

Submission to the Productivity Commission: *Building a Skilled and Adaptable Workforce –* Interim Report

1.0 Executive Summary: Fund Time and Choice, Not Duplication

The Productivity Commission (PC) is correct that high-quality curriculum resources are essential to improving student outcomes, supporting teachers, and strengthening productivity. Australia's teachers deserve resources that are accurate, timely, and locally relevant.

Accordingly, the Australian Publishers Association (APA)—the industry body for Australia's learning-resource providers—welcomes the Government's focus on high-quality curriculum-aligned resources as a driver of a skilled and adaptable workforce.

The core problem, however, is not discovery as the Commission suggests. **High-quality, curriculum-aligned resources** from commercial and other providers **are already abundant and easy to find.**

The real constraints are teacher time and school budgets: too much paperwork, too little time for lesson planning, and insufficient funds to implement the right resources.

What constitutes best practices in learning materials is changing rapidly as classrooms change: AI-enabled tools, interactive platforms, and integrated systems are reshaping planning and instruction and raising the bar for alignment, usability, accessibility, and support.

Centrally authored lesson banks—and slow, manual quality assurance (QA) processes—cannot keep pace with this change or meet the needs of Australia's federated system – across government, Catholic, and independent components.

What matters most is access, quality and usability—coupled with the time to plan with them. Experience shows many DOE-produced materials lag on usability and discovery. A diversity of third-party materials drives value: a mixed market preserves choice, sustains innovation, and keeps pricing competitive.

In this setting, the best role for the government is to set standards and ensure equity. A diverse ecosystem of learning-materials providers delivers the innovation, responsiveness, and subject expertise classrooms rely on.

APA Policy Focus:

The goal is simple: **lift student outcomes by expanding teacher access to high-quality resources and protecting choice for teachers and schools.**

This submission calls for **targeted funding** and a **practical partnership model**, with government and the learning materials sector working together—as occurs in almost every other major sector. This approach would give schools the flexibility to select resources that meet local needs, embed professional learning (PL) within teaching tools, improve discovery without duplication, and ensure the lawful, transparent use of AI in classrooms.

The APA recommends:

- **Equity-weighted funding** so every student has access to quality resources, regardless of postcode.
- **Reduced red tape** to free teachers' time for preparation and collaboration.
- **Well-resourced libraries** as hubs for discovery, equity, and digital literacy.
- **Integrated professional learning** embedded directly within teaching resources.
- **Light-touch discovery tools** that connect schools with diverse providers without adding new burdens.
- **Lawful, transparent AI practices** to protect privacy and intellectual property.

By investing in **time, equity, and capability**—rather than duplicating existing services—government and industry can ensure every school has access to diverse, high-quality resources and every teacher is supported to deliver the best outcomes for students.

2.0 The Existing Australian Learning Resource Ecosystem

In the past 50 years, Australia's learning resource sector has evolved from simply importing UK textbooks into a dynamic, homegrown industry creating resources tailored to local curricula. Australian-owned companies now compete directly with global multinationals, driving innovation and excellence to earn classroom adoption. The sector is rich with former teachers and education specialists, committed to supporting schools as partners in learning rather than working within them. Australia's learning resource creators produce high-quality materials across subjects and year levels that are:

- **Aligned to national and state curricula**
- **Continuously updated based on syllabus changes and evidence**
- **Inclusive and adaptable for diverse learners and contexts**
- **Integrated with professional development and assessment support**
- **Affordable and scalable to preserve choice**

Today, sector platforms integrate seamlessly with school LMS and SIS systems, enabling secure access, analytics, and future-ready AI-powered tools. Learning resource providers already create digital content and services that are reliable, accessible, secure, and trackable. AI can make this work faster and easier—by helping with writing, tagging, and quality checks—while protecting integrity and intellectual property. This is a mature, resilient ecosystem capable of delivering at scale and pace.

3.0 Issues Raised in the Interim Report

While the interim report identifies important opportunities, it misdiagnoses the root problem facing schools. Evidence from schools is clear: teachers need time and schools need funding—not another government repository to search.

3.1 Solving Systemic Challenges Through Partnership

Learning resource providers should be core partners in policy design. Australia's learning resource sector already holds deep expertise in curriculum development, digital delivery, and AI-enabled tools. Attempting to replicate this capability through large public programs would be costly and inefficient, with limited returns for teachers and students.

