Russell Group response to the HEFCE consultation on open access in the post-2014 REF

Summary

- The REF should judge research outputs solely on the basis of research quality factors.
- Our view is that the Green route to open access is a simple, genuine and cost effective way of delivering open access.
- We would welcome unambiguous clarification that access “through institutional repositories” does not require direct deposit in the institutional repository.
- We see institutional and certified discipline-specific repositories as a key part of the infrastructure for open access.
- We recommend some flexibility around when outputs are available within institutional repositories. Making outputs available in institutional repositories close to the point of publication would be a more workable option.
- Embargo periods used by the REF must be consistent with those used by universities to meet Government expectations. Appropriate embargo periods are defined on a paper by paper basis, and not just discipline.
- We welcome the Funding Councils’ proposal not to specify a particular form of licence requirement for open access publications.
- We agree that, for the present time, open access requirements should be restricted to journal articles and conference proceedings.
- We recommend a two year exemption period from the start of the next REF as the absolute minimum.
- There must be no barriers to academics who have worked outside the UK or as active researchers outside the higher education sector during the REF period.
- We favour option B, an compliance percentage for open access publications submitted to the post-2014 REF.
- We recommend an average benchmark closer to 60% of open access outputs submitted by an institution be considered for the post-2014 REF.

The Russell Group of Universities

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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)?*

1. We are disappointed that HEFCE has not given further consideration to assessing open access within the Environment element of REF.

2. **The REF should judge research outputs solely on the basis of research quality factors**, not on where or how they are published. We have concerns that requiring an output to meet an open access standard before it can be assessed in the REF will restrict academic freedom and potentially diminish the emphasis on excellence. Preclusion of outputs on the basis of factors that do not relate to quality could damage the UK’s reputation.

3. It is essential to avoid applying eligibility criteria which have a detrimental effect on the selection choices that universities can make.

4. We have concerns that implementation of the proposed criteria will increase the burden on universities. For example, there would be additional cost implications to meeting compliance if the format of normal deposit (usually pdf) does not allow automated text-mining and if universities were then required to deposit duplicate versions of published articles in alternative formats in order to allow automated text-mining.

5. We make further comment on the proposed criteria elsewhere in our response.

Question 2

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

6. **Our view is that the Green route to open access is a simple, genuine and cost effective way of delivering open access.** Institutional repositories are an important component of Green open access, but so too are discipline-based repositories and those of publishers and research funders, so we are concerned about applying restrictions on where open access outputs must be deposited. **We would welcome unambiguous clarification that access “through institutional repositories” does not require direct deposit in the institutional repository.**

7. To meet the objectives of open access, it would be both unnecessary and inefficient to have to duplicate deposit of research outputs in more than one system.

   - Institutional repositories are not the only suitable infrastructure available to the research community and may not always be the best route to meet the overriding goal of wider dissemination of research.
• 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.

• For Gold open access outputs, the final version article should openly available directly through the publishers own infrastructure, and we would expect institutional repositories to link through to the output through its DOI (digital object identifier).

• For multi-author outputs where there is collaboration across institutions there could be uncertainty about which institutional repository to use.

8. HEFCE must also be confident that technical and staffing capacity exists within the research sector to support and maintain high quality repositories that can accommodate large volumes of research outputs. HEFCE should determine how many institutions currently have or could reasonably be expected to have suitable repositories within the post-2014 REF timescales.

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

9. We recommend that open access publications be made accessible in an appropriate repository as discussed above, with the timing of deposit to be in line with relevant embargo periods.

10. It is not clear what additional benefit there is to increasing availability of Open Access publications by requiring immediate link to institutional repositories, as long as there is already an Open Access version of paper available elsewhere.

11. We have reservations on both proposals of making outputs accessible at either point of acceptance or point of publication.

• Institutions may not be able to access the version of record at the point of acceptance if it is deposited in a non-institutional repository, for example if the paper has been deposited in a publisher’s repository.

