

The University of Oxford submitted a response to the UKRI Open Access Review Consultation in May 2020. The full response, and an accompanying summary statement, are available via the [Open Access Oxford site](#). We outlined our strong support for open access and our belief that the value and utility of research outputs increases the more widely they are available for reuse by everyone.

Our response highlighted significant flaws in the policy, covering a range of potentially problematic areas including funding, embargoes, and timing. While we welcome that the financial implications have, in part, been recognized by the announcement of an uplift in UKRI funding, we consider that the policy as announced does not sufficiently mitigate for the concerns we raised, nor consider changes in the sector in the period between consultation and announcement, most notably the rapid progress of transformative agreements.

### **Timing, transformative agreements, and the REF**

The implementation dates for both articles and monographs remain too soon to allow for planning, preparation, communication, and the number of significant changes that are required to funding models, budgets, institutional repositories, and CRIS systems. The delay in the announcement of the policy, while completely understandable given the pandemic, greatly exacerbates this problem.

In the explanation of changes between the consultation and the policy UKRI note the significant development of, and increase in, transformative agreements for the UK research community. However the policy as announced is largely unchanged from the policy as consulted, which was published in February 2020 and based on work conducted before that date. Implementation of the UKRI policy should be contingent on a review of the impact and efficacy of transformative agreements, taking account of the evidence they provide for greatly increased open access, for managed redistribution of funding for research outputs, and of their effects on library materials budgets. The University of Oxford has 18 current transformative agreements in place. OUP had 10 agreements in place at the time of the consultation but now has 21.

The explanation of the policy states that a UKRI open access compliant publication will meet any future national research assessment open access policy without additional action from the author and/or institution. However, UKRI's Future Research Assessment Programme is likely to affect the policy's intended aim of open access policy conjunction and is not due to conclude until late 2022. Further clarity is required on the status of the existing REF policy in order to minimise the administrative overhead of policy compliance.

### **Funding**

While the accompanying press release contains a welcome commitment to increased funding, the policy lacks necessary commitments and detail. As highlighted in our consultation response there are significant repercussions of an underfunded policy for the UK research community including very research-intensive universities and learned societies, on whose behalf OUP publishes more than 300 journals. This includes a drop in the number of venues in which UK authors can publish their work, undermining the extensive system of collaboration around long-form research, and accelerating market consolidation. A less diverse publishing market would be damaging to UK research and, in order to be effective, the policy must be accompanied by a funding structure which facilitates and rebalances funding within the system to avoid displaced cost, lost investment, and lost value.

## **Embargoes**

Oxford University Press has published extensive research on the value of monographs, conducted with Cambridge University Press, and has also provided further information to UKRI on the commercial performance of its monograph publishing over the life of an edition and the expected rate of transition from print to digital purchasing by institutions. Monograph publishing must remain financially viable as a cornerstone of independent, peer-reviewed, academic excellence critical to many subject areas of UK international leadership. The monograph embargo policy has not changed since the consultation, and our view remains that the short embargo will affect buyer behaviour before the embargo date as well as after, effectively meaning potential customers will choose to wait for free versions rather than purchase during the one-year sales window envisioned in the policy. The ultimate consequence of this might be fewer monograph publishers and less choice for researchers. Our view remains as in our consultation response - that a blanket policy mandate on monographs is not appropriate at this stage. Instead UKRI should act as a constructive agent for change and work with all stakeholders to build an evidence base for sustainable options for the UK's high quality monograph publishing community.

On research articles, we noted last year that in our view immediate green OA, proposed as one of the routes to open access in the policy, presents a significant risk to the financial viability of journals and the learned societies who publish those journals.

## **Copyright and retention of rights**

The University supports authors retaining copyright to their work. It is important that any policy does not introduce friction or confusion into rights and licensing which complicates and slows down the publication process to the detriment of all involved.

## **Further discussion**

We appreciate UKRI's willingness to discuss the policy and its implications over the last year. As we move into implementation, we would welcome any opportunities for further engagement, with the aim of ensuring the move towards open access supports the UK's position as a producer of high quality research. In particular, we note that in some areas academic behaviour and publisher initiatives have already changed aspects of the OA landscape and it is important that new policy recognizes these trends and accommodates further developments flexibly.