

## Background

The Wellcome Trust is currently conducting a review of its open access policy and SCONUL was invited to respond on behalf of its members.

### Current Wellcome policy:

“The overarching aim of our OA policy is to ensure that knowledge and discoveries which arise from our funding are shared and used in manner that maximises the benefit to health. This objective remains our north star.

“Beyond this however, we’ve defined three additional objectives. Specifically, the OA policy should:

- Support a transition to a fully OA world, where no research is behind a paywall
- Be as clear, unambiguous and straightforward as possible to comply with
- Ensure that the costs of delivering this policy are fair and proportionate.”<sup>1</sup>

The full statement of Wellcome’s current policy can be found here:

<https://wellcome.ac.uk/funding/managing-grant/open-access-policy>.

## SCONUL’S response

### A. What do you think has been the impact of Wellcome’s existing OA policy on realising open access?

1. The collective impact on OA policies, approaches and strategies adopted in the UK has been to make the UK one of the countries leading the transition to open access, with 37% of UK outputs made freely available to the world immediately on publication, either through Green or Gold OA<sup>2</sup>. This has taken us further towards a fully open access world than the average globally and must be regarded as a success.
2. We recognise the important role that Wellcome has played in bringing this about by requiring publishers to meet certain criteria, particularly on deposit and licence terms. This has been transformative.

<sup>1</sup> Robert Kiley, Head of Open Research, Wellcome Trust in his blogpost *Wellcome is going to review its open access policy* <https://wellcome.ac.uk/news/wellcome-going-review-its-open-access-policy> (accessed 21 May 2018).

<sup>2</sup> Jubb, M et al (2017) Monitoring the Transition to Open Access December 2017, UUK <http://www.universitiesuk.ac.uk/policy-and-analysis/reports/Documents/2017/monitoring-transition-open-access-2017.pdf> (accessed 21 May 2018)

3. Over the last eight years, Wellcome has consistently taken a leadership position, both in terms of the public debate on open access policy and as an early adopter of open access policies. Wellcome's open access policy has therefore been highly influential in the UK climate, disproportionately so compared to its (significant) funding of UK research.
4. It would be difficult to isolate fully the impact of Wellcome's OA policy from other factors. Certainly the policy of the funding council's REF open access policy has also been a powerful agent of change, leading to higher levels of awareness among researchers of open access.
5. We are still at a relatively early stage in the transition to open access, and there are a number of factors which suggest that, should open access policies remain static, progress towards a shared goal of a fully OA consortia world, where nothing is behind a paywall, is likely to slow or stall. Progressive funder policies are absolutely key to maintaining momentum in the transition.
6. These factors are as follows:
  - 6.1 The progress which has been made to date has come at a high financial and administrative cost to funders and institutions. It is not clear that funders and institutions can afford to continue to meet those costs, whether or not UKRI follows RCUK in supporting institutions through an OA block grant. (Expenditure on APCs has at least quadrupled between 2013 and 2016, and the average cost of an APC has increased by 16% over the same period). Potential impacts include (a) funding being directed toward the large publishers at the expense of smaller publishers, Pure Gold OA journals, OA consortia and new entrants and (b) some institutions withdrawing from deals with the larger publishers, restricting their researchers' access to the latest findings.
  - 6.2 Jisc Collections has led the way internationally in the establishment of off-setting deals as the main tool for controlling costs of the transition to OA. However, certain of the largest publishers have remained wholly opposed to such an approach and continue to benefit from "double dipping" in terms of high subscription charges for "big deals" and high cost APCs. While this option remains open to publishers, there is a clear financial disincentive in place for them to adopt off-setting arrangements or to transition to read and publish approaches, despite strong moral pressure to do so.
  - 6.3 Offsetting deals have had a positive effect on controlling costs and appear to underpin the slower rise of hybrid journal prices. This approach is being picked up internationally and is a powerful driver of change. However, a negative side effect has been to cement in the power of the larger

publishers at the cost of smaller publishers and new entrants, including Pure Gold OA publishers, as library budgets are stretched to meet the costs of these deals. In addition, as these deals have negotiated on the basis of subscription and APC costs, they can be seen as reinforcing the subscription model.