A standing government–industry forum offers a practical way to harness this expertise. Such a forum would keep policy settings current and evidence-based, prevent duplication and market distortion, and protect teacher choice. It would also foster collaboration and ensure timely responses to emerging classroom needs—aligning policy, innovation, and practice to deliver better outcomes for students and reduce teacher workload.

To be effective, this work must respect existing selection pathways—such as faculties, Teaching & Learning Committees (T&LC), and teacher-librarians—and minimise administrative burdens so teachers can focus on preparation and instruction. Any discovery measures should remain optional and market-neutral, surfacing what already exists rather than replacing it. Quality and usability—not ownership—should drive adoption of resources.

3.2 Concerns with a Centralised Government Lesson Bank

Single, centrally authored lesson banks don't match a federated curriculum and tend to become *de facto* mandates, lagging curriculum and technology changes and crowding out SMEs and specialists. Teachers frequently **reject mandated packages even from their own schools** when they don't fit their students' needs. A nationally **centralised bank, in this context, is unproven and inefficient; while diversity sustains innovation and relevance.**

3.2.1 Lessons from Australia: Scootle

The experience of Scootle illustrates these challenges. While it initially widened access to basic digital resources, it quickly became static and unevenly aligned with state syllabuses. Instead, teachers gravitated toward materials that were regularly updated, well-supported, and closely aligned with curriculum needs—primarily those produced by independent learning resource providers, including teacher associations and commercial platforms.

The government's role should be to enable discovery and to support equitable access, not to replace the diverse ecosystem of content creators who already produce and maintain high-quality resources.

3.2.2 International Examples

Around the world, governments have experimented with different approaches to supporting schools' access to learning materials. These experiences highlight both the **risks of centralisation**—where state-provided lesson banks can undermine diversity, innovation, and teacher autonomy—and the **benefits of plural, access-based models** that surface a wide range of resources without displacing them.

Centralisation Challenges and Sector Risks:

- **UK (Oak Academy):** The UK's Oak Academy initiative has sparked significant controversy over what many see as the “nationalisation” of lesson content. While its centralised lesson banks were developed with good intentions, they have created several unintended consequences:

- *Revenue and Market Impact:*

Projections suggest 10–30% declines in revenue for educational resource providers. This threatens the diversity and innovation of the sector by reducing incentives for independent content creation and limiting the range of materials available to schools.

- *Teacher Autonomy and Engagement:*

A recent All-Party Parliamentary Group inquiry into the *Loss of Love of Learning* highlights growing concerns about standardised lesson banks. [Read the report here](#). The report found that:

“Over one-third of primary teachers said they have little or no influence over the content of their individual lessons in their own classrooms.”

This has left many educators feeling like “deliverers of someone else’s script”, reducing their professional autonomy and sense of ownership over teaching.

- *Impact on Student Outcomes:*

The lack of flexibility in these centralised resources limits opportunities for passion-driven, responsive teaching, which are key to engaging students. When teachers can't adapt lessons to their students' interests or contexts, student engagement suffers, and the intrinsic “love of learning” may decline.

- **Poland (Free textbooks):** ~10% market contraction within a year; diversity and update frequency fell as private investment retreated.
- **US (EdReports):** Slow, costly reviews with limited adoption; poorly suited to federated systems.

Australian learning materials providers, by contrast, are encouraged by Ontario's access model, which focuses on helping schools discover a wide range of public and private resources rather than displacing them.

- **Ontario (Access model):** Surfaces multiple providers without undermining them—an equity-focused, plural approach.

3.2.3 Government as Facilitator; Industry as Partner

The government's job is to create the conditions for good choices—then fund schools to make them. Concretely, government should:

- Set curriculum (through ACARA—or its successor—and state syllabuses), safety/privacy requirements, and procurement baselines;
- Establish neutral guardrails for discovery, quality, and interoperability;
- Provide equity-weighted funding, including ring-fenced resource and library budgets.

The industry's job is delivery: diverse, curriculum-mapped content and embedded professional learning, updated at pace and competing on quality, usability, and support.

Australia is not one system—public, Catholic, and independent sectors operate across eight jurisdictions, with varied preferences (some schools dialling back devices, others returning to textbooks—with a mix of booklist and class-set systems. Policy should therefore protect genuine choice across print and digital, avoid de facto mandates, and allow competition and professional judgement—not uniform prescriptions—to drive uptake and improvement.

3.3 Improve Discovery Government and Industry Maintained Directory Hub

If the government wishes to help with wayfinding, it should establish a **directory hub, jointly maintained with industry**, that links out to learning materials providers and distributors. It should be market-neutral, and include links to independent and public resources (curriculum authorities, subject associations, PL providers, research bodies).

