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# Consultation on open access in the post-2014 Research Excellence Framework

## Printable summary of your responses

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## Your responses

#### **1**a

Do you agree that the criteria for open access are appropriate (subject to clarification on whether accessibility should follow immediately on acceptance or on publication)?

## Agree

## **1**b

Do you have any comments on this proposal?

- 1.1 The United Kingdom Council of Research Repositories (UKCoRR) welcomes HEFCEs proposals for providing the widest possible dissemination of UK research and supports the greater accessibility of that research offered through open access mechanisms. For the purposes of this submission the views represented below are those of UKCoRR as an organisation and should not be considered representative of the views of the institutions of our members.
- 1.2 We agree that, subject to clarification of points raised below, outputs should be accessible through a UK HEI repository, that they should be made available as the final peer-reviewed text, and presented in a form allowing for search and re-use as described.
- 1.3 We also agree that the only outputs submitted to the post-2014 REF that should be subject to the requirement for open access should:
- Be a journal article or conference proceeding
- List a UK HEI in the address field
- Any outputs that meet the above criteria should also be allowed a transition period before the open access requirements come in for researchers and HEIs to prepare to be able to meet HEFCE's requirements.
- 1.4 However, version terminology requires clarification: there are differing understandings across disciplines of the term 'final peer-reviewed text', and authors are often not supplied with or are unable to determine which is the 'final' version. A widely-accepted description for the version accepted for publication after changes have been made in response to the peer review process is 'accepted', as in 'accepted version' and 'accepted author manuscript'. We suggest that this terminology be adopted instead of 'final peer-reviewed text'.
- 1.5 UKCoRR would welcome a clear definition of `on acceptance' as different from `on publication'. Publishers have used these inconsistently, particularly in reference to `early view' articles: some regard early view as published, others do not. This causes difficulty in respect of compliance with embargo periods.

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- 1.6 The point of acceptance would be a convenient point in a researchers workflow to submit the author's accepted version of the article. However, HEFCE should recognise the resourcing implication for HEIs if point of acceptance is chosen. The period of time between acceptance and publication can still be extensive and embargo periods are often driven by the publication date. There is a wide range of publisher conditions in this area and consequently manual monitoring is required to administer embargo periods correctly as well as adjust the records to account for any post acceptance changes. Mechanisms and processes to support this would need to be developed by repositories alongside the publishers.
- 1.7 While the point of acceptance will minimise some of the impact on the researchers by aligning more closely with their workflow there are considerable concerns with this point of submission. Under the current processes it would be difficult for HEIs and HEFCE to monitor compliance with this point of submission. Whereas the point of publication or early online date is easier to ascertain for retrospective monitoring for the majority of large publishers. This is, of course, reliant on publishers changing their practices to indicate a single date of publication. Publication dates such as 'Fall 2013' once again introduce unnecessary confusion for authors, HEIs and HEFCE.

### 2a

Do you agree with the role outlined for institutional repositories, subject to further work on technical feasibility?

Strongly agree

#### 2b

Should the criteria require outputs to be made accessible through institutional repositories at the point of acceptance or the point of publication?

Publication

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Do you have any comments on these proposals?

