

Russell Group response to the House of Lords Science and Technology Committee's inquiry on open access publishing

Summary

- The Russell Group is committed to open access, but the sector, and in particular research intensive universities, face a number of challenges in the implementation of open access policy.
- We welcome recent engagement with Research Councils UK (RCUK) to discuss many of these challenges. We hope solutions can be found to ensure universities are not unnecessarily burdened and we will continue to work with RCUK and BIS to address our ongoing concerns.
- RCUK funding may only be enough to cover Gold open access costs for around 10% of papers published by Russell Group universities. It is important that universities have as much flexibility as possible in how they use their block grant to achieve open access.
- The Green route should be considered as a viable and cost effective route for delivering open access. Embargo periods still need to be agreed and could be phased with the intention to deliver shorter periods over time. Greater freedom could also be given on licence requirements to help keep costs down and ensure researchers aren't overly restricted in where they can publish.
- Universities should not be penalised on efficiency savings related to the Wakeham Review as they deliver on open access.
- The Government should look in more detail at the potential unintended consequences of implementing open access policy and should include this with the RCUK review of implementation in a year's time.

1. Introduction

- 1.1 We welcome the opportunity to contribute to this timely inquiry into open access publishing. As well as submitting this short note, we would be happy to contribute oral evidence if required.
- 1.2 The purpose of The Russell Group is to provide thought leadership and strategic direction for the 24 major research-intensive universities of the UK; we aim to ensure that policy development in a wide range of issues relating to higher education is underpinned by a robust evidence base and a commitment to civic responsibility, improving life chances, raising aspirations and contributing to economic prosperity and innovation.

- 1.3 The Russell Group has been monitoring the development of open access (OA) policy for some time. We followed the 'Finch Review' and Royal Society work on science as an open enterprise with interest and the Russell Group is now represented on the Research Sector Transparency Board which will be covering OA, open data and other issues over the coming year. We have recently had a number of meetings with Research Councils UK (RCUK) to discuss implementation of OA policy.

2. Russell Group position on open access publishing

- 2.1 The Russell Group is committed to open access publication, but we need to ensure the implementation of policy works for the sector, hence our on-going discussions with RCUK. We understand that the Higher Education Funding Council for England (HEFCE) will broadly follow RCUK's lead on OA for future rounds of the Research Excellence Framework (REF), so it is vitally important to get this policy and its implementation right first time.
- 2.2 Implementation of OA policy creates significant challenges and risks to universities – even more so for research intensive universities because of their higher volumes of publications and focus on publishing in journals with the highest standing. Gold OA publishing, where an up-front 'article processing charge' (APC) allows instant open access, may well become the standard international model in future, but there will be a long transition period. It is important that the UK is not disadvantaged or burdened with unreasonable costs or other requirements during the transition. At all costs, implementation of OA policy must avoid damaging the UK's standing for world-class research.
- 2.3 We have a wider concern about the overall business case for the Government's OA policy that arises from some of these implementation issues. Ultimately, universities could see savings from a world-wide move to Gold OA as this would allow current subscription fees (which some universities report are increasing at rates well above inflation) to be repurposed to pay for APCs. Other low-cost online OA publishing models are also likely to emerge. But in the meantime, universities in the UK will need to continue paying subscription charges to access journals and will be widening their payment of APCs, while at the same time our international competitors will increasingly be able to access our best research papers for free.
- 2.4 The Government should work with universities, research funders and other stakeholders to monitor development of the OA market and whether subscription rates do indeed start to come down – and come down substantially – as payment of APCs increases. The UK produces approximately 6% of the world's published research articles, so the risk is that the UK will only see subscription rates come down by this much overall.
- 2.5 We would also like to see the full business case from Government on the benefits and costs of moving swiftly towards Gold OA, ahead of many of our international competitor nations, and why benefits to the economy – such as increased exploitation of research outputs – cannot be achieved more cost effectively through Green OA. We have already expressed concern to BIS about the top-slicing of Research Council funds to pay for open access and the concomitant reduction in research that they will be able to fund as a result.
- 2.6 The main issues around implementation that still need to be addressed are listed below, along with our proposed solutions. Where funding may be required to address

these issues this should be additional, new money, rather than being taken from research budgets. If this is not possible, other alternative solutions may be required, for example allowing universities more freedom on how the block grant can be used and/or altering OA target levels to create a phased approach to OA over a longer time period.

