UKRI OA Review, ALPSP Responses

Research Articles

In-scope outputs

1. To what extent do you agree or disagree that it is clear what research articles are in-scope of UKRI’s proposed OA policy (see paragraph 46)?

Agree

2. Are there any additional considerations that the UK HE funding bodies should take into account when defining research articles that will be in-scope of the OA policy for the REF-after-REF 2021? (max 200 words)

We think it is important that the two policies are as similar as possible and agree there should be a ‘common policy position for outputs’ across both policies. To assist compliance we think that both policies should use the same definitions for which articles are in scope.

OA Routes and Deposit Requirements

3. In setting its policy, should UKRI consider any other venues for peer-reviewed research articles which are not stated in paragraph 47?

No

4. Are there any specific challenges for you, your community or your organisation in terms of complying with the requirement in UKRI’s proposed policy for immediate OA of in-scope research articles? (max 400 words)

ALPSP is an international membership trade body that supports and represents not-for-profit organizations and institutions that publish scholarly and professional content. With nearly 300 members in 30 countries, membership also includes those that work with these publishers and societies. Our mission is to connect, inform, develop and represent the international scholarly and professional publishing community. Our members include subscription/hybrid journal publishers and fully open access publishers.

Most journals published by our members do not currently offer immediate green OA under a CC BY licence; they commonly charge APCs for immediate gold OA. Without comprehensive funding for APCs, the policy effectively rules out publication in those, the majority of journals. Our view is to achieve immediate open access for in scope articles there has to be a means of funding immediate gold open access. A zero embargo green option undermines both the subscription and APC business models. It would lead to cancellations of subscriptions as libraries with budget cuts decide that they no longer need to pay to access articles. If APCs are not charged there is no business model to support publication. A zero embargo green option also introduces confusion for readers as it will lead to suboptimal versions (e.g., the author manuscript version) of papers deposited in different repositories.

Publishers invest significantly in the processes of assessing and verifying research output through high quality selection and peer review; correcting papers to make their messages clear; and publishing on their platforms, which require continual development with tools that make
articles more discoverable. ALPSP represents learned society publishers, not for profit publishers, and commercial publishers, which together publish many of the world’s most prestigious journals. Without funding and sustainable business models many publishers would no longer be able to invest in their journals and maintain the high quality output so essential for the advancement of research.

5. Should UKRI’s OA policy require a version of all in-scope research articles to be deposited in a repository, irrespective of whether the version of record is made OA via a journal or publishing platform? (max 100 words)

No

We acknowledge the preference of universities for institutional repositories to record the research coming from an individual university and support this requirement. Beyond this we do not think there is a need for additional repositories and believe their existence would add unnecessary complexity to the landscape.

6. For research articles, are there any additional considerations relating to OA routes, publication venues and embargo periods that the UK HE funding bodies should take into account when developing the OA policy for the REF-after-REF 2021? (300 words)

The issues around funding, are also true for the REF. The REF affects a greater volume of UK research – i.e. many more articles are eligible for the REF than are UKRI-funded – so we reiterate that any immediate OA policy must allow for funding of gold open access. We acknowledge that the volume of funding required is challenging for UKRI so we would encourage UKRI to endorse a 12 month embargoed green open access option for some of the research output.

**Licensing Requirements**

7. To what extent do you agree or disagree that where compliance with UKRI’s OA policy is achieved via a repository, a CC BY license (or OGL where needed) should be required for the deposited copy? (200 words)

Disagree

In general, we support CC BY in many areas, but we have additional concerns regarding the suitability of CC BY across all subjects. See question 8 for more detail.

We also do not agree with the use of CC BY licence for green open access content, including author manuscript versions of content, previously published under a subscription model. This undermines the commercial potential of the version of record.

8. To what extent do you agree or disagree that UKRI’s OA policy should have a case-by-case exception allowing CC BY-ND for the version of record and/or author’s accepted manuscript. (300 words)

Disagree

We should recognise that not all research is the same. HSS subjects in particular make more use of third-party content, and so have the onerous problem of clearing permissions, etc. Also, in contrast to STEM subjects, mode of expression is a differentiator and of importance to HSS output.
We think that authors funded by certain councils (e.g. AHRC), should be allowed CC-BY-ND.

