

July 2013/16

Policy development

Consultation

This document sets out proposals for implementing an open access requirement in the post-2014 Research Excellence Framework.

Responses to this consultation should be made online by **1700 on 30 October 2013**

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

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| To | Heads of HEFCE-funded higher education institutions Heads of HEFCW-funded higher education institutions Heads of SFC-funded institutions Heads of universities in Northern Ireland |
| Of interest to those responsible for | Research management and administration, Library and information management |
| Reference | 2013/16 |
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| Enquiries to | Research policy team, e-mail openaccess@hefce.ac.uk , tel 0117 931 7470 |

Executive summary

Purpose

1. This document sets out proposals for the implementation of an open access requirement in the post-2014 Research Excellence Framework (REF).

Key points

2. Following an informal consultation on open access in the post-2014 REF, in which the four UK higher education funding bodies sought advice on an initial view, we have developed full proposals for the implementation of an open access requirement in the post-2014 REF. These proposals have been informed by the advice we received through the informal consultation process.

3. This consultation seeks comments on the proposed criteria for open access in the post-2014 REF, the definition of the research outputs to which the criteria will apply, and the proposed approaches to allowing exceptions from the open access requirement.

4. We invite responses from higher education institutions and other groups, organisations and individuals with an interest in scholarly publishing and research.

Action required

5. Responses to this consultation should be made online by **1700 on 30 October 2013**, using the electronic response form which can be accessed alongside this document at www.hefce.ac.uk/pubs/year/2013/201316/ (see paragraph 14).

Introduction

Background

6. The landscape of scholarly publishing is in a period of transition. New technology has opened up significant new modes of academic discourse and possibilities for sharing research findings. The desirable situation where all outputs from publicly funded research are freely available on first publication ('open access') is now within reach, and 'delayed open access', where the material is available after a short embargo period, is commonplace.

7. In the past year there have been significant moves by governments and funders of research, nationally and internationally, to encourage the transition of scholarly publishing towards open access. These moves have created discussion and debate about the mechanisms and effects of the transition, but it is clear that the principle of open access has wide support.

8. In February 2013, HEFCE published a letter (hereafter 'February letter') seeking advice on the developing intentions for open access policy of the four UK higher education (HE) funding bodies (hereafter 'funding bodies')¹. At the same time, the other three UK HE funding bodies also wrote to their institutions in similar terms. In that letter, we set out our commitment to the principle of open access, our view of the potential benefits it will deliver, and an overview of the definitions and context for open access (February letter, paragraphs 1 to 4). We also set out our initial proposals for implementing a requirement that all outputs submitted to the post-2014 Research Excellence Framework (REF) exercise be published on an open-access basis, and invited respondents to provide advice on the detailed aspects of this requirement to inform our consultation proposals.

9. HEFCE received over 260 direct responses to our letter from a wide range of higher education institutions (HEIs) in England and Scotland, organisations, groups and individuals with interests in research and scholarly publishing. The HE funding bodies in Wales and Northern Ireland provided HEFCE with a summary of the views expressed by their institutions. All of this advice was reviewed and analysed to inform the development of our consultation proposals during April and May 2013. HEFCE will publish an analysis of the advice received².

Consultation proposals

10. This consultation invites views on the funding bodies' proposals for implementing an open access requirement in the post-2014 REF. The proposals have been developed following full consideration of the advice we received in response to the February letter. **The proposals have no relevance to the 2014 REF.**

11. In developing these proposals, we have made a number of assumptions about aspects of the next REF that have not yet been formally decided. This has been necessary in order to provide due notice to the HE sector on the policy requirement. The main assumption is that there will be a post-2014 REF that operates, substantially, on the same basis as the 2014 REF. For example, it is our assumption in this document that there will be four main panels with disciplinary remits broadly similar to those of the current REF main panels.

¹ The four UK higher education funding bodies are: the Department for Employment and Learning, Northern Ireland, the Higher Education Funding Council for England (HEFCE), the Higher Education Funding Council for Wales, and the Scottish Funding Council. The letter is available on the HEFCE web-site under 'Open access and submission of outputs to a post-2014 REF' at www.hefce.ac.uk/whatwedo/rsrch/rinfrastruct/openaccess/.

