

## **GuildHE / CREST – Response to HEFCE’s consultation on open access in the post-2014 Research Excellence Framework, October 2013**

### **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.

Do you have any comments on this proposal?

We agree with the consensus that publicly funded research should be made more accessible to potential users and beneficiaries outside of the academy, and that Open Access (OA) is one way to promote broader dissemination and take-up. We recognise that in narrowly defining the criteria for OA as it relates to a sub-set of text-based research outputs for the purposes of this consultation HEFCE have attempted to address the serious concerns expressed by various disciplinary communities about mandating OA at too early a point in what is likely to be a difficult and complex transition period.

While from a practical perspective we do agree with the criteria for the purpose of this consultation, and considering the likely timescales pertaining to the next REF, GuildHE / CREST would like to caveat this response by reiterating the point made by others in the sector about the importance of future REFs reflecting and capturing the diversity of excellent research outputs generated across the sector. There is a danger in allowing OA discussions to carry on in a way that devalues non data- or text-based research outputs, and delays the very serious and timely discussions required to address concerns in these areas. GuildHE / CREST members have also raised concerns, as have others, over the need to continue to assess the ramifications of OA as administered in the UK on the international reputations of academics, institutions and disciplines.

### **Question 2**

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

Yes, given HEFCE’s position that shared repositories will meet the eligibility requirements. One of the concerns around OA for many institutions is the added cost of administering OA associated, for instance with APCs and general concerns about publishers’ ‘double dipping’; hence the need for national and international organisations such as HEFCE and the Research Councils to continue to monitor publishers’ activities. Shared repositories can, at least, alleviate some of the associated costs, for instance in the creative and health disciplines where agreements with multiple stakeholders may significantly increase the cost of OA publication, making compliance less financially burdensome. However, there still exist technical and practical issues with respect to how some complex, non-text based outputs are represented on repositories that panels and assessors will need to take account of, and specialist advisory groups need to continue to consider and develop practical, workable solutions for.

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

Yes

Do you have any comments on these proposals?

GuildHE / CREST members are divided on this point, as would befit a group of institutions needing to take into account the complexities of broad disciplinary portfolios. The majority favour outputs to be made accessible at the point of acceptance of a final, peer-reviewed draft of the 'publication' or public dissemination of a given research output. However, there is no overall consensus, so we would like to see some flexibility with respect taking into consideration different disciplinary practices and special circumstances.

### **Question 3**

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

Yes, given the panels are, under the current system, best placed to take into account embargo periods suitable to disciplinary conventions. These periods should work to complement or align with the negotiations and general advocacy undertaken by national and international research organisations (such as RCUK and the Wellcome Trust) in association with publishers and other research disseminators. Any guidelines proposed should be as simple and clear as possible, and must be provided with a significant lead-in time so that researchers and institutions with research outputs involving multiple partners are able to assess the complexities of the situation and find ways, wherever possible, to successfully negotiate OA for outputs entered in future REFs.

Do you agree with the proposed requirements for appropriate licences?

Yes, in that HEFCE's proposal is not to specify a particular form of licence, in view of various as yet unresolved issues, and in recognition of the likely ongoing developments in this area.

Do you have any comments on these proposals?

### **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

Do you have any comments on this proposal?

GuildHE / CREST do support this position in the short term, given the current unresolved state of many serious issues relating to OA, and specifically with respect to this consultation, taking into account the caveats expressed in Question 1 with respect to the importance of securing, as soon as possible, full representation and full consideration of all the outputs that make up the UK research portfolio. We would like to suggest the urgent formation of expert advisory groups charged with developing further criteria that can extent OA as appropriate to other types of research outputs and will consider and recommend practical solutions with input from the various disciplinary communities.

### 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?

Yes – with respect to journal articles and conference proceedings.

Do you have any comments on this proposal?

This allows some flexibility given the diverse venues and interfaces – linked, again, to disciplines – required for the widest and highest quality dissemination of research undertaken in the UK. However, this may not be an appropriate time frame for all research outputs, depending on their circumstances. Again, substantial discussion and clarity is required both for researchers and institutions planning for subsequent REFs.

### 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?

Yes.

Do you have any comments on this proposal?

### 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?

Yes.

Do you have any comments on these proposals?

We agree that percentage targets should vary according to the Main Panels in order to take into account the diversity of disciplines, subjects and institutions likely to make up future REFs, and that the sector should be consulted and provided guidance through the specialist advisory panels on appropriate targets in the short and long term vis-à-vis REF and OA more broadly as it is defined and practiced.