

## **Submission on behalf of Publishers Association members to the World Bank in response to request for input on a potential revision of Operational Guidelines for Textbooks and Reading Materials (World Bank Education Sector, July 2002)**

The existing *Guidelines* are recognised by Publishers Association members as containing much that is of value.

Members' feedback has primarily focused on areas where good policies are most in danger of being undermined by poor governance or poor implementation processes. These issues of governance and implementation emerge at multiple phases: in the bidder-selection stage (transparency), when choice is devolved to levels below that of central government without adequate supervision or support, and through the distribution and post-sale audit/monitoring phases.

Members also highlighted the potential for locally embedded World Bank consultants to advise accurately on and oversee the working of: development lead-times for bid submission, delivery time-lines, evaluations and communication processes.

In what follows, we will structure our remarks around the existing *Guidelines*, attempting to offer rephrasing or changes of emphasis to existing text, and in some cases text that is substantially new. In either case, an explanatory footnote is offered as rationale for the proposed amendment or insertion.

The Publishers Association would welcome the opportunity to engage further with the World Bank in discussion on revised Guidelines.

### **p.1 Purpose**

This note sets out the operational guidelines *from a principled and policy-led position on the provision of* textbooks and reading materials. It provides the framework for appraising borrowers' proposals for financing *the development and acquisition of* textbooks or reading materials for educational purposes.<sup>1</sup>

Articulating educational publishing with education outcomes is essential for sustainable book provision and educational outcomes.<sup>2</sup>

(For its part, the *education system has a duty that is central to the success of ventures grounded in these Guidelines: continually to assess curriculum requirements...*)<sup>3</sup>

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- 1 The *Guidelines* have a vital role in ensuring that Bank principles are put into practice. Equity and access, social and labour-market development, competitiveness, innovation, sustainability and pluralism are woven into the mechanisms through which implementation takes place. The Bank's and its borrowers' roles in textbook provision will focus on providing an effective governance environment for the development and provision/acquisition of materials.
  - 2 The articulation with 'general publishing' that features in the 2002 *Guidelines* is in practice seldom realistic, and may be considered non-central to this policy area.
  - 3 It is tempting to capitalise 'Education'. We view this ongoing process as a core duty of national governments, which should be institutionalised, and should be separate from the acts involved in the provision of materials.

## pp. 1 – 2 Statement of Operational Guidelines<sup>4</sup>

### p. 2 Key Issues and Options in the Application of the Operational Guidelines: Policy Issues and Considerations – Pedagogical objectives

Appraisal should establish that the borrower's proposal includes the introduction and maintenance of a review process... *and approval should be contingent on the implementation of this process.*<sup>5</sup>

For textbooks, the assessment should focus on conformity with a prescribed school curriculum. Selection decisions – choice at the lowest feasible levels – *will then be left in the hands of teachers and local (non-national) educational administrators, who are best placed to judge teachability, accuracy of information presented, organization and sequencing of lessons and other pedagogical issues. In many instances, provision may be made for the training of such decision makers in exercising this level of professional discretion.*<sup>6</sup>

### p. 3 Policy Issues and Considerations – Enrollment size and language of instruction

For non-international languages, building private-sector textbook development, publishing and distribution capacity in-country may eventually encourage the development of other forms of local book publishing.<sup>7</sup>

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4 The 2002 *Guidelines* remain valid. Support for the provision of teachers' guides, teacher training and the maintenance of transparent and competitive processes are among those policy areas where good principles are most in danger of being frustrated by poor implementation or monitoring. Realistic priority on literacy and numeracy is also vital to success.

It is arguable, moreover, that the principles of 'private sector involvement and the exercise of choice at the lowest feasible level' have in practice been subordinated to the 'agreed roles of the public and private sectors' in the bullet-point area of the existing section, with the private sector often being asked to provide cheap printing services only, and 'choice' playing no further role.

5 Our members were not able to cite an instance where they felt the current policy recommendation had been adequately enforced.

6 It should be clear that the current list of assessment criteria supports prescriptive administrative decision-making, and is at odds with a number of policy goals.

7 See footnote 2 above. There was scepticism as to the likelihood of 'trickle-down' benefits to general publishing, accompanied by a firm view that curriculum-level publishing needed to be seen as the priority. See also remarks on Annex A.

