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Wellcome's Open Access Policy Review

Q3 2018

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Submission of Written Evidence to Wellcome Trust Open Access Policy Review

JOURNAL PUBLISHERS

- **Gemma Hersh, Elsevier**
- **Iratxe Puebla, PLOS**
- **David Ross, SAGE**
- **Carrie Calder, Springer Nature**
- **Martin Eve, Open Library of Humanities**

Name: Gemma Hersh
Organisation: Elsevier
Please indicate whether you consent to Wellcome making this written response publicly available Yes

1. Wellcome, like many funders, supports a transition to universal OA. How is your current business model changing or how may it change to accommodate universal OA?

Elsevier fully supports open access and has taken significant steps to reengineer our entire portfolio in this regard. This includes the following:

- the launch of 170 new gold open access journals;
- the availability of a gold OA publication option in over 1850 hybrid titles;
- green open access options for all our journals including options to share preprints immediately and accepted manuscripts publicly after an embargo period;
- the shortening of our embargo periods to assist UK authors with green open access
- compliance
- varying the Article Publication Charges (APCs) to provide a broader range of options for authors, keeping our average APC below market average while delivering above average quality
- offering a choice of two reuse licenses, including CC-BY

In addition to reengineering our entire journal portfolio, we have agreements with 50+ funders including the European Research Council, the Joint Research Council, The Gates Foundation, EMBL and the World Bank, supporting their OA policies and helping guide authors to choose compliant options. While we do not have a formal agreement with the Wellcome Trust, we work closely with you too, for example signposting to your authors what you require from them in terms of compliance and working with you to find efficient solutions to your deposit requirements.

We have developed new services and evolved existing ones to support open access and open science more broadly. For example, we are founding partners of CHORUS in the US (recently piloted in Japan and Austria) and have APIs that can help to significantly increase green OA uptake. Our products such as Pure and bepress support institutions to manage and showcase their institutional output and our platforms such as Mendeley, facilitate researcher collaboration. Our Scopus OA indicator helps users identify where articles are published gold open access and all open access content we publish is signposted and searchable on ScienceDirect. To date there are over 400,000 open access articles on ScienceDirect, reflecting the growing corpus of content we publish OA. We are one the leading open access publishers, publishing over 27,000 gold open access articles in 2017.

2. Some funders and institutions have decided that they will no longer fund APCs (or set price caps) in hybrid journals. Should Wellcome follow suit and why?

The Wellcome Trust's open access policy is one of the most successful in the world. By its own reporting, Wellcome Trust's compliance level is as high as 87%.¹ The Wellcome Trust's approach is one others should be following, rather than the reverse. Were the Wellcome Trust to decide to no longer fund APCs or to set price caps in hybrid journals, we would be very concerned about the impact this would have on the progress of open access; on author choice; and on research quality.

¹ <https://wellcome.ac.uk/funding/managing-grant/wellcome-and-coaf-open-access-spend-2016-17>

The majority of Wellcome Trust-funded authors publishing gold open access publish in hybrid journals.² This reinforces the importance of hybrid journals to delivering Wellcome Trust's open access policy. If this option was removed or restricted in some way, this could have a significant knock-on effect on the Wellcome Trust's long term open access goal. We would also anticipate concern within the author community if Wellcome were to take the decision to prevent or restrict (e.g. through APC capping) authors' choice of journal; journals represent a community and if an author cannot publish where they want to, this impacts their and the wider community's ability to identify and benefit from each other's contributions. As outlined in a recent [Publishing Research Consortium report](#), hybrid journals are crucial to author choice and allow authors to publish in journals of their choice while also meeting their open access requirements. Absent being able to meet their OA obligations in their journal of choice, authors may face a stark choice of not publishing open access to continue to use their favoured outlet, or publishing in an open access journal which they do not feel is suitable. Neither of these outcomes is desirable.

We understand the concern around the cost associated with gold open access in a world where the majority (80%) of the world's articles continue to be published under the subscription model. We also understand there are questions around the price differential between hybrid and fully gold journals. However, this can be explained with reference to quality. In general, the Field Weighted Citation Impact (FWCI) of hybrid journals is higher than the FWCI of fully gold journals. Given that quality is one of the variables Elsevier (and no doubt other publishers) uses to set APC prices, hybrid journals tend to have higher APCs.

To illustrate the point, the below table demonstrates that hybrid journals tend to have a higher FWCI on average and a correspondingly higher APC. We would also note that for Elsevier, our APCs are below market average, while the FWCI of our journals is significantly higher than the rest of the market:

Table A: Quality and pricing - Global					
	Elsevier			Other publishers	
	FWCI	APC ³		FWCI	APC ⁴
Gold	1.07	£1,094		0.89	£1,294
Hybrid	1.37	£2,003		1.16	£2,257

Looking at the articles Elsevier publishes on behalf of Wellcome Trust-funded authors, the average APC paid is in line with the reported COAF averages, although is slightly above Elsevier's global average APC (Table A), reflecting the higher quality journals Wellcome Trust authors choose to publish in:

Table B: Quality and pricing – Wellcome Trust funded authors				
	COAF		Elsevier	
	FWCI	Average APC ⁵	FWCI ⁷	Average APC ⁶
Gold	Unknown	£1,943	1.65	£1,750
Hybrid	Unknown	£2,401	1.62	£2,456

² <https://wellcome.ac.uk/funding/managing-grant/wellcome-and-coaf-open-access-spend-2016-17>

³ Based on Elsevier Market Intelligence, verified with third party data. All averages are weighted. A USD/GBP exchange rate of 1:0.775 has been used

⁴ APC based on main competitors only and are weighted averages

Given the above, capping or restricting hybrid publishing would likely mean capping or restricting publishing in some of the highest quality journals, with a knock-on impact on the quality of Wellcome Trust-funded research.

3. Many researchers and institutions argue that there is too much friction in the system, making it difficult to understand and comply with publisher and funder OA policies and processes. Do you agree and if so, how could Wellcome seek to reduce this through its OA policy?

We recognise there are frictions to be found, as there are in any complex system with such a wide variety and high number of market participants. Some of these frictions are down to legacy systems; Open Access is still very much in its infancy and so it is surely to be expected that industry and institution-wide systems are not as well integrated as they might be. However, ongoing implementation challenges are being worked through by all stakeholders, for example via the UUK OA Coordination Group. Elsevier sits as publisher representative on this group. We have also been involved in discussions around how to make the Scholarly Communications License workable, and how we might be able to support UK institutions via the Jisc Router. Publishers are also working collectively and with other stakeholders on initiative such as howcanishareit.com, to make it easier for researchers to understand publisher policies.

We remain open to continuing to work with all stakeholders to discuss ideas for removing friction and strongly believe that collaboration is the best approach to doing this.

4. If you were tasked to rewrite Wellcome's OA policy – and cognisant of the [objectives](#) we have defined – what one thing (if any) would you change and why?

Given the high rate of open access that the Wellcome Trust achieves, its policy is working well. However, we note that this review is intended to take account of developments in scholarly communication, such as the increasing use of preprints, and that the Wellcome Trust is concerned with costs associated with gold open access (which will inevitably continue to increase as the proportion of articles published gold open access continues to rise).

With this in mind, one area the Wellcome Trust may consider exploring is the role that preprints could play, formally, as part of its open access policy. While preprint sharing in the health and medical sciences is relatively young compared to certain other disciplines (such as high-energy physics), things are evolving.⁸ Should this be an area Wellcome Trust wishes to consider, Elsevier would be delighted to share our expertise. Our preprint server and working paper repository, SSRN is home to over 6,000 papers in its Biology Research Network, for example. Papers across SSRN's networks have been downloaded over 12M times in the last 12 months. The total number of citations to papers in the SSRN eLibrary is close to 6M.⁹

Whichever direction or approach the Wellcome Trust takes, we remain open partners to help deliver open access.

⁵ <https://wellcome.ac.uk/funding/managing-grant/wellcome-and-coaf-open-access-spend-2016-17>

⁶ A EUR/GBP exchange rate of 1:0.877 was applied.

⁷ FWCI is a sophisticated measure but is sensitive to outliers, especially in low-level aggregations such as these. Numbers should be taken as estimates

⁸ <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-17-050.html>

⁹ <https://papers.ssrn.com/sol3/DisplayJournalBrowse.cfm>

Name: Iratxe Puebla/Veronique Kleimer
Organisation: PLOS
Please indicate whether you consent to Wellcome making this written response publicly available Yes

Question 1: Wellcome, like many funders, supports a transition to universal OA. How is your current business model changing or how may it change to accommodate universal OA?

PLOS's fundamental goal has remained unchanged since our founding: to advance research communication by transforming how scientific knowledge is shared and accessed. We have served as a catalyst for change by providing concrete demonstration that a pure gold Open Access is not only better for scientific communication, but that it's a sustainable business model.

This means, of course, that PLOS's responses to the Wellcome Trust as part of this consultation are fundamentally shaped by our standing as a not-for-profit publisher generating program revenue primarily from article processing charges (APCs). To ground our comments around universal OA and our guidance to Wellcome around funding policies, it's worth considering the strong policies PLOS has already in place to support Open Access publication practices and universal OA:

- Since the launch of our first journal, PLOS has published all articles Open Access under a CC-BY license (or CC-0) and deposited all articles in PMC.
- Therefore, all PLOS articles are compliant with current Wellcome Trust Open Access policy.¹
- Amongst the top five publishers (by volume) of COAF-supported research and APC spend in 2016-17, PLOS was the only publisher to be fully compliant with Wellcome policy.
- PLOS strengthened its data availability policy in 2014 and has since published approximately 94,000 articles with an associated Data Availability Statement. In 2017 alone, more than 4,600 datasets associated with PLOS articles were deposited in open repositories.

PLOS's ultimate vision for universal OA includes expanding open access to the full range of research outputs. For example, PLOS routinely publishes replication studies, null, and negative results. Moving ahead, we will continue to explore initiatives to support the OA publication of data, code, and methods, and to provide means of credit to those who choose to embrace open science.

As a mission-driven organization founded to seed fundamental change in scientific communication, we also acknowledge the limitations of our current APC model. These limitations are felt most keenly by early career researchers and by those in fields with low grant funding and research from the Global South and disease-endemic countries.² PLOS provides waivers to authors who cannot afford APCs when possible, but this is not scalable or sustainable. We believe that it's imperative we develop alternative business models that remove this barrier to joining the global research system.

While we have begun to research alternatives, PLOS does not have a ready, neatly packaged solution to what is an undeniably challenging, systemic issue. We are keen to partner with actors who are committed to the same goals in order to find alternative solutions beyond the APC to deliver true universal OA. Finding a community-driven solution to a community problem will require the creativity, influence, and capabilities of multiple actors within the system, including funders like Wellcome.

¹ <https://wellcome.ac.uk/funding/managing-grant/wellcome-and-coaf-open-access-spend-2016-17>

² <http://blogs.plos.org/absolutely-maybe/2018/04/02/a-reality-check-on-author-access-to-open-access-publishing/>

Question 2: Some funders and institutions have decided that they will no longer fund APCs (or set price caps) in hybrid journals. Should Wellcome follow suit and why?

Looking at the current state, it's clear that Wellcome's existing policy has played an extremely important role in moving towards full OA. While not the sole driver for growth, Wellcome and other funders have contributed to many more research articles being published OA and to publishers' continued development of compliant options.