9. **Would the proposed licensing requirements for UKRI's OA policy, which exclude third-party content (see paragraph 55), affect your or your organisation’s ability to publish in-scope research articles containing third-party content? (200 words)**

The proposed licensing requirements will affect our member organisations’ ability to publish articles which include third-party content. Moving to CC BY will require authors to clear more extensive permissions, or to explain the exclusion of the third-party content from the article’s overall licence. This adds time and cost to the process and could be prone to errors, confusion and extra burdens on authors and users. In some cases, authors may not be able to get that consent at all if third parties have concerns about the article’s CC-BY licence. There is a risk that users may not check for more restrictive terms within the body of the articles and use the third party content in infringement of copyright.

10. **Are there other considerations UKRI should take into account regarding licensing requirements for research articles in-scope of its proposed OA policy? (200 words)**

Yes

UKRI should consider what happens if the money currently provided by industry, in particular the pharmaceutical industry, is taken out of the system. A mandate for CC-BY and unacceptance of CC-BY-NC means that pharma no longer have to pay to use published content for marketing purposes. This means that some of the cost of publishing currently covered by the private sector would need to transfer to the public sector. UKRI should consider how industry can help fund the transfer to open access.

11. **For research articles, are there any additional considerations relating to licensing that the UK HE funding bodies should take into account when developing the OA policy for the REF-after-REF 2021?**

See question 10

*Copyright and Rights Retention*

12. **Which statement best reflects your views on whether UKRI’s OA policy should require copyright and/or rights retention for in-scope research articles? (300 words)**

a. UKRI should require an author or their institution to retain copyright and not exclusively transfer this to a publisher

b. UKRI should require an author or their institution to retain specific reuse rights, including rights to deposit the author’s accepted manuscript in a repository in line with the deposit and licensing requirements of UKRI’s OA policy

c. UKRI should require an author or their institution to retain copyright AND specific reuse rights, including rights to deposit the author’s accepted manuscript in a repository in line with the deposit and licensing requirements of UKRI’s OA policy

d. UKRI should not have a requirement for copyright or rights retention
Please explain your answer. UKRI particularly welcomes views as to whether it is necessary to require copyright and/or rights retention if its policy were to require a CC BY licence, which enables reuse. If you selected answer b or c, please state what reuse rights you think UKRI's OA policy should require to be retained (2,000 characters maximum, approximately 300 words).

Please note that views are not sought on whether institutions should hold the copyright to work produced by their employees as this is subject to Section 11 of the Copyright Act 1988.

For immediate open access articles funded by APCs we support creative commons licences.

Our preference for subscription/hybrid journals is for publishers to use exclusive licences to publish, which grant them all the rights they need to publish and to defend the copyright in the work, but allow the author to retain copyright, and to have clear rights to deposit their work.

This is important so that articles can be part of third party aggregation services often bring additional, non-academic revenue into the sector. Exclusive licences also enable publishers to defend authors’ rights and copyright.

**Technical Standards Requirements**

13. Regarding research articles in-scope of UKRI’s OA policy, to what extent do you agree or disagree with each of the seven proposed technical standard requirements for journals and OA publishing platforms?

- **a.** persistent digital object identifiers (PIIDs) for research outputs must be implemented according to international standards such as DOI, URN or Handle

  *Agree*

  We agree with this in principle, although we would like to see specification of which standards. For example, many publishers support Crossref DOIs for publications and data, but not directly Handle (except through DOI) or URN.

- **b.** article-level metadata must be used according to a defined application profile that supports UKRI's proposed OA policy and is available via a CC0 public domain dedication; the metadata standard must adhere to international best practice such as the Crossref schema and OpenAIRE guidelines

  *Agree*

  Most of our member organisations adhere to all the technical standards and support their wider use. Many provide subsets of metadata (such as authors, title, journal name and year) free of charge to organisations like Crossref. Further metadata may require more investment, for smaller members in particular, when a charge may be deemed appropriate.

- **c.** machine-readable information on the OA status and the licence must be embedded in the article in a standard non-proprietary format

  *Agree*
d. long-term preservation must be supported via a robust preservation programme such as CLOCKSS, Portico or an equivalent

Agree.

Long term preservation is crucial.

e. openly accessible data on citations must be made available according to the standards set out by the Initiative for Open Citations (I4OC)

Agree.

f. self-archiving policies must be registered in the SHERPA RoMEO database that underpins SHERPA/FACT

Agree.

