Russell Group comments on HEFCE’s pre-consultation letter: open access and submissions to the REF post-2014

1. Introduction

1.1 We very much welcome this early opportunity to comment on the development of HEFCE policy in this important area. We look forward to working with HEFCE and other stakeholders as policy takes shape and will also respond to the main consultation later this year.

1.2 Given that Russell Group universities generate the bulk of world-class outputs that are likely to be submitted to the Research Excellence Framework (REF), we hope HEFCE will engage with us throughout this process. **Pursuing open access must not be allowed to compromise the quality of submissions in the REF post-2014.**

1.3 We would like to assure HEFCE that the Russell Group remains committed to open access (OA) publication of research. We are working to address open access issues constructively and our institutions are at the forefront of delivering open access via both Gold and Green OA routes. However, we anticipate a number of challenges in implementing open access policy which we have articulated to RCUK, the Government and to both houses of Parliament in recent committee inquiries. In addition, we remain concerned about the overall business case for a predominantly Gold OA policy and whether it will indeed provide significantly greater returns to the economy for the money invested than pursuing an evolution of existing practice – based on Green OA with moves to Gold developing naturally over time.

2. Policy and principles

2.1 Our view remains that the Green route is a simple, genuine and cost effective way of delivering OA and we would like to see a wider acceptance and financial support for Green OA routes as a valid option. We are therefore very pleased that HEFCE is proposing to accept both Gold and Green options, with no preference for Gold over Green, as stated in the pre-consultation letter:

As the transition to full open access will occur over a period of time, we propose to accept material published via either gold or green routes as eligible, recognising that
it is not appropriate to express any preference in the context of research assessment. ¹

2.2 We recommend HEFCE maintain this principle for the long-term: all forms of open access should be acceptable in all future rounds of REF and its successors.

2.3 We believe the transition to a predominantly Gold OA future will take a substantial period of time – certainly beyond the timeframe for the post-2014 REF – and moves in this direction will occur at different rates in different disciplines. Even if a substantial Gold OA market develops in the UK and internationally, we can envisage there will still be instances when it will not be possible to make all research outputs open access at the point of publication, for example because of: the medium in which the output is presented, lack of funding to pay Article Processing Charges, commercial, security or other restrictions or where the chosen publisher does not support Gold OA. Similarly, there are likely to be cases where even Green OA is not possible (i.e. with some non-digital media). Potential submissions to the REF should not be limited by any of these factors.

2.4 Research outputs should be judged solely on their own merits – in other words on research quality factors, not on where or how they are published. Requiring an output to meet an open access standard before it can be assessed in the REF would restrict academic freedom and potentially diminishes the emphasis on excellence. Preclusion of outputs on the basis of factors that do not relate to quality will damage the UK’s reputation: all forms of research output are currently eligible for REF and this must continue.

2.5 Our recommendation is that achievement of open access should instead be reported on and assessed as part of the research environment element of REF. Statistics on the proportion of open access achieved, reflecting the balance of disciplines submitted, and policies and processes to support open access should be audited in a simple and non-bureaucratic way. Different disciplines will have different, but equally valid, approaches and this will need to be reflected in how they are assessed.

3. Expectations for open access

3.1 It is impossible to determine up front whether or not an individual publication is likely to be submitted to a future REF, but making all research publications open access at the point of publication in case they are required for a future REF could be prohibitively expensive — especially for the most research-intensive universities. And as set out above, there will still be cases where open access just isn’t possible or practical. The REF must therefore be flexible in its approach to open access, hence our recommendation on open access as a research environment factor.

3.2 Open access is still in a period of relative infancy with new approaches being developed, disciplines at different stages of uptake and innovative publishing models becoming available all of the time. Ruling out work originally published in an ineligible form and then retrospectively made open access will be counterproductive. It could

¹ http://www.hefce.ac.uk/news/newsarchive/2013/name.78750.en.html
hold back the development of new open access models and it could mean that a future REF misses key research outputs that, for reasons other than research quality factors, were not made open access when originally published.