The market of OA options has grown to include a large proportion of hybrid journals and the Wellcome Trust's own experience shows that Wellcome Trust authors select hybrid journals first (likely because they can continue to publish in their "preferred" journals). Hybrid journals have been widely seen as a transition to universal OA, but they are blunting the growth potential of full OA and creating an administrative burden for funders and institutions alike. The rate of increase for OA articles publishing in fully OA journals, while still growing, has halved over the last three years from 30% in 2013 to a flattened ~16% annual growth as a trailing three-year average.³ Studies show that hybrid OA journals tend to charge higher APCs which, combined with "double dipping" inflates the cost of moving to full OA and generates a significant incremental revenue stream for commercial conglomerates.⁴ As these publishers increasingly seek to lock hybrid APCs into their "big deals", there exists a very real risk that these higher prices will be locked in in perpetuity. The promise of a transition that has long been associated with hybrid OA journals has morphed into a strong force to maintain the status quo in the market.

While Wellcome Trust's current OA policy has certainly contributed to the growth of OA articles, if its ambition is now to accelerate a more fundamental shift toward universal OA, it should bring its influence and leadership to bear by stopping funding for hybrid OA options. Given the importance of this revenue stream for commercial publishers, such a move would undoubtedly drive a much faster conversion to full OA.

Market incentives need to be established that shift funds currently spent on subscription activities to Open Access options. Author's choice is an important value to maintain, but it is equally important to recognize that in today's environment, authors are pressured to publish in certain venues, most of them *not* OA. Moving to universal OA will require a change in the incentive system, in particular, at the level of research assessment for funding and career promotion.

Incentives for individual researchers must reward open science practices including, but not limited to, fully OA publication. PLOS is working with others to support initiatives like DORA, which seeks to reform research assessment⁵, and the implementation of the TOP guidelines at the article level to support recognition for openness and transparency⁶. We have implemented and are supporting^{7,8} the use of ORCID and the CRediT taxonomy to help assign precise credit while supporting team science. Again, these are not issues any one actor can solve alone and PLOS is ready, willing, and eager to collaborate across the community toward this broader vision.

Alongside our clear recommendation that Wellcome cease funding hybrid OA, we acknowledge that changes in funding policy must be coupled with work to shift incentives both in the broader market and in the research communities.

Question 3: Many researchers and institutions argue that there is too much friction in the system, making it difficult to understand and comply with publisher and funder OA policies

³ <https://nfais.memberclicks.net/assets/docs/OA2017/deni%20-%20final%20presentation.pdf>

⁴ <http://blogs.lse.ac.uk/impactofsocialsciences/2016/03/15/enabling-authors-to-pay-for-open-access/>

⁵ <https://sfdora.org/>

⁶ <https://osf.io/sm78t/>

⁷ <http://www.pnas.org/content/early/2018/02/26/1715374115>

⁸ <http://blogs.plos.org/plos/2018/02/guidelines-transparency-for-author-contributions/>

and processes. Do you agree and if so, how could Wellcome seek to reduce this through its OA policy?

In line with our recommendation that Wellcome shift its funding policies to exclude hybrid OA, we reinforce our perspective that publication in fully OA journals makes compliance with policy easier to track and less costly to administer.

However, there are other mechanisms by which Wellcome could reduce “friction” within the system, namely by entering into centralized billing arrangements with publishers. Payment arrangements could be structured using either the direct billing or deposit account method. Wellcome would assume payment responsibility for corresponding authors who are affiliated with the funder (e.g. direct affiliation if funder is the research institution itself or indirect affiliation as research grant recipients).

We believe this approach — which other funders, like the Max Planck Institute and the Bill and Melinda Gates Foundation, have instituted — would allow Wellcome greater direct control and line of sight for the publishing activities underwritten by its research grants. This type of arrangement will significantly reduce friction for authors, who will no longer need to worry about not having the funds to publish if their research grants have expired.

Instituting direct publisher relationships will also eliminate complex and costly administrative responsibilities for universities, which track OA compliance and pay APCs which are then relayed to the funders. The heaviest compliance burden for universities usually relates to OA license and OA APC offsetting monitoring for hybrid publishers.

Question 4: If you were tasked to rewrite Wellcome’s OA policy – and cognisant of the objectives we have defined – what one thing (if any) would you change and why?

To support a transition to a fully OA world where no research is behind a paywall, we believe that the Wellcome Trust should cease funding hybrid journal APCs and provide specific incentives for OA publication of a broad range of research outputs.

The hybrid model was originally positioned as an interim solution to provide more OA options during a time when the market was testing Open Access. In practice, however, the hybrid model:

- creates a costly burden for institutions and funders to administer related to compliance and creates complications with other funding models like block grants and off-setting;
- increases the cost of moving to full OA, through a combination of higher APCs and “double dipping” practices;
- reinforces the status quo, rather than accelerating the transition to true universal OA.

We believe that universal OA is attainable. But we also believe that this “transition period” is in danger of becoming the permanent model. Guided by the leadership of the Wellcome Trust, we believe the community can take steps to accelerate our progress toward universal Open Access.

Name	David Ross
Organisation	SAGE Publishing
Summary of Organisations' Approach to Open Access	Positive engagement to best serve the needs of our authors, the societies we represent and the broader scholarly communication ecosystem. As a pre-eminent publisher in social science as well as a humanities publisher, we have a particular interest in exploring OA solutions that are sustainable in fields where there is little funding available for pay-to-publish OA models.

Please indicate whether you consent to Wellcome making this written response publicly available

Yes

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1. Wellcome, like many funders, supports a transition to universal OA. How is your current business model changing or how may it change to accommodate universal OA?

SAGE's approach to OA has always been positive engagement. SAGE was set up with the mission of dissemination of knowledge, and will remain permanently independent to pursue that mission under the terms of our founder's estate plan. We recognize the opportunity which OA represents to enhance the dissemination of the scholarship we publish. Obviously, that opportunity also depends on the viability of the business models involved and the readiness of the fields we serve to shift to OA models.

Our first foray into OA was a partnership with Hindawi back in 2007 and we were a founding board member of OASPA in 2008. Since then we have built a portfolio of over 170 pure Gold OA titles. Most of these are in Medical disciplines but we also have titles in Engineering and the Humanities and Social Sciences. 20% of these pure Gold OA titles have been transitioned from a subscription mode.

We are seeing significant growth in our pure Gold OA program but consider this additive, allowing us to publish material that would not have necessarily been published in our subscription journals. OA has also given us the opportunity to start journals that can help support and enable new areas of research in ways that we used to do with subscription journals in decades past but that had become impossible to do viably in recent years

The vast majority of our 800+ subscription titles offer a hybrid option, SAGE Choice, and we have seen uptake grow steadily over time. That growth in hybrid has slowed in recent years if you exclude national flip models such as the VSNU deal.

In addition, we allow the archiving of Author Accepted Manuscripts in the author's Institutional Repositories without embargo enabling immediate Green deposit OA as a route to OA in disciplines that do not have the funding available to support paid APCs.

In this sense we have been working with a mixed publishing model for some years. We believe this is going to continue for some time.

2. Some funders and institutions have decided that they will no longer fund APCs (or set price caps) in hybrid journals. Should Wellcome follow suit and why?

We do not believe that either course of action is justified as long as the current policies foster a vibrant competitive landscape.

If the refusal to fund hybrid APCs was accompanied by a mandate to publish Gold OA then this would severely restrict the journals researchers could choose to publish in – limiting academic freedom. Journal brands play a significant role in signalling quality and importance to readers, and academics should not be prevented from selecting the journals most appropriate to reaching their required audience. These broader academic drivers need to be considered in parallel.

The industry standard hybrid OA charge of \$3000 has been established for many years – in part influenced by the "Costs and business models in scientific research publishing" report commissioned by Wellcome Trust in 2004 and it must be noted that this rate has not increased since it was introduced over a decade ago.

A blanket cap on hybrid APCs accompanied by a mandate to publish OA where available would significantly damage the many publishers who operate on lower profit margins who are striving to transition to an OA

future. There are in the region of 2000 journal publishers with a multitude of organisational structures and philosophies, and a vibrant and competitive market is to the benefit of all stakeholders. Steps which would undermine the viability of society and independent publishers would only lead to greater consolidation in the hands of the largest corporate entities.

3. Many researchers and institutions argue that there is too much friction in the system, making it difficult to understand and comply with publisher and funder OA policies and processes. Do you agree and if so, how could Wellcome seek to reduce this through its OA policy?

The policy landscape is certainly complicated. The plethora of mandates globally, each with its own requirements and rules makes operating in an international context increasing complex. SAGE would welcome some consolidation.

We are working with industry partners to simplify the process for authors. The Jisc Publications Router project in the UK and Project DeepGreen in Germany are two such examples where we are trying to develop systems to make deposit mandates frictionless for authors. We have also worked with SHERPA/RoMEO to populate their database with accurate information.

4. If you were tasked to rewrite Wellcome's OA policy – and cognisant of the [objectives](#) we have defined – what one thing (if any) would you change and why?

We would not insist on the imposition of a CC BY licence. SAGE believes in author choice and does not take the view that only CC BY is “real OA”. Authors, particularly those in the humanities and social sciences, have real concerns about derivative use. Social science articles often represent a nuanced argument in their entirety and there is valid concern that CC BY may enable sections to be quoted out of context and so misrepresent authors views. In addition, protecting commercial rights can enable the academic system to benefit from significant revenue streams from businesses, offsetting costs which would otherwise be carried by funders and universities.

Understanding of licence options may be limited in the majority of cases, but the solution to that is outreach and education, not the imposition of blanket terms.

Name:	Carrie Calder
Organisation:	Springer Nature
Summary of Organisations' Approach to Open Access	Springer Nature is a mixed model publisher, offering pure OA journals, hybrid journals and subscription-only journals (see q1 for more details)
Please indicate whether you consent to Wellcome making this written response publicly available	Yes

1. Wellcome, like many funders, supports a transition to universal OA. How is your current business model changing or how may it change to accommodate universal OA?

At Springer Nature, our goal is to help researchers advance discovery by making their findings as accessible, understandable, discoverable, usable, reusable and shareable as possible. We see the rise of open research in all its manifestations as one of the major forces reshaping the way that researchers communicate and collaborate to advance the pace and quality of discovery. With the world's most significant open access portfolio, we offer researchers, institutions and their funders open access options for journals, books and sharing research data.

We have achieved more than 70% gold OA uptake in four countries which have adopted our Springer Compact agreements (77% in the UK), showing the momentum that is possible for a transition to OA when there is a collaborative approach from all parts of the scholarly communications community. Globally, in 2017 30% of the articles we published were gold open access. Springer Nature OA published articles represent 30% of the wider gold open access market.

- **Open access options for authors at all levels and across all disciplines:** We publish more than 570 fully open access journals, and offer an open access option in over 1,700 hybrid journals.
- **A pioneer of OA models:** BMC has long been a pioneer in open access publishing, from introducing the APC model to innovating in open peer review.
- **Springer Compact:** Our Springer Compact model offers our partners significantly more value and reduces their administrative burden by taking a holistic approach and combining their local OA publishing fees with their global access/ reading fees, facilitating the transition that we are trying hard to support.
- **BMC memberships:** The BMC and SpringerOpen Membership Program enables academic and research institutions, societies, groups, funders and corporations to actively support open access in scholarly publishing and reduce the barriers for researchers wishing to publish in an open access journal.
- **High profile OA titles:** We have leveraged our brand equity to increase the credibility of open access: in 2010 we launched *Nature Communications* as the first Nature-branded journal to offer an OA option. In 2014 we announced that it would become fully OA, making it the premier OA journal in the world. In *Scientific Reports*, a broad scope Open Access journal, we publish the largest journal in the world
- **Books and data:** We've also led the way in providing OA publishing options and services for books and data as well as articles. We believe open access to knowledge in any format inherently facilitates interdisciplinary research and pushes the boundaries of discovery.

