

First Name: Alison Last Name: Taysum Email Address: ast11@le.ac.uk
Responding on behalf of an Organisation Country: UK
Organisation: British Educational Leadership, Management and Administration Society (BELMAS)

Question 1. Is there anything unclear or are there any issues that have not been addressed by the guidance document?

The British Educational Leadership, Management and Administration Society has concerns about the method and speed of implementation proposed both by cOAlition S and, in the UK, UKRI, particularly the elimination of Green (and hybrid) journals.

Question 2. Are there other mechanisms or requirements funders should consider to foster full and immediate Open Access of research outputs?

a) We do not believe that 'Gold' access is the best solution for the prestigious leading international journal of our field Educational Management, Administration and Leadership and her sister professional journal Management in Education; we think that Green (and hybrid) journals are capable of meeting aspirations for wider access.

b) We believe that cOAlition S, and in the UK, UKRI and others, should engage more widely with a range of stakeholders to consider relevant evidence about systemic effects, looking also at distributional effects (between newer and older researchers; research in different parts of the world; and researchers from different disciplines) and a range of possible unintended consequences, including the effects on the social sciences. The Learned Society BELMAS would be happy to co-operate in any such exercise that seeks to recognise different national implementation strategies.

c) Of great concern is the negative impact the stance on hybrid journals may have for the important work of BELMAS in promoting, maintaining, improving and advancing education of the public by the advancement of the practice, teaching, study of and research into educational leadership, management and administration.

d) Our journals have high numbers of submitted articles, and exercise a stringent control of 'quality' rather than seeking to maximise income by publishing larger numbers of articles. We have concerns about the quality of published research, and the efficiency of judging quality in a system that gives incentives for volume of publications. Whereas our Learned Society members do not plan to change their attention to peer review or selectivity of publication, other publications may do just that. Large volume commercial publishers may have an even larger role in academic publishing bringing economies of scale that may make journals funded only by article processing charges viable, and incentivise growth in the number of published articles irrespective of quality. Any of these developments could make finding and judging the quality of published research more inefficient.

e) There are a range of questions about the impact of sudden alterations in the distribution of publishing resources under the transformation being proposed by Plan S on countries that are not cash rich who will not be able to pay article processing charges. For such countries, current difficulties in supporting access to read under the subscription charging model will be replaced by difficulties in being published.

f) There has been relatively little discussion about the importance of continuing to have different streams of funding that support academic autonomy.

Recommendations:

1. Despite the issues we have raised, BELMAS remains a supporter of open access, and understands the desire to increase it further. We also understand concern over publication costs, not only as a barrier to dissemination and access, but also as a drain on public resources which could be used elsewhere. We do not, however, agree that a single model based on access via article processing charges is necessarily the best way forward. We think cOAlition S should take an evidence-based approach to the proposal to eliminate Green (and hybrid) journals that considers how to promote greater openness that works for all disciplines. Engaging with the evidence will take time, but the evidence should be considered before the planned implementation and its timetable, are put into effect. This need not lack a sense of urgency, but it would take more detailed empirical work than has been done up to now to address the consequences – the advantages and disadvantages – of the implementation proposals set out.