



Memorandum

Introduction – about ALT:

1. The Association for Learning Technology (ALT) (www.alt.ac.uk) is the UK's leading membership organisation in the learning technology field. We are a professional body with over 1000 individual members, and over 200 organisational and sponsoring members (including most of the UK's universities, a substantial number of colleges, government bodies such as BIS, and large and small UK and international IT companies as well as NUS). We run a peer-reviewed journal *Research in Learning Technology* (RLT) which has gone through two main transformations in access model (from print only to print and toll-access online, and then to print and fully Open Access) the experience of which provides the basis of much of our evidence. We hold a very successful 3-day annual international conference with published peer-reviewed proceedings. We run a competence-based accreditation scheme for learning technologists that is used internationally. We are a nominating body for the Research Excellence Framework panels, with nominees appointed to the Education panel and to the Computer Science panel for the 2014 exercise.

2. The learning technology expertise of our members allows us to have sight of the issues from a number of sometimes conflicting standpoints. We have academic authors who receive royalties for their works published through traditional mechanisms. We have links to publishers and an understanding of academic publishing in print and especially electronically. We are a professional and learned body that publishes a peer-reviewed journal. However, we are also a body with a strong interest in there being wide availability of information to learners, teachers and researchers through simple Open Access mechanisms. We are especially keen that students at UK learning establishments, a major funder in their own right, enjoy the benefits that technology brings. We are also keen to see the power of the Internet exploited to the benefit of society at large and worldwide, with information being increasingly a common good rather than the basis of restricted practices. What follows is therefore a submission that is hopefully balanced and based on the views of researchers, article contributors, article consumers including practitioners, students (a good proxy for the general interested public), and industry.

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Central Executive Committee: Haydn Blackey, Alastair Clark, James Clay, Claire Donlan, Shirley Evans, Douglas Gowan, Diana Laurillard, Matt Lingard, Dick Moore, Martin Oliver, Norbert Pachler, Vanessa Pittard.

ALT Ambassadors*: Dame Wendy Hall DBE FRS, Professor of Computer Science at the University of Southampton; Terry Mayes, Emeritus Professor at Glasgow Caledonian University; Jane Williams, past Principal of City of Wolverhampton College and Executive Director for FE, Skills and Regeneration of Becta.

* Ambassadors provide informal advice to ALT on matters within their area of interest, and act as advocates for ALT.

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Factual Information

Concentration and change

3. The Internet and the World Wide Web have changed many aspects of the ways in which knowledge is shared and mediated. Industries such as music and newspapers have changed rapidly and substantially, often involving a significant disintermediation process. The academic publishing industry is changing, as are libraries, but with very uneven disintermediation. For instance, learners, teachers and researchers increasingly access all the information they require on line rather than by visiting a library and yet subscribing libraries still feel the need to retain, feed and water a back-catalogue in print and therefore there is a strong tendency towards lock-in. It is hard to see why this is necessary except for the copyright libraries.

4. There are other ways in which scholarly publication, dominated by four big businesses (down from 8 15 years earlier), has remained relatively unscathed:

- the business-model is typically still subscription-based, so usage is not paid for at the point of use;
- publishing contracts are often long and complicated and slow to get changed, especially for smaller learned societies, many of whom lack the muscle and experience to deal effectively with large publishers;
- churn in journals remains low – it is very hard to establish and get good reputations for new ones, especially in new subject areas – and so old models of knowledge and their relative importance tend to be reinforced.

Evidence from Research in Learning Technology (RLT)

6. Learning Technology is a relatively new field but our peer reviewed journal has been published since 1993, initially as a conventionally published journal. In 2009 ALT established an ePrints based Open Access Repository – <http://repository.alt.ac.uk> – into which, by agreement with the then publisher Taylor and Francis, RLT articles were placed after an 18 month embargo period.

7. In December 2010, following a competitive tendering process, we changed the publishing model for RLT from conventional to Open Access, with effect from January 2012. The change involved a change of publisher from one of the “big four” to a small specialist Open Access publisher based in Sweden.

8. RLT is now a “Gold” Open Access journal, published under a Creative Commons Attribution BY 3.0 license, with, importantly, no Article Processing Charges (APCs), and with a SPARC Europe Seal for Open Access Journals. We made the transition to Open Access without introducing APCs, whilst at the same time managing a small reduction in our organisational membership fees. For the moment we continue to make RLT available in print for a charge.

9. Switching to Open Access has sharply increased the use made of RLT's content. During April 2011 Taylor and Francis made RLT freely but temporarily available (along with the content of many of its other education journals). This resulted in a six-fold increase in the number of full text downloads. Since switching to Open Access in January 2012, the number of full text downloads per month for the top 10 most downloaded of RLT's articles has increased on average by a factor of 8.1 (range 6.2 to 11.5).