- 6.4 While publisher early adopters of offsetting arrangements may have benefited from first mover advantage, the impact of this is likely to lessen over time and we may see some attempt to move back to more traditional approaches if these are allowed to continue alongside offsetting models. Libraries, HE leaders and funders will need to collaborate to a greater degree in future to ensure that we are being as effective as we can in resisting such pressures.
  
- 6.5 We are at very early stages of read and publish deals which arguably bring us closer to our shared ideal of “nothing behind a paywall”. We need to create an environment in the UK and beyond in which these approaches can be fostered if we want these publishers to maintain an engagement with this approach. This includes funders working with colleagues internationally to coordinate, and where possible align, objectives, strategies and requirements.
  
- 6.6 The Finch report<sup>3</sup> envisaged an open access future in which giving authors greater control over the publication costs of their research would result in an effective “market” in APCs. There is no clear evidence that such a market exists. Instead, because of entrenched behaviours around appointment and preferment, Journal Impact Factor (JIF) appears to remain the overwhelming driver behind decisions about where to publish. It appears there is no correlation between JIF and the cost of APCs, suggesting instead that the cost of an APC may be being used by publishers as a proxy for the prestige of a journal and that publishers may be using JIF as a mechanism to drive up APC prices. Hence, the key driver for price control of APCs envisaged in the Finch report is missing. While negotiators do their best to control costs, their scope for doing so is necessarily limited, even with effective collective engagement with negotiations with libraries, HE leaders and funders.
  
- 7. For these reasons, we argue that, while Wellcome and other funder open access policies have been instrumental in bringing about change, without further development of those progressive policies, we are in danger of being locked in to a high-cost state of permanent and increasingly expensive “transition” where

---

<sup>3</sup> Finch Group (2012). Accessibility, sustainability, excellence: how to expand access to research publications, Report of the Working Group on Expanding Access to Published Research Findings <https://www.sconul.ac.uk/sites/default/files/documents/finch-report-final.pdf> (accessed 21 May 2018)

funding for APCs is normalised as an additional income stream and not as a mechanism to support transition.

**B. What are the main reforms or developments needed to ensure 100% of Wellcome-funded research outputs are OA? Please highlight the reform that you believe to be the most important.**

1. The management of OA APC funds through institutions has been challenging because publisher processes have not been developed to streamline payment at the article level. The workflows for paying APCs are labour-intensive and messy for authors and their institutions, despite considerable investment by institutions in infrastructure to inform and support authors and to ensure, and report on, compliance.
2. One option would be for Wellcome to change the way APC funding was supported (for example, pay APCs directly to publishers). There are potential benefits and challenges to this approach.
3. We appreciate that this approach would help Wellcome track APC payments and ensure that all outputs meet the requirements of its own policy. It would also remove some of the administrative burden from institutions.
4. However, while we don't believe that involvement of the author in the process of paying APCs has delivered the sensitivity to price envisaged in the Finch report, it has undoubtedly raised awareness of open access among researchers. This is highly desirable. (SCONUL member institutions continue to report a mixed picture on levels of understanding of open access among researchers, including of the overall objective of opening up access of the world's knowledge.)
5. Such an approach would also have drawbacks around (a) ensuring compliance where joint funders are involved (b) making negotiation of offsetting deals more challenging by removing the link between institution and article and (c) removing the institution as the primary point of information and advice for authors.
6. An alternative approach to smoothing the process of paying APCs and tracking payments would be to require publishers to improve their workflows and automate processes. It is highly surprising that a full eight years on from the development of OA funder policies this has yet to occur. For the reason stated above, we would prefer this approach as it does not remove the author from the process.
7. We believe that it should be a requirement for all publishers of Wellcome-funded research outputs to have signed up to an enhanced service level agreement. An

SLA should cover automation; standards adoption, automated repository deposit, metadata, as well as licensing, deposit and reporting and should include a commitment to participate in the developing OA support infrastructure for example Jisc Publications Router.

