

Response to Plan S Implementation Guidance from Cancer Research UK (CRUK)

Summary:

Cancer Research UK (CRUK) is pleased to give feedback on the Implementation Guidance for Plan S. We are the world's leading charity dedicated to beating cancer through research. We fund research to find new ways to prevent, diagnose and treat cancer to save more lives. We are entirely funded by the public. We fund research at institutes, universities and hospitals across the UK, in addition to an increasing number of collaborations abroad.

At CRUK, we are committed to ensuring that the data and knowledge generated through our funding is put to maximum use by the scientific research community and, whenever possible, is translated to deliver patient benefit. One of the ways we do this is by providing timely, open and unrestricted access to published research. This facilitates rapid sharing of knowledge and promotes innovation. Thus, we strongly support the aim of Plan S to make research openly available.

We have sought feedback from our researchers, by surveying CRUK-funded group leaders and fellowship holders to gather their opinions on Plan S. We received over 100 responses, with detailed feedback. Concerns were raised by our researchers and internally about the proposed implementation of Plan S, detailed below, which prevent us from signing up to the current version of the plan. We need to ensure that our researchers are not in any way disadvantaged and can continue to do the best science and accelerate progress in cancer research.

Based on this feedback and internal discussions at CRUK, we do not feel the current implementation plan is the best way forward, but we are willing to continue to work with cOAlition S to overcome these significant barriers and find a workable implementation.

1. Is there anything unclear or are there any issues that have not been addressed by the guidance document?

1) Lack of involvement of the scientific community

We believe that consultation of the scientific community, who will be impacted by Plan S, is important for the decisions being made in its implementation. In our view the scientific community has not been sufficiently consulted in formulating the Plan S principles themselves (distinct from this consultation on the implementation guidance).

2) Disadvantaging researchers under the current system of research assessment

Many of our researchers are concerned that Plan S-compliant researchers will be disadvantaged under the current system of research assessment. They are concerned Plan S will result in a reduced choice in where they can publish their work, particularly in prestigious high impact factor

journals which mostly have a hybrid model. The potential disadvantage may predominantly affect early career researchers who have not yet built the reputations and track record to overcome these barriers.

To prevent disadvantaging researchers, a shift in how research is evaluated is required before Plan S is implemented, including implementation of the principles of [The Declaration on Research Assessment \(DORA\)](#). DORA encourages improvements in research assessment, to assess the quality and impact of research through means other than journal-based metrics and publication venue. Even though CRUK, along with many UK funders and institutions, has signed up to DORA and are working to implement DORA principles in our funding practices, our community is concerned that the cultural shift to adopt these changes in research assessment has not yet taken place across the sector, particularly outside the UK. Our researchers fed back that, in practice, there is still a reliance on journal impact factor and high impact factor journals for assessing merit and impact of research in grant funding decisions and hiring decisions. Whilst CRUK is working to [implement the DORA principles](#) across all of our funding schemes, our view is that the wider sector shift will take longer. Therefore, we have sympathy for researchers who are concerned that complying with Plan S will place them at a comparative disadvantage – when it comes to research assessment, our view as a funder is not the only one that matters to their careers.

This repeated concern from researchers reflects the lack of consultation with the research community in the development of Plan S principles themselves.

3) International collaboration and mobility

We are concerned that Plan S could result in a disincentive to international collaboration. In some countries Plan S may be adopted widely, while it may not be in others.

Collaboration with US-based researchers is particularly important for our research community due to a large proportion of oncology research taking place in the US. With the exception of the Gates Foundation, there is a lack of any public support for Plan S from large US funders. This means that US researchers can effectively publish in any journal. If collaborating with a cOAlition S-funded researcher means that those US researchers are restricted in their choice of publication venue, this could result in a barrier to collaboration. How does cOAlition S propose that funders should tackle this problem?

This might also disadvantage mobility of researchers as it could mean they are evaluated in different ways in different countries due to inconsistent policies. This could reduce European researchers' international competitiveness.

4) Costs

We are concerned that the cost implications of Plan S are still unclear – particularly as no limit to APCs has yet been agreed.

From a UK perspective, this also represents a shift in how the costs of academic publishing are supported – from institutional libraries to public and charitable funders – we are concerned that the impact of this, particularly on charity funders, has not yet been fully considered.

Our researchers noted it would be undesirable to divert funding from research. Additionally, if the funding for open access publication is limited, this could limit publication and outputs.