We agree that self-archiving policies should be available in Sherpa Romeo, though Sherpa is very slow making updates to applicable records in Sherpa Romeo, which cause confusion for authors and libraries. This needs to improve and be up to date

g. unique PIDs for research management information must be used and must include the use of ORCID to identify all authors and contributors.

Agree. ALPSP supports the use of ORCIDs.

14. Regarding research articles in-scope of UKRI’s OA policy, to what extent do you agree or disagree with each of the five proposed technical standard requirements for institutional and subject repositories?

No Opinion

15. To support the adoption of technical standards for OA, are there other standards, actions and/or issues UKRI should consider? (400 words)

We are concerned for our smaller members that these requirements may have significant cost implications and disadvantages them compared with large commercial publishers. We would like to see funding made available to smaller publishers to support the costs of the technical requirements.

16. To support the implementation of UKRI’s proposed OA policy requirement for research articles to include an access statement for underlying research materials (see paragraph 69), are there any technical standards or best practices that UKRI should consider requiring? (200 words)

We support increased data sharing and availability but it would be beneficial to align with existing standards and make the requirement for Data Availability Statements in the first instance. There is a huge amount of work to do as this area evolves and this will vary considerably across disciplines. The STM organisation’s working paper ‘Research Data Year’ provides guidance on this. https://www.stm-assoc.org/standards-technology/2020-stm-research-data-year/?

Timing of Implementation
17. UKRI’s OA policy is proposed to apply to in-scope research articles accepted for publication on or after 1 January 2022. Which statement best reflects your views on this? (300 words)

C – The policy should apply later than 1 January 2022

Our member organisations need time to prepare for any changes. Also, authors need to know when they submit their work whether the policy is in force and that is usually several months before publication so it would be better to set the date from when articles are submitted.

The current Covid 19 pandemic is causing much disruption and economic challenges to the research community and publishers. We believe that preparing for compliance for January 2022 would be more challenging because of this. We are heading into what could be a deep recession. The changes UKRI is considering would be very disruptive for strained businesses in that time.

If UKRI continues to financially support hybrid publishing, this would help our member organisations comply with a shorter timeframe and adapt accordingly.

18. For research articles, are there any considerations that UKRI and UK HE funding bodies need to take into account regarding the interplay between the implementation dates for UKRI’s OA policy and the OA policy for the REF-afterREF 2021?

N/A

Supporting Actions: Public Value, Costs and Funding

19. Do you think the proposals outlined in Section A will have any financial cost implications for you or your organisation? (300 words)

We do think there will be significant financial implications for our member organisations. Many currently offer author choice via a hybrid model and without additional funding for authors an author-pays OA model will not sustain the considerable costs entailed in providing high quality selection and peer review and excellence in digital distribution in line with the technical standards outlined by UKRI above. Highly selective journals often have very high rejection rates and give valuable guidance to many authors on improving their work. Many of these journals are owned by learned societies or small publishers. Without sufficient financial return they will no longer be able to maintain the high quality of editorial work that helps to achieve the best standards of output. We encourage UKRI to consider the value of societies/society publishers and consider their funding in the round, as well as the value of a diverse market. The Tickell Review ‘The UK is home to a significant constellation of publishers and Learned Societies’ explains this well, with learned societies and publishers both a fundamental part of the research ecosystem and contributing to invisible exports


20. Do you think the proposals outlined in Section A will result in financial benefits for you or your organisation? (300 words)

We believe that the proposals outlined in section A under current levels of funding will result in significant losses, not benefits, for many of our member organisations.
21. Can you provide any evidence of a changing balance of costs across research organisations arising from an emphasis on publishing costs rather than read costs? (300 words)

Transformative agreements with customers looking to redress the balance to include publishing costs as well as read costs in their agreements with publishers are a promising mechanism for subscription/hybrid journal customers to transition to fully open access. Currently roughly 8-15% of large institutional customers for journals are entering into such agreements and the proportion is growing. More funding for these agreements, however, needs to be provided so that they can include the fully open access journals currently in existence.

22. Can you provide any evidence on cost increases and/or price rises (including in relation to OA APCs and subscriptions) and reasons for these? (300 words)

N/A as this varies across our member institutions

23. Do you think there are steps publishers and/or other stakeholders could take to improve the transparency of publication charges? Views are also welcome on how greater transparency might inform future funding levels. (300 words)

ALPSP was pleased to support the SPA-OPS project funded by Wellcome Trust and UKRI and the subsequent report by Information Power on costings. We do, however, think it is important to focus on price and not cost of publishing to be compatible with anti-competitive rules. It is impossible to provide like for like cost metrics for journals when each operates differently and have widely different cost bases. Adding metrics around costs to the journals model is not helpful as they are not meaningful across journals.