- 2.1 UKCoRR agrees that a 'green' mandate, a mandate for open access through the existing repository infrastructure, is a genuine and cost-effective route to deliver open access for the UK.
- 2.2 We agree with the role outlined for institutional repositories (IRs) as storage and reporting are already features of the repository environment. We also welcome HEFCE's commitment to continue to work with institutions and repositories on the technical feasibility of their proposals. Ensuring interoperability of the systems involved and thereby minimising researchers' efforts in meeting funders' future requirements will be key to the success of these proposals. Shared repository services have provided further economies of scale for a number of institutions and we are happy to see HEFCE acknowledge this.
- 2.3 All those involved in the research cycle benefit from early recording of the existence and availability of research outputs. Making outputs available through the IR at point of acceptance embeds deposit within the researcher workflow and may have the advantage of speeding up the release of articles from embargos if they are counted as beginning at the point of acceptance.
- 2.4 However in terms of monitoring compliance and assessing if outputs are eligible for the post-2014 REF process under the terms of the open access requirement submission at the point of publication would be preferred. Thus, while IR staff would prefer a mandate for submission at the point of acceptance to promote the ideals of open access and particularly 'green' open access, a mandate for the point of publication, or within a defined timeframe of publication, will be more practical.
- 2.5 Please also see paragraphs 1.5 1.7 above for further comment.
- 2.6 Institutional repository software is generally capable of accommodating publisher embargo periods currently, so it is possible to ensure that accessibility would remain dependent on the date of publication for those outputs that are deposited into the IR directly.
- 2.7 HEFCE's revised requirement for outputs to be 'accessible through' rather than solely available in an IR has the advantage of supporting the freedom of researchers to make their outputs available through the most appropriate venue, be that the IR, a subject repository or direct from the publisher. A key issue is interoperability to ensure information flow between systems and the repository environment is still developing in this area. It is expected that new functionality and tools will facilitate this approach prior to the post-2014 REF.

3a

Do you agree that the proposed embargo periods should apply by REF main panel?

Neither agree or disagree

#### 3b

Do you agree with the proposed requirements for appropriate licences?

Neither agree or disagree

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Do you have any comments on these proposals?

- 3.1 UKCoRR agrees that embargo periods should apply by REF main panel as outlined in the proposal provided that consideration for specialist subject areas remains embedded in the proposals. It is essential that researchers working in interdisciplinary fields are accommodated as their outputs may be submitted to panels whose embargo periods do not align with the journals in which their research is published.
- 3.2 Consistency between HEFCE and RCUK mandates on embargo periods is essential for clarity in researchers minds about the requirements they need to fulfil. Any further complication in this area will reduce compliance to both mandates. The embargo periods of both bodies should be as short as is reasonable to make them. Short embargo periods can increase the repository services usage, which will benefit the community as a whole, both nationally and internationally.
- 3.3 There is already evidence that some publishers may take advantage of the evolving market to drive increased income from HEIs, for example through tactics such as imposing long 'green' embargo periods in order to force payment of Article Processing Charges. Publisher approaches will to a significant extent determine the extent to which researchers and HEIs are able to comply with open access requirements. HEFCE should work with others to maintain awareness and take appropriate action as required.
- 3.4 Regarding appropriate licenses for open access we would need more information on the exact license being proposed before being able to provide an informed response. However, agreement should be reached between all stakeholders, including HEFCE, publishers, HEIs and their authors regarding the licence type requirement, particularly on the issue of acceptable reuses of outputs. The wider public interest should also be considered. UKCoRR would welcome continuing to be part of consultation with HEFCE when agreement on a human, machine and legal readable license is proposed. Ultimately, the goal must be to achieve "full open access", the maximum degree for open access, where both the fee and the license barriers will be removed.

## 4a

Do you agree that the criteria for open access should apply only to journal articles and conference proceedings for the post-2014 REF?

Agree

## 4b

Do you have any comments on this proposal?

- 4.1 We agree that the open access criteria should be met in these two types of publications for three reasons; first, the open availability of the journal articles and conference proceedings have been in the focus of open access for the past ten years, since the first open access initiative. Since then the open access infrastructure for journal articles has become mature, well developed and includes, open access journals, gold open access publishing and the article processing charges (APCs). Currently many authors are publishing both their articles and conference proceedings openly. As a result, HEFCE's proposal will not introduce a new way of disseminating research results and there will not be a need for a shift in the authors existing publication habits.
- 4.2 Secondly, authors use these types of publication to distribute the findings of their research, increase their personal profiles and their impact, and no royalties are expected. Open access can serve this purpose very well, as studies have discovered that open access articles receive more citations than the closed access ones. Third, the "RCUK Policy on Open Access" covers the same forms of outputs. Therefore, the HEFCE proposal can support the goals of the RCUK policy too.
- 4.3 Due to the fact that existing infrastructures for open monographs and open data are not still in place these two forms of publication should not be considered for mandatory deposit in the HEFCE proposal, but they can be recommended items for deposit. Currently we are experiencing cases where authors experiment with the publication of both open monographs and research data and this is a good time to

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start their implementation.

