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RESEARCH ARTICLE



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### **Special Articles: Commentary**

### **Opacity about COPE (Committee on Publications Ethics) Physical Address and Operations**

Jaime A. Teixeira da Silva <sup>a, \*</sup>

P. O. Box 7, Miki-cho post office, Ikenobe 3011-2, Kagawa-ken, 761-0799, Japan

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#### **Abstract**

Annual report and financial statement forms from 2012-2015 for The Committee on Publications Ethics (COPE) are publicly available on the COPE website. On those forms, COPE's physical address is listed as 22 Nelson Close, Harleston, Norfolk, in the United Kingdom (UK). In fact, COPE is registered both as a charity and as a charitable company. However, only one physical address is registered in the UK. Other than these documents, COPE website pages that should list the physical address, contact people, phone numbers and emails, as any transparent and socially responsible organization would do, in fact did not list such information, at all, or in full, even on the "contact us" page until about June, 2017, when the website was updated, possibly following my concerns. This registered physical address is simply a mail-drop address, but it is unclear if COPE is sharing that address with other registered UK companies and charities. Several of these aspects related to COPE's stated physical registered address correspond to some of the predatory characteristics that the now-defunct Jeffrey Beall blog used to list, and which WAME, the World Association of Medical Editors, a close COPE ally, still espouses as predatory, albeit related to publishing. In addition, documents tend to be undated and membership has been changing numbers even though the application for COPE membership was suspended in March, 2017. This paper argues that, based on an adaptation of these criteria alone, COPE displays some predatory, dishonest or misleading characteristics. These issues would not only undermine trust in COPE, but could in fact may constitute a serious breach of basic ethical principles that its global membership would expect from an ethics organization that claims to be transparent about its operations, and that cares about the fine-scale nature of this critique.

**Keywords:** Contact Us Page; Ethics; Incomplete; Mail-Drop Address; Dishonesty; Misleading; Opacity; UK.

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\* Corresponding author

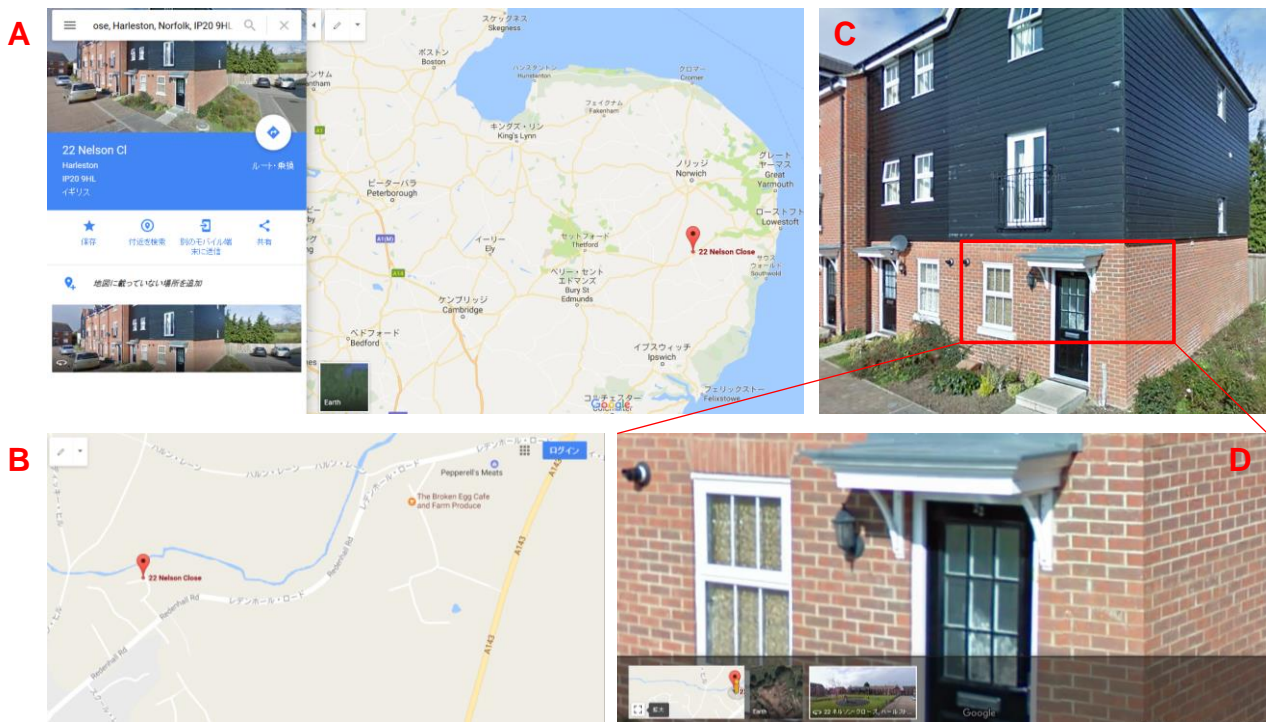
E-mail address: [jaimetex@yahoo.com](mailto:jaimetex@yahoo.com) (J.A. Teixeira da Silva)