10. The average number of abstract views recorded per month has also increased - by a factor of 4.6 on the average monthly 2011 level, to nearly 18,000. The average number of full text downloads recorded per month increased by a factor of 9.6 on the average monthly 2011 level, to nearly 17,000.

11. It is important to note here that as soon as articles are made available as Open Access content, especially under the most open CC-BY license (which RLT uses), there is nothing to stop multiple versions of articles being posted anywhere on the Internet. As a result the traditional concept of "full text download" from a journal's own primary publishing platform has even less meaning than under conventional publishing arrangements. We are happy with these rights of use and reuse as it maximises uptake. We think that the caution and even hostility to the CC-BY license (which we are sure others will express to you in their responses to your call for evidence) is very much overplayed and often results from imperfect understanding of Open Access.

12. In 2012 we have achieved an approximately 3 fold increase in the number of submissions to the journal with quality articles being offered from around the globe as well as the UK. LT is a small field and we are in discussion with most other similar bodies worldwide in order to ensure that moves happen in an ordered fashion. While our community is clearly technologically more advanced than some others, and its research output often has a relatively short lifespan of interest, this is by no means atypical of much academic practice.

13. Our authors' priority, reiterated in surveys, is the widest possible dissemination and use of their results. That way they are more likely to have impact and/or get cited. The data above suggests that dissemination is facilitated when this model is followed. Again we believe that this is true of most academic authors and perhaps especially so in the UK because of the REF model of evaluating output employed by the funding councils.

14. Overall we have been very pleased by our move although it was not without significant financial risk. It has been part of thinking through our changing role, activities and income streams in a changing world. While it is tempting to try and hold on to traditional income streams as long as possible, the experience of other industries is that this can make for a long term lack of competitiveness and subsequent failure. It has helped to be in an expanding and important field - were our field contracting and losing relevance it would have been much harder.

Gold Open Access as the ideal – the eventual model:

15. As a learned society that successfully made its journal “Gold” Open Access of its own accord, we fully support the move over time to Gold that the Finch report and now the Government, the funding councils and the major UK research funders are enabling. We concur with RCUK’s Mark Thorley that we need to make the outputs of research “accessible at the highest quality to the widest number of people, to do the widest range of stuff with, with the least restrictions” (<http://blogs.rcuk.ac.uk/2012/10/24/rcuk-open-access-policy-our-preference-for-gold/>).

16. The evidence submitted to the House of Lords enquiry under Lord Krebs, (<http://www.parliament.uk/documents/lords-committees/science-technology/Openaccess/OpenAccessEvidence.pdf#>) including our own but various others and especially those of the Minister of State and of Professor Tony Hey, drew attention to several key problem that need addressing - the cost to institutions and hence essentially to the state of providing staff and students with access to scholarly output has risen steeply throughout the period in which the Internet revolution was driving down hard the costs of digital content in general, albeit to the discomfort of some major players in the associated industries. This is neither sustainable nor fair and suggests that, in line with other internet effects, there are significant savings to be made by the taxpayer as a funder and user from a move to Open Access.

17. A switch to Open Access, funded by learned societies as part of their charitable endeavour (as in the case of RLT), or by Article Processing Charges (as in the case of journals in the PLOS stable) represents a realistic way to drive down the costs of scholarly publishing (and possibly the only way other than very widespread and systematic adoption of Green Open Access). It exposes the economics of publication much more clearly than is the case under a subscription model, where, perversely, the more successful a journal be, the more valuable it is to individual libraries, and thus the more can be charged per subscription, thereby driving up the net income per individual article.

18. The following possible problems with this approach have been suggested, but, we believe, are less serious than is sometimes asserted, or will be compensated for by improvements and savings in the medium to longer term:

- It makes it more difficult for those who are not institutionally or organisationally based to submit articles. This may include retired but research active people and others such as those about to leave an institution where there would be no gain to the institution.
- It potentially gives too much power within institutions to administrations at all levels who might use the power to take control of an APC rationing process within the institution and exploit it for institutional advantage rather than the needs of the academics; or perhaps more likely may simply just do it rather badly.
- It may lead to disruption and distortion with long established journals, practices etc. and some well established journals may not survive, or may cease to be “cash cows” for their publisher and/or for their learned society.

- It potentially disadvantages early adopter parts of the world if the major publishing countries, and especially the USA, do not follow.
- It may stop UK academics publishing in prestigious worldwide journals that have not become “RCUK conformant”.