We think it is possible for publishers to be more transparent about their double dipping policies (not including gold open access papers in their pricing for subscription policies). Increasingly publishers are sharing details of their read and publish agreements.

24. Regarding UKRI's consideration about restricting the use of its OA funds for publication in hybrid journals (see paragraph 80), please select the statement that best reflects your views (400 words)

C – UKRI funds should be permitted to support OA publication in hybrid journals.

Many ALPSP membership organisations do not see hybrid publication as incompatible with the aims of the policy.

We do not think it would be appropriate for UKRI to limit the publication options for authors based on the publication model of the journal. Hybrid journals are run by hugely varying publishers with entirely different missions and business models. The hybrid model allows for differences in OA requirements across subject areas and current differences in geographies.

We believe that hybrid can be a means of progress to OA and OA output in hybrid journals has grown through Read and Publish agreements.

25. To what extent do you agree or disagree that UKRI OA funds should be permitted to support OA costs that support institutional repositories? (400 words)

N/A
26. To help accelerate policy adoption, should UKRI introduce any other restrictions on how UKRI OA funds can be used? (200 words)

Yes

Gold open access is the best way to achieve an open access environment so we believe UKRI should introduce compliance measures for publishing gold open access.

27. Are there changes or alternatives to the present UKRI funding mechanisms that might help support a diversity of OA models?

There are many business models that can support OA. A common model for journals is based on APCs, but there are also other models, such as membership models and subscribe to open.

The models need to be sustainable and to date author pays APCs and read and publish deals have emerged as the most promising. Publishers are highly committed to support the move to open access and therefore many publishers are offering deals read & publish deals (aka transformative deals).

28. Are there approaches to managing transformative agreements or other mechanisms and developments that UKRI should consider to help manage the transition to OA in a way that is cost-effective and offers public value to the UK? (400 words)

UKRI should work with Jisc to ensure that smaller society publishers are able to negotiate deals of this sort.

Supporting Actions: OA Infrastructure

29. Are there any existing or new infrastructure services that you think UKRI should fund the maintenance and/or development of, to support the implementation of its OA policy for research articles? (200 words)

Continued investment in the Jisc Publications Router

30. To what extent do you agree or disagree that UKRI should provide or support a national shared repository? (200 words)

Disagree. This would be a waste of funding money. University repositories have been invested in and provide a point of dissemination for their research. Publisher platforms are interlinked and support technical standards and sophisticated discovery mechanisms for content.

Supporting Actions: Preprints

31. Should UKRI require preprints to be made OA where there is a significant benefit with regard to public emergencies? (200 words)

Yes.

32. Are there any supporting actions that UKRI could take alongside its OA policy to support the use of preprints in all disciplines? (200 words)

We support early sharing of research results as long as preprints are clearly differentiated from peer fully reviewed articles. The Covid 19 crisis has demonstrated the pros and cons of preprints. They are of value in making research available rapidly. On the other hand some work published as preprints has been invalidated by peer review. It is therefore important that pre-
peer review content is clearly marked so readers are aware and make their own decisions about its reliability.

The use of preprints varies according to each discipline. Preprint platforms are very common in many disciplines, especially biology, physics, and maths. They are increasingly prevalent in medicine.

ALPSP would not deem it necessary to stimulate the use of preprints in all disciplines and we wouldn’t suggest a uniform policy on preprints.

UKRI could endorse certain established preprint servers (for example arXiv, bioRxiv, medRxiv) to give authors guidance on where to post their work.

**Monographs**

*In-scope outputs*

33. **To what extent do you agree or disagree that the types of monograph, book chapter and edited collection defined as in-scope and out-of-scope of UKRI’s proposed OA policy (see paragraphs 96-98) are clear?** (300 words)

Disagree

We believe edited collections of scholarly or scientific chapters written by different authors and collated by an Editor should receive funds from UKRI.