While we are supportive of transition to OA in principle, globally the funding and policy picture is complex with many countries not providing the necessary funding for authors to choose an OA route or enable publishers to move away from the subscription model entirely or to flip large numbers of hybrid journals to OA.

Selective journals like *Nature* and the Nature-branded research and reviews titles — which involve substantial editorial development, aim to provide high levels of author service and publish informative, accessible content beyond primary research — require investment. At present, we believe that the fairest way of producing these journals, which ensures their long-term sustainability as a resource for the widest possible community, is to spread these costs among many readers — instead of having them borne by a few authors. We are committed to finding models that would work for all sustainably and fairly, rather than make exceptions for few in response to a specific mandate.

2. Some funders and institutions have decided that they will no longer fund APCs (or set price caps) in hybrid journals. Should Wellcome follow suit and why?

Any reduction in funding or support for hybrid OA would significantly limit the progress we are able to make in the transition to open access in the UK and limit author choice. Given this, our strong recommendation is that Wellcome continue to fund hybrid APCs according to current policies. At Springer Nature, the successful uptake to 77% of UK output being published gold in 2017 (and above 70% in three other European countries) was in no small part down to the Compact arrangement we have in place with JISC. This agreement relies on the combination of block grants and other sources, and any restriction on funding for hybrid journals could impact this success and result in a significant step back. For enabled markets, our innovative Compact model combines reading access to subscription content with open access publishing in one agreement. It links key stakeholders in the research community, from authors to institutions, funding agencies and national governments, with the aim of a sustainable and affordable business model that facilitates an open access transition. If you remove a stakeholder group from this, success will of course be limited.

While some countries, for example in northern Europe, are leading the way in transitioning to OA, globally the picture is mixed, and this means that the hybrid model is likely to continue to be necessary for some years ahead to support the longer-term global transition to OA. In recent years we have seen numerous countries and funders introduce policies in support of OA publication, but there is not yet sufficient support for OA worldwide to enable publishers to flip large numbers of hybrid journals to OA. Given this complex picture, we need flexibility to ensure we can continue to offer authors a genuine choice of where to publish.

Any model which either forces existing journals down a fully-OA route, or prevents some authors from publishing via the hybrid OA route, is likely to lead to the effective removal of publication options for some groups of authors; such a system would also risk the long-term sustainability of established journals that play an important role in connecting research communities and helping authors reach their desired readership.

Critically, hybrid OA also supports author engagement with OA: we know authors don't make publishing decisions based on whether OA options are available to them; rather, they prioritise publishing in peer-reviewed journals with a strong reputation in their community. Provision of hybrid OA publishing options and hybrid funding helps ensure authors choose OA rather than reverting to subscription publishing.

Studies show that gold OA yields more usage and citation than subscription content. Next month Springer Nature will be sharing a study looking specifically at gold impact in the UK. The results of this analysis clearly show that hybrid OA offers significant benefits for researchers, increasing usage, citations, and attention, over and above the benefits already offered by the journals more broadly: the study finds that on average, OA articles are downloaded four times as often as non-OA articles, and cited on average 1.7 times more. Looking at Altmetric, on average, OA articles attracted 2.5 times more attention than non-OA. Therefore, removing or limiting funding for hybrid risks limiting the reach and impact of Wellcome researchers.

With regards to caps on apcs, our experience is that different journals and portfolios can offer different services, and therefore have different costs, meaning that flexibility in pricing is important longer-term to support a diverse journal ecosystem.

3. Many researchers and institutions argue that there is too much friction in the system, making it difficult to understand and comply with publisher and funder OA policies and processes. Do you agree and if so, how could Wellcome seek to reduce this through its OA policy?

Springer Nature has a diverse portfolio, with a variety of OA options in place, but has worked hard to develop policies that ensure authors and institutions are not burdened by confusion or risk of non-compliance. UK authors publishing in any English language Springer Nature-owned journal can feel confident that whichever journal or route they choose to publish in, they will be able to comply with all UK OA policies, gold or green.

In Wellcome's most recent analysis of OA spend and compliance, Springer Nature's non-compliance rate was 4%, the lowest of any major publisher with a mixed portfolio. We actively support researchers in complying with funder policies, including Wellcome's, and continue to work to reduce non-compliance rates, for example by moving more journals to CC BY-only models.

We are aware that the OA 'policy stack' can affect researchers, particularly in the UK, but believe our results demonstrate that this need not be problematic when handled responsibly by the publisher. We're mindful of the need to retain flexibility in OA models and options in order to support the diversity of journal publishing, given that there is no 'one size fits all' model, and believe that this should be the priority when setting OA policy.

Processes

We have seen considerable growth in both pure and hybrid open access article publication as a direct result of policies such as Wellcome's providing a supportive environment for gold. Globally, however, the picture is very different – in 2017 30% of our Springer Nature publications were made available via gold open access, considerably less than the 77% in the UK.

Wellcome/COAF's provision of block grants has been critical in supporting growth in the UK. We know that authors prefer block grant funding to systems which require them to use their own research grants for open access: a recent Publishing Research Consortium report found that publishing gold OA is largely driven by, and reliant upon, external funding, and that there is great resistance among authors to the use of discretionary budgets for APC payments. When we surveyed authors in 2016, 31% of UK authors told us they funded their most recent APC via block grant funds, versus 19% who used their research grants. Any shift away from the current approach risks a regression in open access take-up.

4. If you were tasked to rewrite Wellcome's OA policy – and cognisant of the [objectives](#) we have defined – what one thing (if any) would you change and why?

We are strongly supportive of the current Wellcome Trust policy: you have provided a policy – and a strong voice – in support of gold OA; the funding and funding mechanisms to enable and simplify gold OA publication; and the monitoring required to ensure compliance. These measures have been critical in helping to drive the transition that we have seen in recent years in the UK, and in particular at Springer Nature, while also retaining the diversity of the publishing landscape and supporting author choice.

Springer Nature demonstrably supports the transition to OA, but for some very highly selective journals gold OA is not feasible at this point. Critically, the current Wellcome OA policy allows for a compliant green OA route, ensuring that authors can continue to publish in these journals; we ask that Wellcome bear in mind that one size does not fit all and ask for a continuation of this policy where appropriate.

Potential change

Currently the Wellcome Trust OA policy requires that where an APC has been paid the publisher must deposit the article to PMC on behalf of the author. The WT [publisher requirements](#) allow for exceptions to this in cases where the article is published in a journal which has not yet been accepted for inclusion in PMC, provided that the publisher has formally applied for that journal to be included in PMC. However, application for PMC indexing is not possible until the journal has published a certain volume of content (25 peer reviewed articles), and the policy makes no allowance for journals that are too newly launched to have applied for inclusion in PMC. The Wellcome Trust guide for publishers also explicitly states that "It is not sufficient for publishers to deposit the article via Europe PMC plus", i.e. via manual deposition of the article. This means that very newly launched journals cannot comply with the requirement

for PMC deposition. We would therefore recommend that Wellcome update their guidance to either:

- Extend the exemption for PMC deposition to include newly launched journals that will in time be making PMC applications, as well as those that have already applied for inclusion in PMC; or
- State that publishers are allowed to deposit articles via Europe PMC plus in cases where the journal does not yet have a formal PMC deposition agreement.

We are aiming to open discussions with PMC about the possibility of an agreement to deposit content from journals that are too new for PMC indexing in cases where the research funder requires PMC/EPMC deposition. However, this is a work in progress requiring changes to workflows and the agreement of PMC, so in the interim we request that Wellcome update their policy to enable compliance or exemptions for such titles.

Name	Martin Paul Eve
Organisation	Open Library of Humanities
Summary of Organisations' Approach to Open Access	We are a born-gold, 100% open-access charitable publisher in the humanities and social sciences with an innovative library-funded business model that ensures that we charge neither authors nor readers.

Please indicate whether you consent to Wellcome making this written response publicly available

Yes

1. Wellcome, like many funders, supports a transition to universal OA. How is your current business model changing or how may it change to accommodate universal OA?

Unlike other publishers – such as Springer Nature, who recently flipped an open-access journal to a subscription model (“As of January 1, 2017, IMMI will convert from an Open Access journal to a subscription journal” SpringerNature, *Integrating Materials and Manufacturing Innovation*), warned its investors that changes to rights ownership (i.e. open licensing) may be a threat to its profits, and stated that it intends to use Impact Factor to raise its APC levels (SpringerNature, *Prospectus Dated April 25, 2018*) – the Open Library of Humanities only uses its business model to support a transition to open access.

The Open Library of Humanities is funded by a non-classical consortial economic model. Many institutions (just under 250) contribute a sum that is less than a single article processing charge elsewhere. This allows us to professionally publish our 23 journals in a fully gold open-access format, with open licensing (CC BY in most cases except where difficult with third-party permissions), without any article processing charges for the author.

The OLH is a charitable company limited by guarantee with objects of advancing public education through the publication of open-access research material. This means that, unlike for-profit entities, we have no conflict of interest in implementing our business model and achieving universal OA. Our model also has no conflict of interest between ensuring the quality of outputs; unlike an APC-model, the OLH model has no incentive to publish sub-par material since our revenue stream does not depend upon a per-article fee. Finally, we allow our supporting members to vote on whether or not to allow new admissions.

On this front, we have a strict policy on admissions at OLH that any new journal joining our platform must conform to the following requirements:

1. Are peer reviewed.
2. Have been established for at least five years.
- 3. Are currently funded through a subscription model.**
4. Are based in a humanities discipline, as self-defined by authors and editors.
5. Have an international editorial board.

Point number three is here intended to ensure that we only ask for additional funding from our library members/funders when there is the potential for offsetting. However, according to the University of California, other publishers such as Elsevier have hindered financial offsetting by only permitting substitution of titles, rather than a reduction in price, for their big deals (Fortney). This unidirectionality nonetheless helps in a move towards universal OA.

In terms of *changes* to our business model, we do not intend to implement any radical changes in the near future. We believe our model is already well-suited to helping with the transition to universal OA, particularly in disciplines such as the humanities subjects where Article Processing Charges do not scale well (especially when there is a localised economy [the UK] moving faster towards OA than the global one). Our model was born-OA from the start. It is scalable and ethical in its sole support for open access.

1. The only changes/expansions that we envisage, then, are: To continue to scale our model, including growing the library consortium so that costs are spread, and the number of titles that we publish. In doing this we provide strong evidence that OA can work in the humanities.
2. To continue to encourage learned societies and other publishers to adopt our distributive model that spreads costs between many entities while never excluding an author on his or her ability to pay an article processing charge. For instance, the French-Canadian academic platform Érudit is exploring whether they could adopt a model similar to ours. We believe that spreading this model to multiple

entities would be a sound way to normalize this model and have provided some initial thoughts for learned societies on how they could flip to our model (Eve).

2. Some funders and institutions have decided that they will no longer fund APCs (or set price caps) in hybrid journals. Should Wellcome follow suit and why?

Wellcome should no longer fund hybrid publication but it should **not** relax its compliance criteria as a result. It should do so to lower its own publication costs but also to encourage a transition to universal open access, with which hybrid is not currently helping.

It is a well-known fact, acknowledged in the very announcement for this panel, that hybrid journals are more (34% on average) expensive per open-access article than pure-gold OA (Pinfield et al.; Kiley). It is also well known that some publishers, such as Elsevier, continue to make the argument that there is no “double dipping” in their model, since, in a phrase attributed to Alicia Wise in 2014, “money coming in through a journal subscription is used to pay for a particular number of articles, and that open-access articles in hybrid journals are additional to that” (Smith). The official policy of this publisher is that “Adjustments in individual journal subscription list prices will be based only on criteria applied to subscription articles”, that is, explicitly, that there will be no reduction in subscription costs or subscription volume based on the quantity of hybrid OA material published (Elsevier, *Pricing*).