### p. 3 Policy Issues and Considerations – Authorship and intellectual property rights

Where curriculum units of public education departments or ministries are authors of textbooks, *consideration should be given to converting their role to a more conventional authorial arrangement, and provision should be made for an appropriate and sustained income stream to authors. Outright sale or assignment of copyright should not be contemplated except in emergency/post-conflict situations, and as a short-term arrangement.*<sup>8</sup>

### p. 3 Policy Issues and Considerations – The political environment<sup>9</sup>

#### pp. 3 – 4 Policy Issues and Considerations – Curriculum concerns<sup>10</sup>

The process should provide for *as much decision making as possible by teachers or their immediate representatives... A curriculum should generally be subject to review on a cycle no shorter than three years and no longer than ten years.*

### p. 4 Policy Issues and Considerations – Complementarities with other interventions

The establishment and maintenance of school libraries, *supported by a reliable book-distribution infrastructure*, is therefore to be encouraged.<sup>11</sup>

### p. 4 Policy Issues and Considerations – Manufacturing specifications

*Manufacturing specifications should be subject to international, independent specialist review. If manufacture within the borrower's country is preferred, specifications should be designed to make use of existing private-sector manufacturing and distribution capacity. They should at all events be appropriate to the anticipated duration of use.*<sup>12</sup>

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8 I quote from a submission from one member publisher, which sums up the issues of copyright, authorship and especially assignment of copyright post-tender from our members' perspective:

***The notion that a publisher should take all the risk in... carefully developing books for a submission, and then only have the rights to a single initial print run, has no place in World Bank textbook policy... forcing publishers to grant copyright as a condition of entering a bid destroys the basis of copyright.***

9 Good 2002 statement

10 See Note 3 above. The reference to 'independent' review in the 2002 *Guidelines* could be confusing. In fact, review by qualified practitioners – who are more likely to be teachers or school inspectors – is often to be preferred to 'independent' review, although in many instances the teachers will need independent support or training in order to carry out this role.

11 This in turn implies that a single purchase, direct from printer or supplier to government, covering materials needed over several years, is unlikely to represent a sustainable model.

12 The 2002 *Guidelines* text is unhelpful. In practice, manufacturing specifications may be manipulated in order to justify placing work with a favoured supplier and/or ignored once agreed. If the Bank is supporting a borrower that will be buying goods directly, close supervision of the specification and of the compliance controls may be appropriate. A lifetime for printed products of 2 – 4 years (primary) or 3 – 5 years should be expected. Higher or lower lifetime expectancies are associated with reduced long-term economy.

#### p. 4 Policy Issues and Considerations – Other technologies

Insert text at end of 2002 Statement or equivalent: *Even proven technologies are only as good as the installation, maintenance and support systems that underpin them, and only as useful as the content and classroom practices that bring them to life. Detailed consideration of these life-cycle-long issues must be undertaken as part of a heavily technology-dependent program.*

#### p. 5 Policy Options – Selection or choice

While a single textbook used across the entire education system will tend to offer lower initial cost than teacher- or community-led choice, the negative externalities of the single-textbook policy must be carefully considered: local businesses can seldom thrive under such circumstances (long periods between orders, even for the successful bidder; no business at all for anyone else, for long periods); authorship as a route to career development for outstanding teachers is closed off; and lower diversity in information provision tends to result.

Set against that view is the practical recognition that provision of print materials at very low numbers can be uneconomic.

The selection process must be... [as 2002 statement].

#### p. 5 Policy Options – Government or private sector<sup>13</sup>

#### pp. 5 – 6 Policy Options – Relevance vs. publishing origin<sup>14</sup>

#### p. 6 Policy Options – How to distribute?

Experience with textbook provision schemes has shown the government, especially if highly centralized, to be ineffective in providing sustainable textbook distribution solutions. *Governments have a key role, however, at local level, in establishing school data, especially enrolment; and school administrators need to play a role in school-based inventory control.*

*In emergency and post-conflict situations, the government itself may need to play a short-term role in the physical logistics of textbook provision.*

*Even where little or no private-sector capacity exists, however, the potential for state-supported textbook acquisition to play a part in supporting the emergence of a private-sector distribution chain should not be underestimated. The state then retains a vital role in monitoring and ensuring accountability for effectiveness of provision.*

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<sup>13</sup> 2002 *Guidelines* statement remains valid.

<sup>14</sup> I am not sure that the 2002 statement says anything worthwhile here. Consider omitting altogether? Or replace with a statement that Bank policy is to support wherever possible the emergence of local writers and the establishment of sustainable business, whether foreign-owned or locally-owned.

## Annex A

*Educational publishing and general publishing may be interdependent in advanced economies. However, in many less-developed countries, educational publishing can represent 80% or more of the entire sector. It is the training ground for authors, designers and other industry specialists. These may in some instances move on to more general publishing; but it is reasonable to state that in the absence of a prosperous and sustainable educational-publishing sector, a country will not develop a general publishing industry.*

*Although a printing industry can develop in a country for packaging, magazines and other items, book distribution will tend to be strongly dependent on educational and para-educational (readers, reference books, exam-preparation) items, often sold alongside stationery. If educational materials are not flowing through this private-sector channel, the likelihood is that the channel will not prosper, in other words there will be no book provision of any kind outside the metropolis.*

*If the development lead-time of an educational publishing industry in a country seems extended, involving as it does capital formation, employment and training, standards-setting, and so on, failure to embark on policies to encourage such development can severely stunt a country's social, educational, regional and business development.*

There is need for clear-headed policy-making by governments... [remainder of 2002 statement still valid]