## Introduction to COPE

The number of Committee on Publications Ethics (COPE, 2017a) members is 11,577 on a global scale (COPE, 2017b). According to COPE's governance page (COPE, 2017c), COPE was established in 2007 to "provide a range of services and products aimed primarily, but not exclusively, at editors and publishers of academic journals and designed to provide advice and guidance on best practice for dealing with ethical issues in journal publishing." To achieve this objective, it established itself as a "charitable company limited by guarantee in the UK", with a registered company number 06389120, and also as a charity, with a registered charity number 1123023 (Resource Center, 2017). Although some aspects of the company / charity may be found on the governance page, the physical address could, until May, 2017, only be found on the annual report and financial statement forms that COPE releases to the public (COPE, 2017d).

## Is the COPE Head-Office a Small, Quaint UK Village Mail-Drop Address?

For example, the 2015 statement (COPE, 2015) shows that COPE has a registered office at 22 Nelson Close, Harleston, Norfolk, IP20 9HL, in the United Kingdom (UK). Google maps (©2017 Google) places this office in the north-east of the UK, in the quaint village of Harleston, strategically placed in a nested *cul-de-sac*, and with access to the A143 to the east (Fig. 1A, 1B).



**Fig. 1.** COPE Office

Notes: Fig. 1 (A, B) Google maps (©2017 Google) places the officially stated COPE office in the town of Harleston (NE UK), with access to the A143 highway. (C, D) Close ups of the front and side of the building and of the entrance door at the designated address (22 Nelson Close, Harleston, Norfolk, IP20 9HL) shows no visible signs that there is an office, and no clear or visibly distinct signboard showing the acronym COPE. Is this building, complex or apartment at 22 Nelson Close a mail-drop address? The latter question remains unanswered and the fact remains unknown.

A close up of the front and side of the building (Fig. 1C), as well as the door (Fig. 1D) indicates, however, that there is no sign that there is an office, and no clear or visibly distinct signboard appears showing COPE. This is quite astonishing if one considers the global dimension of COPE and its membership. Why would COPE not indicate its office to the public using a bold signboard? One possibility is that the photo used by Google maps is outdated (a ©2013 date is

shown). It is assumed, because nowhere on the COPE website is it indicated otherwise, that this Harleston office thus serves as the office for both the charitable company as well as the charity. It is also not clear if this is a rented office, or if it is owned by one of the directors or trustees because their residential and/or work addresses are not indicated anywhere on the COPE website, i.e., precise basic and background information regarding COPE's physical address, and that of its 10 directors/trustees (COPE, 2017e), is unclear. Unlike other regular company or even charity websites that would have a clear "About Us" page, or a contacts page that clearly lists the physical address, a contact phone or fax number and even a contact email, the COPE website is very opaque about its physical operations and about its contacts (COPE, 2017f; Fig. 2).