• At the point of acceptance, the metadata linked to the publication will not be available to the institution for deposit in an institutional repository.

• At the point of publication – if that is taken to mean the exact date of publication – it is possible that the author or institution may not have access to the final version of the publication.

12. It is important to avoid institutions using inefficient and unnecessary ‘workarounds’ and depositing duplicate versions in institutional repositories just to meet a specified date.
Therefore, we recommend some flexibility around when outputs are available within institutional repositories and making outputs available in institutional repositories close to the point of publication would be a more workable option. This would increase the possibility of making the publisher’s version the definitive record.

**Question 3**

_Do you agree that the proposed embargo periods should apply by REF main panel, as outlined above?_

13. While there is clearly a relationship between discipline and main panels in many instances, using the main panel boundaries to define acceptable embargo periods is not without risk.

- The link between academic discipline and main panel is through the Unit of Assessment (UoA) and, given the breadth of disciplines within main panels as they are currently constituted, it may be that there are different practices across UoAs within a main panel.

- There may be instances where an output stems from a discipline where one embargo period is standard practice but is, for good reason, submitted to a UoA with a different standard.

- It is important that multidisciplinary research is not disadvantaged and pushed into submission in a particular UoA because of different embargo criteria.

14. Embargo periods for open access publications are not solely a matter of academic discipline, but also the way in which the publication is made open access and whether sufficient funds are available to pay for the Article Processing Charge at the point at which those funds are needed by the author.

15. **Embargo periods used by the REF must be consistent with those used by universities to meet Government expectations. Appropriate embargo periods are defined on a paper by paper basis, and not just discipline.**

16. We do have concerns that there have been inconsistencies in descriptors of embargoes between Government and RCUK which are confusing and there must be clarity from HEFCE on which embargoes apply.

17. We therefore recommend that, while shorter embargo periods can be a desirable aim, there must be sufficient flexibility to allow for instances where they are not achievable. We therefore believe there is merit in acceptable embargo periods of 12 months for STEM disciplines and 24 months for other disciplines in the arts, humanities and social sciences, with longer embargo periods in very exceptional circumstances. If there is
evidence that embargo periods are reducing, then they could be reviewed for future REF exercises.

18. The exception to this may be in many, but not all, fields within biomedicine, where there has been a longer practice of open access publication, supported with charitable and public funding and infrastructure both in the UK and the US.

19. Note that since implementation of the Government policy on Open Access, we have noticed some publishers have now introduced new, longer embargo periods, in particular for RCUK-funded authors. REF criteria must be able to take into account implications of a publisher amending its embargo policy mid-way through the assessment period, which may affect authors who have submitted for publication but have not yet been published.

20. Funders, including HEFCE, should support universities efforts to negotiate with publishers to ensure embargo periods are compliant with funders’ policies and that costs of compliance are not increased unreasonably.

Do you agree with the proposed requirements for appropriate licences?

21. REF should be open to all routes that allow reuse, including non-commercial reuse, share alike and other similar options as well as CC-BY and we therefore welcome that the proposed approach does not define specific licence compatibility.

22. However, we would have concerns if the criteria for REF eligible research outputs stipulates that they must have licences that allow re-use of text and data at this stage without allowance for exceptions where journals are not in step with UK policy. There is still some uncertainty about how quickly journals will move to suitable licences. This may be of particular concern in relation to international journals where there is less interest and pressure to comply with UK open access policy. Concerns have also been expressed that some licences applied to outputs deposited in institutional repositories may not permit text mining (for example, see the response of King’s College, London to HEFCE’s pre-consultation).

23. We welcome the Funding Councils’ proposal not to specify a particular form of licence in view of the dynamic nature of licensing in academic journals. We would suggest that this approach should be supplemented with some flexibility for exceptions as elsewhere in the proposals.

- We have an on-going concern that the price charged by publishers for Gold OA with a CC-BY licence may be greater than with other licences and further increase the financial burden on universities. This needs to be monitored carefully – in particular for the journals with highest international impact – to ensure the UK is not being disadvantaged.