² Also to be made available at www.hefce.ac.uk/whatwedo/rsrch/rinfrastruct/openaccess/.

12. The outcomes from this consultation will inform the final policy decisions of the funding bodies on implementing an open access requirement in the post-2014 REF. It is our intention to announce the policy decisions early in 2014.

Responding to the consultation

13. A summary of questions is available in Annex A. Responses to this consultation are invited from any organisation, group or individual with an interest in research or scholarly publishing. All responses received by the deadline will be considered.

14. Responses should be made online, using the form provided alongside this document. **The deadline for responses is 1700 on 30 October 2013.** Following the deadline, HEFCE will copy responses from:

- institutions in Scotland to the Scottish Funding Council
- institutions in Wales to the Higher Education Funding Council for Wales
- institutions in Northern Ireland to Department for Employment and Learning.

15. We will be holding a number of consultation events for HEIs in the autumn. The events will outline the proposals and provide an opportunity for institutions to raise any issues for clarification and discussion. Registration will be available online, using the form provided alongside this document. HEIs across the UK may register up to two delegates each for these events.

Next steps

16. The responses to this consultation will be considered by the boards (or equivalent) of the funding bodies early in 2014. The final policy decisions on open access in the post-2014 REF will be announced shortly thereafter.

17. We will commit to read, record and analyse the views of every response to this consultation in a consistent manner. For reasons of practicality, usually a fair and balanced summary of responses rather than the individual responses themselves will inform any decision made. In most cases the merit of the arguments made is likely to be given more weight than the number of times the same point is made. Responses from organisations or representative bodies which have high relevance or interest in the area under consultation, or are likely to be affected most by the proposals, are likely to carry more weight than those with little or none.

18. We will publish an analysis of the consultation responses and an explanation of how the responses were considered in our subsequent decision. We may publish individual responses to the consultation within the summary. Where we have not been able to respond to a significant and material issue raised, we will usually explain the reasons for this.

19. Additionally, all responses may be disclosed on request, under the terms of the Freedom of Information Act. The act gives a public right of access to any information held by a public authority, in this case HEFCE. This includes information provided in response to a consultation. We have a responsibility to decide whether any responses, including information about your identity, should be made public or treated as confidential. We can refuse to disclose information only in exceptional circumstances. This means that responses to this consultation are unlikely to be treated as confidential except in very particular circumstances. For further information about the act see the Information Commissioner's Office website, www.ico.gov.uk.

Section 1: Overview of proposals

The funding bodies propose the following criteria for open access.

- a. Outputs should be accessible through a UK HEI repository, immediately upon either acceptance or publication (see paragraph 29), though the repository may provide access in a way that respects agreed embargo periods.
- b. Outputs should be made available as the final peer-reviewed text, though not necessarily identical to the publisher's edited and formatted version.
- c. Outputs should be presented in a form allowing the reader to search for and re-use content (including by download and for text-mining), both manually and using automated tools, provided such re-use is subject to proper attribution under appropriate licensing.

We propose that outputs fulfilling the following definition must meet these criteria to be eligible for submission to the post-2014 REF.

- a. The output is a journal article or conference proceeding.
- b. The output is published after a two-year notice period (from 2016 onwards).
- c. The output lists a UK HEI in the 'address' field.

We are seeking views on which of the following approaches to exceptions would be most appropriate:

- universal compliance of outputs meeting the definition, with exceptions on a case-by-case basis
- a specified percentage for compliance.

Section 2: Open access policy for the post-2014 REF

Policy requirement

20. As we have previously made clear, the established policy of the four funding bodies is that the outputs from all research supported through our funding should be as widely and freely accessible as the available channels for dissemination permit. To support and encourage the further implementation of open access, we intend to introduce a requirement that all outputs submitted to the post-2014 Research Excellence Framework that meet the definition proposed in paragraph 41, be published on an open-access basis according to the criteria set out at paragraph 25.

21. In our February letter seeking advice, we set out our proposal 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 assessment³. This position received widespread support in the responses made to our letter. It remains part of our policy, in recognition that the transition to full open access will occur over time.