19. The Finch recommendations, and plans for implementation, seem in part to have been written with one eye on protecting the revenues of the journal publishing industry (and perhaps especially those of learned societies who have become dependent on these revenues for their perfectly justified and valuable field-sustaining and field-developing activities) rather than on putting the emphasis firmly on reducing overall costs and increasing access. That has to be the long term aim. The transition is the issue here and we return to this below.

20. UK academics individually and collectively, have a long tradition of and are good at negotiating over their funding and workload, library or book budgets. For instance, they are used to trading teaching time for more research activity and convenience and some might consider it a good side effect if they were a little more involved with students in order to finance APCs. The system already involves staff spending significant effort bargaining with their institutions and with others to do and publish research including travel and sabbatical plans and which books and journals to have in the library, and so this will be a marginal change for most - APCs represent just another, hopefully small, facet of negotiation and not the major disruption that some have suggested. For instance if one is moving on and so the publication will “count” for the new institution then there are few who would not find their way to concluding an appropriate arrangement with that institution to pay an APC.

21. In the case of research funded by research council grant, and perhaps with some funding council monies, relevant APCs could be expected to be included in awards. Should the research be exceptionally successful, leading to many essentially distinct publications, then it might perhaps be considered for a supplementary grant of APCs. Conversely unpublished work might perhaps represent grant unspent. Thus a short publishing plan might need to be included in bids for funding if it is not already there. In the case of funding council selective research funding, one would expect each unit of funding to cover APCs at a relevant rate, calculated by council formula. In the longer term the lack of the need for institutional libraries to pay subscriptions more than compensates for the cost of the APCs (internet gain). Again the problem is one of transition as subscription monies may not be distributed as APCs need to be and there are also the international and other phenomena to be handled as covered in Finch.

22. In the longer term, journals could and perhaps should seek and be given sponsorship by the funding bodies and others. This would help drive down APC costs and make the problem very small. That is effectively our own experience in having no APC – we and our members effectively sponsor the publishing activities. We do this because we and the vast majority of UK learners gain as a community from the process. If, as seems to be the case, OA journals attract more interest in publication worldwide that would suggest that, as with other internet generated disruptions, once a critical mass of OA is established then the

wave rapidly overwhelms the previous regime. Such sponsorship of journals can thus be a force for causing the churn that is necessary for progress in a thriving market.

23. In many subjects there should be little difficulty in finding sponsors. If grants or sponsorship of APCs cannot be made to work (i.e. there is no body interested in seeing the publication for the value of an APC), there are various other methods available including an ongoing small fund offering APCs. Sabbatical and other arrangements should perhaps automatically include APCs as they sometimes do other elements (such as travel and conference attendance).

24. It is perhaps with retired and non-institutionally based authors that a possibly ongoing need arises and this is an area where modest amounts of funding may be required, through a charity or otherwise, for some time to come. However, it should also be noted that most Gold Open Access journals, for example all in the PLOS stable, operate sensible waiver provisions for scholars who do not have access to funds to pay an APC.

25. For a recent discussion of the Learned Body issues see the recent blog of the Director of Harvard University's Office for Scholarly Communication, Stuart Shieber; why open access is better for scholarly societies. (<http://blogs.law.harvard.edu/pamphlet/2013/01/29/>)

The transition: Gold v. Green

26. The UK is a major leader in research and education worldwide and an early move to a winning model would help to retain the lead. However other countries, especially in Europe seem not far behind and the number of events, webinars and discussions of OA worldwide as well as adoption is increasing.

27. Recent events in the USA have led to many individuals moving to open access publishing where possible see for instance Scientific American (<http://www.scientificamerican.com/article.cfm?id=digital-activists-suicide-casts-spotlight-on-growth-of-open-access-movement>) and have potentially accelerated the move to Gold access. Here internet related changes tend to move more rapidly than elsewhere once underway.

28. Thus we believe that the larger danger for the UK is not that of being too ahead of the world but in procrastinating or spending too much time in transition and thus falling behind best practice worldwide.

29. However, parts of the Finch report seem to have differentiated insufficiently between STEM and the Humanities / Social Sciences, putting forward a transitional approach that undoubtedly makes greater sense for STEM than it might do for some other fields, especially initially. A possible explanation for this problem is that the learned society world is extremely diverse: the two learned society representatives on the Finch Committee (from the Society for Biology and from the Royal Geographical Society) will have had the unenviable and arguably impossible job of representing the very varied perspectives and situations of the UK's learned societies.