In other words, at present, the hybrid model appears to be seen by many publishers as an additional revenue stream, with no desire for offsetting. Why, when Elsevier claim, as above, to perceive hybrid as simply an additional source of revenue, would they make changes to their model that transition to universal OA, as per question 1, above? Indeed, this publisher does not even appear to have an offsetting agreement in place with Jisc in the UK (Earney).

While hybrid encourages researchers to publish in open access (by ensuring that researchers do not have to change any of their current publication practices/venue selections), it has been ineffective as a *transition* strategy. This is because hybrid only positively contributes to the reputation of journals that receive high - quality Wellcome-funded research. As Springer Nature recently put it: “Some of our journals are among the open access journals with the highest impact factor, providing us with the ability to charge higher APCs for these journals than for journals with average impact factors” (SpringerNature, *Prospectus Dated April 25, 2018* 59). Elsevier likewise notes in its official pricing policy at the time of writing that “Impact Factor” is one of the core considerations for the level of APC that is charged (Elsevier, *Pricing*). In other words, publishers use Wellcome’s hybrid-funded work to raise the prestige of their titles. They then use this symbolic capital/prestige to raise their OA fees, payable by the Trust.

Indeed, the Trust has a great deal of power in its research funding on which it should capitalize in order to keep its publication expenditure at a sensible level, while also encouraging a transition to universal OA. As an aside in a personal rather than institutional capacity, I can state (as Professor of Literature, Technology and Publishing at Birkbeck) that in my experience grant capture is a much larger and more tangible factor in promotion and hiring than the venue of publication outputs. It is not likely that top researchers will be dissuaded from taking Wellcome money and conducting research if hybrid venues are ruled non-compliant. Who pays the piper calls the tune.

It has also been argued that hybrid is essential to academic freedom and that a funder determining publication venue is somehow in violation of this. The history of academic freedom, though, does not match up with the present situation. Take, for example, the UK’s Education Reform Act of 1988, in which academic freedom is legally enshrined “to ensure that academic staff have freedom within the law to question and test received wisdom, and to put forward new ideas and controversial or unpopular opinions, without placing themselves in jeopardy of losing their jobs or privileges they may have at their institutions” (*Education Reform Act 1988*). In one reading, of course, this could be seen as endorsing the free choice of where to publish one’s research. In another take, though, one that situates academic freedom within a history of censorship, this statement instead refers to the ability to publish the work without fear of institutional or government reprisal, but not to choose where to publish it. The freedom to publish the results. Given that academics already play so many games to satisfy their institutions and funders with regard to publishing in supposedly desirable venues, if one reads this in the former light, “freedom” is surely already compromised through willing submission to playing such games. If one reads it in the mode of the latter, then the complaint is that a mechanism designed to avoid academics being prohibited from disseminating their research is compromised by asking academics to ensure the broadest dissemination of their material by OA. This simply does not make sense. As a born-OA pure-gold publisher with an innovative business model, we wish to see the subscription ecosystem dry up and to move towards a world in which all research is available to read, so that it may do the greatest good in the world. We believe that hybrid is an expensive strategy that does not and cannot, by the explicit admissions of other major publishers, fulfil this goal.

3. Many researchers and institutions argue that there is too much friction in the system, making it difficult to understand and comply with publisher and funder OA policies and processes. Do you agree and if so, how could Wellcome seek to reduce this through its OA policy?

It is extraordinary that researchers who work upon some of the most complex problems in the contemporary natural sciences should find it difficult to understand and to comply with the contract of their research funder, particularly when many such scientists have academic institutions behind them to support this activity.

At least part of the problem of complexity, though, is the unwillingness of publishers to change their policies to match the Trust's requirements. For instance, Elsevier requires an entirely separate page on its website simply to outline how to achieve compliance (Elsevier, *Wellcome Trust (UK)*). One could argue, then, as this question presumes, that it is Wellcome's fault for having a policy that is different to other norms. On the other hand, had Elsevier's journals policies that were simply compliant by default, this would also achieve a frictionless mechanism. For instance, the publisher guidelines here state that "When publishing under either one of these open access options, the corresponding author will be given a choice of Creative Commons licenses", yet "Wellcome Trust policy states that authors are required to select a Creative Commons Attribution (CC-BY) license" (Elsevier, *Wellcome Trust (UK)*). A way of "reducing friction" here would be for Elsevier: 1. to license all its material in a way that is compliant, removing the need to know this from authors; or 2. to remove this "choice" for Wellcome-funded researchers.

We would further add that it is not a bad thing to introduce some element of friction into scholarly workflows. As above in our response to question 2, hybrid is a way of reducing friction, but it has not led to the transition aimed for in the objectives of this review. The fact that researchers may have to learn something about the venues in which they choose to publish is not necessarily a bad thing.

4. If you were tasked to rewrite Wellcome's OA policy – and cognisant of the [objectives](#) we have defined – what one thing (if any) would you change and why?

In addition to eradicating hybrid funding, we would recommend that the Trust commit to a hard line on open access – and using its financial clout to ensure that its funded researchers turn only to pure-gold venues, which in turn encourages a transition – but that it provide a variety of funding mechanisms to achieve this. Specifically, we would recommend removing the contingent clause "wherever such options exist for their publisher of choice and are compliant with our policy" as this is a clear get-out in some cases. We would also recommend the rephrasing of "open access charges" to a styling that supports innovation in business models to lower the costs of scholarly communications.

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Submission of Written Evidence to Wellcome Trust Open Access Policy Review

BOOK PUBLISHERS

- **Sven Fund, Knowledge Unlatched**
- **Simon Ross, Manchester University Press**

Name	Sven Fund
Organisation	Knowledge Unlatched
Summary of Organisations' Approach to Open Access	KU is an open aggregation platform for publishers and OA native initiatives focussing on the transactional part. It covers books, journals and around 10 partner initiatives.
Please indicate whether you consent to Wellcome making this written response publicly available	Yes

1. Wellcome, like many funders, supports a transition to universal OA. What OA model do you envisage will help to deliver universal OA for book chapters and monographs?

We advocate a combination of BPCs for complete books and for chapter and in all disciplines on the one hand and other funding channels like diamond funding. For OA books, we believe in a mixed funding structure, as financial resources for academic books are largely held by libraries. To avoid unintended double funding (and allow for intended co-funding), Wellcome should investigate ways to create funding transparency. That would include the services provided by publishers, as well as the funding provided by all parties involved on the publication process.

2. In contrast to its OA policy for research articles, Wellcome does not currently mandate the use of the CC-BY licence for OA books and chapters when a book processing charge is levied. Please comment on whether you think this approach should be maintained and explain why.

Wellcome should require the same licensing standards for books as for journals, i.e. CC-BY. In the digital space, there is no room for differentiation between journals and books based any more.

3. Within journal publishing many researchers and institutions argue that there is too much friction in the system, making it difficult to understand and comply with publisher and funder OA policies and processes. Do you think the same issues are present within OA book publishing, and if so how can they be mitigated?

OA book publishing has less frictions than journal publishing on the level of the medium, as every book is a separately calculated entity. It has the same frictions on the transactional level, e.g. with books as parts of series or ebook packages. But due to the acquisition structures of libraries and the intermediaries involved, OA books have additional complexities, especially around double dipping of the digital versions that are often part of publishers's ebook packages. To mitigate this, Wellcome needs to engage with intermediaries and influence their way of operating, actively cooperate with book repositories like OAPEN, and include books and chapters into services like Wellcome Open Research. Special attention should be paid to metadata distribution to libraries worldwide as early as possible in the publication process. Wellcome should encourage publishers to provide a print publication with every OA book – at least for the launch auf the program and to ease transition into a full OA future.

4. If you were tasked to rewrite Wellcome's OA policy – and cognisant of the objectives we have defined – what one thing (if any) would you change and why?

Name	Simon Ross
Organisation	Manchester University Press
Summary of Organisations' Approach to Open Access	
Please indicate whether you consent to Wellcome making this written response publicly available	Yes

1. Wellcome, like many funders, supports a transition to universal OA. What OA model do you envisage will help to deliver universal OA for book chapters and monographs?

MUP publishing several OA books with WT – here are two – and the relationship has been successful, partly my colleagues tell me because you are flexible.

WT has influence, other funders, institutions, etc watch and follow what you do, there will be a significant impact from WT plans of OA books outside of the medical arena. It is this broader impact that I ask WT to consider.

To get back to the question... A model that does not view the future of OA through an STM (journals) lense;

Publishers (commissioning editors) work directly with authors, in the journals world authors work with the external or managing editor, and publishing systems/operations and not publishers themselves.

Book publishers are creating a new product with every publication and the effort, and the vested interest that goes with that, are very different to the momentum a journal has. I would characterize Journals as a front-loaded model (subscriptions), an APC, and the activity that this covers, is very front-loaded, how do you recognize the more back-loaded nature of book publishing?

MUP publishing several OA books with WT – here are two – and the relationship has been successful, partly my colleagues tell me because you are flexible.

I think there is a case to made that monographs need more post publication care and attention, more marketing, reporting needed for long form, longer half-life, classic long tail product.

The Journals eco-system is highly developed with sophisticated metadata, monographic publishing is still mainly print (c. 80% revenues), with simultaneously digital as libraries demand this, the long read is still consumed in print, while articles are scanned online.

...a model that recognizes the diversity and complexity of monographic product across disciplines, where variety and originality in presentation are valued. A model that gives the author a voice and author choice in a way that supports and facilitates the expression and dissemination of ideas.

A model that doesn't require rapid transition, to allow for change over time (compare the readiness of the Journals model to OA, a digitally mature business that was already highly automated and process and template driven, highly prescriptive (Submission instructions), with a uniform global product – rarely modified or translated.

2. In contrast to its OA policy for research articles, Wellcome does not currently mandate the use of the CC-BY licence for OA books and chapters when a book processing charge is levied. Please comment on whether you think this approach should be maintained and explain why.

Given the above It is therefore unlikely that a CC-BY license would serve the purposes of the authors, their research, or perhaps their institutions in the long term, given the international content in which academic research outputs is a part.

ND Sharing a part of a sustained argument is not like re-using a table or set of results, it may not protect (i.e. mis-represent) the author's arguments, used out of context, and there are potential issues around translation, third party content re-use and it has been argued there more potential for plagiarism. Does not prevent fair use, you can request permission from the author.

NC Argument that humanities scholars, and indeed their publishers, can derive much needed support from book sales and downstream revenues

3. Within journal publishing many researchers and institutions argue that there is too much friction in the system, making it difficult to understand and comply with publisher and funder OA policies and processes. Do you think the same issues are present within OA book publishing, and if so how can they be mitigated?

For there to be friction in OA policies and processes in a highly evolved digital-first homogeneous journals arena is already a red flag for books.

It is often said the OA landscape is an uneven playing field for various subject areas and disciplines, I would say book publishing is not just uneven - it's a different playing field – so the chances are that any friction you see in journals you can multiply many times – books are not journals.

While there are a handful of monograph publishers of scale, many are small, and focus mainly or exclusively on book publishing. They do not have the benefits accrued, either financially or from system and process developments, that are often associated with Journals publishing. Their publishing output includes many single authored and edited collections with little or no funding that are developed over a long-time frame.

These smaller publishers, indeed smaller university presses, will find it challenging to support development of additional new processes and systems and deal with their authors who are generally not well-informed, or have high expectations of a 'full service' publishing experience, editorial support and interaction, where the publisher, among other things assumes the burden of compliance.