22. Our objective in introducing an open access requirement is to increase considerably the proportion of research outputs which are published in open-access form. This objective is aligned with the Government's aim of increasing transparency, and is being developed in the context of international moves towards increased open access⁴. We have listened to compelling arguments to the effect that mandates will play a central role in achieving open access. The advice we received demonstrated widespread support for the principles of open access, and a number of respondents expressed their broad contentment with the policy approach we outlined. It is our view that introducing an open access requirement will enable us to achieve our objective, in tandem with other major research funders nationally and internationally, and will help to deliver the widely-perceived benefits of open access for UK research.

23. We recognise the concerns that have been raised about the potential effect of a mandate on the quality of UK research. In response to these concerns, we are consulting on an appropriate approach to allowing exceptions during this period of transition, including the option of a percentage-based approach to compliance that would allow HEIs flexibility in preparing a submission to the post-2014 REF.

Criteria for open access

24. The criteria outlined in our February letter were considered broadly acceptable in the advice we received, subject to some further issues which are discussed below.

25. The funding bodies therefore propose to treat as 'open access' outputs which fulfil all of the following criteria:

- accessible through a UK HEI repository, immediately upon either acceptance or

³ For an explanation of these routes, see our February letter (paragraph 4).

⁴ For example, see 'Open access guidelines for researchers funded by the ERC' (June, 2012, available online at http://erc.europa.eu/press_release/open-access-guidelines-researchers-funded-erc); 'Principles for the transition to open access to research publications' (April, 2013, available online at www.scienceeurope.org/downloads); 'Action plan towards open access to publications' (May, 2013, available online at www.openaire.eu/en/component/content/article/9-news-events/460-action-plan-towards-open-access-publications-global-research-council); 'Expanding public access to the results of federally funded research' (February, 2013, available online at www.whitehouse.gov/blog/2013/02/22/expanding-public-access-results-federally-funded-research).

publication (to be decided, as outlined in paragraph 29), although the repository may provide access in a way that respects agreed embargo periods⁵

- made available as the final peer-reviewed text, though not necessarily identical to the publisher's edited and formatted version
- presented in a form allowing the reader to search for and re-use content (including by download and for text-mining), both manually and using automated tools, provided such re-use is subject to proper attribution under appropriate licensing.

26. It remains our intention that work which has been originally published in an ineligible form then retrospectively made available in time for the post-2014 REF submission date, should not be eligible, as the primary objective of this proposal is to stimulate immediate open-access publication. There were two particular concerns raised in the advice about this aspect of the requirement:

- a. This would negatively impact upon staff moving into UK HE with outputs that were submitted for publication before the requirement could have applied to them.
- b. Given that we are in a transition period, it would not be feasible to expect full compliance at an early stage with the criteria.

27. We have taken steps to address these concerns in the proposals, as outlined in paragraphs 54 and 58.

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)?

Do you have any comments on this proposal?

Institutional repositories

28. We received significant support for the role outlined for institutional repositories in our February letter. In the criteria outlined above, we have taken account of concerns about duplicating the deposit of outputs, especially in view of the role of subject repositories in some disciplines, by proposing that outputs should be 'accessible through' institutional repositories. We have also noted concerns about staff mobility and collaboration issues arising from our previous intention that outputs be deposited in the repository of the submitting institution. We have amended the criteria to reflect that the output need only be accessible through the institutional repository of the HEI at which the author (or one of the authors) is employed at the time of either acceptance or publication.

29. In terms of meeting our policy objective, our requirement is that outputs are made accessible through institutional repositories at the point of publication. We would, however, like to ensure that the point at which outputs are made accessible reflects existing practice in the sector, where possible. We also wish to make the process of compliance as simple as possible for authors and HEIs, and have received advice that the point of acceptance would be more suitable. Therefore we are seeking views on whether it is preferable for the criteria to state that

⁵ Embargo periods refer to delayed access to the full text of the output.

the point at which outputs are made accessible (respecting any embargo periods) through institutional repositories should be acceptance for publication, or publication itself.

30. The advice we received suggested that institutional repositories are in a varied state of readiness to implement these criteria, and that some HEIs already benefit from shared repositories. It is our intention that outputs accessible through shared facilities maintained by HEIs that do not have their own institutional repositories would meet the criteria set out at paragraph 25.