This approach delivers better outcomes by speeding teacher access to quality resources without duplicating content or creating new administrative burdens—and by preserving competitive dynamics that lift quality and keep prices disciplined. It also fits Australia's federated system and three-sector delivery in every state and territory (government, Catholic, independent): shared national guardrails can sit alongside sector—and jurisdiction-specific needs, allowing each system (and within each school) to discover options quickly while selecting and implementing locally.

The hub should:

- **Structure & Function:** Be a simple, searchable directory linking out to provider or distributor sites. It should feature brief, factual, market-neutral listings; free-text search and basic browsing capacity (subject/learning area, year band); and allow provider self-updates with light governance; and no mandated data schema.
- **Governance & Eligibility:** Feature transparent listing criteria; equal footing for commercial, NFP and association providers; straightforward self-service updates.
- **Publisher Autonomy:** Allow providers to retain control of websites, demos, trials, customer data and support.
- **Optional Trials (on provider sites):** Government issues optional model principles (privacy, security, time-limited access); while providers run their own "try before you buy" experiences suited to product complexity.

- **Discoverability, not QA:** There is no need for a slow, costly, federally mandated QA process that risks shrinking the pool of available resources and stifling innovation. Instead, the focus should be on clear discovery pathways and well-signposted guidance for providers. Governments should set out the standards and elements it expects from quality learning materials—allowing providers to meet these benchmarks in their own way—while keeping the system open, efficient, and responsive.
- **High-quality third-party resources rely on a two-way communication process:** Publishers provide schools with training, support, and updates to help teachers use tools effectively, while schools share feedback on how resources perform in real classrooms. This dynamic exchange drives continuous improvement and responsiveness in a way that centrally-produced, government-run lesson banks can never match.

Outcome: Better signposting with **minimal administrative burden, preserved competitive dynamics to drive innovation**, and **direct publisher–school relationships**—key drivers of quality, usability and continuous improvement.

3.4 School Libraries: Supporting Equity, Discovery and Quality

Well-resourced libraries help teachers by curating aligned resources and reducing administrative tasks. They underpin reading engagement, information/digital literacy, ethical content use, and effective discovery—especially in disadvantaged and remote communities. Libraries **reduce teacher workload** by curating aligned, usable materials and supporting classroom implementation.

Policy actions:

- Conduct national and state audits (staffing, collections, systems)
- Establish dedicated funding for librarians and collections
- Set minimum entitlements and equity targets
- Position libraries as digital/AI literacy hubs

Why this matters now: Libraries act as the **equity and quality backbone**—curating across multiple providers, reducing workload, and ensuring students in **disadvantaged and remote** settings access **aligned, usable** resources at the point of need.

3.5 Professional Development, Embedded Support, and Improved Outcomes

Professional learning is most effective when integrated into the resources teachers use every day, rather than delivered separately. Our members' learning materials often **embed professional development (PD) features** (guidance notes, scaffolds, exemplars, assessments) that reduce teacher workload and improve practice. Live PL complements this with reform support and peer learning. **Quality and usability**—not authorship—**determines impact**.

Priorities:

- Target out-of-field teaching support.
- Align PL to curriculum rollout timelines.
- Provide micro-grants for faculty planning.

3.6 AI, IP and Privacy

AI tools are entering classrooms quickly, offering new ways to improve teaching and learning but also raising serious concerns about privacy, equity, and copyright. Australian governments should ensure that AI systems in schools:

- use consent-based licensing for any training, fine-tuning, embedding, or retrieval involving published works,
- are transparent and auditable, and
- protect student data through privacy-by-design measures, while also supporting balanced screen-time practices in the classroom.

3.6.1 Ethical and Governance Settings for School AI Deployments

To harness AI safely and effectively, APA supports a practical baseline for school-approved tools:

- **Ethical & Transparent:** Align with AI ethics, clear labelling, plain-English disclosures, and explainable outputs.
- **Protect Students & Data:** Privacy-by-design, Australian data storage, no training on school content, and admin audit controls.
- **Respect Culture & Integrity:** Safeguard Indigenous Cultural IP, ensure authenticity, watermarking, and plagiarism protection.
- **Clear Rights Signals:** Standardised metadata and enforceable “no-AI-train” tags vendors must follow.

