

HEFCE Consultation on open access in the post-2014 Research Excellence Framework – Imperial College London Response

Imperial College London undertakes world class research, and encourages its researchers to disseminate their work as widely as possible, however they choose to do so. Whilst we support HEFCE's determination to foster open access (OA) publication we urge it to ensure that its OA policy does not in any way compromise the quality of research produced in UK HEIs. More specifically, HEFCE must avoid imposing restrictions which could prevent researchers from publishing their work where they consider best.

With this important caveat Imperial College is content to endorse HEFCE's proposed OA policy. We respond to the individual questions below.

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)?

We are broadly supportive of the criteria for open access, with the provisos that:

- Publisher embargo periods accord with the limits established by the Research Councils, major charities and other government departments.
- Resources will be available to ensure that institutional repositories are capable of supporting access to outputs and the re-use of content.

We support the principle that all material submitted to REF should be accessible as soon as it is published, but are concerned that this may not be feasible in all cases. We would therefore recommend that the proposed requirement that 'outputs should be made accessible through a UK HEI repository immediately upon' be amended to state that accessibility should '*normally*' be within one month of publication, unless this contravenes the agreed embargo period.

We also believe that the quality of the research output should be the determining factor for submission to REF, and that exceptions (below) should recognise that for some disciplines publication in a journal which provides for green or gold open access may not be feasible.

Do you have any comments on this proposal?

Paragraph 20 states that the 'outputs from all research supported through our funding should be as widely and freely accessible as the available channels for dissemination permit'. We consider that this might be difficult to define and measure since there is not a direct relationship between HEFCE QR funding and research outputs.

Paragraph 25 references reuse including text-mining; the College recognises the benefits of automated analysis of large quantities of research outputs but would recommend that HEFCE does not mandate specific file formats for deposit (Green OA).

Question 2

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

We agree with the role of institutional repositories as outlined, recognising that this may require significant investment to achieve.

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

We support the principle that metadata should 'normally' be available within one month of first publication, and that access to the publication itself follows this or the relevant embargo period, whichever is later.

Do you have any comments on these proposals?

Allowance should be made for the time lag between publication and automated indexing of new publications, so that institutions are able to optimise efficiencies of automated processes.

HEFCE and HEIs will need to work together to ensure that the processes developed to support open access do not compromise the publication process.

Question 3

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

We agree in principle that the REF embargo periods should be aligned with the Research Councils' open access policy. We look to HEFCE to negotiate with the publishers on behalf of UK HEIs to ensure that:

- For self-archiving, publisher embargo periods remain compliant with those required by the Research Councils, charitable funders of research and other government departments.
- Embargo periods are consistent across the funders by discipline.
- Initiation of embargo periods is consistently applied by publishers.

We recommend that HEFCE and the Research Councils (possibly in partnership with the Wellcome Trust and Government) should negotiate firmly with the publishers about embargo periods and APC charges. Furthermore we would recommend that UK research funders consider collaborating with research funders overseas with a view to achieving a common position on open access for publicly funded research particularly with regard to embargo periods for green open access.

Do you agree with the proposed requirements for appropriate licences?

The College agrees that it is not appropriate to specify particular licences.

Do you have any comments on these proposals?

Imperial College has robust policies and procedures for the allocation of publication funds and has set aside its own publication fund to enable immediate open access where possible.

However, we are concerned that journal embargo periods for self-archiving may increase to the extent that researchers might be forced to publish Gold OA in order to be compliant. Early evidence suggests that APCs have increased since the announcement of the RCUK policy; this is also reflected in preliminary analysis of RCUK block grant expenditure.

We also note that some publishers are increasing embargo periods. One major publisher, for instance recently "harmonised" its embargo periods, which effectively meant that in some cases where there was no embargo period previously it is now 12 months.

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?

We agree with this proposal.

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?

We agree that this is a reasonable period, on the assumption that no significant technical barriers are identified and that there will be flexibility in cases where publishers have not yet reached agreement with HEFCE and other funding agencies.

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?

This would certainly help where researchers from abroad move to a UK HEI during the REF period. It would also ensure that outputs from international collaborations could be returned for the REF where the UK researcher is not listed as the corresponding author and therefore may not be in a position to ensure that the output is published as open access. Exceptions may need to be made for other more complex cases.

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?*

We reiterate that we believe that HEFCE and the Research Councils must take the lead in negotiating embargo periods for self-archiving (green OA) with publishers to ensure viability of the green route. As such exceptions should be limited to:

- Outputs published in journals whose publishers had not yet reached agreement with HEFCE and other funding agencies.
- Outputs published in overseas journals where no green route is available.

Provided the approach set out above is accepted, we do not believe that percentage targets should be set, since the primary criterion for submission to REF should be the perceived quality of the output.