

# House of Lords Select Committee on Science and Technology Inquiry into Open Access

## Written evidence submitted by the Political Studies Association of the UK

### Executive Summary

The Political Studies Association (PSA) exists to promote political studies and thus supports moves to widen access to research. However, the Government's proposals for implementing an open access (OA) policy are highly problematic, due in large part to inadequate consultation and hence a failure to consider all pertinent issues, not least the significant differences that exist between subject disciplines.

This paper highlights a number of concerns relating to the Government's policy for achieving open access to publicly-funded research:

- Flawed assumptions about:
  - the process and conduct of social science research;
  - the methodologies upon which the current proposals are based;
- These flawed assumptions lead to a biased conclusion preferring so-called 'gold' OA to other potentially more workable solutions;
- A likely significant negative impact on UK social science, threatening the participation of early career researchers and the UK's capacity to compete on equal terms with social science research elsewhere;
- A major threat to UK academic freedom and copyright;
- A significant impact on the externally-perceived quality of UK research, based not on rigorous peer review but instead the ability to 'pay to publish';
- The likelihood of handing a significant competitive advantage to the UK's competitors;
- A negative impact on the vital activities of the UK's learned societies.

The PSA calls on the Government to reconsider its policy and pilot it differentially.

### **1. Introduction**

- 1.1 The PSA welcomes the idea of moving towards more open access to academic publishing. It does, however, have very serious concerns about the speed and lack of consultation with which the Department for Business, Innovation and Skills (BIS), RCUK, and to a lesser extent HEFCE, have pressed ahead with developing and implementing an open access policy. Failure to give full and proper consideration to all the issues has resulted in

a flawed policy that will have serious consequences for the international standing of British universities and research.

- 1.2 As a consequence of failing to consult sufficiently widely, the BIS policy on open access has been shaped largely by considerations specific to the science, technology, engineering and mathematics (STEM) community. The STEM community has been at the forefront of the open access movement and open access publishing is, therefore, considerably better established in the sciences than in the social sciences, arts and humanities (HSS). The needs and concerns of HSS subjects are in most cases quite different to STEM and thus require far fuller scrutiny and consideration by the Government than has been the case to date. It is important that the BIS policy acknowledges that a one-size fits all approach is simply not appropriate.

## **2. Gold, Green, Embargo Periods and Stakeholder Engagement**

- 2.1 The Finch Committee on Open Access outlined the two main approaches. The first is the so-called 'gold' model, whereby researchers pay existing publishers to make their research publicly accessible. This is funded through the use of Article Processing or Publishing Charges (APCs). The report's authors estimate that this would cost research funders between £50-60 million a year. Although the methodology for this calculation is not clear, it is the route advocated by RCUK and appears to be the preferred option of HEFCE. Indeed, RCUK has already announced that from April this year all articles arising from research funded by RCUK will have to be published in open access form and has made available a total of £17 million to UK institutions for the payment of APCs. In calculating the amount of money it would make available for the payment of APCs, RCUK has taken figures from the Finch Report, which are based on the average level of APCs across all disciplines, and has used a figure of £2,072 inc. VAT. Using an average significantly disadvantages HSS because the cost of processing an HSS article is significantly higher than in STEM. This is due to both the greater length of HSS articles (19 pages vs 10 pages<sup>1</sup>) and lower acceptance rates (11% vs 42%<sup>2</sup>). Furthermore, STEM subjects receive a significantly higher proportion of funding from RCUK than HSS and hence it is unclear where the cost of APCs for most HSS articles will be sourced.
- 2.2 The alternative model, 'green' open access, where researchers deposit a version of their work in institutional repositories, means papers can be published in subscription journals without an APC, but have to be made freely available after an embargo period. The authors of the Finch Report, in coming out in favour of the 'gold' model, argued that repositories cannot act as publishers. They also argued that the existing system of 'green' OA, whereby researchers have the choice of whether or not to deposit their research in repositories, is not working, as only a fraction of researchers has ever participated. This view has been strongly challenged by a variety of commentators since the Finch report was published and the Government

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<sup>1</sup> *The Future of Scholarly Journals Publishing among Social Science and Humanities Association, Report on a Study Funded by a Planning Grant from the Andrew W. Mellon Foundation by Mary Waltham, 2009*

<sup>2</sup> *ibid*

announced its agreement with the main findings and recommendations. The PSA believes that the 'green' model has considerable merit and is likely to have far fewer negative consequences for academic freedom and research standards than the 'gold' model. However, in setting embargo periods much greater consideration needs to be given to the fact that the half-life of HSS articles (their continued utility in front-rank research) is considerably longer than for most STEM subjects. The embargo period for HSS of 12 months as currently set by RCUK is inadequate and should be extended to at least 36 months in order to protect the intellectual property of the researcher and to continue to deliver funding to the profession to enable it to develop young researchers.

- 2.3 Clearly it is in the interests of higher education to reduce its costs, but the 'gold' model does not necessarily lead to this. Transaction costs alone are going to be high and, as acknowledged by Finch, the transitional period in which universities continue to pay subscriptions for journals in their libraries (particularly those journals in which UK researchers are a small minority of authors), yet also have to contribute towards the costs of APCs, could be many years.
- 2.4 The Government has justified support for OA on the basis that 'the public shouldn't have to pay twice', both to fund academic research and, through subscriptions, to pay for the published outputs. However the favoured gold version will deliver almost entirely free goods to the publishers, paid for by publicly funded APCs. This is in effect a subsidy from taxpayers and from fee-paying students to commercial organisations, since taxpayers contribute to funding academic research through the research councils and through the portion of the fees paid by students which are used to fund the time academics commit to research and scholarship time. The Government's argument that 'the public shouldn't have to pay twice' is belied by their own proposals: the public will always have to pay both for the research and its publication, whether the publication costs come from APCs or subscriptions.