**A**

**B**

**Registered number: 06389120**      **Registered office**  
**Charity number: 1123023**

22 Nelson Close, Harleston, Norfolk, IP20 9HL

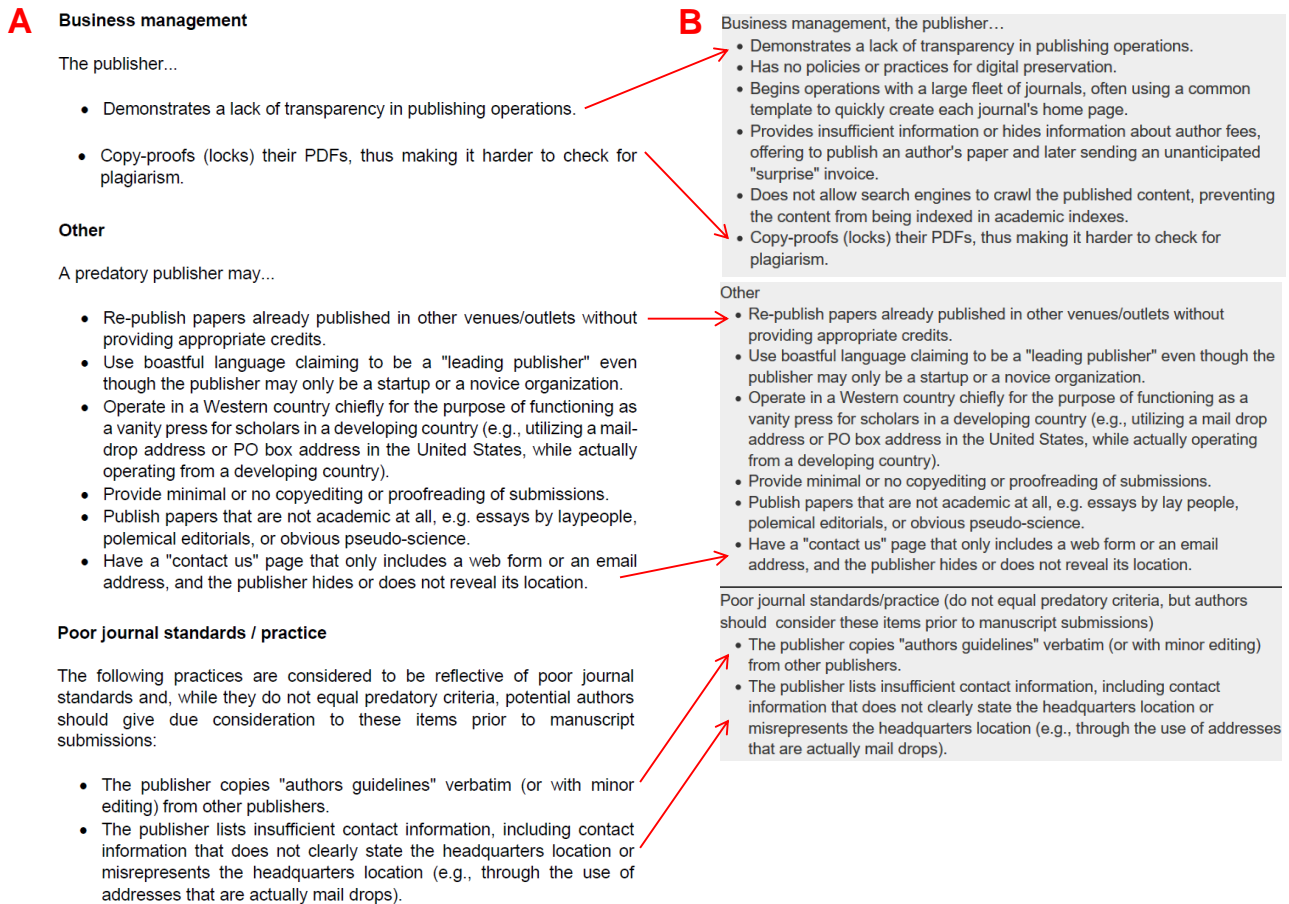
**Fig. 2.** The COPE "Contact Us" Page

Notes: Fig. 2 (A) The COPE "Contact Us" page contains no details of the physical address, no telephone or fax number, and no contact email (two separate parts spliced together to represent missing information in a visually more compact manner). Instead, an online contact form is provided, which was considered by Jeffrey Beall, and now still by WAME, the World Association of Medical Editors, to be a predatory characteristic (see Fig. 3). (B) The public is only aware of the actual company/charity details, including the physical address, by observing the 2015 annual report and financial statement form (screenshot from p. 1 and p. 3). The COPE website was updated sometime near June 2017 to reflect the physical address.