- We also have concerns that some journals may not quickly move to offer a Gold OA CC-BY option, or may not do so at all and this would preclude researchers...
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.

**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?*

24. We agree that, for the present time, open access requirements should be restricted to journal articles and conference proceedings. In time, we expect new business models may emerge that allow for open access format in additional outputs, such as monographs and book chapters, but there is still work to be done for these models to be developed and established as the norm.

25. 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. However, it is too early to have confidence in the open access landscape for all outputs. We therefore support the approach to limit the criteria to journal articles and conference proceedings for the post-2014 REF.

26. Looking ahead, the Funding Councils could play a constructive role in encouraging new models to develop further, working closely with stakeholders in the arts humanities and social science disciplines in particular, for example, by providing financial support for pilot exercises.

**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 journals articles and conference proceedings?*

27. **We recommend a two-year exemption period from the start of the next REF as the absolute minimum.** In other words, there should be no open access requirement for outputs published before January 2016. However, an exemption period will cause further complexity and administrative burden for universities, particularly where submission, acceptance and publication of outputs straddle the cut-off date. It is therefore imperative that there is absolute clarity for authors on which outputs are eligible for inclusion in the UoA percentage benchmark.
**Question 6**

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

28. UK’s leading universities need to be open to people with first-rate academic qualifications to help us generate ideas and innovations so we can stay ahead in a fiercely competitive global knowledge economy. If we are to maintain the success of UK research excellence, then we must be able to attract the very best academics and researchers from around the world.

29. **There must be no barriers to academics who have worked outside the UK or as active researchers outside the higher education sector during the REF period.** We therefore support the proposal that only outputs listing a UK HEI in the address field should meet the criteria for inclusion in the open access target benchmark.

**Question 7**

*Which approach to allowing exceptions is preferable?*

30. We favour option B, an compliance percentage for open access publications submitted to the post-2014 REF, if the target is set at a realistic level.

31. Universities must be free to select research for submission to the REF using the quality of research, not where it is published, as the primary criteria. Case-by-case exceptions, as in Option A, would give a greater element of choice to universities. However, we have grave concerns about the additional burden that would inflict on universities.

32. The use of a benchmark, as proposed in Option B, that follows expectations for Open Access market development removes the need to create a complex justification and audit process around the exemption on a case-by-case basis (Option A). It places responsibility and decision-making on open access judgements in the hands of researchers and their institutions. In addition, it would demonstrate that the Funding Councils are truly sympathetic to particular disciplinary issues and that all research outputs from all disciplines will be treated equally.

*If selecting option b: Do you agree that the percentage target is appropriate?*

33. We have some concerns about whether the proposed percentage targets are achievable with the funds available to universities, and so we **recommend a benchmark closer to 60% of open access outputs submitted by an institution be considered for the post-2014 REF**. The Open Access market is still in flux at this point in time, and the rate of progress following the introduction of the Government’s Open Access Policy this April will not be known until RCUK can report on its monitoring on implementation of the
policy. It is imperative that the Funding Councils are not premature in determining a figure which may be unrealistic. The target could be reviewed for any future REF.

34. Evidence presented by Government at a panel discussion meeting with the Minister for Universities and Science on 12 February 2013 suggests that the proposed overall 70% target (or 60%-75% by UoA) may not be realistic in the medium-term:

“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.”

35. However, we would anticipate that this figure could be increased if more researchers were encouraged to make their publications open access through repositories as their publishers permit them to do.

Do you believe the percentage target should apply consistently or vary by REF main panel?

36. Variation by main REF panel is likely to be the most appropriate solution for the post-2014 REF, reflecting very different starting points in experience with open access between different disciplines. We suggest that the target range across the panels should reflect an overall average in the region of 60%.

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1 Economic analysis of cost of alternative options for open access in the UK – summary of modelling assumptions and findings, BIS, February 2013.