5) Monitoring compliance

The implementation guidance specifies that 'individual members of cOAlition S will align their grant agreements and/or contracts with Plan S and monitor compliance and sanction non-compliance through enforcing contractual requirements.' Further clarification on this point would be useful. In particular:

Checking compliance of researchers:

- Does cOAlition S have suggestions for how compliance of researchers to Plan S would be monitored? We are concerned that, despite considerable past efforts in collaboration with research institutions and Researchfish, we simply do not have a method to monitor compliance with any degree of confidence. Our impression is that smaller charitable funders with fewer resources would struggle even further.
- It would be difficult to sanction researchers if we do not have accurate and sustainable compliance monitoring mechanisms in place.
- Significantly more detail should be included in the implementation guidance regarding a sensible recommended compliance monitoring methodology and suggested sanctions.

Checking compliance of journals and platforms

- It is not clear who is going to be responsible for checking that publishing platforms and journals are compliant with Plan S, though we note the reference to DOAJ. Is cOAlition S confident that DOAJ includes a comprehensive list of open access platforms, not just open access journals?
- Has cOAlition S done any review of whether institutional repositories meet Plan S requirements for open access platforms, particularly in the UK?

6) Implementation timeline and flexibility of implementation

We have some concerns over the speed of implementation of Plan S. Significant changes are required to adapt to Plan S, which might be difficult to implement in the current timeframe, such as: changing the culture of panels and committees assessing research and making appointments; developing effective compliance monitoring methodology; developing high quality compliant platforms and journals; and/or allowing publishers to change their models.

A recent preprint '[Few Open Access Journals are Plan S Compliant](#)¹ highlighted that a large majority of existing open access platforms are not currently Plan S-compliant. This might influence the number of available open access compliant venues to publish in and the time that it will take for some publishers to become compliant.

We are concerned that there are too many restrictions over what criteria journals and platforms must have to be compliant with Plan S, particularly considering the timeframe. We reiterate [the comments](#)² of Harvard Library and MIT Libraries in this regard.

It is also unclear what level of flexibility the various funders have in implementing Plan S. For example, would it be possible to adopt Plan S in part, adopt some of the principles, and undertake just some of the activities (e.g. charitable funders may simply not have the resources to monitor compliance)? If funders implement Plan S differently, who is the authority on whether this is acceptable?

¹ Frantsovåg, M.J.E.; Strømme, T.E. Few Open Access Journals are Plan S Compliant. Preprints 2019, 2019010165 (doi: 10.20944/preprints201901.0165.v1).

² <https://libraries.mit.edu/news/harvard-library/29052/>

Publications:

7) Clarification on authorship/who is the funder of a publication

Plan S applies to outputs 'based on results from research funded fully or partially by cOAlition S members.' But many questions arise when we talk about authorship:

- What defines if a funder funds a publication?
- Does Plan S apply to all authors on a collaborative publication, even if they played a more minor role?
- What is not considered cOAlition S member funded research?

8) Transformative agreements

What constitutes a transformative agreement? And under what 'specified conditions' would these achieve compliance with Plan S?

9) Supporting quality open access journals and platforms

How would support for quality open access journals and platforms work? What would support consist of? It is not clear whether all members of cOAlition S will need to join in supporting the establishment of Open Access Journals and Platforms.

Our researchers have also made clear that publishers do provide value to the research community in the form of curation and quality control, and they want to ensure that incentives to do so continue. They are concerned that the future model envisaged by Plan S could lead to journals being driven by quantity over quality. We would be interested to hear what plans there are to mitigate this risk.

2. Are there other mechanisms or requirements funders should consider to foster full and immediate Open Access of research outputs?

10) Preprints

We suggest exploring preprints as another way to disseminate knowledge and foster open access. Though not peer reviewed, preprints are an innovative way of accelerating access to research findings and are an increasingly popular method of sharing research across our research community.

We acknowledge that at present the barriers that would need to be overcome include that current preprint servers:

- May not require an open license.
- Do not include final peer reviewed manuscripts accepted for publication in other journals, only submitted manuscripts before peer review (although they may link to the final published version).
- Do not match the plan S technical requirements described in the implementation guidance.

Conclusion

At CRUK we believe that the best way to maximise the impact of our research is to provide open and unrestricted access to published research. This facilitates rapid sharing of knowledge and promotes innovation, ensuring that patients can access better treatment sooner. Therefore, we welcome the Plan S initiative and support its aims. However, some key points on how the plan will be implemented going forward remain unresolved, in particular:

- Impact on researchers while the changes in research assessment in line with DORA are yet to be put into practise by the global research sector
- Possible disincentives to collaboration with non-Plan S funded researchers and barriers to researcher mobility
- Cost implications, particularly for charitable research funders
- The lack of accurate and sustainable compliance monitoring methodologies.

To progress these issues, further engagement with publishers, researchers and funders will be crucial. We look forward to continuing dialogue with cOAlition S to achieve an improved implementation plan.