

Academy of Social Sciences Response to the Supporting Guidance for RCUK Policy on Open Access

The Academy of Social Sciences welcomes the opportunity to respond to the Supporting Guidance for RCUK Policy on Open Access publishing.

The Academy of Social Sciences has 46 Learned Societies and 900 distinguished social scientists among its membership. The Academy welcomes the issue of Supporting Guidance by RCUK and the invitation to stakeholders to comment on it.

Broadly, we feel that RCUK has made a minimal response to some issues of concern to the social science community. In particular with regard to the strong preference for Gold over Green routes to Open Access (OA), and the apparent eventual aim for a system based on maximum embargo periods of only 6 months.

3.1 Definitions of Open Access

We prefer a ‘mixed economy’ of publications, allowing Green options to exist in parity alongside Gold. RCUK clearly continues to prefer the Gold route, and its statement that *‘the ultimate decision on which model to follow remains at the discretion of the researcher and their institution’* sits unsatisfactorily beside the prescriptive content of the Publishers’ Decision Tree and other elements of the Guidance, which appear to consign Green routes with embargoes of over 6 months to an option of last resort, or only to exist during an interim period. There is a lack of concrete evidence that Gold is the best policy. In other countries implementing OA, there is often no clear preference for Gold over Green.

The USA, as the largest research and publishing market in the world, is a key player. At the Academy’s November conference, Dr Felice Levine, who directs the American Educational Research Association, suggested that the US government ‘will not quite follow the Finch report’: it will support the move towards the principle of OA, but without prescribing how it should come about.

3.2 What is covered by the policy?

We are glad to hear that monographs are not to be included under Open Access policy at the present time.

3.3 Acknowledgement of funding sources and underlying research material

We also approve that the Guidance does not oblige researchers to make all data or research materials open: confidentiality relating to identifiable human research participants is vital to uphold in many social science projects. However, we do not feel that as currently worded the guidance is clear enough about what is expected in terms of openness of metadata, and we recommend that further specification is included in the revised Guidance.

3.4 RCUK OA Block Grant

As well as actually publishing research, the block grant will cover administration/monitoring and management of APCs, so there are concerns that the funds for publishing may be more restricted than they appear at first sight. We note that it remains unclear how exactly Universities without a block grant, or Learned Societies, will function in the OA landscape.

We wonder whether funding to support OA will increase over the next five years, given the uncertainties of the next Spending Review. There is a further implicit assumption that OA will be self-sustaining after the transition period, but there are many uncertainties in this respect too.

3.5 Article Processing Charges

The Guidance states that *'institutions should work with their authors to ensure that a proper market in APCs develops, with price becoming one of the factors that is taken into consideration when deciding where to publish'*, which seems an unrealistic proposition. Academics will continue to wish to publish in outlets which carry prestige and the best opportunities for citation and reach in their community. Price cannot trump these factors in academic decision-making.

3.6 Embargo periods

This section of the document is currently drafted in a way which is too vague to provide clear policy guidance.

In paragraph **3.6 ii** a maximum embargo period of 6 months is envisaged for all research papers, even those assigned a 12-month embargo period in the publishers' decision tree. It

is just not acceptable to view the 12 month embargo period for HSS output as a temporary measure, without consultation on a move to 6 months and/or firm evidence that it is workable. Embargo periods of six months will seriously threaten the viability of many Learned Societies, with effects not only on publication options, but also on the wider work the societies do in support of their disciplines.

The rigid policy presented above is in contrast to the loose language in **3.6 iii**, where reference is made to *'meet[ing] the spirit of the RCUK policy'*. What does it mean to 'meet the spirit' of OA compliance? Such ambiguities must be resolved in the final Guidance. We recommend that the phrase *'there are insufficient funds to pay for the APC'* in this paragraph is replaced with *'where the author does not have access to funds to pay for the APC'*, as it is quite possible that an institution may have funds to cover publication but may not choose to spend them on a particular paper; the position of the individual and the institution in relation to funds should not be elided. It is important that individual choice of publication routes is preserved. Where authors collaborate with researchers in non-OA compliant countries, they may also need to access a publishing route independent of institutional funds.