Engagement with RCUK

- 2.7 We welcome the willingness of RCUK to engage with us on the implementation of OA policy. Recent discussions we have had with RCUK have been constructive and we are hopeful that some of our concerns will now be addressed before the OA policy goes live this spring.
- 2.8 At our most recent meeting with RCUK, which also involved Research Libraries UK and HEFCE, we discussed each of the points set out in sections 3-5, below. It was clear that all those involved shared common ground on ensuring OA policy is implemented well.
- 2.9 We have been particularly grateful for the clarifications that RCUK has been able to provide on its publication targets, compliance and other matters, and its willingness to review policy implementation in a year's time. We welcome that RCUK describes the implementation of its OA policy as a journey over at least five years rather than being a 'day 1' requirement. This will allow much needed breathing space for universities to make further steps towards open access. Ultimately, moves in the direction of OA will probably take longer than five years.
- 2.10 We now look forward to confirmation of the position RCUK will take as it finalises its guidance notes on implementing OA policy and we hope that the final guidelines will reflect the proposals agreed at the meeting.

3. Funding for open access

Overall funding available

- 3.1 RCUK will be providing a block grant to universities to accelerate Gold OA publishing in the UK from 1 April 2013. The Government has also provided £10 million split between 30 institutions to pump prime OA publication ahead of the RCUK block grant being released.
- 3.2 While 107 institutions will receive some RCUK funding, Russell Group universities will receive 74% of the overall block grant for the two years that have been costed by RCUK. Russell Group universities are set to receive approximately £12.5 million in Year 1 and £14.7 million in Year 2.
- 3.3 These amounts relate to achieving an RCUK target of 45% Gold OA for publications arising from Research Council funded research in Year 1 and 53% in Year 2. As an example, RCUK expects the grant to fund the Gold OA publication of around 170 papers from Durham University in Year 1, 500 from the University of Manchester, and around 700 papers each from the University of Oxford, the University of Cambridge and University College London. However, RCUK is only providing funds to cover the publication of 38 papers from the London School of Economics and Political Science.

- 3.4 In total, the funding is expected to cover the publication of around 7,500 papers by Russell Group universities in Year 1 (out of universities total of approximately 10,000) and 8,800 papers in Year 2.
- 3.5 We estimate that Russell Group universities publish around 72,000 papers a year. Although not all of these papers will derive from Research Council funded activity it is important to note that the Government's moves to encourage Gold OA may therefore only fund this for around 10% of Russell Group publications in Year 1.

Full economic costs

- 3.6 The Wellcome Trust is willing to fully fund APCs and is also open to additional funding requests so that researchers are not constrained by an artificial funding cycle when delivering their own OA policy.
- 3.7 RCUK's proposed policy (set out in a draft guidance note issued in November 2012) had been to pay 80% of the full economic costs for Gold OA on papers from the research it funds as an indirect cost of research. This would leave universities to find the other 20% of Gold OA costs to deliver a policy that is in addition to OA measures universities are themselves already taking.
- 3.8 In discussion with RCUK they have now made it clear that this will not be the case and that how the block grant is used to cover APCs will be left to the institution, with RCUK focusing on monitoring progress towards their Gold OA targets. This is a welcome move that puts the emphasis on outcomes rather than how they are achieved.

Administration and management costs

- 3.9 The administrative and management costs for universities of establishing and operating a new OA model are high. The costs are recurring and will need to be covered for the full period of policy implementation. We have recommended to RCUK that universities should be free to use the block grant to cover reasonable costs associated with OA, rather than being overly prescriptive. This additional freedom would allow universities to be flexible in how they administer the block grant, deliver culture change for the future (e.g. with training), provide oversight of publishing strategies and explore other options that can lead to more open access in the future.
- 3.10 RCUK has now agreed to look at how further flexibility could be introduced.

PhD students

- 3.11 Inclusion of PhD students in the policy creates additional challenges (e.g. in terms of monitoring, administration and additional costs). If insufficient funds are available to cover all OA costs then researchers in the early stages of their careers are more likely to be disadvantaged.
- 3.12 We have proposed that an element of additional support for PhD students should be included to ensure they are not adversely affected and we will monitor the situation closely.

Collaborative research

- 3.13 Most research is a collaborative effort and therefore the RCUK's draft guideline that OA policy will apply to all research funded "wholly or in part" by the Research Councils is impractical. It is almost impossible to disaggregate research outputs to determine if papers include an element of Research Council funded activity or not – and in particular if the original research was done many years ago or elsewhere.
- 3.14 Policy needs to recognise the practicalities of implementation. If the policy is to apply to research funded in part by the Research Councils then this needs to be a significant part of the project funding so it can be identified easily; a limitation period is also required so researchers do not have to determine if previous projects that have contributed to the research paper were funded by the Research Councils. We have asked RCUK to look at the wording of its draft guidelines to provide a solution that is simple and practical to use and which will not create unnecessary burdens.