COPE was formally contacted on March 29, 2017 (Appendix 1) to request a clarification about these issues. Following a reminder on April 11, a response was received from Virginia Barbour on April 12, whose verbatim communication is also transcribed in Appendix 1. Several important aspects remain unclear, despite the formal response from Barbour, although the physical address was defined clearly on the COPE website in about May, 2017, most likely as a direct result of my queries.

These opaque aspects related to the physical address invoke a feeling of concern, because they are oddly similar to some of the predatory qualities that the now-defunct Jeffrey Beall blog used to apply to a 2015 list of predatory open access journals and publishers (Beall, 2015; Teixeira da Silva, 2017a), specifically: "Demonstrates a lack of transparency in publishing operations", "Copy-proofs (locks) their PDFs", as occurs with the annual report and financial statement forms, which are all in PDF format, but whose content cannot be copied, "Operate in a Western country chiefly for the purpose of functioning as a vanity press for scholars in a developing country (e.g., utilizing a mail-drop address or PO box address" (Fig. 3A). It is unclear if 22 Nelson Close is

in fact a mail-drop address, i.e., an address that serves simply to accumulate mail that is then rerouted to a COPE representative regularly, for example each month, for a nominal monthly or yearly fee. It is also unclear if this office at 22 Nelson Close houses other registered companies or charities, all managed under one roof, a practice that had occasionally been invoked by Beall when referring to predatory open access publishers who would use a foreign mail-drop address to feign legitimacy or to give the impression of a valid and respectful operating base.



**Fig. 3.** “Predatory” Criteria

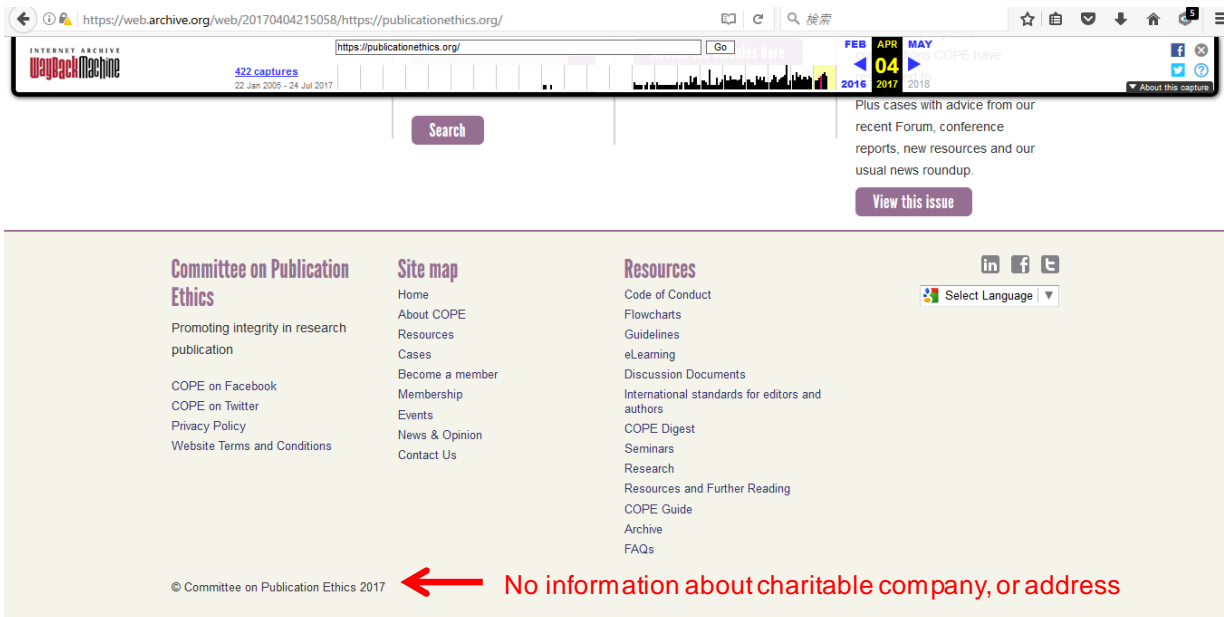
Notes: Fig. 3 (A) Criteria that had been listed on Beall’s 2015 list of predatory qualities that in fact should not have been considered valid because the Beall blog became defunct on January 15, 2017. (B) However, a COPE partner organization, WAME (World Association of Medical Editors), continues to consider the Beall list valid, in its entirety, but WAME has simply supplemented it with other criteria. “Predatory” criteria that Beall/WAME state that apply to the opacity regarding COPE’s address, after contextual adaptation