**C. Wellcome wishes to support a transition to a fully OA world, where no research is behind a paywall irrespective of who funded it. In your opinion what action is required to enable this transition?**

1. While we are concerned about the growth of hybrid Gold OA publishing in the UK for the reasons stated above, we do not suggest that Wellcome prevents its funds being used for publication in all such journals. This is because (a) there are hybrid models, such as the Springer Compact deal, which do not hinder the transition to open access and (b) a blanket ban would be contrary to academic freedom in that publishers would struggle to make a transition to fully OA publishing models while other countries have such varied approaches to open access.
2. Therefore, we argue instead that funders, including Wellcome, should not cover the cost of APCs in hybrid journals which do not meet certain requirements. Payment should only be allowed if and when:
  - There is an acceptable offsetting scheme in place, and
  - There is also a compliant green OA option with full access after 6 months or APC costs should be less than £2000 per article (all in), decreasing £100 per year for next 5 years.
3. What constitutes an acceptable offsetting deal is likely to incorporate a range of objective and subjective measures, including, but not limited to, a significant discount on subscription plus APC costs of 75% or more and a commitment to making the offsetting arrangement transitory.
4. We recommend that funders, representatives of institutions and Jisc Collections work together to agree criteria and approaches to offsetting schemes, and consider whether individual publisher proposals meet those criteria.
5. It is our view that the successful development of off-setting agreements in the UK and elsewhere shows that this is an approach open to all subscription-based publishers. Therefore the introduction of such a funder criteria could not reasonably be held to be a curb on academic freedom but is a matter of publisher choice.

6. A significant minority of SCONUL members have a “green first” policy for open access publishing, particularly among teaching focused institutions. Many have not been in receipt of RCUK block grant funding for OA. Outside of STEM research, Green OA is seen as the primary approach to making outputs open access.
7. Given these factors, we are suggesting that all funder OA policies, including Wellcome’s align around a set of common conditions for publishing in hybrid journals, including reference to OA.
8. On balance, we believe harmonisation of policies particularly on embargoes and processing approaches is necessary whilst still incorporating an element of progression in policy. The current arrangements causes considerable confusion for researchers and increases the likelihood of non-compliance with funder policies. Harmonisation would also allow institutions to reduce associated administration costs.
9. We strongly support initiatives such as the Wellcome Open Research platform. Wellcome’s strong reputation among academics suggest that it will continue to gain significant support among academics and it provides a powerful alternative to traditional publisher models.
10. SCONUL believes that funders should not pay the cost of APCs over a certain level irrespective of whether they are published through hybrid journals. There is no evidence that authors are “shopping on price” when considering where to publish, and there are very few other mechanisms for control of APC costs. (Some institutions will cap the amount they will provide to an author for gold OA publishing, but this is not a widespread approach and negotiators are doing their best to control costs of APCs within the current policy framework but this is challenging.)
11. Hence, despite their name, the cost of APCs does not appear to relate to the cost of producing an article but instead acts as an unreliable proxy for quality as discussed above. Publishers’ costs are not at all transparent, but the profit levels enjoyed by the largest publishers are widely known.
12. Placing a cap on the cost of APCs is a necessary step in the transition to open access because no other effective mechanism exists for controlling costs. In addition, it ensures that APC costs have some relation to the cost of publication and disassociates APC costs levels from the JIF.
13. We note that, given APC costs are not related in any meaningful way to journal production costs or controlled by market forces, setting a cap is very likely have the effect of publisher APC prices clustering near or at the maximum level. This should be expected and planned for. We propose that this suggests the cap

should therefore be set at £2500 and should automatically ratchet down over time, as suggested above for APCs in hybrid journals.

14. We have two further observations on the development of OA policy. First, both academic research and academic publishing are global enterprises, and the policy approaches and strategies adopted by funders and institutions in individual countries impact internationally. Funder engagement across boundaries of country and region seems to us to be a necessary pre condition of effecting global change.
15. Second, in general, authors do not yet understand sufficiently the question of rights to their own work and many sign over those rights to publishers without understanding fully the implications of doing so. The UK-SCL is an open access policy mechanism which ensures researchers can retain re-use rights in their own work, they retain copyright and they retain the freedom to publish in the journal of their choice (assigning copyright to the publisher if necessary). We urge all funders to engage with this initiative and to ensure that their policies foster engagement with it.

Ann Rossiter  
21 May 2018