



## **Submission to House of Lords Select Committee for Science and Technology Enquiry on Open Access**

### **About UKCoRR**

1 The United Kingdom Council of Research Repositories (hereafter UKCoRR) is an independent membership organisation of repository managers, administrators and staff in the UK. UKCoRR's mission is to:

- Promote repository management as a recognised and respected profession
- Provide a forum for discussion and exchange of experience
- Represent the views and concerns of those who work with repositories in organisational, policy and strategic development.

2 UKCoRR currently has 251 members (14th Jan 2013) which includes representatives from the majority of the UK's Higher Education institutions.

### **UKCoRR's credentials for commenting on these issues**

3 It is our view that the repositories staffed by our members are a vital part of the UK's research infrastructure and have a unique open access (OA) focus. Research repositories collect, curate, preserve and make available open access material using both 'green' and 'gold' models. Furthermore our members have experience and expertise, solidly grounded in practice, in:

- the current scholarly publishing environment,
- making publications open access,
- copyright and licensing in scholarly publications,
- advocating for open access, and
- the cultural change needed in academia for open access to research to become the norm.

4 Many repository staff are currently playing a leading role in shaping their institutions' open access policies and practices. In particular, repository staff are at the forefront in implementing RCUK's new open access policy.

### **Overview of UKCoRR 'views on the actions taken by Government and RCUK following publication of the Finch report'**

5 UKCoRR and its members strongly support OA but are concerned that, by emphasising the ‘gold’ route to OA, the Finch report and RCUK’s new open access policy are not as effective as they could be in furthering the ideal of full open access to all research outputs. We feel that the Finch report failed to consider a number of factors in its consideration of the ‘green’ route to open access, including the fact that many institutions and funders with mandates did not follow up on these with any action to ensure compliance, thus reducing their effectiveness. The recommended ‘gold’ route will have this support and more.

6 We are committed, as experts in the field, to assisting our institutions make any period of transition go as smoothly as possible but the role that institutional repositories (IRs) might play in the process has been overlooked, with a very tight time frame for institutions to implement mechanisms to support the administration of the block grants which is at odds with RCUK’s assertion that they support both the ‘green’ and ‘gold’ models of Open Access.

7 We consider the move to a ‘gold’ centric model will only bring maximum benefit as part of a coordinated international move; implemented unilaterally it will lead to a disproportionately high cost for the UK in a time of austerity and correspondingly scarce research budgets. The need to effectively disseminate research should not be allowed to impact the process of conducting that research and studies have shown<sup>1</sup> that the “most affordable and cost-effective means of moving towards OA is through Green OA, which can be adopted unilaterally at the funder, institutional, sectoral and national levels at relatively little cost.” An additional threat is the pace of change in the transition period could impact on the pace of research in the country damaging the reputation of the sector.

**In the following, we address the four issues highlighted by the House of Lords Science & Technology Committee in turn.**

**Issue 1: support for universities in the form of funds to cover article processing charges, and the response of universities and HEIs to these efforts**

8 Funds from RCUK will be allocated on the basis of covering 80% of anticipated APCs for RCUK funded researchers, universities must find the remaining 20% and make up any shortfall. This will divert scarce funds from other activities both within institutions as well as from research funders.

9 Universities wishing to support gold OA for researchers that are not funded by RCUK will need to find even more money and it will be essential that Universities do so to avoid creating a group of ‘second-class’ researchers who do not have the advantages of those funded by RCUK, further damaging the research reputation of the UK. We have already seen this kind of division

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<sup>1</sup> Houghton, J. and Swan, A. (2013) *Planting the Green Seeds for a Golden Harvest: Comments and Clarifications on "Going for Gold"* DLib, 19(1/2).

in another way where publishers are charging RCUK funded researchers more for open access under compliant licensing agreements<sup>2</sup>.

10 The costs associated with implementing the RCUK policy go beyond APCs per se, there is also cost associated with establishing and administering university funds. Given the complexity of the current landscape (variety of APCs, publisher membership models, need to allocate fund fairly, which institution pays for collaborative publications etc) these are significant and will potentially increase over time. In addition there is the level of compliance monitoring and reporting that will be required by the RCUK.

11 These extra costs were recognised by BIS grants, but were allocated to only 30 universities. Other institutions are facing the same costs and challenges but have not received funding to address them.

12 The current policy will require more staffing to be provided; in response to the Finch Report UKCoRR called on organisations with repositories to “reflect whether their current resourcing arrangements in terms of staffing and support are sufficient to meet the needs and aspirations of the institution and funders in achieving open access for all their work”<sup>3</sup>.

13 Open Access began as a community driven movement with the passionate support of sections of the research community, forcing this change on researchers too rapidly could lead to the policy becoming just another burden on already scarce research resources.

### **Issue 2: embargo periods for articles published under the Green model**

14 We are concerned that publishers may choose to extend their embargo periods for Green Open Access in excess of those permitted by RCUK to force RCUK funded authors to pay for gold OA. It is too early to see whether this is happening but the open letter from the editors of 21 prominent History journals published by the Institute of Historical Research<sup>4</sup> which recommends instituting an embargo period 3 times the length required by RCUK (36 months) sets an unwelcome precedent.

