

# Consultation on open access in the post-2014 Research Excellence Framework

## Introduction:

This document gives the ALT response to the current consultation on OA policy for the REF post 2014. The consultation document can be found at

<http://www.hefce.ac.uk/pubs/year/2013/201316/name,82765,en.html>

HEFCE had previously consulted on the wording of the consultation. Most of ALT's suggestions have been taken on board.

Overall our message is one of general approval for the direction and most of the detail. We suggest strongly however that any exceptions should be case by case rather than having percentage targets for each discipline/ set of disciplines. This would mean more work for the funders initially but should lead to a cleaner result faster. We also suggest that having large quantities of non-available work should have an effect on impact funds in a formulaic way.

## 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)?**

Yes

## Comments:

The proposal overall is good and when implemented properly and fully should work well.

As noted below it is best if the wording of the overall policy specifically refers to the accepted version of article. This should be time stamped with the date of acceptance, perhaps with some supporting evidence for that acceptance. (This will be of use to readers through the repository as well as the funders doing an audit).

## Question 2

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

Yes.

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

Deposit should be required at point of acceptance.

## Comments:

Many institutions already have institutional repositories, many of which are used for REF submission purposes that will do what is required including the ability to handle embargos, usually by offering a print version for cost.

Proper use of such a repository will make putting together a REF submission relatively easy thus reducing burden and indeed will allow institutions to have a “running REF” during the period of a REF cycle.

The point of acceptance is clearly defined at a time of some electronic journals moving to a continuous publication model but with issues defined (in which case the publication date is not always well defined).

The author and institution may not know the publication date when the paper is accepted. This means that sometimes things planned for a REF cycle may have to be abandoned if publication date is used. Acceptance is thus fairer for those planning their work between cycles.

There is however an initialisation problem which needs to be handled through the first REF post 2014. There is a danger that some things were accepted in 2013 but not published then and known not to be, which then take over 2 years to be published. These could potentially count in no REF cycle (see below).

Putting things into repositories early would help with impact, make material available earlier to others and is a good model to follow (not just for the funders).

Deposit should be made as soon after acceptance as is possible.

### **Question 3**

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

Yes.

**Do you agree with the proposed requirements for appropriate licences?**

Yes.

#### **Comments:**

It makes sense to vary the embargo period by REF main panel, provided that the deposit takes place as soon after acceptance as is reasonable and that there are other methods of getting access relatively quickly, albeit at cost. It would be good if such access could be initiated/ provided through the repository.

The license requirements do need to be sorted out as outlined. There could be some differences between main REF panels here too as for instance practice on repurposing may vary.

Detailed licensing should not become a “showstopper” for starting. Open Access itself implies a lot of attributes of the license. Some of the notice period can be used for the necessary discussions and decisions.

### **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?**

Yes.

**Comments:**

The proposal takes a pragmatic and workable approach of starting with the main area where open access will bring rewards. While other things may come subsequently, the initial thrust has to be reviewed journal and conference articles.

Monographs are not always written primarily for research purposes and big data brings with it too many difficult issues which need to be settled before proceeding.

The problems with other types of artefact such as computer software are potentially even greater.

**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?**

Probably

**Comments:**

There are, as noted above, some initialisation problems arising from articles that were accepted before the end of 2013 but published subsequently. Unfortunately two years may not cover all of these (but will cover most). There are further problems with things submitted before the end of 2013 but not accepted for a very long time. Again these will be few in number and should be handled through special case regulations rather than holding up the process.

There is a separate problem of institutions setting up the necessary infrastructure of repositories and other infrastructure. Finally there is the problem of journals changing and of individual authors adapting to the new rules and in some cases perhaps shifting their publishing habits.

Given the current state of institutional repositories the infrastructure should be capable of being sorted in well under 2 years - perhaps 12 months or at most 18. Jisc could have a role in helping those institutions who are deficient for compliance through making available support and guidance and perhaps deals for specific products.

Journals are moving at a considerable rate and firm action now would help with that process in the UK. Similar things are happening in other countries including the USA.

Moving individual academics into a culture of Open Access could happen quickly if there is an incentive in doing it. This may be an area in which principles will disappear rapidly given a small financial gain.

The initialisation factors are best handled through the case by case exception mechanism. If one knew that for instance an article was submitted in 2011 but only accepted in 2017 then that would presumably be a good reason for successful special pleading. Thus no notice period is required for this.

Thus a shorter notice period could be made to work but no shorter than 12 months for everything except changing the habits of journals and authors. The speed of this will depend

on other actions (see below) but is more likely to happen slowly in some disciplines. Whatever period is chosen there will be special cases and complaints.

Thus while a shorter period would be preferable, there is logic in starting at the beginning of a calendar year say 2016. However that date needs to be announced soon and fixed as a date, rather than be a function of when any detailed argument stops. In any case those institutions and academics who are able to move early should be encouraged by some form of incentivisation.

## **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?**

Not entirely

Some problems arise essentially because in this part of the REF the institution is rewarded but the individual assessed - it would be much cleaner in this area to assess precisely the output of the institution over the period. This however is a much bigger issue than this consultation.

Thus, given algorithm used ("goals move with players"), while one wants to agree with this question in the way it is expressed, there are resultant problems of game playing and unforeseen consequences which need thinking through.

For example, does it mean that a joint addressed author can avoid the OA requirement if (s)he choose to publish under the non UK address? If so will it harm the fraction of world research attributed to the UK in a given discipline? Thus, while the single address field may be easiest to search, more work is necessary to avoid the game playing.

One way of avoiding too much game playing is to use an algorithm to discount the impact fund for the institution or subject area in the light of the percentage of publications not sourced at the institution.

The underlying problem is how to address fairly the case of authors genuinely moving between countries and in/out UK academia. The best way to deal with this is may be to use the exception mechanism. In principle one wants each researcher in a UK institution depositing the output in the relevant repository when it is accepted. An arriving author could deposit anything that is permitted in the repository and this could be covered by "as soon as possible after acceptance" (for that repository), with an arrival date and the acceptance date noted. This might also address the problems of those moving within the UK leaving the original institution with no incentive to maintain the repository entries effectively.

## **Question 7**

**Which approach to allowing exceptions is preferable?**

**If option b) (percentages of exceptions) are the percentages appropriate?**

**If option b) should percentages to be absolute or by main panel area?**

Option a (Case by case exceptions rather than a fixed percentage)

Percentages ( typically 70%) far too low

Subject area.

**Comments:**

It is best for the UK and the public interest to have mechanisms that cause institutions to maximise the material available through the repository mechanism. Given that embargo periods are allowed, there is little reason to have many exceptions that cannot be handled on a case by case basis.

Suitable choice of words for the definition of when something is deposited may make the main body of exceptions, those arising from mobility, fairly standard or non- exceptional.

The percentages proposed for the alternative scheme b) are in any case exceptionally low given that many outputs are already not covered and presumably they would be outside the percentages as they conform to the policy ( monograms etc.). If it were adopted, option b) potentially encourages institutions to play down to the limit in a variety of ways, many of them undesirable for the UK as a whole. It also fails to recognise the possibility of a distinctive institution in a given area. There will thus still need to be special cases.

One way to handle this might be to use the percentage achieved in some way to potentially affect the funding that an institution might get following the REF (the percentage as a crude multiplier of impact funds would have a strong effect). This would reflect a lower impact as a result of not informing the public etc.

It is probably sufficient to say that funding councils may consider such things when it comes to funding decisions. This technique might also be used to minimise special cases thus reducing load on the funders.