

Response from BPS on RCUK's revised policy and guidance on open access

BPS comments on clarity of the revised guidance

The document is aimed at authors, research institutes and publishers – this may be too wide a range of interests to be covered concisely, especially considering that this document also covers the rationale behind RCUK's open access policy. It would be useful for RCUK to produce separate documents.

It would be helpful to have a shorter, more easily digestible version of the guidance for authors, in order to clearly state what is required of them. An example of this would be stating clearly that all RCUK funded papers should be licensed as CC-BY and explaining why in the policy document. Publishers might find it useful if a shorter document, or checklist, was produced for inclusion in their journals instructions to authors, to reinforce the message that authors must be compliant with their funder's requirements.

A weakness of the document is the coverage of embargo periods. Specific examples include:

- Under 'Compliance of Journals' (p2) it would be useful to state that the 6 month embargo on STEM subjects is only required when the gold/APC route is not available in the Journal
- Section 3.6 (iv) is not sufficiently clear and seems to suggest that publications in STEM disciplines should be subject to a 6 month embargo period in any circumstances. It should be clearer that STEM papers also come under the 12 month embargo in this specific example.
- The poor placement and usage of the Publisher Association's decision tree, which was endorsed by both BIS and RCUK, and is a simple stepwise guide to the policy, should be addressed. It would be useful for RCUK to refer to this diagram more explicitly and perhaps have it at the opening of the document rather than on page 7.
- The document should include a clear statement describing the fact that, in STEM publishing, a 12 month embargo period is acceptable in an RCUK compliant journal when the author is unable to meet the APC. A 6 month embargo period is only required in a non-compliant journal.

Other items RCUK may wish to clarify include:

- A definition of green open access under section 3.1. The explanation under 3.6(vii) (p8) should be covered earlier in the document for the sake of clarity, especially given the long explanation of gold open access in this section.

- RCUK's definition of a 'compelling reason' to prevent access to data. In the case of 'commercial confidentiality' it may be useful to provide criteria for authors to ensure they can be compliant.
- The policy document refers to additional documents such as the 'HEI Best Practice Project' and guidance on use of CC-BY, it would be helpful to clarify when these documents will be available (especially if not prior to 1 April 2013) as further information would be useful to understand the practicalities of the project.
- Concern is often raised about multi-author papers and international papers in terms of responsibility for payment of APCs. It would be helpful for RCUK to address these issues, either with case studies or definite statements on the issues.
- How compliance will be monitored and the penalties for non-compliance. It will be useful for research institutes and universities that will soon be responsible for administering APCs to understand precisely what will be monitored.

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- Section 3.5 (ii) 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 when to publish'*. This is concerning as it seems to suggest authors will be under pressure to publish in low-cost rather than the most appropriate publications. It would be useful for RCUK to clarify this point.
- The comment under 3.6 (ii) of *'RCUK is working towards enabling a maximum embargo period of six months for all research papers'* is of course concerning (particularly considering the lack of clarity around embargo periods). Given [evidence](http://www.publishingresearch.net/documents/ALPSPPApotentialresultsofsixmonthembargofv.pdf)¹ of large reductions in subscriptions if there was only a 6 month embargo it would be very damaging to learned societies, such as BPS, who are heavily dependent on publishing incomes to meet charitable objectives.
- There are valid concerns regarding the CC-BY license, some of which RCUK have acknowledged in this policy document. Issues around patents still remain unresolved. It is good to see a commitment to review the impact of the licenses in 2014, and a commitment to subsequent reviews. We are also pleased to see that RCUK has accepted a CC-BY-NC license for green publishing, rather than CC-BY. Given there is no APC in green publishing this license is more reasonable
- There are of course a number of points contained in the revision to the RCUK's policy which BPS is pleased to see, such as the maintenance of the preference for gold open access; the statement that the transition is intended to take ~5 years and the recognition that this is a relatively short period for such a large charge – given the Finch Report's recommendation to *'keep under review the position of learned societies that rely on publishing revenues to fund their core activities, the speed with which they can change their publishing business models, and the impact on the services to the UK research community'* this acknowledgement is useful and we hope to see it considered in the 2014 as part of the topic of *'any adverse consequences (for example on the sustainability of Learned Societies)'* which has been included in the review outline. We look forward to contributing.

1. <http://www.publishingresearch.net/documents/ALPSPPApotentialresultsofsixmonthembargofv.pdf>

About BPS

BPS is the primary UK learned society concerned with research into drugs and the way they work. Our members work in academia, industry, and the health services, and many are medically qualified. The Society covers the whole spectrum of pharmacology, including laboratory, clinical, toxicological and regulatory aspects.

Clinical pharmacology is the medical specialty dedicated to promoting safe and effective use of medicines for patient benefit. Clinical pharmacologists work as consultants in the NHS and many hold prominent positions in UK Universities