



## **Response to Plan S from UCL (University College London)**

UCL (University College London) is pleased to make this response to the cOAlition S consultation on Plan S. [UCL](#) is a research intensive university in the heart of London. It has one of the most pronounced Open Science agendas of any university in Europe, having appointed a Pro-Vice-Provost (Dr Paul Ayris) to lead on Open Science principles and practices across the University. Through UCL Press, the UK's first fully Open Access University Press, UCL has experienced enormous success in implementing Open Science practice. The University has also signed DORA and changed its [academic promotions framework](#) to be aligned with Open Science values.

The response below is shaped by a Town Hall meeting in UCL attended by over 120 academics on 8 January 2019. All attenders approved of Open Access. The President of The Royal Historical Society, Professor Margot Finn, one of the Executive members in the UCL Press Board, spoke strongly in favour of Open Access and of the impact that her work, published by UCL Press, is making – measured by downloads and numbers of countries where the downloads occur. Currently, with 100 published monographs, UCL Press has achieved over 1.5 million downloads since it was established in 2015.

UCL is fully committed to a transition to Open Access, but there was near universal concern in the room about the heavy-handed approach Plan S is presenting. The tenor of the discussion is highlighted in the points below. As an accompanying document, UCL is submitting a summary of the Town Hall and would be more than happy to follow up on any of the points made. The individual in UCL to contact is the Pro-Vice-Provost (UCL Library Services), Dr Paul Ayris ([p.ayris@ucl.ac.uk](mailto:p.ayris@ucl.ac.uk)).

### **Q1 Is there anything unclear or are there issues that have not been addressed by the guidance document?**

- The fact that the level of the APC cap is unknown makes it impossible to judge the financial impact of any changes at present. Plan S seems to be asking for wholesale change in advance of any study of the implications of the changes. Plan S comes with no attached Risk Assessment, and this is very bad project management practice
- The fact that over 80% of journals would currently not be Plan S compliant means that we face a crisis unless journals change their business models. How quickly can this be done? And how can

change be made until we know how commercial publishers will react? This feels like a leap into the unknown.

- Plan S says little specifically about early career researchers (ECR). Will Plan S help or hinder them in their career development? The view was that it would hinder.
- DORA and new appointment/reward schemes need to be in place to facilitate any move like Plan S. At the meeting, the feeling was that Plan S was detrimental because these schemes are NOT currently present in universities. More time is needed to effect this transition, and this should be measured in years, not weeks.
- What does compliance look like for a publisher who is transitioning to OA? What does a transformative deal look like? What is the measure? Who measures? All the description in Plan S is too vague to be helpful.
- A recurring theme in the Town Hall meeting was that a one size solution does not fit all. Different approaches at different rates of implementation are required in different subject areas. To achieve this there needs to be dialogue with the academic community and with universities – a dialogue which is lacking in how Plan S is being rolled out.
- The Town Hall meeting was bemused by the lack of consultation between the author(s) of Plan S and academics/Learned Societies. Many small Arts and Humanities Societies, which publish journals to support their academic disciplines, face simple closure if the principles of Plan S become the norm.
- The Plan S document is relatively quiet about the reaction of the rest of the world to Plan S principles. Europe on its own is simply too small on its own to effect lasting change in a global publishing environment. Recently, China is reported to be supporting Open Access. This is a major development, if true, but there is no explicit statement from Chinese bodies/the Chinese Government that is supports Plan S. UCL has asked Robert-Jan Smits to publish the Chinese statement of support for Open Access (after all we want to live in an Open Access world), but no statement in English has yet been released.
- What about unfunded research? Plan S is in danger of creating a split in publishing practice between unfunded and funded research Outputs. Nothing is said about unfunded research in Plan S. Is the expectation that universities will fund APCs to enable this to happen? Such an approach is likely to increase the costs of research-intensive universities where much/most of the research is produced. When questioned in a LERU meeting about this, President Juncker's OA envoy said that it was not the intention to increase university costs. The Secretary General of Science Europe has told another LERU meeting the opposite – that university costs will indeed increase. Which is the correct answer and what is the size of the bill?

## **Q2 Are there other mechanisms or requirements funders should consider to foster full and immediate Open Access to research outputs?**

- There needs to be more engagement between the author(s) of Plan S and researchers, universities and Learned Societies. The success of the UCL Press model is that it has been developed in collaboration and consultation with UCL academics. This sense of collaboration is lacking in Plan S – hence the very high level of reserve about the potential for its success

amongst researchers. A limited consultation with 2 short questions is no replacement for deep-rooted academic engagement and is likely to be counter-productive.

- The provisions for alternative publishing platforms are far too vague in Plan S to be useful for implementation. The message behind the current version of Plan S is that the current publishing system can, through the irruptive interventions of Plan S, forcibly change the current publishing system. There is another way. The UCL Press model of establishing alternative publishing systems and platforms (the UCL Press megajournal platform is going live at the end of January 2019) receives too little coverage in Plan S. There needs to be more details about alternatives to the APC model – complaint Green OA repositories and new OA publishers such as UCL Press are not covered sufficiently in Plan S to be presented as viable alternatives. This needs to be re-thought.
- Green OA repositories are tied up with too many difficult requirements in Plan S to be realistic – e.g. XML in JATS format for full text. That will create a barrier to entry and increase university costs. It will not do what Plan S wants it to do – to increase levels of OS compliance. Such detailed requirements can be *recommended* by Plan S if the author(s) wish. They should *not* be obligatory.
- Much is made in Plan S about the role of the CC BY licence and its effect in opening up research to OA and to Text and Data Mining. The document is silent about other approaches and does not address the real concerns of researchers in the Arts, Humanities and Social Sciences who would prefer a CC-BY-ND approach; -ND is seen as the best way to combat plagiarism in these subject areas, despite the fact that it would disallow Text and Data Mining as a result.

## **Respondents are also permitted to upload a supporting document to the feedback form**

A summary of the main points made during the UCL Town Hall meeting is attached.

## **Conclusion**

This response from UCL (University College London) fully endorses Open Access as the direction of travel for scholarly publishing. However Plan S in its current form is not the way forward. UCL researchers call for a wholesale re-think of the strategy and timelines for moving to 100% Open Access. There needs to be engagement with universities and with researchers. The needs of individual subject areas need to be more precisely understood and alternative ways to engage with the principles of Plan S need more careful thought and elaboration.

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