34. **Should the following outputs be in-scope of UKRI’s OA policy when based on UKRI-funded doctoral research?**

   a. **Academic Monographs**  
      Yes
   
   b. **Book Chapters**  
      Yes
   
   c. **Edited Collections**  
      Yes

35. **To what extent do you agree or disagree that UKRI’s OA policy should include an exception for in-scope monographs, book chapters and edited collections where the only suitable publisher in the field does not have an OA programme?** (200 words)

  Strongly Agree

  A flexible approach towards open access for long-text formats is needed. The most suitable publishers for these authors might not yet offer open access options. An exception for all above listed in-scope categories under the new policy is required to allow those publishers to offer their services and products to those who feel that they are the best publication venue. Where this choice does not offer an open access option or that option is prohibitively expensive, the author should be free to publish in traditional mode, ie at no or low cost and expenditure to the author.
36. Are there any other considerations that the UK HE funding bodies should take into account when defining academic monographs, book chapters and edited collections in-scope of the OA policy for the REF-after-REF 2021?

The origination, creation, and publication of scholarly monographs and books are markedly different to the assumptions on research articles as outputs which have underpinned OA policy development. Monographs and books publishers refine, shape and comprehensively edit an author’s work (sometimes also initiating it through identification of a gap in the field), to create an output that is optimised for readership and with maximum potential for impact. Publishers also ensure the content reaches those who benefit from it by marketing the content and add tagging to maximise discoverability. The most comprehensive study of the cost of a monograph came from Ithaka in 2016

https://sr.ithaka.org/wp-content/uploads/2016/02/SR_Report_Costs_Publishing_Monographs020516.pdf. Of the c.$27K it costs on average to publish a monograph, roughly 60% of the cost comes from editorial and marketing, the aspects that cannot be neatly automated: they are the parts of the process that provide credentialization and maximise readership.

The market for monograph purchases is structurally very different to the way in which journals operate and the way that journals holdings have been managed. Importantly, there is no monograph equivalent to the author accepted manuscript (AAM) to use for green OA. Libraries with stretched budgets will no longer pay for monographs if the final versions are to be made freely available, even 12 months or more after publication. There is no viable green OA option that will ensure sustainability of monographs. This will result in publishers no longer being able to invest in monographs.

OA Routes and Deposit Requirements

37. Regarding monographs in-scope of UKRI’s proposed OA policy, which statement best reflects your view on the maximum embargo requirement of 12 months? (200 words)

B - A longer embargo period should be allowed.

Scholarly monograph publishing is unlikely to survive a significant foreshortening of the period for sales because institutional libraries will choose to wait for free versions rather than purchase (see Q36). Embargo periods strike a balance between opening up access whilst maintaining a publisher’s ability to continue their investment in the infrastructure, platform and tools. Much of what is published in Social Sciences and Humanities remains of relevance and value for years after its first publication. Embargo periods should reflect the scientific discipline so a ‘one-size fits all approach’ for embargo periods is not appropriate.

38. Regarding book chapters in-scope of UKRI’s proposed OA policy, which statement best reflects your view on the maximum embargo requirement of 12 months?

B - A longer embargo period should be allowed.

As outlined in questions 36 and 37.

39. Regarding edited collections in-scope of UKRI’s proposed OA policy, which statement best reflects your view on the maximum embargo requirement of 12 months?

B - A longer embargo period should be allowed.
40. Do you have any specific views and/or evidence regarding different funding implications of publishing monographs, book chapters or edited collections with no embargo, a 12-month embargo or any longer embargo period? (300 words)

Any embargo period needs to be long enough to allow publishers to recoup their investments. Zero embargo certainly would not allow this. Particularly in the SSH disciplines the long-form publications last for a long time and sales over a long period are important to the viability of the business plans such that costs are covered over time. One blanket policy that includes journals and long-form publications is not appropriate and does not reflect the disciplinary differences. Longer embargo periods are required for investments to be recouped.

In terms of evidence one of our STEM book publishers achieves almost one third of its sales after the third year of publication, and 61% of sales after 12 months; an early embargo would very likely make this book publishing programme unviable.

Monographs require a funding policy. If UKRI does not provide funding but wants to secure monographs publishers will stop investing in them, threatening the whole future of this means of disseminating research.

Sufficient funding for publishing all in-scope categories is paramount to meet the requirements in this outlined policy.

41. To what extent do you agree that self-archiving the post-peer-review author’s accepted manuscript should meet the policy requirement? (200 words)

Disagree

Most scholarly book publishing involves publishers investing in projects on the basis of proposals and providing considerable support during the period in which the work is prepared. This represents a significant direct investment in the quality of UK research outputs.

