RCPsych response to the cOAlition S 'Guidance on the Implementation of Plan S'

We recognise and support the transition to Open Access. Along with our publishing partner Cambridge University Press we are committed to playing a positive role in the development of Open Research more broadly.

We fully support the ALPSP Position Statement on Plan S¹, and the response from the Society Publishers' Coalition.

Although we share the core principles and ambitions of Plan S we, as a Medical Royal College, have some feedback on the current 'Guidance on the Implementation of Plan S' document open for consultation. This is outlined below.

1. Clarity of the proposals and the timeline to deliver the requirements

This is a common issue raised in other published responses, for which we share concerns.

Working through the guidance, there are several statements of intent from the coalition that do not provide any commitment to a completion date, until which time it will be extremely difficult for us to develop transition plans with any certainty. For example,

'To help inform the potential standardisation of fees and/or APC caps, cOAlition S will commission an independent study on Open Access publication costs and fees (including APCs)'

'cOAlition S members will collectively establish incentives for establishing Open Access journals/platforms or flipping existing journals to Open Access...'

In addition, the joint ALPSP, UKRI and Wellcome Trust project for looking into potential strategies and business models for Plan S compliance is welcome but will deliver recommendations too late for sustainable implementation in time for the proposed Plan S, and ideally needs to report before any timelines are set.

The current timelines proposed seem arbitrary, and we call for a full collaborative and consultative approach to revise these to consider the complexities of the publishing environment (see below for our specific role) and make sure they are realistic.

2. Our role in the 'ecosystem'

There have been many references to the complexities of the publishing ecosystem during the consultation so far. We are disappointed that cOAlition S has failed to take these properly into account in either its plans or its implementation guidance. We share the vision but we feel compelled to warn the coalition that a less transactional, more nuanced approach is needed if we are to navigate these complexities in the interests of the wider research community in the EU and around the world.

¹ ALPSP Position Statement on Plan S: https://www.alpsp.org/Reports-Publications/20190206alpsp-response-plans-implementation-guidelines

The Royal College of Psychiatrists works to secure the best outcomes for people with mental illness, learning difficulties and developmental disorders by promoting excellent mental health services, training outstanding psychiatrists, promoting quality and research, setting standards and being the voice of psychiatry.

The BJPsych journals are academically autonomous but they are part of an interdependent clinical ecology supported by the College on behalf of 18,000 doctors who are its members, for the benefit of and in collaboration with, patients. The Journals and the College support each other in a way that goes far beyond mere monetary transaction as some in cOAlition S seem to suggest. Clinical research depends upon health systems, doctors and patients just as much as they depend on it. We agree with the vision of open research but we must move towards this goal at a pace and in a manner that enables the vital wider work of the College to continue.

The College:

Our work is global, and approximately 17% of our members are based outside the UK.

- We conduct research, evaluation and national clinical audits through our College Centre for Quality Improvement.
- We develop evidence-based guidance and reviews to support the delivery of high-quality mental health care.
- As part of our core curriculum, we train psychiatrists to develop an understanding of research methodology and critical appraisal of the research literature so that they can strive to base practice on the best evidence available.
- We train psychiatrists to develop the ability to conduct and complete audit in clinical practice so that they hold a positive attitude to the potential of audit in evaluating and improving the quality of care.
- We train the psychiatric academic researchers of the future, sustaining the pipeline of research in the UK and around the world
- We digest research to develop evidence-based plain language patient mental health leaflets.
- We brief MPs on the latest research to take to parliamentary debates.
- We campaign for better research funding, and for health services to support academic research and researchers.
- We campaign for transparency and better data to inform research and practice
- We aggregate research sources (both subscription and open access) to maximise access and discoverability via our library services.
- We develop and maintain over 270 peer-reviewed training and CPD online modules.

BJPsych Journals:

- We publish three gold open access journals, including two journals with no article processing charges, in line with the coalition's aim to 'promote a culture that ensures that young scholars have opportunities to excel and advance their careers' and to offer an accessible platform for authors and to promote current policy and practice in low- and middle-income countries.
- We publish two subscription journals, both of which make content freely available after 12 months and are included in aid and donation subscription packages around the world.

- Our publishing goes beyond (funded) research and we aim to educate, improve clinical practice, give guidance and provide commentary and offer the following to support this mission:
 - Top-quality services and education for authors and peer reviewers via workshops, journal standards and our partnership with Cambridge University Press.
 - We commission editorials, commentaries and analysis pieces which bring context, challenge, and enhance the research published in our own as well as other journals in the field
 - Opportunities for authors to enhance their work and its dissemination and understanding with digital content.

Not all but some of the above work is supported by the income we receive from our publishing efforts and indeed we acknowledge that some activities could benefit from the proposed Plan S. However, if the financial support for our work and mission is threatened or diminished in any way, the ultimate penalty is to our patients. For us to develop new business models to ensure this doesn't happen would take more time and consideration than proposed by Plan S.

Our circumstance is just one pixel of a much bigger picture, and we urge cOAlition S to work further with all stakeholders to find a sustainable academic ecosystem that works across all disciplines and all geographies.