How do you mitigate this? Engage the researcher/author - roll out educational programmes in institutions, make it clear what the BPC covers, highlight 'pre-approved' publishers fees? Provide support for smaller publishers adopting 'Wellcome preferred systems' 'Preferred supplier' fees to support peer-review which is often lengthy and more involved than for journals (issues of timing and acceptance) Consider support for a print edition that the publisher may sell – not so much a friction point but to align funder and publisher interest to maximise dissemination AND CONSUMPTION

4. If you were tasked to rewrite Wellcome's OA policy – and cognisant of the [objectives](#) we have defined – what one thing (if any) would you change and why?

Working from a key WT objective...to be fair and proportionate

- ensure that the costs of delivering this policy are fair and proportionate

Flexibility – over funding levels recognizing that long-form publishing can be just that – long, complicated and often with custom needs and workflow, and post publication needs

Otherwise there's a danger in making the process too prescriptive and serving the needs of the funder which can potentially diminishes the variety, quality and end results, which could undermine the very thing that WT is seeking – making quality medical knowledge available to all.



Submission of Written Evidence to Wellcome Trust Open Access Policy Review

ACADEMIC INSTUTIONS

- **Danny Kingsley, University of Cambridge**
- **Philip Bejon, KEMRI-Wellcome Trust Research Programme**
- **Catherine Sharp, University College London**
- **Liam Earney, JISC Collections**
- **Ian Carter, University of Sussex**
- **David Prosser, Research Libraries UK**

Name	Dr Danny Kingsley
Organisation	Cambridge University
Summary of Organisations' Approach to Open Access	The University of Cambridge is committed to disseminating its research and scholarship as widely as possible to contribute to society as well as to academic advancement, in accordance with the University's core values. The Open Access Policy Framework defines roles and responsibilities to meet this commitment https://osc.cam.ac.uk/open-access/open-access-policies/cambridge-open-access-policy-framework
Please indicate whether you consent to Wellcome making this written response publicly available	Yes

1. Has the routing of OA APC funds through institutions been an effective way to achieve compliance with Wellcome's OA policy?

This is a difficult question to answer without a comparator. It could be interesting to break down the compliance levels between institutions that receive block grants and the individual research grants that need to approach Wellcome independently for APC support. We are aware that compliance levels were lower before the block grant started. It is unclear whether the increased compliance is a result of a centralised support service, or simply because the REF imperative has increased awareness of both open access and the services that surround it.

The benefits of having the funds managed locally at the institutional level is the ability for institutional-specific advice and support to be offered. Additionally there are considerable administrative efficiencies afforded by the linking of compliance management of all funder requirements – Wellcome Trust, RCUK and REF. However the lack of provision of financial support for the costs of administering funds has been challenging for institutions.

Providing funds for APCs at an institutional level has required the institutions to meet the need for skilled staff through development and recruitment. While the level of awareness and understanding of scholarly communication issues amongst our research community and its administrators is still relatively low overall, having centres of expertise located in institutions is a considerably more effective way of increasing these skills and the knowledge than centralising it into a funding body.

2. If Wellcome was to change the way APC funding was supported – for example pay APCs directly to publishers – what would be the benefits and challenges of this decision on researchers and institutions?

This decision would offer several challenges. The Wellcome Trust has always been at the forefront of open access policy in the UK (indeed globally), and as a consequence has shifted the landscape. Any significant alteration to the management of open access such as this proposal will have multiple knock on effects elsewhere in the sector due to the heavily integrated nature of compliance management and the other open access policies tied into the same research community.

There are a large number of papers that are the result of joint funding between COAF and RCUK which means the APC for these papers would either have to be solely charged to the Wellcome Trust, or they would need to be double handled by both the Wellcome Trust and the originating institution. This would be unwieldy and add a new layer of complexity into what is already a complex situation.

Currently many institutions have entered into offsetting deals with publishers based on their subscriptions. This significantly (in some cases) reduced the APC cost for papers. If the payment of APCs was managed centrally by Wellcome Trust then these savings would not be afforded.

The reduction of the spend on an institutional level to a given publisher means the percentage offsetting offered by the publishers to that institution could be reduced, increasing the overall cost of open access (and the amount we are giving publishers collectively). In the case of the Springer Compact, the removal of access to Wellcome Funds would make the offsetting deal unviable for Cambridge University, significantly reducing

the amount of research that is open access overall, and dramatically increasing the cost of Springer APCs for RCUK funded papers.

Recruiting, training and retaining skilled staff in this relatively new area is a huge challenge for institutions, with most institutions absorbing the cost of skilling staff up through on-the-job training from scratch. If the Wellcome Trust is proposing to engage with all publishers (including the long tail) for the payment of APCs, this will represent a huge workload. Staffing this endeavour will require effectively poaching existing staff from the institutional pool of workers, which will create a serious problem for institutions who will still need staff to manage open access for other funders.

Researchers will still need to be engaging with their local open access support staff for REF advice and for payment of RCUK/UKRI funded papers, and would separately need to consult with Wellcome Trust on these papers. This is confusing and time consuming for the researcher.

3. Many institutions have agreed offsetting/compact deals with publishers. What are the pros/cons of such agreement? Should Wellcome seek to engage with these deals and if so, how?

Offsetting deals reduce costs for institutions in terms of the amount paid for APCs. Some offsetting agreements (for example Wiley, Springer Compact and OUP) also reduce the administrative burden on institutions. However while offsetting is better than no offsetting, it does not represent the long term solution.

The ideas of hybrid and offsetting operate within the narrative of a 'transition period', which does not appear to be occurring. Offsetting appears to be the new normal, effectively part of the Big Deal negotiations that institutions are trapped within. This is not the seismic shift that needs to happen if there is a widespread move to an open access future.

If the money spent on APC is distributed out to institutions, as is now the case, the individual amounts in relation to negotiations are small. However if Wellcome Trust was to negotiate offsetting or prepayment deals on behalf of the UK institutions, the buying power is considerably more concentrated and a more beneficial deal could be struck across the sector. Institutions could log into a Wellcome Trust dashboard and 'claim' APCs against these deals. The benefit of this arrangement to institutions is a reduced administrative load of management of individual APCs, yet a retention of control over the messaging and service offered locally to their research community.

4. Name one thing (if any) that you would change about Wellcome's OA policy to further support researchers and institutions to achieve compliance with our policy?

We support the requirement for published research to be uploaded to Europe PMC, recognising the high usage of PMC by researchers in the biomedical and clinical medical area.

The Wellcome Trust policy pays for hybrid open access because the intention is that all research is made openly accessible immediately on publication and embargo periods prevent the green option for meeting this outcome. The Wellcome Trust is loathe to be seen to be 'telling researchers where to publish'. The Wellcome Trust has created a policy that supports the increase of profits for large commercial publishers because of this position. It would be impressive if Wellcome Trust created some principles around 'acceptable' publishing outlets and made it clear to the research community that while they are able to publish where they wish, if it is not in one of the 'accepted' publications then the work is not compliant and funds will not be forthcoming. This would effect actual change both by publishers who would lose significant income streams, and researchers who are currently trapped in a reward system that forces them to publish in certain ways.

While this change would initially mean a reduction in compliance while the community adjusted to the new arrangements, long term this would be easier for researchers to find compliant venues to publish their research.

Name	Philip Bejon
Organisation	KEMRI-Wellcome Trust Research Programme (i.e. Kenya AAP)
Summary of Organisations' Approach to Open Access	We follow Wellcome policy in full, operating an open access fund provided by Wellcome to support this. Our librarian conducts audits of access to publications and follows up on publications not made open access.
Please indicate whether you consent to Wellcome making this written response publicly available	Yes

1. Has the routing of OA APC funds through institutions been an effective way to achieve compliance with Wellcome's OA policy?

- For us, yes. Everything is now open access and this has been achieved without impacting the freedom of scientists to publish freely. On the other hand the fact that it has not impacted our freedom has meant that it has been possible to maintain a view of certain journals as being prestigious, career-changing places to publish.

2. If Wellcome was to change the way APC funding was supported – for example pay APCs directly to publishers – what would be the benefits and challenges of this decision on researchers and institutions?

- It would likely restrict our freedom to choose where to publish. This will have negative consequences on careers unless a culture shift is achieved in terms of the prestige of specific journal titles. The implementation of this will require sustained commitment and follow up, and this will have a cost in terms of institutional "bandwidth" for Wellcome in not being able to take up other issues.
Costs seem to be rising of the current model – where OA funds are allowed for hybrid journals, some of which charge exorbitant fees. We have recently begun to manage this more closely within the Kenya Programme to ensure that researchers are not prey to predatory journals, and are nudged away from options that don't seem good value for money.

3. Many institutions have agreed offsetting/compact deals with publishers. What are the pros/cons of such agreement? Should Wellcome seek to engage with these deals and if so, how?

- Unless there is a substantial saving, and Wellcome decides that the saving is a priority in shaping policy, then it seems likely to add increasing bureaucracy if done permissively, or restrict freedom of choice if not. The latter could be used as a deliberate strategy with (see 2 above), but if so would need to be followed through on.

4. Name one thing (if any) that you would change about Wellcome's OA policy to further support researchers and institutions to achieve compliance with our policy?

I think we have all the help we currently need.

Name	Catherine Sharp
Organisation	University College London
Summary of Organisations' Approach to Open Access	UCL has a long-standing open access mandate, and has developed a highly successful new model for open access publishing, in UCL Press. UCL provides funding for authors publishing in fully open access journals, and supports transformative deals with publishers that give all authors at an institution the opportunity to publish open access.

Please indicate whether you consent to Wellcome making this written response publicly available

Yes

1. Has the routing of OA APC funds through institutions been an effective way to achieve compliance with Wellcome's OA policy?

Institutional management of open access APC funds has been an extremely effective method of achieving compliance with the Wellcome Trust's open access policy. Despite the importance of open access to funders and institutions, authors still find the open access landscape extremely confusing, and still do not prioritise open access (nor consider its costs) when choosing where to publish. The complexity inherent in a system with different funder and publisher policies, and probably as many different payment methods as there are publishers – not to mention different submission and production systems – means that authors are in desperate need of advice from expert open access administrators who can guide them through the different requirements and processes to achieve compliance. Institutions are extremely well-placed to do this: indeed, *only* institutions are capable of giving comprehensive advice that takes into account all the relevant policies, institutional conditions and systems, and achieves the best value for money. UCL's levels of Wellcome compliance, as well as the relatively high number of discounts reported in our COAF annual return, is a testament to the success of this approach, which provides authors with tailored advice and support at the earliest possible opportunity.

2. If Wellcome was to change the way APC funding was supported – for example pay APCs directly to publishers – what would be the benefits and challenges of this decision on researchers and institutions?

Any change to the existing model would undermine a system that works extremely well, and would almost certainly lead to lower levels of compliance with the Wellcome open access policy. Researchers are compelled to engage with their institutions' open access systems – as a result of the REF open access policy, and of institutions' own policies – and thus are bound (and encouraged) to ask their institutions for advice on open access (including on types of open access, funding, publisher policies and so on). Introducing any extra layer of complexity by changing the way the Wellcome supports APC funding would lead to confusion and would make it harder for authors to comply with the policy. It would also decouple open access funding from subscriptions even further, making it harder for researchers and institutions to take advantage of, and encourage, cost savings, and making it harder to educate researchers about the benefits of open access.

3. Many institutions have agreed offsetting/compact deals with publishers. What are the pros/cons of such agreement? Should Wellcome seek to engage with these deals and if so, how?