30. A substantial proportion of scholarly output outside of STEM is not grant-funded, or if it is fully or partly funded by grants, the grants are significantly smaller than in STEM, so that APCs loom much larger in the minds of individual researchers than is the case in STEM.

31. It is thus important in the transition to allow discipline areas the options of going at different speeds towards the eventual model. Those where there are not large funding research councils or other external funders, may need to involve a transitional Green OA model with a shortening length of embargo though the transition. This could possibly be handled on a research council basis or a funding council broad subject area basis.

32. But it is important that the transitions are all carefully defined and that they are costed and charged to the relevant subject areas through adjustment of other funding. It should be the case that having a long transition with significant injected funds should come from the subject area (for instance via the selective R funding) and not from savings made by others. There are plenty of mechanisms for doing this and it may be that the transition cost will diminish much more rapidly if the basis of the funds is thus defined clearly at the outset.

33. Some learned societies have been caught in the crossfire. Some have traditionally had their income artificially protected either by the pricing policies of the big publishers, or by having been able themselves to publish in the “rain-shadow” of the big publishers’ pricing policies. Thus learned societies’ mixed reactions to Finch may stem in part from an entirely understandable wish to keep things - that is their income and its current sources - as they are, and partly from a misunderstanding of the scale of the current proposals. As with membership organisations more generally, such bodies worldwide are looking at their future business models and revenue streams: publishing is not the only traditional source of revenue under threat from changing processes. They seek models that allow them to work within the new arrangements and a transition that does not bankrupt them.

34. The same is true of institutional libraries many of which have become accustomed to larger budgets than they will in future have. It may also be hard for them to relinquish prioritization of local archival activities.

35. Alongside this in some cases, there seems to have been misunderstanding of the interplay of Open Access and APCs with factors such as copyright, Creative Commons licensing, moral rights, journal impact, and academic freedom.

Recommendations for action

36. We suggest that consideration should be given to:

1. Reducing the maximum contribution to APCs that funders will cover to, say, £750 (or less) so as to push institutions and scholars into being more discriminating in their choice of journals, and thereby push publishers into reducing their APCs. The focus here needs to be on growing the proportion of PLOS-style Gold Open Access

journals across all fields (it is no accident that at this time moves are afoot to establish the Open Library of Humanities, modeled on PLOS. Would this positive development be happening without the push provided by Finch?)

2. Examining the scope to make a functioning link at the level of individual journals or individual publishers, between the proportion of income raised through APCs and journal subscription rates, so that publishers are actively prevented from so-called “double dipping” - that is: increasing income on hybrid journals by generating APC income without reducing subscription rates.
3. Accepting that APCs will be no different from other things about which academic and research staff negotiate effectively with a variety of players including their own administrations (space, teaching load, sabbatical arrangements, library holdings and subscriptions, conference attendance and travel funds etc.) and are modest in comparison with some.
4. Putting greater effort into “winning hearts and minds” for Open Access more generally. This may involve:
 - Making it clear that APCs may be funded through a variety of methods including grants, sponsorship, subsidy but most commonly through normal institutional activities
 - Making available through some mechanism some funding for those who are not institutionally based.
 - Making it clear, by actions and words, that the long term aim is to drive down publishing costs overall including APCs and have more money available to fund research itself.
5. Accelerating the timetable for funding councils to decide and implement a policy on Open Access for articles arising from their funded research through the R component of the block grants, on the assumption that these policies should be consistent with RCUK’s (ideally they need to work in lockstep).
6. Allowing each broad subject area to have transitional arrangements that fit its circumstances. This may involve shifting the balance in some areas somewhat towards Green Open Access by making it clear in funder mandates that even when a Gold option is offered by a publisher, institution or author self archiving is an acceptable means of making an article Open Access; if funds are not available to (fully) cover APCs. It may also involve different licensing arrangements for a period.
7. Channeling transitional funds (with a clear length of transition specified and above all understood) to those learned societies who undertake to change their or their journals’ publishing models from toll-access to Open Access, as well as to institutions and others for the payment of APCs. The former will accelerate the structural changes that are needed, whilst temporarily cushioning learned societies’ other activities; whereas the latter will, perhaps rather unhelpfully, tend to cement a dysfunctional and inefficient hybrid “half-way house” which should not become extended.
8. Making it clear that the transitional costs of a broad subject area will be borne by that subject area and not by using the efficient areas (perhaps mainly in STEM and new disciplines) as cash cows to allow others to procrastinate unnecessarily.

9. Actively promoting comparable policies in Europe and in other jurisdictions, and especially in North America, and be seen to be so doing. The UK has the organisation and expertise through Jisc to do this effectively and ALT and others are already playing a part.

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