3.3 In addition, those who have worked outside of the UK or in other sectors where open access policies are not followed may find that they are not able to contribute work into the REF post 2014 if open access at the point of publication is a requirement. This could harm our international standing and ability to attract the best talent into the UK research system.

3.4 Open access should count no matter when it is achieved, with all routes being assessed as equal.

4. Repositories

4.1 We are pleased that HEFCE intends to support the development and use of institutional repositories. We see institutional and certified discipline-specific repositories as a key part of the infrastructure for open access, providing a long-term solution independent of the publishing industry and which clearly links research back to the researchers and institutions responsible for the original work.

4.2 HEFCE should undertake research to determine how many institutions currently have or could reasonably be expected to have suitable repositories by the time of the next REF. HEFCE should also consider issues around the use of shared repositories and whether links from these to institutional repositories will also be acceptable.

4.3 Again, there must be flexibility in REF requirements as it may not be possible for some research outputs to be made available in a digital repository.

5. Embargoes and licences

Embargoes

5.1 We have recently commented on RCUK’s open access policy and guidance notes regarding embargo periods. This is relevant to the REF discussion and is repeated below. Extract from Russell Group submission to RCUK:

The simple decision tree included at section 3.6 of the guidance is, as the Minister for Universities and Science has stated on numerous occasions, Government policy. The intention of this is that if there are insufficient funds to pay for the Article Processing Charge (APC) at the point of which those funds are needed by the author, then a longer embargo period of 12-24 months will be acceptable – and even longer in some cases.

However, the RCUK policy and guidance notes continue to stress that “RCUK will accept a delay of no more than six months”, while then giving a number of exceptions where periods up to 24 months may be acceptable as an “interim” arrangement.
The wording of the RCUK policy and guidance notes needs to be consistent with Government policy. The RCUK policy and guidance should clearly state that embargoes of up to 12 months for science, technology, engineering and maths publications are perfectly consistent with Government policy and that longer embargoes are acceptable for publications in those disciplines where a longer payback period is required. In some cases, embargoes exceeding 24 months should be allowed (although we accept this should be the exception rather than the rule).

We agree that where embargoes of six months for research papers in some biomedicine fields have already become the standard practice this should continue.

The only other case where RCUK should be advocating a 6-12 month maximum embargo period is where a publisher does not offer a Gold OA option. In other words, the RCUK policy and guidance needs to be turned around to state that 12-24 month embargoes are the standard policy, with the exceptions being for biomedicine research and where publishers do not offer a Gold OA publication option.

It may, of course, be an ambition for RCUK to move towards 6 months as a standard embargo period with time, but that needs to be set out as just that – an ambition – perhaps as part of a longer-term phased process as we discussed at our meeting in January. Repeated reference to an interim period should be avoided.

5.2 HEFCE’s approach to embargoes should also follow Government policy. Acceptable embargo periods are thus 12 months for STEM disciplines and 24 months for other disciplines in the arts, humanities and social sciences – with longer embargoes also being allowable in certain circumstances.

5.3 We welcome that HEFCE intends material still under embargo at the REF submission date will be eligible, but again, the length of embargo and whether material is under embargo or not should only be considered as part of the research environment assessment.

Licensing

5.4 We have made the following comments to RCUK on licensing requirements:

The lesser requirement for NC (non-commercial) reuse licensing for Green OA publication routes is welcome.

We have an on-going concern that the price charged by publishers for Gold OA with a CC-BY licence is likely to be considerably higher than envisaged by RCUK when calculating funding for the block grant. This needs to be monitored carefully – in particular for the journals with highest international impact – to ensure the UK is not being disadvantaged by RCUK policy.

A bigger problem is that some journals may not quickly move to offer a Gold OA CC-BY option, or may not do so at all. This will make it impossible to comply with the RCUK policy even where an ongoing OA journal that is prominent in the field exists. Thus, researchers would be precluded from publishing there in favour of a less prominent journal that, for example, allowed Green OA where the licensing issues are more flexible. This necessarily degrades the impact of UK research in the
immediate future, with possible wider consequences for the UK’s international standing. This should be of serious concern to RCUK and the Government.

