, including higher educational publishers, scholarly and journal publishers – welcomes the interim report on the Australian Universities Accord. This submission should be understood as an addendum to our earlier submission.

Ensuring access to high quality learning materials

The report offers an important vision for the future of higher education, nonetheless, Australian educational publishers believe there are five critical areas that would benefit from further examination:

- **Role of new learning materials in transforming teaching and learning**
- **Partnering with educational publishers on both commercial learning materials and OERS**
- **Revision of the funding model to ensure student access to high quality learning materials**
- **Incentivising the creation of Australian educational content**
- **The statutory licence and extending access to content**

1. **Role of new learning materials in transforming teaching and learning**

The interim report has a limited amount to say about the future of teaching and learning in higher education and very little to say about the potential of emerging forms of high quality digital learning resources/services to support educational equity, ameliorate the impact of staffing limits, and support better learning outcomes including managing student attrition rates. The current transformation of learning materials will support the reinvention of teaching and learning in education in a number of ways:

A. **Enhanced learning outcomes:** High-quality digital resources, such as immersive simulations and interactive modules, can cater to various learning styles, thereby boosting learning outcomes. Data analytics can provide real-time insights into student engagement and performance, allowing for timely interventions that can improve outcomes for both students and institutions themselves. Virtual labs, AI-driven assessment tools, and automated feedback systems can manage large cohorts without diluting the quality of education.

B. **Managing retention:** Digital platforms can identify at-risk students through analytics, allowing for early interventions. Furthermore, the convenience and flexibility of digital learning can improve the student experience, thus aiding retention. Gamification and interactive content can make learning more engaging, reducing the likelihood of course dropouts.

C. **Scalability and adaptability:** As educational needs evolve, publishers and their products can swiftly adapt. Scalability ensures that institutions can cope with changing educational landscapes, be it remote learning during pandemics or integrating new scientific breakthroughs into the curriculum and best practice pedagogy.

D. **Educational equity:** Digital learning resources democratise access to educational content. Whether students belong to marginalised demographics, face disabilities, or are based in rural areas, digital platforms can bridge social divides. Resources like adaptive learning platforms offer cost-effective, customisable materials that cater to diverse learning needs. Currently, there are clear equity and disability issues in university staff adding 'inaccessible' or 'non-inclusive' learning materials to LMSs.

E. **Ameliorating staffing limits:** Digital platforms can supplement human resources by automating certain administrative tasks and providing analytics for student performance. This can free up faculty to focus on student engagement and mentorship.

Learning materials of these kinds are almost exclusively created by educational publishers - who are at the forefront of what is possible in learning materials and who are facilitating the re-invention of teaching and learning ways that are scalable and affordable for the higher education sector without the need for large government grants.

2. Partnering with educational publishers on both commercial learning materials and OERs

The interim report's statements on the potential of Open Educational Resources (OERs) like CORE Econ suggest a limited understanding about the range, business models, and benefits of both commercial learning resources and publisher-created OERs. It's imperative that university administrators collaborate with educational publishers to identify the specific educational resources needed, their teaching and learning features, models for their provision to students, and support for staff to maximise the benefits of their use. Benefits of this collaboration include:

A. **Quality assurance:** Publishers offer expertise in curating high-quality, peer-reviewed content, ensuring that both commercial and OER materials meet global academic standards.
B. **Scalability:** Publishers have the infrastructure for large-scale production and distribution, facilitating quick resource rollouts across universities.
C. **Technological expertise:** Publishers can supplement university Learning Management Systems with advanced software for delivering digital content, complete with analytics and interactive features.
D. **Customisation:** Publishers offer modular, adaptable materials to meet diverse learning needs.
E. **Cost-efficiency:** Joint development of resources can pool institutional and production capabilities, offering a sustainable model for ongoing updates.
F. **Policy synergy:** Collaboration can yield cohesive policies around material use, informed by data and institutional requirements.
G. **Legal clarity:** Publishers' expertise in copyright issues can guide universities through the complexities of educational material usage that is there to protect the creators.