Offsetting deals reduce the cost of individual APCs, and in some cases can lead to opportunities for all authors to take advantage of the option to publish Gold. UCL has prepayment/deposit arrangements with at least 12 publishers. All but one of these (a fully OA publisher) carries an offsetting/discount benefit, which is passed on to the Wellcome. These deals make it easier for authors to choose Gold and to comply with their funders' policies, and achieve considerable cost savings, making UCL's average APC less than other institutions'. Although the SpringerCompact flipped deal is a model that other publishers should adopt (because it simplifies the landscape and achieves more open access at a relatively low cost), offsetting deals are a useful interim measure, and more efforts should be made to assess the relative benefits of the existing offsetting deals across the whole community. Wellcome could usefully be involved in discussions with Jisc and institutions about this type of assessment.

4. Name one thing (if any) that you would change about Wellcome's OA policy to further support researchers and institutions to achieve compliance with our policy?

The Wellcome open access policy, and the model of implementation that the Wellcome has adopted – devolving responsibility for funding and author support to institutions, while providing robust assistance and guidance where necessary, liaising directly with publishers where appropriate (eg. monitoring compliance with the PMC deposit requirement) and assessing compliance with the policy at grant (rather than institution) level – works extremely well. Authors still struggle to understand the requirement to deposit in PMC where their publisher does not offer a compliant Gold option, though. Otherwise, the current policy and its implementation are the best model for achieving compliance in the current landscape. The Wellcome could perhaps assist institutions with demonstrating the benefits of open access more clearly. This would help institutions to encourage authors to consider open access options when choosing where to publish, and to appreciate the advantages of the Wellcome policy.

Name	Liam Earney
Organisation	Jisc
Summary of Organisations' Approach to Open Access	Jisc provides a portfolio of services aimed at supporting institutions across the lifecycle of open access publication to ease the transition to and management of open access. Jisc also gathers evidence on open access in the UK and provides the UK's National Open Access Desk
Please indicate whether you consent to Wellcome making this written response publicly available	Yes

1. Has the routing of OA APC funds through institutions been an effective way to achieve compliance with Wellcome's OA policy?

- Yes it has been effective. Compliance has risen under this approach, and institutions have developed their workflows and systems to support the administration and reporting. Since institutions buy journal services from publishers, usually via Jisc negotiations, then the involvement of institutions in Wellcome's OA funding has enabled the sector to gain a more complete view of its expenditure on journals.
- However, we note that in the most recent release of data analysing Wellcome and COAF open access spend for 2016-2017 that compliance has dropped slightly, which may suggest that the current mechanism has reached the limits of its effectiveness. It may be worthy of note that whilst achieving compliance with the Wellcome's OA policy is an important objective of negotiations, it is not the only objective and as a result it is 'in competition' with other priorities, some of which may be contradictory.
- Routing Wellcome funds through institutions may not have been the most efficient way of managing OA funds. Experience shows that efficiency comes by reducing the number of administrative transactions (eg read+publish deals). However, there is sometimes a trade-off between administrative efficiency and price sensitivity, as big deals can lock in the positions of both buyers and sellers.

2. If Wellcome was to change the way APC funding was supported – for example pay APCs directly to publishers – what would be the benefits and challenges of this decision on researchers and institutions?

- The system benefits would be administrative efficiency, easier monitoring of compliance and, relatedly, a likely increase in the level of compliance. The benefits to institutions would be the removal of administrative burden. The benefits to researchers might (depending on how it were implemented, and how their institution handles it now) be a reduction in administrative burden.
- In the case of combined journal subscription and publishing agreements, given that the negotiations are handled by Jisc in the majority of cases, transparency could be introduced at the outset around the use of funds.
- The challenges would be to devise a mechanism to ensure responsiveness among publishers to the required service levels and price constraints, in the absence of any price sensitivity (or perhaps even visibility) among authors.
- Potential to introduce confusion into workflows

3. Many institutions have agreed offsetting/compact deals with publishers. What are the pros/cons of such agreement? Should Wellcome seek to engage with these deals and if so, how?

- The response to question 2 given above, is also relevant.

In addition:

Pros (for well functioning agreements):

- Demonstrable cost constraint versus non negotiated APCs
- Increased volume of OA material published
- Increased compliance with funder requirements and penalties on the publisher where there isn't compliance
- Improved workflows and reporting for authors, institutions and funders
- Effective use of existing commercial arrangements to facilitate wider transition to OA
- Ability to demonstrate reduction/removal of 'double dipping'

Cons:

- In many cases the practical experience has not lived up to the opportunity, though this has improved
- Variation in schemes and their management has provided an additional burden for institutions and authors alike, including confusion for authors on eligibility.
- Savings have not always been as great as anticipated
- Overall level of expenditure with legacy publishers has grown
- Legacy publishers' position in market place and author behaviour has been entrenched
- Pure Gold publishers 'squeezed' as funds flow to legacy publishers
- Lack of price sensitivity for authors remains unchallenged
- Current mode of scholarly communications focussed around publication in high impact journals published by a small number of large commercial and society publishers could be replicated in an OA market place, hindering innovation.

Yes, the Wellcome Trust should engage with these agreements. There is an argument that one of the reasons for the failure of such agreements to achieve the desired outcome is the result of one of the major financial participants in such agreements being absent from their management and implementation.

As such one might argue that in the absence of price sensitivity on the part of authors, the funder, as the other party which might exercise price sensitivity, is absent from the discussions and so has been unable to exercise this influence. Currently funders can only intervene once data analysis reveals the progress their policies, after the point where their intervention could assist in the process.

Were the Wellcome Trust to play a direct role in the setting of negotiation objectives and the conditions upon which its funds would be made eligible for payment of APCs, it would remove any misunderstandings on the part of publishers, effectively tie payment to results (with the onus being shared more evenly between author, institution and publisher) and potentially create the conditions for near real time feedback on the progress of the policy.

We would suggest that the Wellcome Trust works with Jisc (as primary negotiator) to ensure its requirements are fed into national negotiation objectives.

4. Name one thing (if any) that you would change about Wellcome's OA policy to further support researchers and institutions to achieve compliance with our policy?

The Wellcome's OA policy operates in a global publishing environment with mobile and collaborative researchers and several funders with varying policy objectives, and thus the ability of any single funder to effect systemic change is limited and conditional on a measure of international cooperation and compromise.

Nonetheless, with an established role as a leader in this field were the Wellcome to seek to align its OA policies with all research funders that are significant in the UK, we believe that this would not only support researcher and institutions in the UK, but send an important signal to funders internationally as well.

Name	Dr Ian Carter
Organisation	University of Sussex
Summary of Organisations' Approach to Open Access	The University supports the principles of open access (OA), as being a means to enable the widest access to its research, and hence the best chance of the results being used, both within and outwith the academy. The University's preference is to use a Green route for OA. The University has had a mandate since August 2011. Research outputs should be published in the most appropriate place (i.e. journal, conference proceeding, monograph, etc.), reflecting their topic and quality. [From the University's Statement on Open Access to Research]
Please indicate whether you consent to Wellcome making this written response publicly available	Yes

1. Has the routing of OA APC funds through institutions been an effective way to achieve compliance with Wellcome's OA policy?

The routing of APC funds through the University has worked, because of the size of the institution. However, the process is resource intensive, and hence we do not believe that it is scalable.

There remains a danger that individual authors will not engage, and that their outputs will be missed, because there is no direct (process) requirement for them to do so. We are not always aware of which authors are persistently not complying with the policy other than where we have spotted a paper. This might be addressed by there being an appropriate feedback loop from the Trust, where they have identified non-compliant outputs.

Whilst being concerned about the operational details, the level of compliance has improved over the period of operation (albeit with a slight drop in the most recent report), and hence the approach might be said to be effective. However, it is not clear whether full compliance could be achieved.

The overall efficiency of the approach is constrained by the nature of individual APC transactions, each of which is relatively small value. Efficiency of the transactional process needs to be addressed more directly, as part of standard publishing workflows.

2. If Wellcome was to change the way APC funding was supported – for example pay APCs directly to publishers – what would be the benefits and challenges of this decision on researchers and institutions?

Such a change may mean less administration for the researcher, and would certainly mean less administration for the institution. However, it would also result in a lack of a point of interaction, which may have adverse effects, such as choice of licence type, unless the Trust was actively involved at the appropriate point.

Conversely, such a change would entail a new burden on the Trust. However, it is also likely to put the Trust in a more powerful position to ensure and enforce its policy with publishers. As a single body, and a major fund holder, the Trust is in a very good position to influence broader outcomes in a way that a single university is not. In our experience, involvement of the Trust in chasing publisher compliance on individual cases has had a higher level of success than when it is the University acting alone. A change is therefore likely to increase the level of compliance, especially if coupled to appropriate communications to the researchers it funds.

In considering making changes, we hope that the Trust will take into account the existing level of variation in funder policies, which cause confusion for researchers and additional burden for institutions, and hence the Trust does not seek unnecessarily to increase that level of variation. We would also be concerned about

policy or process changes that affect a university's and its researchers' ability to meet other OA policy requirements, such as the deposit requirement of the Research England policy.

3. Many institutions have agreed offsetting/compact deals with publishers. What are the pros/cons of such agreement? Should Wellcome seek to engage with these deals and if so, how?

The advantages of such deals vary with each arrangement, given the differences. Such variations need to be understood. For the more favourable deals, the advantages are where all journals are included, that there is a discount, and that there is a reduced level of administration involved. For the less favourable deals, the issues are the complexity, in particular if a deposit of funds in advance is required.

As the University does not have central funds available to deposit, the only way that COAF papers can benefit from such discounts is because the larger RCUK block grant can be used to deposit funds and then be reimbursed on a paper-by-paper basis. The lack of an institutional fund means we cannot use deals which presume all papers are being administered centrally regardless of funding, e.g. those which send all requests to a central dashboard, which we would then need to refuse. Some deals require author intervention at a particular stage (e.g. requesting a voucher, using a discount code) and this can make the process more complicated whilst also running the risk of missing out on discounts.

The Trust would be able to arrange their operations so that most of these issues would not apply, although the last point about author intervention would still be relevant.

If the Trust decides to engage with such mechanisms, we advise that they do so via Jisc Collections. Wellcome could influence the transition to Open Access by only supporting the payment of APCs to publishers which were either Pure Gold OA or had negotiated a suitable (efficient) offsetting deal through Jisc Collections.

4. Name one thing (if any) that you would change about Wellcome's OA policy to further support researchers and institutions to achieve compliance with our policy?

The Trust has been in the vanguard of promoting and supporting OA, being prepared to fund the cost of OA some time before other funders. We encourage the Trust to continue in this vein, and hence to consider how they may wish to promote further change to the scholarly communications process, not just reflect on operational details of their current policy and merely seek statistical compliance with that policy.

The launch of the Trust's Open Research platform is an example of this evolution, and in that context the Trust might develop new routes into and from the material that it will contain, potentially bypassing the standard methods currently used for dissemination and uptake of research results. This is more about the behaviours of the research community than about technical policy options, although the latter do have a bearing.

In terms of more traditional approaches to publication, the Trust should consider supporting only Pure Gold, as part of this transformation of scholarly communications. We recognise that this may be challenging, and in particular threaten niche areas of science in which the Trust has a very high vested interest, such as tropical and neglected diseases. The Trust might therefore wish to allow publication in hybrid journals for specific topics, potentially applying a cap on the APC payable.

Name	David Prosser
Organisation	Research Libraries UK (RLUK)
Summary of Organisations' Approach to Open Access	Research Libraries UK and its members support the move to open access for material in scholarly research journals. Our members employ both green and gold routes to enabling open access, providing pragmatic, discipline-appropriate to fulfil the goal of open access
Please indicate whether you consent to Wellcome making this written response publicly available	Yes

1. Has the routing of OA APC funds through institutions been an effective way to achieve compliance with Wellcome's OA policy?