### **3. Threat to Academic Freedom**

- 3.1 It is not clear where APCs for the social sciences will come from. RCUK and Finch argue that the costs of APCs will be factored into research bids. This may work for STEM, but in social science the lone researcher and small grants for targeted specific research would not stand the cost. New researchers working to small unfunded projects in their own time, a traditional approach for many post-doctoral students anxious to convert their theses into journal articles, do not fit into the 'gold' model at all. Their model rarely exists in STEM subjects, the driver for Finch. The implementation of 'gold' open access will make it even harder for early career colleagues to get published. If Universities hold a sum of money in reserve for paying APCs they will have a vested interest in supporting established 'sure-bets' rather than early career colleagues, or those returning after a career break. At worst those operating outside the mainstream may find funding completely withheld. This is a system that risks promoting orthodoxy over innovation and heterodoxy.

- 3.2 Quite apart from the threat to early career academics, it runs counter to the principles of academic freedom that universities will, in effect, become publication gatekeepers, able to determine the journals in which their staff are published and which articles are deemed worthy of the financial support necessary to be published.
- 3.3 A further concern is HEFCE's proposal that all outputs for the REF2020 should be open access. Given the limited availability of resources for the social sciences this will inevitably lead to 'approved journal' lists, which many would consider an unacceptable infringement of academic freedom, while further limiting the access of new members of the profession and extending overall managerial control over academics.
- 3.4 Also of considerable concern is the requirement that articles that comply with RCUK policy should be available under a CC-BY copyright licence. This means that the authors effectively lose control over their work; so long as it is attributed anyone can use the work, including those who utilise it for a commercial interest and even extremist groups who may want to piggy-back on the research or distort its findings to their own ends. Academics will have no control over this.

#### **4. Loss of UK Credibility**

- 4.1 Another issue is that of quality control. The Finch report does not deal adequately with this and although it rehearses some points, no clear recommendation (at least not a convincing one) is made. The current peer reviewed process is robust and although there are some obvious errors from time-to-time, it works well. The 'gold' option will introduce a perverse incentive in that if an author can demonstrate they have met methodological and ethical criteria the publishers have an incentive to publish them whatever the quality of their data or analysis. The more each journal has in terms of throughput, the more money they take and therefore the higher the profit. Publishing executives will set performance indicators based on throughput and via this, income rather than quality.
- 4.2 Given the comments in the report about the need to make research outputs available more speedily and in accessible ways, the publishers would have the incentive to move towards real-time rolling publishing. Even if it does not evolve into this, there is a danger that peer review will diminish in terms of quantity and quality. This will have a most unfortunate detrimental effect on the international standing of UK research.
- 4.3 This will also encourage the differentiation of journals even more so than at present. Those able to raise higher APCs and to appoint high quality editors will be able to use this as a means to attract good peer review (assuming a genuine market and not a simply regulated flat fee). Merely to publish in these journals will suggest high quality papers, but it will raise another barrier to those entering the profession.

#### **5. International Considerations**

- 5.1 Anecdotally, it appears that some major US publishers in looking at the UK

OA policy, especially as it applies to copyright, are quietly asking journal editors whether they wish to consider any UK based papers at all. UK based editors of UK journals are also alive to the quality and copyright issues and are also asking whether the rushed implementation of these seriously flawed proposals will result in them having to restrict publication in their journals to non-UK based authors. An unintended damaging consequence of the Government's policy may well mean that serious quality international journals restrict the access of UK authors, while the OA policy into which the UK has leapt reduces much output into vanity publishing and online blogs.

- 5.2 The OA proposal as it stands would make UK research widely available at no cost to the UK's commercial rivals. It will allow UK taxpayers and researchers to be exploited by both commercial publishers and international commercial organisations. We run the danger of handing UK funded research free of charge to economic and academic rivals unless there is a global open access provision. At present this appears to be unlikely, especially in HSS disciplines.

## **6. Impact on Learned Societies**

- 6.1 In HSS, one area where the academy has benefited from the existing publishing model is through the annual subventions passed on to learned societies in return for the right to publish the discipline-based journals owned by those societies. In the case of the PSA, for example, this currently accounts for over £400k per year, which is then used to support the development of the profession in a number of ways. These include outreach to schools to further widening participation and professional development activities for doctoral students. Learned societies such as the PSA actually play a major role in facilitating research and its effective dissemination. A destructive consequence of the Government's open access policy is a threat to this income stream for learned societies, the developmental activities that flow from it, in addition to the long-term threat to academic freedom itself.

## **7. Conclusion**

- 7.1 The PSA urges the Government to acknowledge that significant differences exist across disciplines and the threat of the 'gold' model to academic freedom and the reputation of British universities. It thus urges a reconsideration of the preference given to the 'gold' model over the 'green' model, a review of the embargo periods allowed under the latter model and modification of the CC-BY licence requirement under the 'gold' model to a CC-BY-NC licence requirement. Ideally the revised policy should be piloted in a number of disciplines before any decision is made about applying it to all publicly-funded research in the UK.

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