We welcome that a full assessment of the impact of CC-BY will be included in the 2014 review.

5.5 In our evidence to the recent House of Lords inquiry into open access publication we said²:

We recognise that a CC-BY licence removes doubt about how research papers and their content may be reused, but we would like to see the licence requirement widened to include other CC-BY non-commercial and share-alike licences. This will help to keep OA costs down and will ensure researchers are not unduly restricted in where they can publish. Again, there could be a phased approach over a number of years to encourage CC-BY in the long-term.

5.6 HEFCE should take the same approach to licensing as it proposes for open access in general and be open to all routes that allow reuse, including non-commercial reuse, share alike and other similar options as well as CC-BY.

6. Exceptions

6.1 If open access is treated as a research environment factor then the issue of exceptions is simplified. An overall benchmark of around 40-60% of outputs submitted by an institution being open access could be considered.

6.2 This is consistent with Government modelling presented at a panel discussion meeting with the Minister for Universities and Science on 12 February 2013. Extract from panel meeting paper Annex 2:

The proportion of OA-articles in the world was estimated to be around 10% in 2010 (Laakso 2011*) and growing at annualised rates of 20% in the previous 5 years. If this rate of growth was sustained until 2020, open access would reach 42% world-wide by that year.

In 2010 UK researchers published 123,600 articles, attracting a 6% share of World publications (1,936,000). Under BIS assumptions**, the UK published 7% of world open access in 2010, which accounted for 11% of publications ... 

... if trends prevailing prior to 2010 were sustained, 51% of all UK publications would be open access by 2020.

...if all publications attributable to Research Councils were available in gold open access, this would take proportions of all UK publications available in OA to 43% in 2015 and 64% in 2020.

[Laakso et al (2011), the development of open access journal publishing from 1993 to 2009, PLoS One. This assumption states that the UK share of world open access is equal to the UK share of journals registered in the Directory of Open Access Journals (DOAJ). There were 533 UK journals in the total of 7600 registered in DOAJ in 2010, giving an assumed 7% share of UK of world OA-articles.]

6.3 The use of a benchmark that follows expectations for OA market development removes the need to create a complex justification and audit process around the exemption of categories, sub-categories and individual outputs. It places responsibility and decision-making on open access judgements in the hands of researchers and their institutions. In addition, it would demonstrate that HEFCE is truly sympathetic to particular disciplinary issues and that all research outputs from all disciplines will be treated equally.

6.4 We welcome that HEFCE is also open to introducing a notice period before any open access requirements are considered as part of the next REF. Given that open access is still very much a work in progress and researchers and their institutions are already having to adapt to new open access policies from RCUK and other funders, we would recommend an exemption period of at least two years from the start of the next REF cycle. In other words, any open access requirements in the research environment or other areas of REF should not be introduced before 2016.

7. Monograph publications

7.1 Using an overall benchmark percentage of publications submitted by an institution as outlined above should remove any challenges around the open access publication of monographs and book chapters.

7.2 With time, we expect new business models to emerge that could lead to a higher proportion of monographs being made available in open access formats. HEFCE could play a constructive role in encouraging these to develop further, working closely with stakeholders in the arts humanities and social science disciplines in particular – for example, providing financial support for pilot exercises.

8. Open data

8.1 We agree that considerable progress may be made on opening up research data by the time of the next REF, but open research data is a much more complex issue than open access publication and the current position is further behind developments in OA. At this early stage it is not feasible to place any formal requirements on open data in the next REF.

8.2 The critical factors for universities in moving to an open data future are expected to be costs, timeframe for change and the practicalities of implementation. These practicalities include issues such as infrastructure, skills and training, standards, IP and commercial interests, data storage and legacy, and issues around content – e.g. what data should be open, at what point, and who decides.

8.3 Various groups including the Russell Group, the Research Sector Transparency Board and LERU are currently looking at the challenges of open data and we expect the
debate to evolve significantly over the next few years. We recognise that there could be significant value in opening up published research data so that it can be used more effectively by researchers and even commercially, with appropriate IP protection. We welcome engagement with HEFCE and other research stakeholders on how to develop open data successfully.

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