

## Open Access and Submissions to the REF post-2014

### University of Sussex Response

25 March 2013

Thank you for the opportunity to contribute to the development of your consultation on open access publishing in the context of future Research Excellence Frameworks.

**We welcome advice on our expectations for open-access publications, as set out at paragraph 11.**

- i) We support the principle of open access publishing, and the benefits that it brings, to both academic and non-academic audiences. We are pleased to note the funding bodies' recognition (paragraph 8) that expectations need to be based on what is reasonably achievable and where open access applies. This allows for flexibility in response based on the form of output, the disciplinary development of approaches to OA, and the timescales involved.
- ii) With respect to the location, we can see an advantage in requiring the outputs to be available through the institution's repository, but question whether this might point to another location, such as a subject repository or publisher's site, where greater functionality of access, etc. might be provided. Whilst we recognise the funding bodies' desire to ensure long-term curation of the outputs, the wider benefits of open access will come from being able to use outputs in the highest functionality environment, which might not always be an institutional repository.
- iii) We agree that the form of the output should be at least the final peer reviewed text, and preferably the publisher's version of record. Again, the latter may allow greater use than the former version.
- iv) We also agree that the output should be in a form that enables search, re-use, text and data mining. We advocate that items are available on a CC-BY basis wherever possible, but recognise the issues facing learned societies and some subjects, and hence advise the funding bodies to consider allowing non-commercial and / or non-derivative licence options in certain circumstances. In noting this, we would observe that the nature of non-commercial re-use in an academic context might benefit from some exploration.
- v) We note the proposal not to allow retrospective conversion to OA (paragraph 12), and can understand the motivations. However, we hope that the funding bodies are therefore careful in determining (and announcing) the point at which this policy applies, to reflect what is reasonably achievable.
- vi) Continuing this theme, the introduction of this policy would have effects on all research outputs (of a form captured by the policy), including those where APC funds are not explicitly provided by the funders of the research (e.g. some charities, government, the EU, etc.). If these outputs are to be considered for submission in a future REF, they will have to be

published on a complaint basis, which, at present costs, will result in substantial costs being incurred by institutions, and/or constraints on where a researcher may be able to publish, which could have negative effects on them and their institution, in particular in a REF context. The economic and academic viability of doing so has to be a factor in the choice of effective date.

**We welcome further advice on repository use and on techniques for institutional repositories to cross-refer to subject and other repositories.**

- i) The wording of paragraphs 13 and 14 is more helpful than that in paragraph 11, on which we have already commented. Enabling a link-through from the institutional repository to another location provides a potentially more efficient mechanism. It also allows institutions to take account of various funders' requirements that outputs are lodged in subject repositories.
- ii) Having said this, we should also note that the technical approach to these matters is likely to have moved on considerably by the time of the next REF, and hence the nature of both institutional and subject repositories is likely to have changed, possibly significantly. The funding bodies should therefore not overly constrain themselves, or institutions, in the approach they take in this area.

**While we expect that sufficient clarity and reassurance on embargoes and licences will be achieved through the Research Council discussions, we welcome responses which address these issues.**

- i) We agree that it is sensible for the REF to use the same embargo requirements to the major research funders (noting the variations between the latter). However, there is still considerable debate within the relevant communities about these, and hence we caution the funding bodies to take a considered view, recognising the very different issues and concerns between disciplines. Whilst it may be possible to see a time in the future where all subject areas operate in a similar way, that is not where we currently sit, and the sector is unlikely to have fully converged by the time of the next REF. Whilst the most recent amendments to the RCUK policy and guidance are a step forward, they still hold substantial concerns and unnecessary constraints. We believe that the funding bodies should be actively involved in determining a standard, practical approach to embargo periods with RCUK, rather than awaiting the latter's conclusion. There is a danger (as in one or two other areas of policy) of the use of a singular approach based on the experience or practices of one subject area.
- ii) Paragraph 15 suggests determining the eligible periods based on practice "at the time". At which time is not clear – the time of the formal consultation, or at the time of the announcement of the REF, or at the next REF census date, or at the individual publication date?
- iii) We are relatively positive on the matter of licences (in relation to third party work), as we believe that this is resolvable, based on existing practice, and on guidance that is available from Creative Commons. However, some subjects will need further development work in this

area, and hence the funding bodies need to be mindful with respect to achieving compliance by a given date.

- iv) We are also concerned that the RCUK and the funding bodies are not paying sufficient attention to the international nature of the publication process, both in terms of the location of the outlet, and the inclusion of co-authors from outside the UK. Both of these will affect the ability of the UK author to select a compliant journal or to fund Gold OA. If the Councils and the funding bodies do not wish to damage the standing of UK research, they need to consider this aspect carefully.