31. The funding bodies will be working with various partners in the research information sector to review the technical development requirements that will be needed for institutional repositories to meet the criteria. We also envisage that the REF submission system will be developed with the maximum interoperable capability that can be achieved.

Question 2

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

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

Do you have any comments on these proposals?

Embargo periods and licensing

32. We propose that embargo periods are aligned with the Research Councils' open access policy, and those endorsed by Government⁶. We propose that the REF main panels will follow the embargo period set by the appropriate Research Council. This assumes that research in the medical, life and natural sciences, and engineering is broadly covered by main panels A and B; research in the social sciences, humanities and arts by main panels C and D.

33. We recognise that there are a number of issues to be clarified with respect to identifying appropriate licences for open-access research publications. HEFCE is working with other key stakeholders to address these issues, and will continue to strive for clarity and simplicity where possible.

34. For the post-2014 REF, we propose to accept as eligible those outputs that are published with licences enabling the third point of the criteria in paragraph 25 to be met. We do not propose to specify a particular form of licence, in view of the as yet unresolved issues, and in recognition of the likely ongoing developments in this area.

Question 3

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

Do you agree with the proposed requirements for appropriate licences?

Do you have any comments on these proposals?

⁶ See section 3.6, 'Embargo Periods' in 'Research Councils UK policy on open access and supporting guidance', available at www.rcuk.ac.uk/research/Pages/outputs.aspx

Flexibility and review

35. The funding bodies recognise that researchers and HEIs require clarity about the requirements for the next REF, given the length of publication cycles and that the next REF publication period will start on 1 January 2014. For this reason we are seeking to confirm the key aspects of our policy on open access, including a sufficient notice period to enable researchers to comply (see paragraph 54).

36. However, we are aware that there are still gaps in the evidence base on open access, and that the landscape is evolving. Some of the advice we received highlighted the early stage at which our policy is being introduced, and the fact that it cannot take into account planned future reviews of open access policy by the Research Councils.

37. In developing our policy proposals, we have borne in mind the balance between allowing sufficient flexibility and providing the sector with certainty about what will be required. It is our view that our policy expectations embody the principles of open access, which are widely articulated and agreed upon and will not be the subject of review. The mechanisms for open access, which is what the planned reviews will consider, have been incorporated into our proposals in as flexible a way as is possible to provide a sufficient level of certainty to the sector. For example, we have expressed no preference for the route by which outputs are made open access, and have not set a requirement for a specific licence type (see paragraphs 21 and 34).

38. We understand the concerns that have been raised about the potential for inequality in the distribution of funds for publication within HEIs. While we expect HEIs to have, or begin developing, robust policies and procedures governing the allocation of publication funds, we also recognise that managing this is the responsibility of autonomous institutions. We expect, however, that the evidence of support for equality and diversity requested in the research environment template will be extended to include open access policies in the post-2014 REF.

Open data

39. Significant support for the principle of open data was expressed in the advice we received in response to our letter, as well as information about challenges and issues that will need further consideration. We remain committed to exploring the issues and working in partnership with other interested parties to address them.

40. In the meantime, we retain our original position that we do not consider it feasible at present to make access to data a formal requirement in a post-2014 REF. This position was supported in the advice we received from the overwhelming majority of respondents.

Section 3: Definition of outputs to which the criteria will apply

41. Following the advice received, and in view of the open access policies of other major funders, the funding bodies propose that the requirement to comply with the open access criteria in the post-2014 REF applies to outputs meeting the following definition:

- the output is a journal article or conference proceeding
- the output is published after a two year notice period (from 2016 onwards)

- the output lists a UK HEI in the 'address' field.

Type of output

42. In the February letter, the funding bodies set out our view that the open access requirements should apply to those outputs in media where the concept of 'open access' applies for which open access is reasonably achievable. We also sought advice on an appropriate approach to exceptions from the requirements.

43. There was widespread concern voiced in the advice we received about the extent to which open access is reasonably achievable and applicable for certain types of output, including monographs.

44. The funding bodies recognise the transitional nature of the move to open access, and consider that the journey is best supported by achieving a balance between meeting our objective, allowing new models and recognising the transitional nature of the journey. Furthermore, we are keen to ensure our policy is aligned with those of other major funders. In view of these considerations, therefore, we propose that for the next REF, the requirement to comply with the criteria for open access will apply only to the types of output for which it is widely felt that open access is reasonably achievable, and for which there are existing requirements in place from other funders – that is, journal articles and conference proceedings.

