The House of Lords Science and Technology Select Committee Short Inquiry into Open Access

A response from the Association for Learning Technology (ALT)

“The kind of organization we wish to aim at is one where all relevant information should be available to each research worker and in amplitude in proportion to its degree of relevance. Further, that not only should the information be available, but that it should be to a large extent put at the disposal of the research worker without his having to take any special steps to get hold of it.”
- JD Bernal, writing in 1939

ALT

1. The Association for Learning Technology (ALT) 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). We run a peer-reviewed journal Research in Learning Technology (RLT). We hold a very successful 3-day annual international conference. We run a competence-based accreditation scheme for learning technologists that is used internationally. We are a nominating body for members of Research Excellence Framework panels. We respond to policy and other consultations such as this one.

2. Our field of discourse allows us to have a view in this area from a number of sometimes conflicting standpoints. We have academic authors in our membership who receive royalties for their works. We have links to publishers. We are a professional and learned body that publishes a peer-reviewed journal. However, we are also a body committed to wide availability of information through Open Access to resources. We are keen that students at UK learning establishments enjoy the benefits that technology brings. We are keen to see the power of the Internet exploited to the benefit of society at large and worldwide, with information a common good rather than the basis of restricted practices. What follows is therefore the result of balanced consideration and is informed by our own data arising from the experience of our own journal.

2 ALT defines Learning Technology as “the broad range of communication, information and related technologies that can be used to support learning, teaching, and assessment”.
3 For the 2014 REF individuals we nominated to the Education and to the Computer Science sub-panels were each appointed.
4 Our recent policy consultation responses can be found on the ALT website.
Our starting point

3. The Internet and the World Wide Web change many aspects of cultural and scientific production, along with the way in which knowledge is shared and mediated. Just as the music and newspaper industries have changed, so the publishing industry is changing, as is the role of libraries.

4. Although it has changed greatly in the sense that articles are now available online to those with access rights, scholarly publishing has so far remained relatively unscathed by the “Internet revolution”, mainly because:
   - the business-model is typically subscription-based, under which usage of scholarly articles is not paid for at the point of use;
   - subscribing libraries need to keep a back-catalogue and therefore there is a tendency towards lock-in;
   - publishing contracts are complicated and slow to get changed, especially for smaller learned societies, many of whom lack the muscle and experience to deal effectively with large publishing companies;
   - the industry is dominated by a four main businesses (Wiley, Springer, Elsevier, and Taylor and Francis), as the diagram below indicates.

![Diagram of STM Commercial Journal Publisher Consolidation from 1998 to 2008]


5. We note and strongly welcome and support the opening remarks made by Lord Krebs (just prior to Dame Janet Finch’s 15 January evidence session) that the Committee will not be questioning the overall Open Access agenda, which it takes as a given. For this reason we have not sought in this note to justify the push towards Open Access, which we fully support.

Research in Learning Technology (RLT)

6. 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 Taylor and Francis, RLT articles were

A copy of this response is available at http://repository.alt.ac.uk/2242/
placed after an 18 month embargo period. In December 2010, following a competitive tendering process, our Trustees decided to change the publishing model for RLT from conventional to Open Access, with effect from 1 January 2012. The change involved a change of publisher from Taylor and Francis (one of the “big four”) to Co-Action Publishing (a small specialist Open Access publisher based in Sweden). RLT is now a “Gold” Open Access journal, published under a Creative Commons Attribution BY 3.0 licence, with currently 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. The most recent Issue of RLT is a Special Issue on Digital Inclusion and Learning, guest edited by Professor William Dutton (Oxford Internet Institute, Oxford University) and Professor Jane Seale (Graduate School of Education, University of Exeter).

The effect of openness

7. 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 increased on average by a factor of 8.1 (range 6.2 to 11.5). The average number of abstract views recorded per month 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.

8. 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 licence (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. For obvious reasons it is far too early to say whether the switch to Open Access will change the esteem, influence and impact of RLT overall, or whether it will have any influence on citation rates.

9. 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.

Our observations on the implementation of the Finch report

10. As a learned society that successfully made its journal “Gold” Open Access of its own accord, we fully support the move to Gold that the Finch report and now the Government, the funding councils and the major UK research funders are supporting. We concur with RCUK’s Mark Thorley that Gold will 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”.

5 RLT’s TOC page on the Directory of Open Access Journals can be viewed here: http://www.webcitation.org/6B4crCuug7.
6 http://www.researchinlearningtechnology.net/index.php/rlt
7 http://blogs.rcuk.ac.uk/2012/10/24/rcuk-open-access-policy-our-preference-for-gold/ 24 October 2012

A copy of this response is available at http://repository.alt.ac.uk/2242/
11. A switch to Open Access, funded by learned societies as part of their charitable endeavour (as in the case of RLT and many of the other "no-fee" Open Access journals\(^8\)), or by Article Processing Charges (as in the case of PLOS) is probably the only realistic way to drive down the costs of scholarly publishing (other than very widespread and systematic adoption of Green Open Access) because it exposes the economics of publication much more clearly than is the case under a subscription model, where, perversely, the more successful a journal is, the more valuable it is to individual libraries, and thus the more can be charged per subscription, thereby driving up the net income to the publisher per individual article.