In response to the increasing number of national and international open access policies UK institutions (and, in particular, research-intensive institutions) have put in place extensive infrastructure that informs authors of their rights and responsibilities, aids authors in fulfilling those responsibilities, ensures compliance, and provides reporting back of compliance levels. By routing OA APC funds through institutions Wellcome has been able to tap into and utilise this infrastructure. This gives authors a clear, single point of contact within institutions irrespective of the funder (or funders) of a particular piece of research. It also means that an accurate and consistent approach has been achieved across all funders. Adopting a system that bypassed the institution would mean that Wellcome would have to replicate this infrastructure at some level, so leading to inefficiencies.

2. If Wellcome was to change the way APC funding was supported – for example pay APCs directly to publishers – what would be the benefits and challenges of this decision on researchers and institutions?

Benefits:

- For Wellcome it would provide simpler oversight of compliance across multiple institutions.
- For institutions, it would:
 - Reduce administrative overheads by reducing the number of invoices for APCs that institutions would need to process and the number of queries and enquires from authors. (Although authors may well still come to central institutional OA offices for advice.)
 - Reduce the administrative burden of having to request extra funds from Wellcome when current funds are spent.
 -

Challenges

- Confusion and uncertainty for authors in understanding who to direct invoice queries to, especially for projects jointly funded by Wellcome and another funder.
- Would cause extra administrative work when dealing with those publishers that offer bulk invoicing arrangements - e.g. PLOS invoice institutions directly on a monthly basis, so saving time and effort
- Removes the institutional connection between OA funding and subscription funding, which would inhibit decision making around offsetting and other publisher deals. This may be the only way to effect transformational change – there needs to be a relationship between OA costs and subscriptions.
- Potentially increases per APC institutional costs as we members economies of scale associated with high number of Wellcome associated submissions to specific publishers
- Concern that the burden of compliance checking would pass to the individual author. If Wellcome expected individual authors to carry out that activity there would probably be a drop in compliance. Overtime any benefit in levels of central administration would be eaten up as institutions realise it still makes sense to involve libraries in the compliance checking activity.

3. Many institutions have agreed offsetting/compact deals with publishers. What are the pros/cons of such agreement? Should Wellcome seek to engage with these deals and if so, how?

Offsetting deals reduce the overall cost of open access within the UK. RLUK members benefit from offsetting deals (both negotiated collectively and individual arrangements) and these deals reduce the overall financial burden on Wellcome. Some offsetting deals can significantly reduce administrative time and effort, making the process simpler for the authors and institutions.

However, there are a bewildering array of different offsetting arrangements, some of which are not particularly effective and efficient, and which institutions find difficult to take advantage of (e.g., some voucher schemes, or pre-payment schemes where any remaining credit is not rolled over to the next financial year). Further, it has been difficult to engage some of the very largest publishers in meaningful offsetting. Having Wellcome engage with the wider community (including Jisc Collections) could be helpful as it would encourage the publishers to think of the total costs within the UK and not to see subscriptions and OA APCs as separate.

4. Name one thing (if any) that you would change about Wellcome's OA policy to further support researchers and institutions to achieve compliance with our policy?

A question around the Wellcome OA policy is whether it is purely to encourage OA to Wellcome-funded research or if the intention is to promote a wider transformation to OA. It has been successful in the former, but there is less evidence of the latter. A problem here is that publication in hybrid journals is proving not to be transformative – it is encouraging publishers to stick with subscriptions for as long as possible, while generating extra revenue from APCs. This is especially true for those publishers who have not engaged seriously with the issue of offsetting and who are effectively double-dipping within the UK market.

One option would be for Wellcome (and other funders) to disallow use of their funds for payment of OA APCs in hybrid journals, or to restrict them to those publishers who demonstrate progressive, transformative policies. RLUK and our members would be willing to work with Wellcome to look at the practicalities of such a move (for authors, institutions, and the Wellcome itself) and to develop criteria for assessing the transformative nature of publishers' policies and offers.

Our members would also like to see Wellcome work with their COAF partners to ensure that policies are consistent across COAF.



Submission of Written Evidence to Wellcome Trust Open Access Policy Review

FUNDERS

- **Jennifer Hansen, Bill and Melinda Gates Foundation**
- **Mike Huerta and Dina Paltoo, National Institutes of Health**
- **Jean-Claude Burgelman, European Commission**
- **Katharina Rieck, Austrian Science Fund (FWF)**

Name:
Organisation:
**Summary of Organisations’
Approach to Open Access**

Jennifer Hansen
Bill & Melinda Gates Foundation
The foundation’s Open Access policy enables the unrestricted access and reuse of all its peer-reviewed published research, funded in whole or in part, including any underlying data sets with no exceptions to its policy.
Yes

Please indicate whether you consent to Wellcome making this written response publicly available

1. Briefly outline your OA policy and indicate (if known) what you spend on delivering your OA policy and current level of compliance.

The foundation’s OA policy has four requirements:

- Publications Are Discoverable and Accessible Online. Publications will be deposited in a specified repository(s) with proper tagging of metadata.
- Publication Will Be On “Open Access” Terms. All publications shall be published under the Creative Commons Attribution 4.0 Generic License (CC BY 4.0) or an equivalent license. This will permit all users of the publication to copy and redistribute the material in any medium or format and transform and build upon the material, including for any purpose (including commercial) without further permission or fees being required.
- Publications Will Be Accessible and Open Immediately. All publications shall be available immediately upon their publication, without any embargo period. An embargo period is the period during which the publisher will require a subscription or the payment of a fee to gain access to the publication. We are, however, providing a transition period of up to two years from the effective date of the policy (or until January 1, 2017). During the transition period, the foundation will allow publications in journals that provide up to a 12-month embargo period.
- Data Underlying Published Research Results Will Be Accessible and Open Immediately. The foundation will require that data underlying the published research results be immediately accessible and open. This too is subject to the transition period and a 12-month embargo may be applied.

The foundation will pay the fees to publish on these terms via Chronos. Since the foundation’s policy went into effect on January 1, 2015, it has paid over \$5.3 million in APCs. The average APC payment on that amount is \$2812.

We haven’t yet conducted a compliancy audit, but our assumption is that more than 95% of articles published by our grantees in 2017 are compliant, the first year our policy was in full effect.

2. Which elements of your OA policy work well and which elements not so well?

In regards to the policy itself, the brevity and clear stated requirements with no exceptions or waivers works to quell ambiguity, meaning no confusion about what is required.
For the implementation, we developed Chronos, a web-based service to help our grantees easily comply with our policy, in partnership with ISSRC. Chronos launched in August 2016 and we’ve learned a lot about how publishers’ systems work, i.e., challenges with workflow, invoicing, etc.

3. To what extent (if at all) do you work in partnership with national bodies responsible for negotiating access to subscription journals? What do you see as the major challenges/opportunities of developing a funder/institution partnership to provide both access and publishing rights for the researchers you fund?

The foundation hasn’t worked with national bodies to negotiate access to subscription journals, so isn’t able to offer views on challenges and opportunities.

4. If you were tasked to rewrite Wellcome's OA policy – and cognisant of the [objectives](#) we have defined – what one thing (if any) would you change and why?

I would encourage Wellcome to

1. remove the six-month embargo period and require immediate access.
2. think about removing hybrids as an option
3. think about how preprints should be incorporated into the policy – do grantees fulfil their obligation if they make a preprint available and publish in a journal that isn't compliant with its policy?
4. think about a possible APC cap and how that may affect the market.

Name	Michael F. Huerta
Organisation	National Library of Medicine (NLM)/National Institutes of Health (NIH)
Summary of Organisations' Approach to Open Access	The NIH policy requires green gratis public access to accepted peer-reviewed manuscript.
Please indicate whether you consent to Wellcome making this written response publicly available	Yes

1. Briefly outline your OA policy and indicate (if known) what you spend on delivering your OA policy and current level of compliance.

The NIH Public Access Policy was passed in 2008 and made permanent by Congress in 2009. The law states:

The Director of the National Institutes of Health ("NIH") shall require in the current fiscal year and thereafter that all investigators funded by the NIH submit or have submitted for them to the National Library of Medicine's PubMed Central an electronic version of their final, peer-reviewed manuscripts upon acceptance for publication, to be made publicly available no later than 12 months after the official date of publication: Provided, that the NIH shall implement the public access policy in a manner consistent with copyright law.

To clarify, this means that any peer reviewed paper accepted for publication in a journal and supported by NIH (i.e., through a funding award, contract, intramural program, or NIH employee) must be made freely accessible to the public within 12 months of publication.

The cost of delivering the NIH Public Access Policy is roughly \$5 million/year.

The current level of compliance (2008 - present) is approximately 88%. NIH funding results in over 100,000 papers being published annually. To comply, about 45% of those papers are deposited in PubMed Central (PMC) directly by the publisher under a PMC agreement. The other ~55% are self-archived author manuscripts (Green OA) deposited via the NIH Manuscript Submission system (NIHMS).

2. Which elements of your OA policy work well and which elements not so well?

What works well:

- *The implementation of the policy.* The NIH Public Access Policy has been an overwhelming success. To date, nearly 900,000 NIH-funded papers accepted for publication after April 2008 have been made publicly accessible in PMC.
- *The success of the archive.* PubMed Central is accessed by 2 million users, retrieving more than 5 million articles, on the average weekday, ensuring the NIH research is not only accessible to the public, but being discovered and used to further advance scientific discovery.
- *Support of community.* Publishers have found ways of supporting NIH-funded authors through either direct deposit to PMC or initiating manuscript deposit in the NIHMS. At this time, publishers initiate ~70% of all manuscript deposits that NIHMS receives. Publishers also generally have clear policies on how NIH-funded researchers can comply. Additionally, librarians have worked tirelessly to raise awareness of the policy and help researchers comply in a timely fashion.
- *Tracking and reporting tools.* To help navigate the complexities of complying with the NIH Public Access Policy, the National Center for Biotechnology Information (NCBI) at the NLM/NIH have built tools to help researchers and institutions track and report compliance: [My Bibliography](#) and the [Public Access Compliance Monitor](#).

What elements work less well:

- *The complexity of the archives submission methods.* PubMed Central was established as a journal archive rather than as an open access repository. As such, navigating the various submission methods (publisher submission vs. manuscript submission) can be challenging for authors. To address these challenges, NIH/NLM built the above-mentioned tools and maintains user support staff to ensure authors can comply with as little headache as possible. Although the submission methods do introduce complexity into the process, their availability makes it easier for authors that publish in PMC participating journals to comply with the policy.

3. To what extent (if at all) do you work in partnership with national bodies responsible for negotiating access to subscription journals? What do you see as the major challenges/opportunities of developing a funder/institution partnership to provide both access and publishing rights for the researchers you fund?

There are inherent complexities with a funder developing partnerships which involve use of public funds regarding publishing rights for researchers that NIH funds.

Rather, instead of NIH negotiating access and publishing rights for researchers, NIH requires authors to work with the publisher before any rights are transferred to ensure that all conditions of the NIH Public Access Policy can be met. Authors should avoid signing any agreements with publishers that do not allow the author to comply with the NIH Public Access Policy.

The NIH Public Access Policy puts the onus on the author/researcher to comply with the policy, rather than on the publisher, as the researcher is the recipient of the NIH support.

Publication costs, including author fees, may be charged to NIH grants and contracts on three conditions: (1) such costs incurred are actual, allowable, and reasonable to advance the objectives of the award; (2) costs are charged consistently regardless of the source of support; and (3) all other applicable rules on allowability of costs are met.

Determining “reasonable” publication costs can be a challenge as different journals and publication models result in a wide range of such costs.

