

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

A response from the Society of Biology to the Higher Education Funding Council for England

28 October 2013

The Society of Biology is a single unified voice, representing a diverse membership of individuals, learned societies and other organisations. We are committed to ensuring that we provide Government and other policy makers - including funders of biological education and research – with a distinct point of access to authoritative, independent, and evidence-based opinion, representative of the widest range of bioscience disciplines.

The Society of Biology welcomes this and the previous request for opinion on the development of the HEFCE policy and is pleased to offer these comments, gathered in consultation with our members and advisors for your consideration.

The Society has individual Members and Fellows, many of whom will assess or be returned in the Research Excellence Framework exercises. We also have Member Organisations, some of which are learned societies that publish journals independently or under contract with commercial publishers. We welcome HEFCE's recognition that learned societies have a broad view and responsibility in this area. While journal publishing in itself provides important support to their respective disciplines, it also generates income that enables and funds crucial additional support for research and other desirable academic activities.¹

Question 1. Criteria for open access

The HEFCE policy states '*Outputs should be accessible through a UK HEI repository immediately upon either acceptance or publication, though the repository may provide access in a way that respects agreed embargo periods.*'

We suggest that the use of the term 'accessible' be clarified; an 'accessible' output could imply one that will be available to users, therefore effectively ignoring any embargo period. The policy should clearly state that the output is to be deposited in a repository (at the time of acceptance or publication) and then openly available after an embargo period if appropriate, and in line with the conditions of publication.

¹ Noted in The Finch Group Report (March 2013) available at <http://www.researchinfonet.org/publish/finch/>, which sets out the range of support learned societies provide for their specialisms: facilitating communication within and between the sectors, policy makers and the public; providing careers guidance, professional development, and promoting good practice (Section 6.24) and ensuring that the UK has a strong international presence within their specialism (Section 8.5); additional references are in Sections 1.4, 3.48, 6.10, 8.15, 8.5, 9.12; and relevant details for the bioscience sector are available in *Thorn et al*, 'Learned societies and open access: key results from surveys of bioscience societies and researchers' *Serials*, 22(1), 2009; and *Morris et al*, 'Learned society members and open access' *Learned Publishing*, 22 (3), 2009.

An accessible output could simply mean that the repository provides a link to the publisher's platform where the actual content is held, or that the content could be requested from the author via the repository. We understand that the policy was deliberately worded to allow flexibility for the author, however we recommend that explicit mention of these options should be made to provide clarity. In addition we welcome the use of the term 'through' within the clause stating that '[O]utputs should be accessible through a UK HEI repository' as providing necessary flexibility and support for the development of interoperable, interlinked or aggregated repositories which may offer advantages of efficiency and permanence as well as discoverability that could be challenging for individual HEI repositories to achieve alone (as well as supporting the possibility of linking to publisher websites).

i. Final Accepted Version

If the output has to be accessible (i.e. accessible by users) upon acceptance, then this can only be the final accepted version (FAV). This version may be available via the publisher's platform, but not always. It would therefore be advisable to actually request that the FAV be deposited in the repository (rather than linked to it), whereas the version of record (see below) could be a deposit or a link.

Note that when using the FAV, there may be additional burden for authors to deposit a more polished version of the accepted article than they usually submit to a publisher. Usually, the content including figures and legends is not as well presented in the FAV as in the version of record. The final peer-reviewed text is not necessarily an exact match with the published edited article, and the latter may be more accurate.

There is concern about the possibility of more than one version of the article being available via open access, and care should be taken to ensure that this is minimised as much as possible, and that versions are clearly marked. Guidance would be welcomed.

ii. Version of Record

There can be numerous intermediary versions of an article which precede the version of record (VOR) to publication, some of which can be made available via early online access. The VOR is the version of a journal article that has been declared by the publisher as being the final published version, and the date of the publication of this version is commonly used by publishers to define the start of the embargo period.

Clarity is therefore needed about which version of the output is being used and when the embargo period starts, as different journals and publishers appear to have different definitions.

The 'Cross Mark' system² from CrossRef goes some way to addressing these issues by notifying readers of changes to article content, regardless of who publishes it or where on the web it is stored. Cross Mark also

² <http://www.crossref.org/crossmark/AboutFAQs.htm>

contains optional publication record information for the article indicating funding sources, licensing information and publication history (as well as the peer review process).

iii. **When to deposit outputs**

From the researcher's point of view, it is logical to deposit the output at the time of acceptance as this is a point at which the author will be contacted by the publisher. However, this may not prove true if the UK author is not the corresponding author; co-authors may not receive any further communication from the publisher. After this point, there is nothing to prompt the author to make the deposit. However, at the time of acceptance, the author may not always be certain which access model they will choose (i.e. whether APCs will be paid, or if an embargo period should be enforced).