4. Green open access, embargo periods and licence issues

Green open access

- 4.1 Green OA was recognised as being important in the Finch Review, and is also accepted as part of the OA landscape by BIS and RCUK. A quarter of Research Council funded papers are expected to be made open access through Green routes in five years time in the RCUK model.
- 4.2 Green OA can include self-archiving in institutional or discipline-based repositories and/or archiving in repositories operated by publishers. Publishers may then allow free access to deposited material after an embargo period. Institutional repositories are already searchable by current web engines in an effective way.
- 4.3 The Green route is a simple, genuine and cost effective way of delivering OA, but there is no additional RCUK support for Green OA even though it is a part of their overall OA model. We recognise that the Government and RCUK have a stated preference for Gold OA, but we would like to see a wider acceptance and financial support for Green OA routes as a valid option. The Finch Review recommended an additional £10 million should be made available for repository enhancements.

Embargo periods

- 4.4 There is some uncertainty over the allowable embargo period for Green OA. The RCUK expectation is only 6-12 months (depending on funder) in all cases, whereas BIS, following Finch Review recommendations, allows 12-24 months in certain circumstances. Publishers in some disciplines are now asking for even longer embargo periods, which would then restrict the publishing options available to UK researchers.
- 4.5 Green OA with reasonable embargo periods is an important element in the mix of options for all researchers and in particular for disciplines in arts, humanities and social sciences.

- 4.6 We have suggested that RCUK should follow the Finch Review recommendations, but recognising that some disciplines have already moved to six month embargoes as the norm and so not pulling back in these areas. RCUK could then take a phased approach to implementation, reducing the expected embargo period over a number of years if and when disciplines are able to move in that direction.

CC-BY licences

- 4.7 OA costs are likely to be higher than modelled for the Finch Review because of the requirement for Gold OA to be accompanied by a CC-BY (creative commons by attribution) licence allowing commercial and all other forms of re-use and modification. Some journals have already increased their APCs where this licence is available, others are unlikely to offer the highest level CC-BY licence as an option and this will restrict journal choice for researchers.
- 4.8 We recognise that a CC-BY licence removes doubt about how research papers and their content may be reused, but we would like to see the licence requirement widened to include other CC-BY non-commercial and share-alike licences. This will help to keep OA costs down and will ensure researchers are not unduly restricted in where they can publish. Again, there could be a phased approach over a number of years to encourage CC-BY in the long-term.

5. Other challenges

Wakeham efficiencies

- 5.1 Implementation of OA policy introduces additional administrative burdens on universities which is contrary to efforts on improving efficiency that universities are making in light of the Wakeham Review.
- 5.2 We would welcome a statement from the Government that universities will not be penalised on efficiency savings related to indirect costs as a result of implementing OA policy.

Unintended consequences

- 5.3 Open access policy implementation may create unintended behavioural consequences, for example in publishing strategies among academics or in the perceived attractiveness of the UK to overseas researchers. In turn, this may have important knock-on consequences. This may, for example, be seen as an impact on the international standing of UK universities if there is an overall reduction in the number of research papers submitted to the most highly-rated journals because of cost or licence restrictions or if the proportion of international researchers in UK institutions is affected.
- 5.4 In some disciplines, including physics and economics, it is already fairly standard practice for working versions of papers to be circulated on the web or shared through open repositories for comment and further input. It is possible these activities could be put at risk by some approaches to OA publication.

- 5.5 These potential unintended consequences need to be better understood and balanced against opportunities that might arise from OA. We would welcome a commitment from Government to investigate these issues further and publish its findings at the same time as RCUK reviews implementation of OA policy.

Arts, humanities and social sciences

- 5.6 The current OA policy applies only to research papers (in journals and conference proceedings) so it is likely to exclude much arts, humanities and social science research. This creates a discipline-level split on OA, which will need to be addressed.
- 5.7 However, what works for STEM disciplines may not always work in other areas and it is possible that different approaches may be needed for some arts, humanities and social science disciplines.
- 5.8 We understand that steps are now starting to be taken to address these discipline-specific issues, and additional challenges for Learned Societies publishing, and we welcome the opportunity to engage with RCUK and other stakeholders as these develop.

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