

RCUK policy and guidance on Open Access

● Response from the Royal Geographical Society (with IBG) 19 March 2013



● Thank you for giving the Society, which is the UK's learned society and professional body for geography, the opportunity to comment on the revised policy and guidelines.

● We are pleased to see that the policy and the guidance have now been incorporated into one document and that additional commitments have been made to review impact throughout the transition period. We have the following comments to make with regard to policy, guidance and review of impact.

● Policy

We note there have been no changes to the RCUK policy; which expresses a preference for the Gold route to Open Access and which seeks to drive behaviours towards Gold in two ways:

- By providing funding for (mostly) the research intensive universities to support payment of APCs, those funds increasing over the next five years so that by 2018 an anticipated 75% of papers arising from RCUK funded research are published in the 'Gold' route, and the remainder being 'Green';
- By the stated policy intention to converge on a 6 month (STEM) and 12 month (H&SS) embargo for the Green route for all disciplines, after the transition period of five years during which longer embargos are allowed.

Furthermore, the policy seeks to maximise perceived value for money in distributing the APC funding to universities as lump sums, with the expectation that university managers will seek to drive down APC costs in this newly created 'market place'.

An implicit, but undoubtedly intended, consequence is that publishers (both commercial and learned society) profit margins are reduced as a result of the APC market, and whatever agreement is reached over the avoidance of double-dipping.

There is also a clear sense from the document that while the maintenance of high quality standards, as secured by peer review, remains important to RCUK, the status and sustainability of leading (UK) international journals as markers of UK excellence in science is not viewed as important.

We understand that RCUK wants to drive change pro-actively, but we continue to believe that this policy is driven by dogma in stating a fixed endpoint for which there is insufficient evidence that it will meet the tripartite criteria of sustainability, access and excellence that RCUK signed up to as part of the Finch Report. The policy has not taken sensible account of the many uncertainties surrounding how, and at what speed, Open Access will take hold in the rest of the world; has not sought to understand the economics of Gold OA in the humanities and social sciences; and fails to recognise appropriate and sustainable green embargo periods.

We re-iterate the points made in submissions to the recent enquiries of Lords and Commons Select Committees that an endpoint of a 12 month embargo in H&SS will lead probably to the demise of many of the UK's leading journals in these areas; as will a strongly market driven approach to APCs. The impact of such a failure on the Learned Societies will be significant for many. The only conclusion we can reach is that RCUK accepts this, and the reduction in what the Learned Societies can do to support and add value to the academy, as a consequence of their policy. We note and welcome the identified need for monitoring impact on the societies.



The second half of 3.6(iii) is equally as confusing to authors. What are they supposed to do – root around going to consecutive journals first to try to get a cheaper one, then to get one with a short embargo, before finally being able to choose one with a longer embargo? This is unworkable and not in the spirit of Finch or of the publishers tree. It is also grudging on the part of the Research Councils. **The second sentence in 3.6(iii) should be completely removed from the guidance.**

3.6(iii) and 3.6 (iv) should simply be reworded to one point as follows:
‘The choice of open access remains with the author and their research organisation. Where funding for APC’s is unavailable to the author for whatever reason, during the transition period, longer embargo periods are allowed, up to 12 months (STEM) and 24 months (H&SS).’

It is important that reference is explicit to the unavailability of APCs to the author. There should be no ambiguity that this relates to insufficient funds in the institutions ‘Gold’ pot. Funds may be unavailable to the author for many reasons, depending on how the institution uses its discretion to allocate OA funds; to keep an author waiting until the Gold pot is exhausted before he or she is allowed to publish green, would be unethical and unworkable.

The decision tree wording needs clarity here too. The box that currently reads ‘Are APC funds available from the research funder?’ should be clarified to ‘Are APC funds available to the researcher?’ This is needed again to take account of the discretion that has been given to institutions as to how they spend their OA pots.

3.7(vii) For clarity and consistency with the point above, the last sentence should read ‘.....and allow re-use including **non-commercial** text and data mining’.

Review of policy implementation and impact

We welcome greater effort being put into reviewing the impact and the specific mention of the learned societies in this context. We fully endorse the fact that regular reviews throughout the transition period are needed; we support the recommendation made by the Lords Report of reviews in 2014, 2016 and 2018 and encourage RCUK to adopt that.

We note the issues (set out in bullet points) that RCUK intends to address in the review process, but caution that in at least five of these areas the impact will barely have been felt by the end of 2014. We also recommend a review process led by an independent review panel.

Finally, we are also pleased to support the points made in the Academy of Social Sciences response to this consultation.

Rita Gardner CBE
Director