Beall’s 2015 list of predatory qualities related to publishers also included the following two clauses: 1) “Have a "contact us" page that only includes a web form or an email address, and the publisher hides or does not reveal its location”, 2) “The publisher lists insufficient contact information, including contact information that does not clearly state the headquarters location or misrepresents the headquarters location (e.g., through the use of addresses that are actually mail drops).” Iyer and Samociuk (2006) found that mail drop addresses were “associated with alarming regularity with cases of fraud and corruption”, which is not necessarily implied about COPE. These Beall-created clauses match almost perfectly with COPE’s practice. Most importantly, these clauses remain valid because World Association of Medical Editors (WAME, 2017a), a COPE partner organization (COPE, 2017g) that Virginia Barbour still officially is associated with, validates these

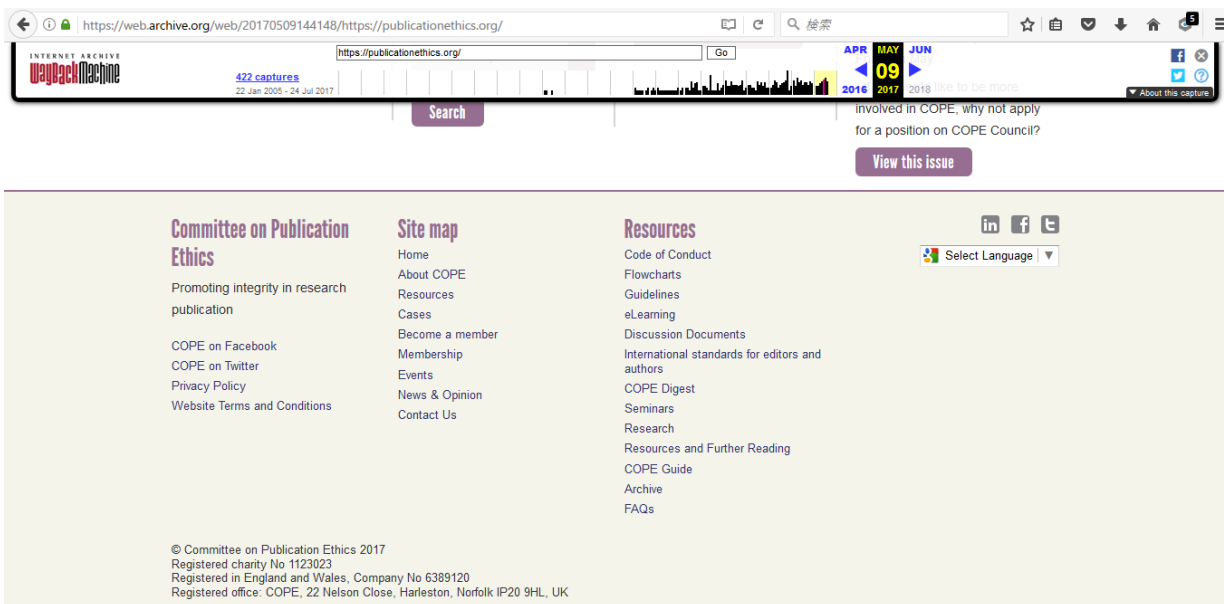


criteria (Fig. 3B) as it warns global academic and scholars about predatory activities of journals and publishers (WAME, 2017b).

