



Consortium of University Research Libraries

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Drs A Wissenburg
Research Councils UK Secretariat
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Thursday 25 August 2005

Dear Drs Wissenburg

RCUK position statement on access to research outputs

CURL, SCONUL and CILIP would like to express their support for the RCUK interim position statement on access to research outputs. We believe that the statement is a reasonable and balanced approach to current issues and has the potential to make significant improvements to research communication. We would urge RCUK to adopt the statement as its policy as soon as possible.

We believe that the principles outlined in paragraph 3 of the position statement are an excellent summary of the key priorities for the major stakeholders in the research community. We believe that the ways in which the statement proposes to implement these principles are both reasonable and achievable.

We welcome the requirement (in paragraph 14) to deposit work funded by Research Councils in open-access repositories. Both CURL and SCONUL are committed to supporting HEIs as they develop a network of institutional repositories in order to ensure that a large majority of authors have a repository available to

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them. We also note the description of the potential of repositories to support the RAE process (paragraph 21) but would observe that for institutions to use their repositories for such purposes will require joined-up guidance from RCUK and HEFCE.

We also strongly support RCUK statements on rigorous quality assurance (paragraphs 18-22). We believe that the implementation of the policies outlined in the statement should be monitored with the quality imperative in mind. However, we agree that in principle there is no reason to believe that new publishing and dissemination models would adversely affect key processes such as peer review.

We note RCUK's caution with regards to the viability of the open-access publication charge model of journal publishing (paragraphs 25-27). However, we welcome confirmation that the Research Councils are willing to fund such charges. Such a move is likely to allow more extensive testing of the model – something which is certainly required.

CURL, SCONUL and CILIP also welcome the comments on providing easier access to data sets (paragraph 8), changing VAT regulations in relation to electronic publications (paragraph 28), and resourcing digital preservation initiatives (paragraphs 29-30). In addition, we give particular welcome to the RCUK position on working with learned societies on taking issues of research communication forward (paragraph 32).

We believe that in two areas of significant detail the statement may be improved. These relate to paragraph 14b, which currently reads:

“Where research is funded by Research Councils and undertaken by researchers with access to an open access e-print repository (institutional or subject-based), Councils will make it a condition for all grants awarded from 1 October 2005 that a copy of all resultant published journal articles or conference proceedings (but not necessarily the underlying data) should be deposited in and/or accessible through that repository, subject to copyright or licensing arrangements... Deposit should take place at the earliest opportunity, wherever possible at or around the time of publication, in accordance with copyright and licensing arrangements.”

As it stands, this paragraph has two potential ‘loopholes’ that will mean that some who oppose it will be able to prevent authors or institutions from complying with the requirement.

The first problem relates to the phrase “subject to copyright or licensing arrangements”. This allows publishers simply to change their copyright transfer agreements in order to prevent deposition in e-print repositories. Although the majority of large publishers currently allow deposition, we have reason to believe that some are reviewing their position on this.

The second problem relates to the phrase that “deposit should take place at the earliest opportunity, wherever possible at or around the time of publication, in accordance with copyright and licensing arrangements.” Since no timescale is

specified for deposit, it will be possible for publishers to introduce embargoes on articles. Oxford University Press has recently introduced a general 12 month embargo and is currently considering a 24 month embargo for some of its titles. They can do this and still say that they are fully compliant with the RCUK policy. We have reliable information that other major publishers are also considering the introduction of lengthy embargoes. If embargoes were widely introduced then there would be little change in the public accessibility of research outputs despite the introduction of the RCUK policy.

We would urge RCUK to examine seriously the possibility of tightening up these clauses in order to avoid the possibility that deposition of articles in open-access repositories will become even more difficult for authors and their institutions than it is at present. We agree that as the funders of research, the Research Councils have a responsibility to ensure research they have funded is widely available and we believe that this can legitimately involve a requirement on authors to deposit all articles in open-access repositories within a particular timescale. Publishers with restrictive select copyright transfer agreements would then need to revise their policies in order to allow deposition. Other publishers would not be able to change their policies in order to prevent deposition. We believe that a reasonable timescale for deposit would be 'as soon as possible but no later than three months after publication' (bearing in mind that an article is often completed 12 months or more before it is actually published). Ideally, this should apply to all articles (the phrase "subject to..." should be removed). The amended wording would therefore be:

"Where research is funded by Research Councils and undertaken by researchers with access to an open access e-print repository (institutional or subject-based), Councils will make it a condition for all grants awarded from 1 October 2005 that a copy of all resultant published journal articles or conference proceedings (but not necessarily the underlying data) should be deposited in and/or accessible through that repository. Such repositories should be OAI-PMH compliant. Deposit should take place as soon as possible but no later than three months after publication."

We would, of course, be happy to discuss these suggestions with you if required.

We would be keen to see the adoption of the position statement by RCUK without delay and reiterate our full support for this development.

Yours sincerely

Suzanne Enright
Chair, SCONUL

Clare Jenkins
Chair, CURL

Deborah Shorley
President, CILIP

CURL, Consortium of University Research Libraries

Established in 1983 to bring together the larger research-based university libraries in the United Kingdom and Ireland, CURL has grown from a fairly informal grouping of seven university libraries into a strong, nationally and internationally recognised partnership of 25 major research libraries participating as full members, including 22 major university libraries and the UK'S three national libraries. It also has one associate member, the Wellcome Trust. CURL's mission is to increase the ability of research libraries to share resources for the benefit of the local, national and international research community. More information is available at www.curl.ac.uk

CILIP, the Chartered Institute of Library and Information Professionals

CILIP is the leading UK professional body for librarians, information specialists and knowledge managers who work across all sectors of the economy. CILIP awards professional qualifications at all levels, supports the continuing professional development of its members and acts as an advocate for the value of skilled library and information professionals and the services they provide. It forms a community of around 35,000 people engaged in library and information work, of whom around 23,000 are CILIP Members and around 12,000 are regular customers of CILIP Enterprises. For more information about CILIP, please go to www.cilip.org.uk.

SCONUL, Society of College, National and University Libraries

SCONUL, founded in 1950, is an association representing the heads of library and information services in all universities, and most colleges of higher education, in the UK, together with the directors of national libraries. (SCONUL also represents their counterparts in Ireland, and its membership includes the CURL libraries). By sharing good practice, and facilitating collaborative schemes for the benefit of library users, SCONUL (www.sconul.ac.uk) promotes excellence in its constituent library services.