Journal articles and conference proceedings

45. We propose that the criteria for open access in the post-2014 REF will apply to outputs defined as articles in academic journals or conference proceedings, and which also meet the remaining points of the definition in paragraph 41.

Monographs and books

46. The advice we received on monographs and other book-length publications (for example, edited books) emphasised the very early stage of development of open access options for these types of publication. The majority view in the advice we received is that monographs should not be subject to the requirements for the next REF.

47. The funding bodies accept that it is currently not reasonable to expect open access options to be widely available for long-form publications, and recognise the differences that exist between these publications and journal articles in terms of business models and publication cycles. Therefore we do not intend for the open access requirements to apply to monographs and books for the post-2014 REF.

48. We recognise the value that long-form publications hold in some disciplines. We are therefore committed to working with the research and academic publishing sectors on developing a long-term approach to extending the benefits of open access publication to these output types.

49. It is our view that there will be significant development in open access options for monographs and books in the coming years. We support the moves made by the Wellcome Trust to extend its open access policy to monographs, and look forward to seeing the developments in suitable models that this will surely encourage. HEFCE, in partnership with the Arts and Humanities Research Council and the Economic and Social Research Council, is now working to gather evidence on open access publishing models for monographs, and to explore possible avenues for future development in this area. Further detail of this work is attached at Annex B.

50. In view of our expectation that open access publication for monographs and books is likely to be achievable in the long term, we would like to make clear our intention to extend the requirement to these output types in the future, but not in the period being addressed by this consultation.

Other text and non-text outputs

51. We recognise that open-access publication will not be appropriate for some output types, for example those delivered confidentially for security or commercial reasons. The research assessment process has established practices for handling this sort of material, and it is not our intention that the criteria will apply to these outputs.

52. The funding bodies recognise that there are further issues to be considered in relation to the concept of open access for non-text outputs, including those arising from creative and practice-based research. We do believe, however, that the benefits of open access should be extended to research in all disciplines, and look forward to working with the relevant groups to explore the issues.

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?

Do you have any comments on this proposal?

Notice period

53. We previously sought advice on an appropriate period to take account of publication cycles, which will allow outputs that were submitted for publication before the policy announcement and do not meet the criteria to reach publication and remain eligible for submission to the REF. From the advice we received, it is our view 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.

54. We therefore propose that the criteria for open access will apply to outputs published after the two year notice period which will follow the policy announcement. Where an output has more than one publication date, for example online first, the earliest date of publication will determine whether the criteria apply. This is likely to mean that the requirement will start to apply to outputs with an earliest date of publication in or after early 2016, and which also meet the other two points of the definition in paragraph 41.

55. We recognise that there are likely to be exceptional cases where outputs are submitted for publication before the policy announcement, but take longer than two years to reach publication. Paragraph 63 sets out two approaches to exceptions that we consider will allow such outputs to be listed in submissions to the post-2014 REF.

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?

Do you have any comments on this proposal?

Publication address field

56. In the advice we received, a significant number of concerns were raised about the effect of our proposed policy upon staff mobility. In particular, there were questions about the ability to comply of researchers who publish before a move into UK HE, whether from industry, from outside the UK, or from independent research.

57. The funding bodies fully recognise the benefits for society and HE that are brought by the productive sharing of knowledge through researcher mobility. We are keen to facilitate this where possible, and do not wish to create barriers for researchers moving into UK HE.

58. In view of these intentions, and the advice we received, we consider that the requirement should apply only to those outputs which are authored (in whole or in part) by a researcher employed at a UK HEI at the time of the output's submission for publication. Therefore, we propose that the criteria for open access apply to outputs that list a UK HEI in the 'address' field, as the most appropriate approach to determining employment within UK HE at the time of the output's submission.

59. As set out in paragraph 22, our policy objective is to increase the proportion of open access publications. In line with this objective, the third point of the definition will bring outputs arising from international collaboration into the scope of the requirement. We recognise, however, that in exceptional circumstances it may not be possible for UK researchers to meet the open access criteria with an output arising from international collaboration; for example, if an output has one UK-based author among a large number of internationally-based authors who are not required to publish on an open access basis. In these exceptional circumstances, we expect that our proposed approaches to exceptions (see paragraph 63) will enable such outputs to remain eligible for the REF.

