

Russell Group evidence: Independent review of the implementation of RCUK Policy on Open Access

1. Introduction

- 1.1 The purpose of the Russell Group is to provide strategic direction, policy development and communications for 24 major research-intensive universities in 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.
- 1.2 We welcome the opportunity to provide feedback on RCUK's Open Access (OA) policy and support the emphasis on an evidence-based review of implementation. The Russell Group is committed in principle to OA publication of research and our universities have worked hard to implement RCUK's OA policy as effectively as possible. However, research-intensive universities face a number of challenges in the implementation of this policy.
- 1.3 In particular, we remain concerned about the overall business case for a predominantly Gold OA policy and want to ensure that the Green route remains a valid option for the future. Researchers should be free to publish how and where they believe it is most appropriate. Whilst most publishers offer RCUK-compatible options for OA, researchers' choices should not be restricted where this is not the case, or where alternative publication routes are more appropriate, or if the cost of compliance is excessive. If academic freedoms are unduly affected by OA compliance issues then there is a risk that the impact of UK research will be limited in the immediate future, with possible wider consequences for the UK's international standing.
- 1.4 Of course, as the call for evidence recognises, the policy is still in relatively early stages of implementation, so the full impacts, implications and potential costs and benefits may not yet have been fully realised. On-going monitoring of the impact of this policy over time is paramount, as is a commitment to ongoing effective engagement with the UK's research-intensive universities which are most affected by the policy.

2. Green/Gold OA

- 2.1 We support Green OA as a simple, genuine and cost-effective route to deliver OA. We therefore welcome that RCUK guidance states both Gold and Green OA routes are acceptable to comply with the policy:

Although this [Gold OA] is our preference, we allow a mixed approach to Open Access; and the decision on which model to follow remains at the discretion of the researchers and their research organisations.¹

However, it would be helpful for this clarification to appear prominently in the policy, not just in the guidance. The policy itself currently only refers to 'immediate, unrestricted, on-line access', which would suggest the Gold route.

¹ <http://www.rcuk.ac.uk/RCUK-prod/assets/documents/documents/RCUKOpenAccessPolicy.pdf>

- 2.2 The emphasis on Gold OA has led to the impression amongst some researchers that Green OA is a second rate choice. In some cases researchers have not been aware that the Green as well as Gold option is available. On-going support from RCUK for both Green and Gold routes is essential.
- 2.3 There are now OA requirements under the new EU research Framework Programme, which stipulate that scientific publications resulting from publically-funded research under Horizon 2020 shall be ensured. Green and Gold access routes are treated equally with no preference specified for either route. The Canadian Research Agencies, the Australian Research Council and the US National Institutes of Health (NIH) are all pursuing policies requiring research they fund to be publicly accessible within 12 months. The UK risks putting itself at an international disadvantage if it is isolated in its preference for Gold OA and does not recognise the strong role that the Green route can provide, not just in the short-term. Ultimately researchers need to have sufficient flexibility to be able to publish where it is most suitable for them.
- 2.4 The timeframe for achieving full compliance with RCUK policy and for achieving 75% publications as Gold OA should be kept under review and should take into account the outcomes of this review. Researchers and institutions must not be put at a disadvantage against international competitors while the transition to a new OA publishing future takes place.

3. Cost issues

- 3.1 Whilst the Russell Group is committed to OA, we want to ensure that costs related to the implementation of OA policy are proportionate. We continue to have concerns about top-slicing the research budget in order to fund OA, not least because the true costs are as yet unknown and may not be fully known for some time.
- 3.2 The Finch report stated that universities should not be expected to bear the brunt of additional costs of moving to Open Access. However, whilst the Block Grant is provided to eligible research organisations primarily to cover the payment of Article Processing Charges (APCs) and other publication charges, there are other costs associated with the implementation of OA policy which are borne by universities. In particular, institutions have incurred additional management and administration costs as many have had to employ extra staff in order to, for example, track publications from researchers receiving RCUK grants; advise researchers about the RCUK policy and the most appropriate route to OA compliance; manage the block grant and monitor compliance with the policy, including checking that the correct licences have been applied.
- 3.3 Green OA presents a significantly more cost-effective option compared to Gold or hybrid OA and it is therefore important that this route continues to be accepted. However, it should be recognised that this route can also have cost implications for institutions.
- 3.4 Despite institutions now paying significant sums to publishers to cover APCs, subscription costs for many journals have not fallen, thus requiring universities to effectively pay twice with the result that their research is being made open, whilst they cannot access others' research without paying.
- 3.5 It is difficult to analyse the sufficiency of the Block Grant at this stage since many APCs have been paid from existing grants. In addition, given the novelty of the policy and the time taken to communicate the availability of funding from the Block Grant for

APCs, take-up may not have been as high as it will be in the future. It is anticipated that there may be more pressure on the Block Grant in the future and it is essential to monitor this over time.