12. However, we believe that the approach to implementation flowing from the Finch report could be further improved.

13. The "elephant in the room" is the role and position of the big publishing companies, which have as we indicate above have so far remained largely unscathed (in comparison to the music, film, and newspaper industries) by the "Internet revolution".

14. The chart above highlights the key problem, which is that the cost to universities 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 more generally. There has been a feeling that somehow this part of the university system should be protected from market forces and this has been fostered by some in universities as well as by the major publishing beneficiaries.

---

\(^8\) Here is a recently published list of "no-fee" Open Access Journals
http://www.eigenfactor.org/openaccess/fullfree.php (last accessed 18 January 2013)

A copy of this response is available at http://repository.alt.ac.uk/2242/
15. The Finch recommendations, and plans for implementation, thus seem to have been written with one eye on protecting the revenues of the journal publishing industry (and perhaps also of those learned societies who have become reliant on these revenues for their perfectly justified and valuable field-sustaining and field-developing activities) rather than on putting the incumbent publishers under firm pressure to reduce their prices - in effect to make less money from scholarly publishing than is presently the case - whilst at the same time encouraging the widening of access that is made possible by the Internet revolution.

16. There is a further problem that parts of the Finch report seem to have differentiated insufficiently between STEM and the Humanities / Social Sciences, putting forward an approach that undoubtedly makes greater sense for STEM than it may do for some other fields. 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.

17. Learned societies, who make a very significant contribution to promoting disciplines as well as research outcomes in the UK and internationally, have thus been caught in the crossfire. Some of them 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 overestimating the scale and impact of the current proposals. As with membership organisations more generally, such bodies worldwide are having to look at their future business models and revenue streams: publishing is not the only traditional source of revenue under threat from changing processes. Those with a “license to practice” element, typically but by no means all in the STEM area, and those whose members perceive them as doing much more than mainly publishing, have considerable inbuilt resilience. Others are less well placed.

18. Alongside this in some cases, there seems to have been a wilful misunderstanding of the interplay of Open Access and APCs with factors such as copyright, Creative Commons licensing, moral rights, journal impact, and academic freedom. Finally, a substantial proportion of scholarly output outside of STEM is not grant-funded except through HEFCE, or if it is fully or partly funded by grants, the grants are significantly smaller than in STEM, so that APCs quite properly loom larger in the minds of individual researchers than is the case in STEM.

**Steps that could be taken**

19. Given the above analysis and our own experiences we believe that the following should be considered.

1. Reduce the maximum contribution to APCs that funders will cover to, say, £750 (or less) so as to push universities and scholars into being more discriminating in their choice of

---

9 This month’s President’s Letter to Fellows and Members of the Royal Historical Society, whilst we do not agree with all of it, encapsulates clearly a number of these issues: [http://www.royalhistoricalsociety.org/RHSPresidentELetterJanuary2013.pdf](http://www.royalhistoricalsociety.org/RHSPresidentELetterJanuary2013.pdf)

A copy of this response is available at [http://repository.alt.ac.uk/2242/](http://repository.alt.ac.uk/2242/)
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.

2. Examine 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. Put greater effort into “winning hearts and minds” for Open Access more generally and ensure consistency in the information published about its implementation by different agencies (HEFCE and RCUK, for example).

4. Shift the balance somewhat towards Green Open Access by making it clear in funder mandates that even when a Gold option is offered by a publisher, author self archiving is an acceptable means of making an article Open Access, if, for example, funds are not available to (fully) cover APCs.¹⁰

5. Channel transitional funds to those learned societies who undertake to change their or their journals’ publishing models from toll-access to Open Access, as well as to universities for the payment of APCs. The former will accelerate the structural changes that are needed, whilst temporarily cushioning learned societies’ valuable field- and discipline-developing activities; whereas the latter will, rather unhelpfully, tend to cement a dysfunctional and inefficient hybrid “half-way house”.

6. Accelerate the timetable for HEFCE to decide and implement a policy on Open Access for articles arising from HEFCE funded research, on the assumption that HEFCE’s policy should be consistent with RCUK’s (they need to work in lockstep).

7. Actively promote comparable policies in Europe and in other jurisdictions, in particular in the USA, and be seen to be so doing.

Conclusion

20. We are grateful for the opportunity to respond to the Committee’s call for evidence, and we would be happy to speak directly to members of the Committee, or to clarify points in writing if that would be helpful.

Maren Deepwell PhD
Chief Executive
Association for Learning Technology (ALT)
17 January 2013

¹⁰ A trenchant expression of this approach is given by Stevan Harnad here: http://openaccess.eprints.org/index.php?/archives/932-RCUK-Policy-In-Direct-Contradiction-With-BOAI-10-Recommendations-for-Institutions.html

A copy of this response is available at http://repository.alt.ac.uk/2242/