For long-text publications like monographs, the self-archiving of post-peer review accepted manuscripts, the Green OA path with no embargo period, is not sustainable in the long-term as it limits the ability of publishers to recoup their investments that they put into publishing these formats.

42. Regarding monographs, book chapters and edited collections, are there any additional considerations relating to OA routes, deposit requirements and delayed OA that the UK HE funding bodies should take into account when developing the OA policy for the REF-after-REF 2021?

All the same comments above apply

Licensing Requirements and Third-Party Rights

43. To what extent do you agree or disagree with CC BY-ND being the minimum licensing requirement for monographs, book chapters and edited collections in-scope of UKRI’s proposed OA policy?

Agree.

44. To what extent do you agree or disagree that UKRI’s OA policy should include an exception for in-scope monographs, book chapters and edited collections requiring significant reuse of third-party materials?

Agree
We should recognise that not all research is the same. HSS subjects in particular make more use of third-party content, and so have the onerous problem of clearing permissions, etc, and to gain permissions that are consistent with creative commons licences would be extremely prohibitive.

Also, in contrast to STEM subjects, mode of expression is a differentiator and of importance to HSS output.

Authors should be able to choose the open access license that is most consistent with the majority of content in their work – significantly reducing confusion among users.

45. **To what extent do you agree or disagree that if an image (or other material) were not available for reuse and no other image were suitable, it would be appropriate to redact the image (or material), with a short description and a link to the original?**

Strongly Disagree. This can have a substantial impact on the value of a published work to a user.

46. **Do you have a view on how UKRI should define ‘significant use of third-party materials’ if it includes a relevant exception in its policy?**

Yes.

Significant use should relate to the importance and centrality of the content to the work and not to cost.

The term “significant use” should be avoided, unless it would denote use of less than a substantial part. Generally in copyright a reproduction of a substantial part is required to constitute infringement, whereas the copying of an insubstantial part is not considered an infringement. If UKRI wishes to set the bar higher and also proscribe use of “insubstantial parts” and formulate an exception to its policy, then it makes sense to refer to such portions of a text as nevertheless “significant” (even though insubstantial in a copyright sense).

47. **Do you have any other comments relating to licensing requirements and/or the use of third-party materials, in relation to UKRI’s proposed OA policy for academic monographs, book chapters and edited collections?**

No.

48. **Regarding monographs, book chapters and edited collections, are there any additional considerations relating to licensing requirements and/or third-party materials that you think that the UK HE funding bodies should take into account when developing the OA policy for the REF-after-REF 2021?**

Treatment of licences and third-party materials should not differ between UKRI policy and REF policy.

*Copyright and Rights Retention*
49. Which statement best reflects your views on whether UKRI’s OA policy should require copyright and/or rights retention for in-scope monographs, book chapters and edited collections?

D UKRI's OA policy should not have a requirement for copyright or rights retention

Authors can already retain copyright under the Gold OA model, making it unnecessary for a mandatory requirement. Publishers offer a variety of options supporting the OA licensing scheme and urge UKRI to support a flexible approach allowing researchers to choose the open license that best supports the dissemination of their work while also choosing the level of protection they think best against fraud and inappropriate use of their work.

Timing of Implementation

50. Regarding the timing of implementation of UKRI’s OA policy for monographs, book chapters and edited collections, which statement best reflects your view?

C The policy should apply later than 1 January 2024

We encourage UKRI to consider providing more time for the start of this policy so that smaller and mid-size publishing organisations are ready for the implementation.

Given that monographs, books, and edited versions have a much longer development period in the publishing process than journals the suggested effective start of this new policy would have to apply now. Therefore the policy needs to start much later than January 1, 2024, to allow publishers to prepare for it.

51. In order to support authors and institutions with policy implementation UKRI will consider whether advice and guidance can be provided. Do you have any suggestions regarding the type of advice and guidance that that might be helpful?

N/A

52. Regarding monographs, book chapters and edited collections, are there any other considerations that UKRI and the UK HE funding bodies need to take into account when considering the interplay between the implementation dates for the UKRI OA policy and the OA policy for the REF-after-REF 2021 OA?