4. Working with publishers

- 4.1 For OA policy to work efficiently, it requires researchers, institutions, funders and publishers to work effectively together. However, there are some concerns that differing requirements from RCUK on the one hand and publishers on the other can create problems for researchers. In particular, the embargo periods set by some publishers exceed the embargo periods allowed by RCUK for Green OA, thus obliging researchers to publish via the Gold route (with the associated cost implications) or to publish elsewhere. This places restrictions on researchers' freedom of how and where they can publish. Researchers' choices on where to publish should not be limited if publishers do not offer routes which comply with RCUK policy. This is particularly important with regard to international collaborations, where publication decisions are made jointly, or co-funded projects.
- 4.2 There are some concerns that despite institutions paying APCs for articles to be published via the Gold route, articles are not always made open immediately (particularly in hybrid journals). There have also been cases in which the CC-BY licence has not been clearly identifiable and available or the wrong licence type has been used. Institutions are therefore performing a series of post-publication checks which are time-consuming, adding to the administrative burden, as well as being expensive in terms of staff costs.
- 4.3 It could be useful to explore how publishers might be able to assist in monitoring policy compliance and working with institutions to this end, for example by notifying the relevant OA institution staff as well as the researcher when a paper is accepted for publication. This would help institutions to track RCUK-funded publications more efficiently.
- 4.4 Consistency in the terminology used by publishers would also help researchers to better understand what options are available to them and whether they are compliant with RCUK requirements.
- 4.5 There have also been some problems concerning the request, issuing and payment of invoices from publishers, with institutions reporting that this process can be highly bureaucratic and can involve long time delays. This may in part be due to the novelty of the policy, as well as the additional communication link, not only between publisher and researcher, but between publisher and the institution paying APCs on behalf of its researchers. It would be useful to investigate this issue further and explore ways in which this process could be improved to reduce the administrative burden.

5. Creative Commons licensing

- 5.1 The requirement to make Gold OA papers, for which Research Council funds have been used to pay for APCs, freely available under a CC BY licence can put limitations on researchers about where they are able to publish as some publishers do not allow the use of these licences. It is important that researchers are not precluded from publishing in the journals they see as most suitable as the impact of UK research then becomes diminished. It would be more appropriate for academics to decide for themselves which licence their work will be published under.

- 5.2 As noted above, it would be helpful if publishers provided clear information on the types of licences available/allowed and to make clear under which licence an article has been published. Ensuring that the correct licence is always applied is also essential to avoid institutions being required to double check licences post-publication.

6. Policy communication

- 6.1 Communication of the RCUK OA policy has been challenging for institutions that have to ensure all researchers are aware of and compliant with the policy. Whilst institutions are working to communicate the policy internally to their staff, RCUK could engage more with researchers and do more to make the policy clearer to those receiving funding. For example, it would be helpful for Research Councils to reiterate OA requirements in grant letters.
- 6.2 In these early stages, there is a varying degree of knowledge and experience of OA in the researcher community and institutions have had to invest time and effort to explain specific details such as licensing requirements and embargo periods. Of course, as institutions and researchers become more familiar with the policy these issues are likely to be reduced, but support from RCUK in terms of clear and concise policy communication would be helpful.

7. Conclusions

- 7.1 Russell Group universities are working to implement RCUK OA policy as effectively as possible. However, the policy is still in a relatively early stage of implementation and as such there are still challenges to overcome, as outlined above. It will take time for institutions to be fully compliant with the policy and the timeframe for achieving this should remain open and realistic. Whilst small revisions to the policy may be necessary to improve its efficacy and reduce costs, it would be unhelpful if RCUK introduced major new elements into the policy in the near future – institutions are still adapting and working to implement the existing requirements and this will take time.
- 7.2 In March, HEFCE published its policy for open access in the post-2014 Research Excellence Framework. Ensuring that RCUK's and HEFCE's policies are compatible will be essential. Indeed, the Russell Group would support a move towards aligning RCUK's policy with that of HEFCE, which supports a combination of Green and Gold OA routes and includes a helpful list of exemptions to OA, including if the most appropriate publication either actively disallows OA or has embargo periods longer than HEFCE's maxima.²
- 7.3 We appreciate that this is the first review of a series that are likely to take place over the coming years and we welcome RCUK's commitment to seek evidence to support the review of implementation. Regular assessment of the impact of the policy and cost-benefit analysis will be necessary to ensure that the UK's international standing for research excellence is enhanced, and not disadvantaged, by OA policy and that the overall cost of implementing the OA policy is not disproportionate.

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² http://www.hefce.ac.uk/media/hefce/content/pubs/2014/201407/HEFCE2014_07.pdf