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?

Do you have any comments on this proposal?

Section 4: Exceptions

60. For the post-2014 REF only, the funding bodies are proposing a narrower definition of outputs to which the criteria will apply than we originally indicated in our February letter. This is in view of the advice received, the policies set by other funders, and our desire to find a workable balance between achieving our objective and recognising the transitional nature of the journey.

61. Consequently, given the boundaries of our proposed definition, we expect that HEIs should find compliance broadly achievable. Furthermore, we note concerns raised in the advice about the potential burden for HEIs in managing various approaches to exceptions when making a REF submission.

62. However, we note that concerns have also been raised about the effect of compliance on the ability of researchers to publish in journals that do not yet provide open access-options that

would meet the criteria, or in collaboration with researchers (including those working in an international or non-HE context) to whom the policy would not apply.

63. The funding bodies would like to set out a policy on exceptions that is sensitive to concerns about burden and about the effect upon academic publishing. We have identified two alternatives to managing exceptions that we are seeking views upon, to determine which approach is preferable to HEIs.

a. Full compliance with the criteria (for those outputs meeting the definition at paragraph 41). This would include an option for exceptions on a case-by-case basis, in **exceptional** circumstances. We envisage that, in practical terms, this would involve providing a short statement with the output at the time of submission. We would need to consider whether sub-panels would be asked to adjudicate, or whether a central group or the REF team would do so. We consider that this approach may introduce a lesser burden on HEIs than a percentage-based approach; however, it would include an element of risk in the submission, and is likely to demand a higher level of compliance for outputs within scope across all Units of Assessment (UoAs).

b. A percentage-based approach to compliance with the policy, according to which a specified percentage of outputs in a submission (meeting the definition at paragraph 41) would be required to meet the criteria for open access. The proposed percentage targets set out below were determined through reference to the compliance expectations of other funders and estimates of the proportion of project-funded research by discipline. As shown below, given the variance in the percentage targets using this method, it is feasible that different main panels might have different expectations. We welcome views on whether variance or consistency is preferred. It is our view that a percentage-based approach would allow more flexibility during the transition to open access, but we are aware that it may be challenging on a practical level for HEIs to manage during submission preparation.

Either consistent target across all UOAs for outputs within scope

| | |
|----------------------------------|-----|
| Percentage target for compliance | 70% |
|----------------------------------|-----|

Or varying targets by main panel for outputs within scope

| Main Panel | A | B | C | D |
|----------------------------------|-----|-----|-----|-----|
| Percentage target for compliance | 75% | 75% | 70% | 60% |

Question 7

Which approach to allowing exceptions is preferable?

If selecting option b:

- Do you agree that the percentage targets are appropriate?
- Do you believe the percentage target should apply consistently or vary by REF main panel?

Do you have any comments on these proposals?

Annex A

Consultation questions

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)?

Disagree

Do you have any comments on this proposal?

The Royal Geographical Society (with IBG) welcomes the scope of the proposals and the manner in which the consultation has been handled.

We disagree with the criteria because we feel that the wording needs to be clarified and assurances given, as set out below. Subject to that clarification taking place, we agree with the three themes of the criteria.

We would urge a rephrasing of the first criteria which is unnecessarily ambiguous, and probably unintentionally so (given the clearer statement in paragraph 29). It is important that the repositories are aligned with the agreed embargo periods in terms of access to the final peer reviewed text, otherwise green embargos have no meaning. However, as currently worded the statement could be read to mean that UK HEI repositories may choose not to respect green embargo periods.

If the third criteria can only be delivered through a CC-BY licence, we do not support it; however if the third criteria can be met with more restrictive licenses, including CC-BY-NC-ND then we agree with the statement. We urge you please to clarify this as considerable confusion appears to exist across the sector regarding this point.

We believe it right that the outputs be made available as the final peer-reviewed text and not as the publisher's edited and formatted version.

Question 2

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

Agree

While this is primarily a matter for HEIs to respond to HEFCE upon, some disciplines will be well served also by subject repositories. Thus, Learned Societies as well as HEIs should be involved in these discussions and the development of advice to ensure users and disciplines as well as funders and universities are appropriately served.