**A**



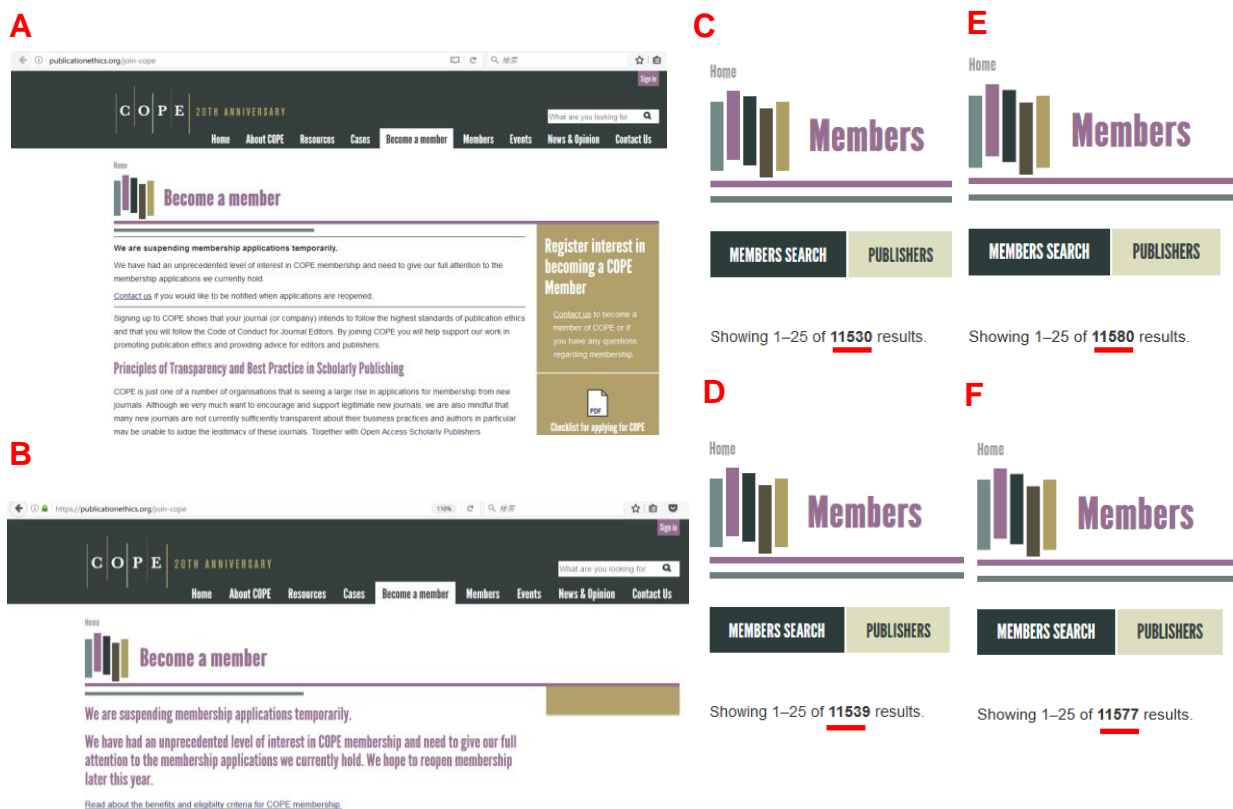
**B**



**Fig. 4. COPE Web-Site’s Update**

Notes: Fig. 4 COPE updates its web-site, after 20 years, to reflect a publicly visible indication of details regarding its charitable company status, and its physical address, most likely in response to my queries and stated concerns. Even so, the exact date of this update is unclear, sometime between April 4, 2017 and May 9, 2017. (A) April 4, 2017 screenshot. (B) May 9, 2017 screenshot. Source from Wayback Machine using COPE (2017a).