3.6.2 Education Statutory Licence: Safe, Lawful AI in Class

Educator use of AI **on in-copyright publisher content** often entails copying or ingestion into a tool. Where that use is for classroom preparation or delivery, it should occur **under the education statutory licence** (or another licence) and **must not** enable vendor retention for training or broader reuse.

Contrary to CAG submissions to the PC, the **education statutory licence (Copyright Act s 113P)** is **technology-neutral** and already supports many AI-assisted classroom uses while ensuring creators are paid.

- **It enables (classroom context):**
 - Short extracts in school-approved AI for **differentiation** (reading levels, scaffolds, quizzes and so on).
 - **RAG/secure retrieval** into the school environment (LMS/classroom devices) without onward publication.
 - **Inclusive formats** (alternative/simplified versions).
 - **Parity for online delivery** (synchronous/asynchronous) with face-to-face use.
- **It does not enable:**
 - **Unconsented model training** or commercial reuse outside school context.
 - Overriding third-party platform **terms** or the need for **consent-based datasets** for vendor fine-tuning.

Priority actions:

- Implement the proposed April 2024 online-learning clarifications and publish plain-English AI classroom scenarios.
- Require school-deployed AI to honour statutory-licence safeguards (access controls, no retention for model training, audit logs).
- Procure tools that interoperate with licensed and open content to maximise accuracy and curriculum alignment.

Harnessed properly, the **statutory licence** reduces uncertainty and workload, supports inclusion, and enables responsible AI adoption—while sustaining investment in high-quality Australian resources.

3.7 Funding & Procurement Reform (The Lever That Matters)

The most pressing barriers to improving teaching and learning are insufficient funding and limited access to quality resources. Schools need reliable budgets and modern infrastructure to provide teachers and students with the tools they require. Without these foundations, other reforms will have minimal impact.

- **Dedicated budgets for schools:** Re-establish a **ring-fenced learning-materials budget line** in every school to restore school autonomy and teacher agency. Funding should be **equity-weighted**, providing higher allocations to disadvantaged and remote communities so that every student—regardless of postcode—has access to high-quality resources.
- **Sustained funding for libraries:** Commit to **dedicated, ring-fenced funding** for school libraries (as outlined in Section 3.4) to cover qualified staffing, regular renewal of collections across print and digital formats (including databases), and modern discovery systems integrated with school LMS platforms.

Once these basics are in place, government investment should also focus on partnerships with industry, shared infrastructure, well-resourced school libraries, and interoperable systems—rather than duplicating content already available in a competitive market.

4.0 Recommendations

This section outlines practical steps for the government to take in partnership with industry and schools. These recommendations aim to ensure equitable access to diverse, high-quality resources, reduce teacher workload, and improve student outcomes without duplicating what already exists.

4.1 Partner to Solve Systemic Challenges

The government should establish a **standing forum** that brings together learning resource providers—including both content and platform specialists—sector leaders, and policymakers, perhaps as a standing feature of the proposed new federal Teaching and Learning Commission. This forum would keep policy settings practical and evidence-based while avoiding duplication and market distortions.

By working together, the forum can:

- Respect and strengthen existing school selection pathways, such as faculties, Teaching & Learning Committees, and teacher-librarians.
- Reduce administrative burdens so teachers can spend more time on lesson preparation and professional collaboration.
- Ensure any discovery initiatives are **optional and market-neutral**, surfacing existing resources rather than replacing them with government-mandated content.

This collaborative model would align Australia with other sectors where government and industry co-design solutions rather than compete with each other.

4.2 Avoid Centralised Lesson Banks and Protect Diversity

The government should **not build or mandate** a single, centrally authored lesson bank. Instead, it should focus on **neutral standards for discovery and interoperability** that support plural provision across jurisdictions and school sectors.

Centrally produced banks tend to lag behind curriculum and technology changes, crowd out specialist providers, and risk becoming de facto mandates. A diverse marketplace sustains innovation, supports specialist content, and preserves choice for schools.

Procurement processes must therefore be designed to **preserve competition and diversity**, ensuring schools can select both print and digital resources that best meet their needs, while monitoring the impact on small and medium-sized providers.

4.3 Improve Discovery Through a Joint Government-Industry Directory Hub

Teachers need fast, simple ways to locate quality resources—without the government duplicating existing content. The solution is a **shared directory hub**, jointly maintained by government and industry, that provides wayfinding while leaving publishers in control of their products.