### **Issue 3: engagement with publishers, universities, learned societies and other stakeholders in the development of research council Open Access policies and guidance**

15 There is a general feeling that protection of publishers’ revenue has been prioritised over achieving cost effective Open Access. UKCoRR would have welcomed more engagement with repositories in development of policy.

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<sup>2</sup> Nature Publishing Group ([http://www.nature.com/press\\_releases/cc-licenses.html](http://www.nature.com/press_releases/cc-licenses.html)) will be charging between £100 and £400 per article more for the CC-BY license than their more standard CC-BY-NC-ND or CC-BY-NC-SA licenses.

<sup>3</sup> <http://ukcorr.org/2012/06/21/the-finch-report-optimism-hope-and-frustration-for-repository-staff-in-equal-measures/>

<sup>4</sup> <http://www.history.ac.uk/news/2012-12-10/statement-position-relation-open-access>

16 RCUK have issued a demand for compliance monitoring and yet not issued detailed guidance on how this process will work making it hard for universities to set up procedures for compliance.

17 Currently the majority of publisher policies for both gold and green Open Access do not meet the criteria defined by RCUK<sup>5</sup>. We hope that publishers will amend their policies to meet these high standards but in the meantime academics may find that although their preferred journal does offer some form of OA, it is not fully compliant with RCUK policy leaving them with the unenviable task of choosing between the preferred journal for their field of research and compliance with their funding agreement; a difficult position as many institutions and HEFCE continue to emphasise the importance of where you publish.

18 The discussions about Open Access, via both routes, have focussed almost entirely on journal articles in STM subjects. The different publishing cultures and research climates of the social sciences, arts and humanities have been left out of the debate. Mandates such as the RCUK's treat non-journal outputs as 'grey literature', which is an error – a published book is an important and valid way to disseminate research results, especially in fields where the relevance of outputs persists, and indeed can increase over time. It is particularly important that the continued dominance of scholarly monographs in these fields is recognised and provision of Open Access to this type of publication is encouraged.

19 Additionally the AHRC regularly funds practice-based research in the arts where the output may be a performance, the creation of an artefact, or an exhibition. No attention at all has been given to the policy, social, economic and technological requirements for providing Open Access to non-textual outputs.

20 Given that their policy is based on recommendations similar to those of the Finch report, a lot of focus has been placed on RCUK. Nevertheless, RCUK funding represents a proportion of total Government R&D funding, and Finch applies to *all* publicly funded research. It will be valuable for other Government agencies and Departments to express their own views and policies on this to help inform the rollout of Open Access more widely.

#### **Issue 4: challenges and concerns raised by the scientific and publishing communities, and how these have been addressed**

UKCoRR have the following concerns:

21 The Finch report has a strong preference for Gold OA which has the discussed need to find extra funds when repositories are already able to make material OA at much lower cost<sup>6</sup>.

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<sup>5</sup> I.e. CC-BY for gold, CC-BY-NC for green with appropriate embargo periods.

<sup>6</sup> <http://ukcorr.org/2012/06/21/the-finch-report-optimism-hope-and-frustration-for-repository-staff-in-equal-measures/>

Over the past decade the investment of public money into the national repository infrastructure by JISC can be said to be tens of millions of pounds and this investment should be built upon.

22 UKCoRR is also concerned that this may see funding streams moved away from more niche, but nevertheless valuable, research in order to ensure the publication of a more limited selection of key research<sup>7</sup>.

23 In effect this move could lock out or significantly reduce the published contribution of independent scholars whom are not attached to an institution as well as impacting on Early Career Researchers who may find it more difficult to secure funding.

24 APCs may be set artificially high, resulting in more tax payer's money being diverted to the publishing industry. Will this result in a reduction in the journal subscription charges? Evidence seems to be growing that they will but only in proportion to the number of article processing charges (APCs) they receive<sup>8</sup>. So the maximum discounts we could receive under current plans would be equivalent to the proportion of the world's research funded by the RCUK, or put another way, a fraction of 6%. These discounts for most HEIs would also take a number of years to be realised in Library budgets given publishers' continued reliance on 'big deals' as the primary route to journal subscriptions.

#### **Concluding remarks/recommendations.**

25 UKCoRR welcomes moves towards OA and recognises that recent action taken by Government and RCUK has done a lot to establish OA as a priority for UK research.

26 Encouraging academic authors to retain more rights (e.g. licence rather than transfer copyright) and promoting green OA would be more cost effective at this stage.

27 We recommend that the Government and RCUK, particularly, demand demonstrable value for money from publishers charging APCs.

28 We advocate moves towards IRs and publishers cooperating towards achieving the RCUK/Government's aims. This interface could be used to build trust and encourage the development new models of dissemination, which could be used to alleviate the concerns of the Learned Societies by re-positioning them in the scholarly lifecycle.

29 Further research should be carried out to inform the debate around embargo periods and their impact on journal sales, to better inform Publishers/Learned Societies on addressing their concerns. Responses on this matter so far seem somewhat arbitrary, which suggests a lack of hard facts on what impact there will be in the longer term.

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<sup>7</sup> Ibid

<sup>8</sup> See Elsevier's '[Double Dipping Policy](#)' for an example.

30 UKCoRR strongly encourages some leniency and flexibility from the RCUK and the government as a whole, in implementing a change of this nature and scale. Regular reviews and updates will be needed to both policies and practice in response to the reactions of other stakeholders and countries.