In that fortified list of criteria, WAME also warns scholars that this criterion may be predatory: “No location is listed for the journal offices, or location is very different than the location of the editors and editorial board.” In the case of COPE, trustees and/or directors could be equated with journal editors. This considered, the physical location of the 10 trustees (12 in the 2015 annual report and financial statement), who also serve as directors of COPE, is not indicated anywhere. However, it is known that the former (2012 until end of May, 2017) COPE Chair, Virginia Barbour (COPE, 2017h), resides in Queensland, Australia, on the other side of the world to the COPE registered office. If these definitions of “predatory” were to be followed strictly, as were defined by the now defunct Beall criteria, but resurrected, revalidated and fortified by WAME, then one can only conclude that COPE displayed, until about June 2017, and at least with respect to the address and/or contacts issues, predatory aspects. Although it could be argued that a charity and a publisher share different missions, ultimately, they both work to serve the academic community and the public, and thus predatory qualities that apply to one, apply equally to the other. Virginia Barbour also serves on the ethics and policy committee of WAME (WAME, 2017c), but this was not indicated on her COPE profile, i.e., this was a hidden or undeclared conflict of interest, in apparent direct contravention of several of COPE’s stated and claimed “Principles of Transparency and Best Practice in Scholarly Publishing” (COPE, 2017i).



**Fig. 5.** COPE’s Public Statement on Temporal Suspension of Membership

Notes: Fig. 5 COPE had a public statement (A, B) in March, 2017 that membership had been temporarily suspended. Despite this declaration, there were 11,530 members on March 27, 2017 (C), 11,539 members on March 30, 2017 (D) and 11,580 members on May 10, 2017 (E). Current (August 1, 2017) membership is 11,577 (F). Sources: (COPE, 2017b; COPE, 2017g).

These facts alone should draw deep concern from global academia and begin to raise red flags that not all appears to be well, or possibly even ethical, about COPE, the world’s largest and most powerful, ethics organization, or its leadership. In 2017, as COPE celebrates its 20<sup>th</sup> anniversary, the global academic community has the responsibility, despite the risks, of being vigilant, even of “ethical” organizations such as COPE, which have created a plethora of ethical rules that authors

and editor are expected to conform to. It is astonishing to notice that four key pillars of publishing ethics, openness, transparency, accountability and honesty, which COPE expects of authors that submit to its member journals, do not even feature in COPE's 2016-2018 strategic plan (COPE, 2017j). This indicates that other actual or possible predatory practices by COPE and/or its allies should be carefully examined, to examine if they match the defunct-Beall / revalidated-WAME criteria. The former should no longer be used (Teixeira da Silva, 2017b). In doing so, it will be possible to determine the micro- and macro-predatory nature of COPE's policies and behavior (Teixeira da Silva, & Al-Khatib, 2017), if any.

### **COPE: Other Opaque and Potentially Predatory Behaviors**

Separately, but linked, when browsing the COPE website, it is evident that COPE organizes many seminars, offering discounts to COPE members. This practice suggests that COPE is involved in commercial or quasi-commercial activities, and tries to lure potential members, or customers, by offering discounts. Although this practice does not sound purely charitable, nor does it appear to violate the functional limitations of a 'charitable company', COPE should clarify its position clearly on this issue. To date, despite queries to COPE, this issue has not been clarified.

Finally, Beall had also indicated one important predatory property: "Has no policies or practices for digital preservation." In the context of publishing, this indicates that if the journal ceases its operations, all content disappears from the internet. The same concern is valid for the COPE website. In fact, this concern was somewhat validated when Barbour indicated, in the same email communication on April 12, that version 1 (10 January, 2014) of "Principles of Transparency and Best Practice in Scholarly Publishing" (COPE, 2017i), which is in fact version 2 (22 June, 2015), was removed from public view because "We revised these principles so don't have the previous version on our site to avoid confusion and to ensure the correct version is used." This statement is of concern because it indicates that publicly available information can be easily struck from the public record, not allowing the public to examine, for whatever reason, the content of such documents. A Google search did in fact reveal one archived version of this document (Openscience, 2013). On April 15, 2017, a few additional queries were sent to Barbour et al., to seek clarification about some lingering aspects about unclearly or incompletely answered questions. These concerns about the nature of the COPE "office" are extremely important because, as indicated by Barbour, there is no staffed office, which complicates a logical explanation for this automatic email statement received from Linda Gough on April 18, 2017: "The COPE office is closed for the Easter holidays. We will re-open on Tuesday 18 April."