We do remain concerned that there is an inadequate appreciation of the resources needed to develop and maintain repositories and the future-proofing required to ensure a sustainable legacy archive of scholarly outputs. There is potential for the extensive duplication of repository provision, which could see costs escalate. HEFCE should use this juncture to consider the full implications of separate institutional repositories before moving forward.

It is also likely that confusion about different versions of publications and data sets will emerge due to the multiplicity of repositories and the mobility of authors who may deposit research in a number of institutional repositories worldwide. Appropriate kite-marking and author ID initiatives (e.g. CrossMark, ORCID) should be explored fully.

There are widespread misunderstandings throughout the HE sector in terms of copyright and usage licences so institutions will need to be capable of providing advice to authors on an individual basis, another burden.

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

The RGS-IBG is strongly of the view that outputs should be made available through institutional repositories (IRs) at the point of publication (for Gold OA) or, in the case of articles subject to green embargos, on completion of the agreed period of embargo from the point of publication. Further clarification with respect to articles subject to green embargos would be helpful; specifically to make it clear that deposit of the basic information (author, title and place of publication, date and duration of embargo) should take place on publication, with the full article to be released after the agreed embargo period.

There are at least three practical reasons for our preference for point of publication:

1. Deposit prior to publication would mean that those articles published Gold would lose the advantage of having only one, final version out in the world as authors would have to archive their non-publisher PDFs.
2. Licence type is agreed after acceptance in many cases and the listing or archiving in the IR will require the licence to be specified. Likewise, third party copyright agreements are often negotiated between acceptance and publication.
3. Many publishers' copyright agreements state that authors must include a link to the final published version; this is only available on publication.

Question 3

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

Disagree

Do you agree with the proposed requirements for appropriate licences?

Agree

Do you have any comments on these proposals?

1. While the use of REF main panels provides a simple approach that does accommodate broad differences across the sciences, social sciences and humanities, there are disciplines that do not follow these patterns. Mathematics is a clear example where

usage and citation half-lives are more akin to those in HSS disciplines. Disciplines vary within REF main panel definitions and the proposed embargo periods should be set at sub-panel level, but within an overall framework of embargo length policy.

2. Given the nature of Geography and the variety of institutional contexts (departments/schools) in which the subject finds itself in UK HEIs, we expect that there will be a number of cross-referrals between sub-panels in different main panels (B7 and C17 in REF 2014). Some human Geography will be returned to B7 and referred to C17. This raises questions about appropriate embargo periods and compliance rates.
3. We believe it vitally important that HEFCE has its own policies regarding embargo periods. HEFCE policies will impact much more fully on the research community than RCUK policies. Furthermore, there is still much dispute and concern over RCUK policy (which sets a maximum of 6 and 12 month embargos in STEM and HSS respectively), a concern that has been temporarily assuaged for many (but not all disciplines) by the longer embargo periods that are allowed during the transition period where funding for APCs is unavailable to an author.
4. By having its own policy, HEFCE is enabled to take a leading, independent role in finding the appropriate balance between open access, excellence and the sustainability of the UK's leading journals.
5. We believe it right for HEFCE to reserve its position at this point in time on licensing, since this area needs more consideration. As a point of principle, we strongly recommend that, in whatever form, non-commercial and non-derivative licences be permitted in both Gold and Green routes to open access in order to protect academic integrity against careless, arbitrary or subversive reuse of research findings. Additionally, we do not support external commercial operations (especially non-UK ones) raising revenues on the back of freely available and publicly funded research.

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 believe it is inappropriate to expect repository of monograph text and strongly support its own special-case exception. The output of monographs varies significantly across disciplines (and sub-disciplines) and the balance of those disciplines varies across institutions. Without a blanket exception, this will be a very uneven burden across institutions.

The issue of monographs also needs to be thought about broadly to consider edited volumes and book chapters.

Some clarity would be welcome on whether monographs are wholly exempt from the percentage compliance rates or whether monographs, as non OA publications, are expected to be included within the percentage non-compliant submissions to REF post 2014.

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?

Disagree. We would suggest a notice period of three years, 2017.