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Do you agree that a notice period of two years from the date of the policy announcement is appropriate to allow for the publication cycle of journal articles and conference proceedings?

Neither agree or disagree

#### 5b

Do you have any comments on this proposal?

- 5.1 Currently, the majority of the UK HEI institutions operate institutional repositories, and they have used them, among other things, to collect material for the REF 2014. These institutions have the infrastructure in place and they are already in position to comply with full-text deposits. It is true that a small number of the UK HEI institutions do not have repositories, but the authors of these institutions can use the OpenDepot.org service for that purpose. Many authors are already familiar with self-archiving, as they have been applying it since the beginning of the first institutional repositories and many IRs have recently seen an increase in self-archiving, due to the REF 2014 deposits and the RCUK policy.
- 5.2 As a result, since the majority of the UK HEIs maintain institutional repositories and authors are familiar with the self-archiving process there is reduced need for a two year delay in the publication cycle of the journal articles and conference proceedings. Generally speaking, every time a policy is being introduced all parties related to the policy have a common understanding that a full compliance rate may not be achieved, but this is not a good reason alone to delay the policy. HEFCE can acknowledge that some time may be required, and the period 2014 2016 can be used as a transition period, but it is not necessary to officially declare a delay, as some universities are ready to comply with the policy right away and HEFCE has made provision for exceptions in the cases where authors may not be able to comply straight away.
- 5.3 However, while the majority of IRs are ready to collect the full text outputs required a number of institutions will require a delay to ensure that they have policies and mechanisms in place to capture metadata records that point to open access material that is held elsewhere. A notice period of some kind is a pragmatic way to allow these changes to be implemented in the IRs that need to make these changes.

## 6a

Do you agree that criteria for open access should apply only to those outputs listing a UK HEI in the output's 'address' field for the post-2014 REF?

Neither agree or disagree

### 6b

Do you have any comments on this proposal?

- 6.1 It would, for the most part, be acceptable to apply criteria for open access to only those outputs listing a UK HEI in the outputs address field for the next REF.
- 6.2 There should be some provision for exceptions, for example to allow for international recruitment of investigators onto UK-based research projects. This would take into account circumstances where the address/primary corresponding author associated with the paper may be an investigator who is not UK-based. Additionally more consideration should be given to the possibility of there being valid non-HEI addresses, for example local hospitals, that should not be used as an opportunity to avoid compliance.
- 6.3 We would also welcome explicit confirmation that it is not solely papers that list "a UK HEI in the 'address' field" that are eligible for submission to the post-2014 REF process; simply that it is only these papers that are subject to the open access requirements.
- 6.4 The terms and conditions of the HEFCE policy must be the same for all authors who want to submit an output that will count for the REF and that must be stated explicitly. The creation of a two tiers policy can only be confusing to those who wish to comply and implement it, and it creates opportunities for some to avoid compliance. The default should be mandatory compliance, while authors who wish to exclude themselves must request to opt out and should be treated on a case-by-case basis.
- 6.5 An alternative proposal may be for institutions to submit details of a researchers employment history as part of their REF1 return to allow compliance to be judged in this way. This would, of course, incur exceptions, particularly for researchers that had submitted work while working for international institutions.

## 7a

Which approach to allowing exceptions is preferable?

Not Answered

#### 7h

If selecting option b: Do you agree that the percentage targets are appropriate?

Not Answered

## 7c

If selecting option b: Do you believe the percentage target should apply consistently or vary by REF main panel?

Not Answered

## 7d

Do you have any comments on these proposals?

7.1 UKCoRR feels that individual institutions would be better placed to evaluate their own institutional readiness in terms of the most acceptable options for exceptions. However we would hope the post-2014 REF process could be carried out with the aim of full compliance.

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