

HEFCE Consultation on Open Access in the post-2014 REF**Sussex Response****October 2013**

The consultation paper can be found at:

<http://www.hefce.ac.uk/pubs/year/2013/201316/name,82765,en.html>. The response options are generally on a five point scale from Strongly Agree to Strongly Disagree.

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)?

Agree.

Do you have any comments on this proposal?

Access through an institutional repository is acceptable, as this will support the use of subject repositories and other locations as the actual storage site.

The final peer-reviewed text is appropriate, and more likely to be acceptable to publishers.

We have some concerns about the third criterion, relating to licence conditions for access and re-use, because of the current state of play, especially in journals based outside the UK, where the policy drivers may not be as advanced.

We agree that outputs retrospectively made available should not be eligible. To do so would privilege institutions with larger available resources, and would encourage inappropriate behaviours by publishers, thus increasing the sector's spend with them, rather than helping to address the cost of scholarly communications to the sector.

Question 2

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

Agree.

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

Acceptance.

Do you have any comments on these proposals?

We are persuaded of the benefits of access at the point of acceptance. This has the benefit of enabling (slightly) earlier access. The downside might be a reduction in functionality in comparison to the publisher's final version, but this is not significant in this context. It also may be easier for institutions to capture and evidence information on the date of acceptance than on that of publication. As noted, institutional systems and processes are likely to have to be modified to meet this requirement, including data capture and, possibly, linking evidence of the publisher's acceptance directly to the output's record.

Others may be in favour of point of publication because they (institutionally) harvest publication information from publishers and other sources, rather than capture it directly. Such an approach would require a period after the nominal publication date, both to ensure that the article was actually available (i.e. that there was no administrative element of the scholarly communications process that caused an article not to be eligible), and that the relevant data is available to an institution to be able to capture and report. A period of three months might be required for this purpose.

Question 3

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

Agree.

Do you agree with the proposed requirements for appropriate licences?

Agree.

Do you have any comments on these proposals?

We support the alignment of requirements between REF and RCUK, in both embargo periods and licences. Commonality is more likely to lead to compliance than would a divergent position. However, we note that there will be substantive overlap between Council areas and Main Panels; e.g. ESRC-funded work in medical and public health areas.

We also express caution with respect to access terms, given their evolution, as noted. We support the principles, but would wish to see more explicit guidance, both for institutions and for publishers. Identifying no licence type(s) risks causing confusion for researchers, and we strongly recommend that the funding bodies address this as soon as is practical.

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?

Strongly Agree.

Do you have any comments on this proposal?

We support the proposals. If Open Access to long-form publications becomes practical and established within the timeframe of the next REF, the funding bodies may wish to consider introducing the requirement, with a suitable notice period.

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?

Agree.

Do you have any comments on this proposal?

We have some concerns about the two-year notice period, because of the lengthy cycle times in some subjects. If the mechanisms for dealing with exceptions are adequate, it should be acceptable. We note that the current RCUK timescale expects compliance by 2018; the proportion expected by the funding bodies in 2016 and 2017 should align with that of RCUK, who have not yet published their targets for that period.

The funding bodies should be clear about the definition of the date of publication. In particular, it is worth noting the difference between this and the date of acceptance, if that is used as the criterion for the date of access. It may be sensible to use the same date for both purposes.

An alternative approach would be to use submission date as the criterion, as that is independent of the publishing cycle time.

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?

Agree.

Do you have any comments on this proposal?

We believe that the circumstances relating to internationally co-authored work will be more frequent than "exceptional", and hence the flexibility to be provided will need to be sufficient. Analysis has shown that internationally co-authored outputs tend to be more highly regarded, and hence they are disproportionately likely to be selected.

Question 7

Which approach to allowing exceptions is preferable?

Option b.

If selecting option b:

- **Do you agree that the percentage targets are appropriate?**

Agree.

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

By REF Main Panel.

Do you have any comments on these proposals?

With respect to option (b), we believe that it is appropriate to have targets that apply based on the Main Panel, to reflect the differing subject and journal positions and practices. It also helps to mitigate against varying institutional subject profiles. We believe that 75% compliance should be possible for Panels A and B, but question how realistic are the targets for Panels C and D, given the current positions of those subjects. It would be unfortunate if the REF policies militated against publication of the UK's outputs in the best possible venues.

Experience of the current REF in relation to providing specific statements, e.g. in relation to specific outputs or individual circumstances, has been that this can prove to be an inordinate burden. As noted against question 6, we do not believe that this situation will arise in “exceptional” circumstances only. Indeed, in suggesting target compliance rates ranging from 60% to 70% under option (b), the funding bodies are illustrating that the requirement could apply to one in four (relevant) outputs. The burden on institutions, individual researchers, and those reviewing the statements is therefore non-negligible. In addition, as noted, option (a) contains a risk to institutions, which can be mitigated, but not eliminated.

We are not clear whether the targets would apply at the UoA level or at the Main Panel level for an institution, and also note that the percentage targets should only apply to (relevant) submitted outputs in 2016 or later, rather than to the submission as a whole or to all output types. Having targets at UoA submission level could, of course, create volatile calculations of compliance because the relevant population of outputs may be small in some UoAs.