4. If you were tasked to rewrite Wellcome’s OA policy – and cognisant of the [objectives](#) we have defined – what one thing (if any) would you change and why?

The Wellcome OA policy has been a leader among research funder policies since its inception, always responding to changes in the publishing landscape and driving toward a more open research ecosystem.

- One area that Wellcome’s policy does not currently address is the openness of the associated data with the publication. Although that may be outside the objectives of this current review, it would be a great way for Wellcome to continue to be a leader in open science.
- The primary challenge for Wellcome may be in balancing the goal of making more research open immediately, against the economic impact of paying what can be quite high OA fees to hybrid journals. As Wellcome has shown in their annual review time and again, hybrid OA costs are often disproportionate to other OA costs, and in such cases, Wellcome may want to consider encouraging researchers to take a Green OA/selfarchiving (with a maximum 6-month embargo) approach to compliance.
- Introduce guidance for acknowledging awards (including possible use of a funder DOI). More consistent and accurate reporting of awards would allow PubMed Central, in some cases, to more quickly identify Wellcome-funded papers and ensure faster processing.

Name	Jean-Claude Burgelman
Organisation	European Commission
Summary of Organisations' Approach to Open Access	Mandatory open access to scientific publications & research data 'as open as possible, as closed as necessary'
Please indicate whether you consent to Wellcome making this written response publicly available	Yes

Briefly outline your OA policy and indicate (if known) what you spend on delivering your OA policy and current level of compliance.

- Mandatory open access to scientific publications: 1) self-archiving in all cases, and 2) eligibility of costs for OA publishing (where the case)
- Research data to be 'as open as possible, as closed as necessary' with a request for a DMP, yet with opting out options (on both what data to have open, and – currently, the DMP itself) in the context of the Open Research Data pilot, initiated in 2014.
- Evolution of the mandate towards the incorporation of FAIRness of data.
- Support via infrastructure for Open Science (e.g. OpenAIRE)
- Mandate can evolve, based on the experience with each Framework Programme and/or their pilots (FP7, H2020, Horizon Europe)
- Uptake of the policy is measured: for publications, depending on the datasets used, the uptake in 2017 is estimated between 63-75%, in which ¼ are pure Gold OA publications, and ¾ only Green publications (self-archived with an average 10 month-embargo, all academic fields included). Figures have been made public ([link](#)).
- For Article Processing Charges, internal reporting suggests that an average of 1500 EUR has been spent in 2017 per article (median: 1200 EUR), an increase from the average of 1006 EUR in the previous sample of 2016.
- For research data, the situation of a pilot limited in scope, then expanded in 2017, makes the evolution difficult to assess objectively. However, figures have been made public ([link](#)).
- Sanctions for non-compliance to the policy are possible. A framework has been worked out by the Commission. According to it, grants can be curtailed for failure of compliance as of 2018.

2. Which elements of your OA policy work well and which elements not so well?

Positive:

- A comprehensive 'package' of mandates, support and tools for all research outputs
- No constraint regarding the eligibility of costs for open access requirements (articles/data)

Challenging:

- The growing need for support and training (both to beneficiaries and European Commission staff) e.g. evaluation of Data Management Plans (DMPs)
- The need for a commonly agreed measurement for OA compliance (indicator)-to be worked out
- The issue of sanctions in the case of non-compliance- framework just developed. It remains to be seen how it works out.
- Generally speaking, the opinion among some beneficiaries that the Commission's OA mandate should fit some practices already established in the scientific community (e.g. publishing in one specific journal without consideration of other alternatives), versus the opinion that the practices established in the scientific community may evolve and eventually accommodate the current OA policy

3. To what extent (if at all) do you work in partnership with national bodies responsible for negotiating access to subscription journals? What do you see as the major challenges/opportunities of developing a funder/institution partnership to provide both access and publishing rights for the researchers you fund?

The European Commission does negotiate access to subscription journals and services from scientific publishers, but only in the remit of activities for its own library services (e.g. the library of the Directorate-General for Research and Innovation).

The European Commission has an open access policy to ensure the broadest possible access to the results of the research it funds. In this sense, it could be interested in partnerships with institutions in this direction. The European Commission views that researchers and/or their institutions should be in a position to manage the intellectual property rights of the works they produce to provide open access, as required by funders, for example by H2020. Challenges to this is possible conflicts of interests of researchers and institutions to publish in subscription publishers who restrict access and require full transfer of their copyright, as well as the current evaluation system that promotes journals of high impact, most of which can be counted among subscription journals. Researchers and their institutions must be required to hold enough rights to be able to comply with open access requirement.

In this situation there are opportunities for collaboration between institutions and funders, first in moving towards a publishing system that is based on open access and not on subscriptions primarily and, second, in developing a research system that promotes, incentivizes and rewards open science in terms of evaluation.

4. If you were tasked to rewrite Wellcome's OA policy – and cognisant of the [objectives](#) we have defined – what one thing (if any) would you change and why?

The European Commission is not in a position to advise the Wellcome Trust on what it should or should not do. However, having regards to Open Science, the European Commission believes that funders may look more thoughtfully at the increasing use of pre-printing as a way of sharing research findings before they are formally peer reviewed.

Austrian Science Fund (FWF)

1. Briefly outline your OA policy and indicate (if known) what you spend on delivering your OA policy and current level of compliance.

FWF Open Access Policy: <https://www.fwf.ac.at/en/research-funding/open-access-policy/>

The FWF **requires and supports** all project leaders and project staff members to make their peer-reviewed research results freely available through the Internet. The current policy is based on the recommendations of the study “*Developing an Effective Market for Open Access Article Processing Charges*” by Solomon and Björk (2014)

(1) Gold Open Access

Open Access to publications is ensured through direct publication in an Open Access venue. The [Creative Commons Attribution CC-BY](#) licence (or an equivalent open licence) need to be attached. Journals have to be listed in the [Directory of Open Access Journals \(DOAJ\)](#) ¹.

Costs: Gold Open Access publishing may involve an article processing charge (APC) to the publisher. Through the programme [Peer-reviewed publications](#) up to EUR 2,500.00 can be covered per publication.

(2) Hybrid Open Access

If offered by publishers and if explicitly chosen by FWF-funded authors, the costs of Open Access to single contributions in a subscription venue can also be covered. The [Creative Commons Attribution CC-BY](#) licence (or an equivalent open licence) need to be attached. Journals or proceedings have to be listed in [Web of Science](#) or [Scopus](#).

Costs: Through the programme [Peer-reviewed publications](#) up to EUR 1,500.00 can be covered per publication.

The Austrian Science Fund (FWF) together with the Austrian Academic library consortium (KEMÖ) negotiates Open Access Agreements with the following publishers: [Institute of Physics \(IoP\)](#), [Taylor & Francis](#), [Springer Compact](#), [Frontiers](#), [Wiley](#)

Austrian Science Fund (FWF) publication cost data:

Zenodo: <https://zenodo.org/search?page=1&size=20&q=austrian%20science%20fund>

Open APC: <https://treemaps.intact-project.org/apcdata/openapc/>

(3) Green Open Access:

Open Access to publications can also be ensured by self-deposition of the author's accepted manuscript in a registered sustainable subject or institutional repository. If there is a restricted period during which such archiving is not permitted, the period should not be longer than 12 months.

Archiving: Notwithstanding the selected option (1-3), publications have to be deposited (by the author or by the publisher) in a registered repository with sustainable access at the time of publication. These can be either subject or institutional repositories, see [Directory of Open Access Repositories](#). If the publications are in the **Life Sciences** (or related topics), authors are required to make their peer-reviewed papers freely available, subject to the embargo period, in the full-text repository [Europe PubMedCentral](#).

Monographs: Other forms of peer-reviewed publications (e.g. monographs, complete collected volumes or proceedings, databases and other web-based formats) are supported by the [Stand-Alone Publications programme](#). Around 700 are archived via the [FWF E-Book Library](#) and the [OAPEN Library](#).

Open Research Data: Whenever legally and ethically possible, all research data and similar materials which are collected and/or analysed using FWF funds have to be made openly accessible. Data underlying the published research results should either be openly accessible immediately or – if not used in publications – two years after the project is finished. The following criteria are to be applied:

- An appropriate repository has to be selected; see [here](#)
- Deposited datasets have to be citable; see [here](#)
- Data should be deposited in a way that it can be re-used without restrictions; see [here](#)

Austrian Science Fund (FWF) compliance monitoring: The FWF open access compliance report of 2017 shows that 90% of the peer-reviewed publications that arose from FWF projects in 2017 are openly accessible (2015: 83%). Further information: <https://doi.org/10.5281/zenodo.1239495>

Publication Costs spent via the programmes Peer-reviewed publications and Stand-Alone Publications (2013 – 2017):

Year	Costs
2017	€ 3,342,612.28
2016	€ 3,224,783.04
2015	€ 3,758,154.20
2014	€ 3,413,486.16
2013	€ 2,645,171.54

2. Which elements of your OA Policy work well and which elements not so well?

Elements that work well:

- Compliance with OA mandate = 90 % in 2017 (see [Compliance Report 2017](#)).
- 46 % of all monitored OA publications in 2016 had a CC BY licence attached.

Elements that do not work well:

- The lowest rate of compliance with the FWF's Open Access Policy can be found in editions, contributions to edited volumes and monographs (66%) (see [Compliance Report 2017](#)).

3. To what extent (if at all) do you work in partnership with national bodies responsible for negotiating access to subscription journals? What do you see as the major challenges/opportunities of developing a funder/institution partnership to provide both access and publishing rights for the researchers you fund?

The Austrian Science Fund (FWF) together with the [Austrian Academic library consortium \(KEMÖ\)](#) negotiates Open Access Agreements with publishers. So far, there are agreements with the following publishers in place: [Institute of Physics \(IoP\)](#), [Taylor & Francis](#), [Springer Compact](#), [Frontiers](#), [Wiley](#)

Additionally, the FWF together with Austrian research institutions supports several alternative open access publication models and open science infrastructure to ensure their long-term sustainability: [SCOAP3](#), [Europe PMC](#), [arxiv](#), [DOAJ](#), [OAPEN](#), [OLH](#), [SciPost](#). See also: <https://www.fwf.ac.at/en/research-funding/open-access-policy/open-access-publication-models/>

Major Opportunity: Negotiating OA agreements together with libraries allows for better negotiation opportunities for the consortium as a whole. This is because the FWF, unlike the libraries, always has an exit option.

4. If you were tasked to rewrite Wellcome's OA policy – and cognisant of the [objectives](#) we have defined – what one thing (if any) would you change and why?

The Wellcome Trust certainly has one of the world's leading, if not the leading Open Access Policy.

Even closer coordination with the other funding organisations and above all with the research institutions in the UK could be useful. For example, the Wellcome Trust and other funders could only cover publication costs under the following conditions:

- An Open Access agreement or offsetting agreement between the research institution and the publisher must be in place (e.g. Springer Compact, IoP). If no agreement can be reached, at least the publishing and service conditions need to be transparent and it must be ensured that there is no double dipping.
- Starting with 2020, agreements (incl. costs, conditions and services) between the research institution or library consortium and the publisher have to be openly accessible.
- Data on citations of the publications need to be openly accessible according to the standards by the [Initiative for Open Citations I4OC](#).

If these conditions are not fulfilled, only Green Open Access with zero embargo can be published.

Furthermore, the Wellcome Trust together with other funders and research institutions could support the [SCOSS](#) initiative to strengthen alternative publication models and allow for sustainable open science services and infrastructure.

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Version 1

Wellcome exists to improve health for everyone by helping great ideas to thrive. We're a global charitable foundation, both politically and financially independent. We support scientists and researchers, take on big problems, fuel imaginations and spark debate.

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