**We welcome advice on the best approach to exceptions and on an appropriate notice period. Any cases made for exceptions should be underpinned by clear evidence.**

- i) Paragraph 17 acknowledges that we are in a transition period, but gives no indication of the funding bodies' view as to the possible length of that period. This is important in the context of when it is reasonable to expect all outputs to be OA (paragraph 8). The Research Councils have suggested that they are not expecting full compliance until the end of a five year period (i.e. 2018). Are the funding bodies considering a similar timescale, which is what is implied?
- ii) We are pleased that the funding bodies are prepared to consider possible exceptions, but also recognise the practicalities of implementation. We believe that it may be possible to identify some categories of material that should be exempt, monographs being perhaps the most obvious at the present time. We do not believe that operating on a case-by-case basis would be practical: it would add a substantial burden, lead to potential disputes, and raise a risk of exclusion of an item that has been submitted in good faith.
- iii) We are equally not supportive of a target proportion of outputs. That gives the impression of tokenism, but would also have a variable effect across disciplines, and thus also affect institutions in different ways, dependent on their subject mix. Following on from this, we do not believe that the policy should be applied differentially across subject areas, as that would undermine the funding bodies' policy and principles. It may also send an undesirable signal to government and others as to the sector's perception of the non-academic value of outputs from disciplines so treated.
- iv) Recent announcements in other countries, including that from the White House at the end of February, provide indications of a global move on the part of governments and funders. The pace and nature of such announcements may be a factor in considering the timescale over which compliance is expected, as well as the specific criteria. For example, the in-coming US requirement is, effectively, for a 12-month Green mandate, as opposed to the 6-month one required by RCUK. (It is worth noting that the federal humanities funding would not be affected by this requirement, because the level of spend is not sufficient.)
- v) In determining a date after which (relevant) outputs will have to be OA in order to be eligible for submission, the funding bodies will wish to consider whether to apply a single date across

all subject areas (easier to communicate, understand, implement and monitor) or to have staggered dates for different subject areas, based on their readiness. The latter has the advantage of promoting early adoption, but also holds the potential for complexity and confusion (in particular for interdisciplinary articles that might relate to subject areas with different requirements). In addition, the funding bodies would need to be aware of variations in readiness within subject areas. On balance, we suggest that a single date be applied, and that this should be the beginning of 2018, in line with the RCUK expected compliance date. Such a date would provide reasonable time for OA publishing developments to take place across all subject areas, for international developments to have taken place, and thus for the maximum engagement. It would also recognise the substantial backlogs in many leading journals, which have articles already reviewed and accepted but which will not appear until 2015.

- vi) The other factor to note in this is the potential cost burden of achieving compliant OA for all outputs that might be considered for submission (i.e. the population is not just those that are finally selected). If Green OA were not available, for whatever reason, institutions would be forced to use the Gold route. Whilst the Council has observed that QR funds can be used for such purposes, given current pressures on research funding it would not be sustainable for too large an amount to be diverted towards this area of policy, given the direct effects it would have on other, equally important, areas of research activity supported by those funds. Despite desires from institutional subscribers, it is unlikely that we will see a substantial reduction in journal subscription costs during the period under consideration, and hence the cost of Gold OA not met by relevant funders' allocations will be a direct burden on institutions.

**We seek comment on when it may be thought inappropriate to expect repository deposit of monograph text. Alternatively, given the percentage of submitted material which is in monograph form, we ask for advice on whether an expectation of a given percentage of compliance as described above (paragraph 18c) would eliminate the need for a special-case exception for monographs.**

- i) We believe that the sector is some way from a robust and applicable approach to OA for monographs and similar (noting the need to be clear about definitions). We do not believe that it would be appropriate to expect monographs, books or edited volumes to be OA, nor to use a percentage basis, as that could discriminate against a subject or institution that happened to operate in an area where there were few OA options available.
- ii) Creative works, such as biography, historical and cultural/political studies, are published on a commercial basis, and it is difficult to see the publishers of these being willing to accept an OA approach (or for authors and their institutions and funders being willing to accept the commensurate level of the APC). This form of work has non-academic "impact", which we should not seek to damage.
- iii) We would welcome support from the funding bodies to address this area more broadly, so that OA could be reliably applied to monographs, but do not doubt the complexities of doing

so.

**We invite comment on whether respondents feel this is the appropriate approach or whether they feel that sufficient progress has in fact been made to implement a requirement for open data as well. We will consider any representations that such a requirement may reasonably now be developed but would also need advice on how this might be achieved.**

- i) We agree that it is not appropriate at this time to include a requirement for access to underlying data or other materials. This should not exclude data being provided as an output in its own right, and valued as such. The funding bodies may wish to adopt the RCUK approach of requiring all relevant submitted outputs to include information on whether and how access to the data and material can be requested.

Contact Point: Dr Ian Carter  
Director of Research and Enterprise  
University of Sussex  
[i.carter@sussex.ac.uk](mailto:i.carter@sussex.ac.uk)  
01273 877718