N/A

Supporting Actions: Funding

53. Do you have any views regarding funding levels, mechanisms and eligible costs to inform UKRI’s considerations about the provision of funding for OA monographs, book chapters and edited collections in-scope of its proposed policy? (400 words)

Without appropriate funding, the disruption to the existing ecosystem will lead to concentration of supply and a reduction in quality of scholarly monographs, with associated reductions in the quality of research outputs as a result of reduced publisher investment during the research and writing period. We consider that the policy will only work if fully funded as zero embargo green open access is not a viable route.
54. To support the implementation of UKRI’s OA policy, are there any actions (including funding) that you think UKRI and/or other stakeholders should take to maintain and/or develop existing or new infrastructure services for OA monographs, book chapters and edited collections? (400 words)

Expansion of Sherpa (or similar) services would be important because currently monograph policies are underrepresented there. Inclusion of monographs and potentially chapters (if linked appropriately) in services such as CrossRef at an earlier point would help identify these works.

55. Are there any technical standards that UKRI should consider requiring and/or encouraging in its OA policy to facilitate access, discoverability and reuse of OA monographs, book chapters and edited collections? (300 words)

Standard identifiers for book chapters would be useful.

56. Do you have any other suggestions regarding UKRI’s proposed OA policy and/or supporting actions to facilitate access, discoverability and reuse of OA monographs, book chapters and edited collections? (400 words)

There is a need to ensure metadata standards are fit for purpose in this area, for example, a standard way to indicate that a work is a chapter, monograph, etc. and a standard way to define a limited set of contributor roles (e.g. editor, author, translator).

Monitoring Compliance

57. Could the manual reporting process currently used for UKRI OA block grants? N/A

58. Should UKRI apply further sanctions and/or other measures to address non-compliance with its proposed OA policy? (300 words)

N/A

59. To what extent do you agree or disagree with the example proposed measures to address non-compliance with the proposed UKRI OA policy (see paragraph 119)? 300 words

ALPSP did not have an opinion on questions 57-59.

Policy Implications and Supporting Actions

60. Do you foresee any benefits for you, your organisation or your community arising from UKRI’s proposed OA policy? (400 words)

Access to and re-use of research, but this needs to be financially sustainable to retain journals as the prime vehicles for research dissemination (as long as that’s achieved in a way which doesn’t financially undercut the creation, improvement, and publication of that material).

61. Do you foresee UKRI’s proposed OA policy causing and/or contributing to any disadvantages or inequalities? (400 words)

Yes.
We believe that the UKRI’s proposed OA policy will be disadvantageous to small learned society publishers. They lack the investment funds to flip to an OA only model and continue to sustain their society activities and are mostly heavily reliant on hybrid journals. If hybrid journals are forced to close, this policy will also create further inequalities in the system for unfunded researchers, for example, clinicians, many AHSS researchers and those in countries with less available research funding, as they will have fewer journals available to them.

62. Do you foresee any positive and/or negative implications of UKRI’s proposed OA policy for the research and innovation and scholarly communication sectors in LMICs? (400 words)

Yes

LMICs will find it difficult to fund APCs so authors in those countries will be disadvantaged compared with wealthier nations where funding of APCs is more likely. This is likely to lead to a lower number of publication outputs from those countries. While there may be some increased access to UKRI-funded research for these regions, the impact of this is likely to be small as most low income countries have access to research through the Research4Life programme.

63. Do you anticipate any barriers or challenges (not identified in previous answers) to you, your organisation or your community practicing and/or supporting OA in line with UKRI’s proposed policy? (400 words)

Yes

If the UKRI policy does not allow authors to publish in hybrid journals then UK authors will be disadvantaged as they will not be able to publish in some of the top journals in their field.

In addition, early career researchers encouraged to publish in high impact factor journals will see a detrimental impact on their career progression if they can no longer publish in these journals.

64. Are there any other supporting actions (not identified in previous answers) that you think UKRI could undertake to incentivize OA? (300 words)

N/A

65. Do you foresee any other implications (not identified in previous answers) for you, your organisation or your community arising from UKRI’s proposed OA policy? (300 words)

N/A

66. Do you have any further comments relating to UKRI’s proposed OA policy? (400 words)

N/A

67. Do you have any further comments relating to commonality between UKRI’s proposed OA policy for outputs acknowledging UKRI funding and the OA policy

N/A
68. Do you have any further thoughts and/or case studies on costs and/or benefits of OA? (400 words)

No