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## BPS' response to HEFCE

BPS welcomes the opportunity to input into shaping the full HEFCE consultation into open access requirements for the post-2014 REF exercise. We are pleased to see that HEFCE [acknowledge](#)<sup>1</sup> that learned societies '*support desirable academic activities*'. The Finch Report<sup>2</sup>, which was accepted essentially in its entirety by the Government, stated a need 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*'. Given the potential impact of HEFCE's requirements BPS seeks clarification as to how HEFCE propose to take this into account in the formal consultation due this year. In its [response](#)<sup>3</sup> to the Finch Report BPS noted support for a move to open access publishing and, like HEFCE, sees value in working towards improving the dissemination of research. However, an ordered transition is vital and HEFCE will have an important role to play in ensuring stability in academic publishing. HEFCE acknowledge that the '*the full costs and savings to institutions of the move to open access are ... unknown*'<sup>4</sup>. Given this, a cautious approach to open access requirements is advisable.

### **Q1 - We welcome advice on our expectations for open-access publications, as set out in paragraph 11**

Given the statement under paragraph 9, '*we accept the Finch Report's arguments that in the long term, the gold rather than green route may be the most sustainable way to deliver open access*'<sup>1</sup> it is surprising that the criteria outlined in paragraph 11 seem very much directed towards green open access publishing. It would be useful to have HEFCE clearly specify requirements under both routes, considering that HEFCE do not plan to have a preferred route.

The statement that '*the repository may provide access in a way that respects agreed embargoes*'<sup>1</sup> is concerning – we would expect repositories to adhere to the embargo and believe that a 12 month embargo is sufficient for STEM publishing. Given [evidence](#)<sup>4</sup> of large reductions in subscriptions if there was only a 6 month embargo it would be very damaging to learned societies, such as BPS, which is heavily dependent on publishing income to meet its charitable objectives. Activities such as supporting scholarly communication by providing free or subsidised scientific meetings; providing research funding, bursaries and travel grants; and providing education and training opportunities such as our Diploma in Advanced Pharmacology, are funded by publishing revenues, therefore given the potential damage of a 6 month embargo to learned societies we recommend HEFCE specify a 12 month embargo for STEM publishing.

## **Q2 We welcome further advice on repository use and on techniques for institutional repositories to cross-refer to subjects and other repositories**

There are a number of popular subject-specific repositories in existence and considering funders such as RCUK and Wellcome Trust specify repositories which are not based in institutions, having a requirement to deposit work in institutional repositories would be an additional burden on researchers. In addition, this may require a large investment in the functionality of repositories.

## **Q3 While we expect sufficient clarity and reassurance on embargoes and licenses will be achieved through the Research Councils discussions, we welcome responses which address these issues.**

As noted under Q1, an embargo period for STEM publishing should not be less than 12 months. The Finch Report states *'where an appropriate level of dedicated funding is not provided to meet the costs of open access publishing, we believe that it would be unreasonable to require embargo periods of less than twelve months'*<sup>2</sup>. This Report was endorsed by the Government; therefore we would recommend HEFCE endorse the 12 month embargo.

A CC-BY license mandate and open access requirements should be decoupled. HEFCE should define, in consultation, what its open access requirements are and then decide an appropriate license, or acknowledge licensing options that meet the requirements under either gold or green routes.

However, should HEFCE wish to follow the example of other funders around use of CC-BY there are a number of issues to consider, for example:

- The RCUK plans to review its policy (and this review should include licensing requirements, in line with the House of Lords Select Committee [recommendations](#)<sup>5</sup>) in autumn 2014 so it would seem premature for HEFCE to strictly follow the RCUK's gold licensing policy at this time – given the potential for change during the post-2014 REF window.
- In terms of green publishing, RCUK has not specified a license to meet with its green mandate. It has, however, acknowledged that CC-BY-NC would meet its requirements. It would not be reasonable for HEFCE to therefore mandate the use of CC-BY, given that there has been no APC paid in any form of green open access publishing.

## **Q4 We welcome advice on the best approach to exceptions and on an appropriate notice period. Any cases made for exceptions should be underpinned by clear evidence**

RCUK states that in the first year of providing additional funding for gold open access publication it anticipates 45% of publication output will be paid for from additional institutional block grants, and anticipates a ~5 year transition (to 100% compliance, but with 75% gold). Given that HEFCE has stated *'we have made it clear that institutions can use our funds provided for research towards the costs of accessible forms of publication'*<sup>4</sup> this suggests that there will be no additional funding provided to universities to also provide for APCs in the gold route. If authors without access to funding are therefore required to publish via the green route in order for their work to be considered for the post-2014 REF it

will be integral that HEFCE acknowledge 12 month embargo for STEM subjects and come to a decision regarding the appropriate licensing which is acceptable to all stakeholders – this may make a 80% target possible. If HEFCE chooses short embargo periods and CC-BY licenses, learned societies will be damaged by a drastic shift in their business models. Additionally, our members and authors will be restricted in where they can publish (particularly considering non-UK publications may not be compliant with HEFCE's mandate). An 80% target is unattainable in this model.

Considering the time required for full consultation on these issues, and the time taken for publication of research it seems there should be, at minimum, a one year notice period from announcement to enforcement. Again this would be dependent on the criteria HEFCE set for open access.

**Q5 We seek comment on when it might be thought appropriate to expect repository deposit of monograph text. Alternatively, given the percentage of submitted material which is in monograph form, we ask for advice on whether an expectation of a given percentage of compliance as described above (paragraph 18c) would eliminate the need for a special-case exception for monographs.**

No comments

**Q6 We invite comment on whether the respondents feel this is the appropriate approach or whether they feel that sufficient progress has in fact been made to implement a requirement for open data as well. We will consider any representations that such a requirement may reasonably now be developed but would also need advice on how this might be achieved.**

We would agree this is a sensible approach, given the lack of clarity over how this might be achieved.

## **In conclusion:**

- BPS is supportive of a transition to gold open access and of green open access publishing when an appropriate embargo (12 months) is adhered to.
- There are deep concerns around CC-BY mandates, especially in green open access publishing, therefore we would ask HEFCE to exercise due caution.
- BPS members may be impacted in a number of ways by these requirements – including through additional burdens of self-archiving research articles, reduction in overall research budgets to fund gold publishing, and a reduction in freedom of choice in where to publish should the mandate be overly restrictive. We would therefore welcome the formal consultation to discuss the potential impact on our members more fully.
- We hope that HEFCE will consider, more fully, the impact on learned societies of any open access mandate, particularly with regard to the speed of implementation.

## 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.

### References:

1. [HEFCE consultation letter](#)
2. [Finch Report](#)
3. [BPS' response to Finch Report](#)
4. Publisher's Association & ALPSP's [report](#) on 'potential effect of making journals free after six months'
5. House of Lords Select Committee 'implementation on open access' [report](#)