Since none of these details can be appreciated from the COPE website, except for an updated physical address made in about May, 2017 (Fig. 4), most likely in direct response to my criticisms, this paper provides an important bridge to the academic public regarding these gaps in information.

Two other aspects fortify the opacity behind COPE's operations. The first relates to dateless documents (COPE, date unknown). In general, it is expected that important documents that are made public should indicate their publication date, including blog entries. This is not the case at COPE, making such documents uncitable. As also demonstrated in this paper, blog and website content can be easily edited and thus manipulated, which are dishonest practices, especially when edits are not clearly indicated, nor when the dates when such edits were made are clearly indicated. The second worrisome aspect related to COPE opacity relates to membership numbers (COPE, 2017b). On March 27, 2017, it was learnt that COPE was temporarily suspending membership applications (COPE, 2017g). Despite this publicly stated fact, membership jumped by 9 members within 3 days, by March 30, 2017, and by more than 50 members by May 10, 2017 (Fig. 5), making that declaration – which is still in effect today – a ruse.

The analysis in this paper is highly pertinent given the fact that COPE is the *de facto* largest ethics organization in the world, given that it is celebrating its 20<sup>th</sup> anniversary in 2017, and since aspects related to opacity vs transparency of its operations go to the heart of academics' concerns about the publishing industry, which includes primarily COPE members.

### **Acknowledgement**

Screen-shots from copyrighted documents or websites taken under the fair-use agreement (Teixeira da Silva 2015a).

### Conflicts of Interest

The author has been critical of some aspects related to COPE (Teixeira da Silva, 2015b; Teixeira da Silva, 2017c). The author thanks the input and discussion offered in an old version by Alexandru-Ionuț Petrișor (University of Architecture and Urban Planning, Bucharest, Romania).

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### Appendix 1

In a bid to clarify several of these issues highlighted in this paper, seven questions were formally addressed by email to Virginia Barbour, the COPE Chair, Natalie Ridgeway, the COPE Executive Officer, Linda Gough, the COPE Administrator, and Iratxe Puebla, the COPE Assistant, on March 29, 2017. A reminder was sent on April 11, 2017. Barbour sent the following responses, also indicated below, verbatim, after each question. A final request for clarification was sent on April 15, 2017.

1) Why is COPE registered as a charity and also as a charitable company? “We are registered as a charity and a company limited by guarantee in the UK – as is normal for organisations like us.”

2) COPE’s physical address is listed as 22 Nelson Close, Harleston. Is this a mail-drop address? “22 Nelson Close, Harleston is our registered address to which mail can be sent for the purposes of being a charity and a company.”

3) Does this address serve for the address of both the charity as well as the charitable company? See answer to question 2.

4) Why is there no COPE sign on the building at the above address to indicate that this is the COPE office? No answer was provided, but most likely it is because this is a mail-drop address shared with other charities and companies, a fact that was not confirmed by Barbour or COPE.

5) Which COPE trustees/directors or committee members may be found working in this office? If you could kindly supplement that response with an indication if their presence is full time or part time. “Our Trustees/Council members are volunteers (including me) and as such they do not work on a contracted basis for set hours or from set locations. Our staff (employed and freelance) also work virtually from a number of locations and hence we don’t have a physical office where they are based together.”

6) On the COPE contact us page, why is there no physical address, contact phone, fax number or email listed? “We have a contact us link on the website: this is the means by which we can be contacted since we don’t have a physical location.”

7) Can you please provide the COPE office telephone and fax number, please? See the answer to question 6. No fax or telephone number was provided.

Barbour did add one final statement: “Our website sets out further details on our governance.”