3.7 Licences

CC-BY licencing is not a standard derived from OA journals, but rather from open source computing. The RCUK proposition to *'ensure that the 2014 review includes an assessment of the impact of the use of CC-BY especially within the Arts, Humanities and Social Science disciplines, and ...[to monitor] through active engagement with the various academic communities and their publishers'* is welcome, in light of the acknowledgement that such licencing is predominantly used in STEM subjects. However, the current wording does not address adequately the concerns of HSS researchers who fear for the integrity of their product – essentially their own thoughts in writing – in a system which allows re-use without permissions. STEM products have the additional protection of patenting, independent of published results, whilst no additional protections are available to HSS researchers.

Paragraph **3.7 v** still does not explain exactly how third-party material can be utilised under CC-BY. Taken together **3.7 vi** and **viii** are ambiguous: Green route does not require CC-BY, yet it is preferred/recommended.

3.8 Repositories

There are issues related to the funding and sustainability of repositories under Open Access – we recommend that monitoring of repositories is included in RCUK reviews under **3.13** below.

3.9 Accepted manuscripts

We welcome RCUK's commitment to peer review as a crucial part of quality assurance in publication of research. However, lower-priced publication options include on-line publishers who do not conduct peer review to the same standard as subscription journals, and so the cost of peer review needs to be considered in greater depth as part of the OA landscape.

3.10 The Transition period

A major issue is the length or nature of the transition period to OA. We are pleased to see that the transition period is now identified as being of 'around five years'. However, **3.10** again uses vague language: during transition researchers and institutions should 'follow the spirit of the policy' and 'strive to achieve full compliance'. It remains unclear what this means in practice. It is also unclear how the move from 75% of research papers being compliant to 100% being compliant is to be funded at the end of transition. The need for a managed transition was a prominent feature of the Finch report.

3.11 Allowable costs within research applications

Whilst funding for publication of output not covered by OA in grant proposals is to be welcomed – notably monograph publications – we will keep a watching brief for any indication that such publications are underprivileged in the move to Open Access.

3.12 Institutional Publication Funds

We have outlined our concerns about the shift to internal institutional systems to allocate publication funds in response to other consultations. These concerns are both financial, and related to the shift from academics choosing directly where to publish to academics applying to an institutional fund where administrators can decide whether and where funds should be allocated. The Finch report acknowledged that:

'Current funding regimes focus on providing access to research literature through libraries, via payments for subscription-based journals. Arrangements to meet the costs of APCs for open access publishing tend to be ad hoc and unsystematic. In the period of transition there are bound to be additional costs as both systems exist side by side.' (Report of the Working Group on Expanding Access to Published Research findings - Executive Summary (2012):6)

3.13 Reviews of the policy and implementation

We fully endorse **3.13 iii** that *‘Only with evidence can RCUK properly understand how its Open Access policy is working, and, for example, set the block grants at a level appropriate for the achievement of the compliance we require.’* However, we are not persuaded that appropriate evidence will be available in all the proposed areas of review in 2014. As publishing (and subscription) contracts are often for up to 5 years in length, it may well be that the transition to OA publishing has barely begun by 2014. Many journals have long lead times, with articles currently accepted for publication in a couple of years’ time. The recent House of Lords Science and Technology Committee Report on *‘The implementation of open access’* said that:

‘RCUK must remain vigilant beyond the planned 2014 review. We recommend that it commit, as a minimum, to a further review of the implications of its open access policy in 2016 and an end-stage assessment in 2018.’ (HL Paper 122 (2012-13):17)

We support this position on further and later reviews, as evidence relating to all the issues listed under **3.13 iii** will take time to become available and to collate and analyse meaningfully. We also note that the monitoring of repositories mentioned under **3.8** above should be an item in the review schedule. We welcome RCUK’s desire to incorporate stakeholders’ views and evidence into the review process and feel that a commitment to repeated reviews over time would best secure this engagement.

It is important that the terms of reference of the review, the membership of the review panel, and its findings concerning the impact of OA, are all made public and open to consultation.

3.14 Monitoring

The Academy welcomes RCUK’s emphasis on a minimum level of reporting so that data related to OA publishing is not burdensome to supply. To obtain a full picture of the impact of OA implementation there must be simple, flexible and accessible reporting system which reaches all parts of the research and publishing ecosystem, and which stands up to robust scrutiny.