Contrastingly, some OERs in the Australian higher education space fall short. CORE Econ, for example, relies on a difficult to sustain business model – including largely non-transparent external funding. And while publishers appreciate CAUL's interest in developing OERs, the lack of a viable business model will limit the range available and their effectiveness as learning tools. The library sector's call for university and government funds to create repositories for OERs is naive and unnecessarily duplicates the existing role of educational publishers – who have the capacity to produce the resources students actually need and will use. Educational publishers with their emphasis on quality, scalability, and customisation, should be considered vital partners in elevating the quality of both commercial and open educational resources.

3. Revision of the current funding model to ensure student access to high quality learning materials

We welcome the 360 degree review of the tertiary funding model. As part of that review we argue that the existing funding model denies students easy and cost-effective access to high-quality learning materials and technologies, essential for improving learning outcomes and boosting retention rates. There is a need for legal and policy reform to incorporate the cost of diverse learning materials—including software, platform-based resources, scholarly articles, and journals—into the comprehensive educational funding model.

The current Higher Education Support Act (HESA) complicates mandating learning materials that come at a cost to students but lacks pathways for alternative modes of provision of high-quality learning materials. Although HESA aims to facilitate access, it inadvertently hampers equitable access to learning resources.

To address this issue, the government could allocate a modest portion of university grant funds to secure comprehensive suites of third-party learning materials and incentivise public-private, university-publisher collaborations. Incorporating the costs of learning materials into educational funding offers benefits:

A. **Equitable access:** Ensures universal access to essential resources.
B. **Quality assurance:** Enables institutions to procure peer-reviewed materials.
C. **Administrative efficiency:** Streamlines budgeting and procurement.
D. **Outcome focused:** Allows faculties to utilise resources for improved learning outcomes.
E. **Innovation support:** Facilitates the adoption of state-of-the-art educational materials.

Platforms like Kortext, InclusiveAccess.org, VitalSource, and RedShelf can serve as key interlocutors with the government and individual universities to explore sector-wide solutions for the provision of learning materials. Centralisation, data-driven decision-making, interactivity, scalability, and customisability should be emphasised in any eventual solution. Quality interactive learning materials are pivotal in offering cost-effective and pedagogically sound higher education to the growing number of Australians in the university and VET systems.

While the government and universities have been active in talking to Learning Management System (LMS) providers, the challenges of sector-wide access to content remains largely unexplored. These kinds of solutions have been implemented in other countries, including the US, Europe, and the UK to great effect. There is uneven awareness among Australian educational administrators of the range of business solutions that could provide student-focused learning materials in cost-effective ways, thereby alleviating the financial burden on students and aspects of the teaching and learning burden on academic staff.

4. Incentivising the creation of Australian educational content – including First Nations content

There is a national interest in incentivising the creation of high quality Australian learning materials. Educational publishers are key to the availability of culturally relevant learning materials, including First Nations content. Publishers' expertise in curating and producing high-quality, peer-reviewed content guarantees that educational materials are academically rigorous, current, and reflective of Australia's diverse cultural landscape. Currently, there are profound threats to the viability of educational publishers seeking to develop Australian-oriented learning materials. Government and universities must partner with educational publishers in the provision of such materials. This symbiotic relationship supports the provision of materials appropriate for higher education students training to be our next generation of nurses, teachers, scientists, lawyers, engineers, businesspeople, and artists.

5. The statutory licence continues to provide cost effective access to a diversity of educational materials

The APA endorses the interim report's emphasis on the importance of a robust, equitable higher education system for achieving national priorities. The statutory licence plays an ongoing role in the cost effective provision of additional learning materials and scholarly materials. The statutory licence offers a streamlined mechanism for the use and distribution of educational content, ensuring that all students, regardless of their circumstances, have access to a diversity of resources they need for academic and professional success.

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