This hub should follow clear principles:

- **Structure and Function:** A simple, searchable interface that links out to provider and distributor sites. Listings should be factual, market-neutral, and organised by subject, learning area, and year level. Free-text search and basic browsing tools should be included, but no complex, mandated data schemas.
- **Governance and Eligibility:** Transparent, equitable listing criteria with equal footing for commercial, not-for-profit, and association providers. Providers should be able to self-update listings through a light-touch governance process.
- **Publisher Autonomy:** Publishers retain control of their own websites, demos, customer relationships, and data. The government should not host reviews or take on quality assurance functions directly.
- **Optional Trials:** Government can issue model principles for trials—covering privacy, security, and time-limited access—while providers host “try before you buy” experiences on their own platforms.

This model enables teachers to quickly find what they need, while keeping the marketplace dynamic and responsive.

4.4 Fund and Modernise School Libraries

School libraries are the **discovery and equity backbone** of the education system. To deliver consistent, high-quality access and reduce teacher workload, the government should fund and modernise libraries as hubs for both print and digital resources.

Key actions include:

- Conducting a **national and state audit** of library staffing, collection quality, discovery systems, and per-student investment, with results broken down by school type and disadvantage levels.
- Establishing **dedicated, ongoing funding streams** for teacher-librarian positions, regular collection renewal (print and digital), and integration of library systems with school LMS platforms.
- Setting **minimum entitlements and targeted funding** for low-SES, regional, and remote schools to address inequities.
- Position libraries as hubs for **digital and AI literacy**, and thus help teachers and students use resources lawfully and effectively.

Investing in libraries will cut workload, improve discovery, and ensure every student—regardless of postcode—has access to quality resources.

4.5 Strengthen Professional Development Embedded in Resources

Professional learning (PL) has the greatest impact when it is **embedded in the materials teachers use every day**. Third-party resources often include built-in guidance, scaffolds, exemplars, and assessment tools that reduce workload and improve teaching practice.

To scale this impact, government should:

- Prioritise investment in resources with embedded PL features.
- Target support to out-of-field teachers, especially in areas like STEM where shortages are most acute.
- Fund release-time micro-grants so faculties can collaboratively adapt resources and plan their teaching.

This approach connects PL directly to classroom practice, improving both teacher capability and student outcomes.

4.6 Make AI Lawful, Safe, and Transparent

AI can transform classrooms, but only if deployed **safely, ethically, and lawfully**. Government must set a **clear legal and governance baseline** to protect students and creators, including:

- **Consent-based licensing and remuneration** for any AI that trains on published works, with a default “no-train” setting for school-deployed systems.

- **Transparency and provenance requirements**, such as plain-English documentation and clear labelling of AI-generated content.
- **Privacy-by-design and auditability**, with administrator access to logs and risk assessments, and preference for Australian data residency where feasible.
- **Respect for Indigenous Cultural and Intellectual Property (ICIP)** to avoid homogenised or biased outputs.
- **Integration with the education statutory licence**, ensuring AI-assisted classroom uses remain lawful and creators are paid.

This framework will ensure AI improves teaching without undermining trust, privacy, or intellectual property rights.

4.7 Fund Choice and Teacher Time

Ultimately, the biggest barriers to better teaching are **time and funding**. Government should address these directly by:

- Re-establishing a **dedicated budget line for learning materials** in every school, weighted for equity so disadvantaged schools can access the resources they need.
- Investing in **core infrastructure**, such as libraries, interoperability, and data sharing, rather than duplicating content the market already provides.

This approach will empower schools to select the best resources for their students while giving teachers back the time they need to plan and teach effectively.

5.0 Conclusion: Back Teachers with Time, Choice, and Resources

There is **no discovery crisis**—Australia already has abundant, high-quality, easy-to-find resources. The PC's north star should be to **fund teacher time and school choice**, especially in public schools—through **ring-fenced resource budgets, equity-weighted funding, strong libraries and reduced admin**. That is how we unlock better planning, stronger teaching and improved student outcomes—without wasting public money duplicating what already exists.

Reforms will succeed if Government:

- Partners with the education resource sector—encompassing both content providers and digital platforms—rather than displacing them.
- Includes publishers and rights-holders in governance and consultation.
- Focuses investment on **access, equity, libraries, privacy and interoperability**—not duplication.
- Adopts data and information based discoverability measures rather than expensive manual QA.
- Ensures AI/EdTech use of content occurs only within **licensed, remunerated** frameworks.

As the representative body for educational publishers, the Australian Publishers Association stands ready to work with government, schools and stakeholders to ensure every teacher has the **time**, and every school the **funding**, to select the **best resources for their students**.

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