From the HEI point of view, the point of publication is a more logical time for deposit, because this is the point at which any embargo starts and the terms of publication will be known; the VOR will also be available, at the least via a link to the publisher's site.

Therefore, if deposit is upon acceptance, HEI institutional repositories will need to capture details of embargoes and terms of publication, and enable open access after the embargo period.

Question 2. Institutional Repositories

There is a risk that the development and maintenance of institutional repositories will place an unnecessary burden on HEIs.

The development of a central repository for published research outputs originating in the UK, which would have the added benefit of cross-discipline search functions, should be considered to address this additional burden.

- A single repository would enable economies of scale for the on-going curation costs of individual HEI repositories and possibly offset the initial set up costs, whilst decreasing administrative burden at institutions and improving usefulness for users.
- Repositories must also ensure compliance with embargos and licencing requirements, and there must be some element of quality control for institutional repositories to ensure that the deposited publications are the strictly peer reviewed articles. A central repository would help to streamline this process across HEIs.
- Outputs can be branded and sorted according to institution in a central repository, thus preserving the institution's brand, while also facilitating intra- and inter-institutional comparisons available, in terms of valued research and open access compliance, as well as intra- and inter-institutional searching.

Institutional repositories play an important role in the stewardship of 'grey' literature; theses and dissertations, technical reports and working papers and more, which are not bound by publisher agreements, are less time-sensitive, and are not always peer-reviewed. Institutional repositories should be

supported to provide persistent access to these outputs, including data sets, detailed methodological protocols, and other supplementary material that supports published outputs including supplementary data.

Publisher archives remain the most reliable source for the version of record, and a central UK repository should collaborate with publishers, both to ensure links to the published Version of Record (which will reflect any subsequent retractions or corrections) and also to explore the potential for automated collection of metadata.

Question 3. Embargo periods

Many publishers, especially those that are Learned Societies, facilitate Open Access via green or gold routes or a mixture of the two. Embargo periods relating to green OA should be respected by repositories. The release date of the deposited article should reflect the embargo period set by the publisher, as this has been accepted by the author.

i. Licences

We agree the need for further discussions on appropriate licenses, and that these discussions must be fairly reflected in the HEFCE policy.

Question 4. Outputs

We agree that the criteria for open access should apply only to journal articles and conference proceedings for the post-2014 REF and agree that an open access policy for monographs should be considered separately.

Question 5. Notice Period

We agree that the notice period of two years is fair and takes into account the publishing cycle.

Question 6. Researcher Location

We agree that the 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, as this avoids any potential negative impacts on researcher mobility. However, there is a risk that the policy may restrict the attractiveness of UK researchers (especially junior researchers) as international collaborators if non-UK authors do not want to publish in a journal that complies with the HEFCE policy. This point needs further thought in reference to global open access policies that are currently being developed.

Question 7. Compliance

Tracking compliance with OA policies has been historically difficult with HEIs lacking comprehensive data on what has been published by their employees and under what terms. Funders' tracking of publications should help to shed more light on compliance, but HEIs will also need to introduce systems to track compliance, especially if there is to be monitoring of the percentage of total publications compliant with the OA requirement, and the growth of this quotient over time.

There are, however, practical problems with the percentage system as it is generally not possible to determine, at the time of submission or acceptance, whether a particular paper will be chosen for submission to REF. This decision-making process generally begins one to two years before the REF submission date and involves comparison of all of an author's papers, analysis of citation data, and internal and external review.

It will not be possible to control, retrospectively, whether the correct procedure relating to OA papers has been achieved, and the percentage compliance escalator will complicate this. Importantly however, this could remain difficult to control if a co-author, with no interest in REF and potentially with no funds for OA, is the submitting author.

If a compliance percentage is to be applied to HEIs, one based on the fraction of research that is publicly-funded is the most justifiable, since the availability of public funds for open access publishing is different across institutions and disciplines.

A short statement of exception would be in line with existing academic practice and appears to be the least burdensome; therefore we strongly recommend this option.

Exception notices should not therefore pose an unreasonable institutional burden for HEIs, and a sharing of best practice between HEIs and organisations such as the Wellcome Trust would be helpful in this instance.

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