Do you have any comments on this proposal?

Some journals in geography have long publication pipelines, in excess of two years, so articles to be published after the 2016 deadline may already have been accepted.

An alternative approach would be to reduce the proposed percentage compliance rate so that papers already submitted to journals with long pipelines can readily be included within the allowable percentages of non-compliance.

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?

It would not be appropriate to require academics coming into the UK to have met open access requirements whilst working in a setting that may not have supported (nor required) open access publication.

There remains ambiguity, however, in relation to those who are not employed by an institution but have an unpaid affiliation to it. This could disproportionately affect certain groups – for example Early Career Researchers.

Additional points of detail: The wording of this issue is confused throughout the consultation document. The summary page suggests only those articles with a UK HEI in the address field can be submitted to REF (not that submissions to REF only have to be OA under this condition). In addition, paragraphs 41 and 58 also do not specify whose address - this only applies to the researcher being submitted, not if one of their colleagues was based in the UK at the time but they were not.

Question 7

Which approach to allowing exceptions is preferable?

B Percentage target

If selecting option b:

- Do you agree that the percentage targets are appropriate?

Agree (depending on how blanket exceptions apply to these e.g. books)

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

Vary by REF main panel

Do you have any comments on these proposals?

1. The administrative burdens imposed by a case by case approach, and the potential subjectivity involved, make this approach unworkable.
2. We strongly support the idea of varying the percentage target, as a pragmatic approach to some of the issues that have been raised. Until more data are available we do not know if the variation between disciplines is such that percentages would be better varied by sub-panel rather than main panel. We ask HEFCE to keep this under review for subsequent REF exercises.
3. Our own data gathering (based on analysis of submissions to the geography sub-panel for RAE 2008) suggests the target is attainable, but data for REF 2014 will give clearer insights (and the policies of publishers and journals are actively evolving). Much will depend on resources available (for Gold OA) to academics across disciplines and institutions.
4. We recommend that the percentage stipulated be realistic in order to take account of the needs of some disciplines (e.g. where there are long publication pipelines or significant international collaboration with countries/publishing in overseas journals where Open Access publication is less supported). We encourage HEFCE to set the bar at a sensibly achievable level at this stage.
5. We urge HEFCE to continue to monitor the compliance of overseas journals to inform appropriate future percentage targets.
6. As a matter of principle, HEFCE will, we hope, allow academic colleagues to be the decision-makers as to where they publish their papers; and thus be prepared to be flexible in continuing the percentage approach so that it can allow for those academics who have good reason to wish to publish in a non-compliant journal.

Royal Geographical Society (with IBG) October 2013

Annex B

HEFCE work on open-access monographs

1. HEFCE, in partnership with the Arts and Humanities Research Council and the Economic and Social Research Council, is investigating monograph publishing in the context of open access. There are varying views in the higher education sector on the best approach, but also recognition that this issue needs some serious reflection. Geoffrey Crossick, Distinguished Professor of the Humanities at the School of Advanced Study, University of London, is leading HEFCE's work on this. Professor Crossick was formerly Vice-Chancellor of the University of London and Warden of Goldsmiths.
2. As a first step, HEFCE is convening an expert reference group to establish what key evidence is needed to inform understanding in this area, and to provide advice on an appropriate programme of work to gather this evidence. This will bring together key representatives from interested organisations to develop increased understanding about the challenges and opportunities for open-access monograph publishing.
3. The project is being governed by a steering group comprising representatives from HEFCE, the research councils, and the British Academy. The membership of the steering group is detailed below:

Project steering group

| Member | Role | Organisation |
|-----------------------------|--|---|
| Steven Hill | Head of Research Policy | HEFCE |
| Professor Geoffrey Crossick | Project lead Distinguished Professor of the Humanities | School of Advanced Study, University of London |
| Professor Mark Llewellyn | Director of Research | Arts and Humanities Research Council |
| Fiona Armstrong | Deputy Director of Policy, Resources and Communications | Economic and Social Research Council |
| Professor Nigel Vincent | Vice-President for Research and HE Policy | British Academy |

4. The first meetings for the project are scheduled to commence in autumn 2013. We are expecting the project to run until mid-2014. Further information, including the membership of the reference group, will be made available in due course.