

HEFCE Consultation on Open Access in the post-2014 REF

SCONUL Response

October 2013

SCONUL strongly supports the principle of open access publishing, in particular the benefits it delivers in terms of maximising access to the outputs of academic research and extending its reach to wider audiences. Those leading academic libraries in the UK have been long-term proponents of greater open access to the outputs of academic research. We welcome the Government's engagement with this issue and support their view that removing barriers to accessing taxpayer funded research will have real economic and social benefits.

We endorse the direction of travel set out in the HEFCE consultation documents and our comments are intended to help ensure that the final policy recommendations are as effective and as widely supported as possible. Overall, we believe that the proposals are measured and modest. However, we note that the proposals adopted as a result of this consultation will form an important part of the framework for academic publishing for at least the next seven years, and therefore should be framed with an awareness of the significant changes in technology and in the culture and business of academic publishing that are likely to take place over that period. HEFCE must be mindful of the need for the framework to avoid acting as a break on developments which benefit academic research in the UK. For this reason, we would have preferred to see HEFCE include monographs within the scope of its proposals, albeit under slightly different requirements than for journals and conference proceedings.

Question 1

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)? Do you have any comments on this proposal?

SCONUL agrees that the criteria set out by HEFCE are appropriate:

- (a) accessible through a UK HEI repository although the repository may provide access in a way that respects agreed embargo periods;
- (b) made available as the final peer-reviewed text, though not necessarily identical to the publisher's edited and formatted version; and
- (c) presented in a form allowing the reader to search for and re-use content.

Question 2

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

We are pleased to see strong acknowledgement of the role played by institutional repositories in facilitating a move to open access through providing a suitable container for REF outputs and the effective management and reporting of associated metadata.

There is a requirement within the emerging OA landscape for both institutional and subject repositories and we support the reference to accessibility "through" rather than within an institutional repository. This will help foster the development of a vibrant repository

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ecosystem which in turn should help ensure that access to publicly funded research is made as widely available as possible.

Considerable investment has been made over the past decade in building and developing a robust repository infrastructure, both in the UK and internationally, in support of the dissemination of academic research. It will be crucial to continue investing in and developing this infrastructure to meet emerging needs in an open access environment in order to be able to fully realise the benefits of OA. We would urge HEFCE to consider both institutional and subject repositories as part of this infrastructure and to include both in its technical review.

Greater interoperability between repositories and other sources of publications data such as publishers websites needs to be developed in order to optimise the visibility, use and reuse of research outputs and to support the reporting requirements of a variety of stakeholders.

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

SCONUL believes that the key point should be that of acceptance, because

- (a) institutions and authors are not always fully cognisant of publication dates either in advance or at the point of publication
- (b) there can be doubt about exactly what constitutes publication, and
- (c) there can be a considerable time lag between acceptance and publication. In contrast, the acceptance date is clear and known to the author.

However, we would urge HEFCE to be cautious about the using the point of the creation of a metadata record as a proxy for acceptance. Policies and workflows vary considerably between institutional repositories. There may be a considerable gap between acceptance for publication and the creation of an associated metadata record, and in some instances, this will not exist until the point of publication.

Question 3

Do you agree that the proposed embargo periods should apply by REF main panel, as outlined above? Do you agree with the proposed requirements for appropriate licences? Do you have any comments on these proposals?

Yes we agree, but note that embargoes are a barrier to Open Access and should be managed out over time. We note too that although some participants in the debate about the future of open access have raised concerns that shorter embargo periods may impact on subscription rates, there is no credible evidence to support this view.

We also note that differing expectations and economic models that currently exist between disciplines are likely to have an impact on the rate at which embargo periods can be phased out. A reliable evidence base would better inform decision making in relation to requirements around agreeing embargo periods.

HEFCE Consultation on Open Access in the post-2014 REF

SCONUL Response

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We fully understand the potential benefits to be gained by allowing the reuse and repurposing of research materials and are therefore supportive of items being made available on a basis which allows for text and data mining. However, given the longevity and significance of the proposals to emerge from this consultation, we believe HEFCE should avoid specifying the specific licence type (CC BY) but should instead focus on licence requirements.

We note that there appears to be widespread misunderstanding of the implications of CC licenses among academics and it would be helpful if HEFCE were able to commission some work to develop advocacy tools for use in HEIs to dispel these misunderstandings.

We would also encourage HEFCE and the Research Councils to work with the community to develop model repository licenses, copyright transfer agreements and public copyright licenses that will best serve the interests and requirements of all stakeholders (e.g. funders; authors; publishers). SCONUL would be willing to input expertise to any such work that may be commissioned.

Question 4

Do you agree that the criteria for open access should apply only to journal articles and conference proceedings for the post-2014 REF? Do you have any comments on this proposal?

No. We would have liked to have seen HEFCE include monographs in the scope of its open access provisions, albeit subject to different set of requirements. The sector should be moving quickly to develop workable OA monograph models. Excluding monographs from the REF will have the consequence of delaying that process.

In formulating its advice and guidance, HEFCE will need to recognise that there are a variety of ways in which conference proceedings are published. With some conference proceedings, there will be an element of private funding which may act as a barrier to open access publication. Some ambiguities also apply to research outputs which can include working papers and e-prints which are never formally published in a journal. HEFCE should consider ways in which these outputs, if submitted to the REF, are included within the scope of its open access requirements.

While we agree that it is not appropriate at this point to make it a formal requirement that access to underlying data and other materials be provided, we note that it is possible to interpret HEFCE's position on open data as running counter to the RCUK approach. We believe that information on whether and how access to underlying data and materials can be requested should be provided, in line with the RCUK approach.

Question 5

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? Do you have any comments on this proposal?

HEFCE Consultation on Open Access in the post-2014 REF

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Agree.

Question 6

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? Do you have any comments on this proposal?

Agree.

Question 7

Which approach to allowing exceptions is preferable? Do you have any comments on these proposals?

SCONUL believes that Option A is the better approach where 100% of REF submissions are expected to meet the open access criteria discussed above, with scope for exemptions. We note that it will be very important for HEFCE to provide clarity of the grounds and process for exemption under this option.

We believe Option B would provide an opportunity for authors to attempt to game the system by staking a claim to be included in the non-compliant element of a REF submission. Those responsible for the REF submission in their institution would find it highly challenging to manage levels of non-compliance to ensure the institution is below the target percentage for the appropriate panel. To avoid this gaming behaviour, HEFCE should set a clear expectation that all research is made open access.

HEFCE will also need to provide guidance about how multi-authored REF submissions are to be treated under the new proposals. We would advocate an approach which focuses on compliance by the lead author.