

Advice to HEFCE on open access and submissions to the REF post-2014 (March 2013)

Introduction

- 1 This advice is submitted in response to the letter issued by Higher Education Funding Council for England (HEFCE) in February¹ noting the Council's intention to consult formally on the role of open-access publishing in the submission of outputs to the post-2014 Research Excellence Framework (REF) and seeking some early input to help shape this consultation which will take place later this year.
- 2 Our advice is structured according to the headings as set out in the letter.
- 3 We would like to take this opportunity to endorse the recommendation made by the Russell Group in its own response to the letter, suggesting that achievement of open access should be reported on and assessed as part of the research environment element of REF.

Expectations for open-access publications

- 4 The expectations as set out in the letter do not refer to the commonly used terms 'green' or 'gold', which relate to different types of open access publication. It may be that the four funding bodies² are opting not to take a position on this, but it may be useful when developing the consultation proposals later this year for HEFCE / REF to discuss how both of those methods of open access are viewed. The favoured option would be for the expectations to allow both forms of open access, without expressing a preference, to ensure that, as far as is possible, no research output is excluded from being eligible for assessment.
- 5 There may be some research output that cannot be made open access, for reasons beyond the control of the author(s). It would be helpful to understand how these cases may be treated when it comes to the next assessment exercise.

¹ 25 February 2013, available at: www.hefce.ac.uk/news/newsarchive/2013/name,78750,en.html

² Higher Education Funding Council for England, Higher Education Funding Council for Wales, Scottish Funding Council, Department for Employment and Learning Northern Ireland

Advice on repository use and on techniques for institutional repositories to cross-refer to subject and other repositories

- 6 We see no need to privilege one form of online repository over any other. The only requirement should be that eligible repositories are demonstrably well-managed and sustainable. The example of arXiv in physics and the quantitative sciences shows how this may be achieved for subject repositories. In the long run it is likely that UK research will achieve greater international visibility through subject-based rather than institutional repositories.

Advice on embargoes and licences

- 7 The Research Councils UK (RCUK) policy refers only to work that is funded in full or in part by research council grant. Academics will conduct research during the next assessment period that will have been funded by institutions (through QR) or by other organisations (as well as work that has not required or received any specific research funding at all). The consultation should consider whether it would be appropriate to have one overarching policy on embargoes regardless of what specifically applies to individual outputs.
- 8 In its latest draft guidelines, RCUK's policies on embargo periods are premised on its ambition to provide funding for article processing charges (APCs) increasingly over a five-year transition period to enable gold access for its funded research. It would not be reasonable for HEFCE to follow RCUK's views on post-transition embargo periods unless it too was guaranteeing to make available the same levels of funding for APCs
- 9 Currently, there is substantial disagreement across academic communities about the appropriateness of the RCUK preferred licence, that of CC-BY. In humanities and social sciences (HSS) disciplines, many feel that it is an inappropriate licence to use, and would rather use a licence such as CC-BY-ND or CC-BY-NC-ND. The RCUK policy states that it will consider the impact of the CC-BY licence on HSS research in its 2014, although many organisations are, like us, advocating that any such consideration should take place prior to imposing one licence for all research. The consultation proposals might consider whether it would be appropriate to exclude outputs from the next REF if a CC-BY was not applied, but might also – as we would advocate – simply state that any such licence would satisfy the REF rules.
- 10 Although the RCUK policy links embargoes and licences together in its open access policy, we do not believe that it is appropriate to do so for research assessment, given the lack of evidence about the impact on some disciplines. It would be unfair to exclude work for this reason. Therefore, we think it would be better to 'unlink' embargoes and licences in the rules for research assessment.

Advice on the best approach to exceptions and notice periods

- 11 We support the proposals to recognise the need for exceptions. It is difficult at this stage to say if any one of the three options for exceptions within paragraph 18 of the letter will be a better approach than the others. It may be that a combination of all should be possible, with consideration of which approach to apply being incorporated into the next survey of submission intentions. One sub-category must surely be journals in countries where the open access agenda has not yet been extensively adopted, at least insofar as it relates to humanities and social science.
- 12 Should a general rule be applied, discretion will probably still be required. As part of the survey of submission intentions, institutions could be asked if they believe that any of the material they are proposing to submit needs to be considered for exception from the open access rules.
- 13 To maintain one of the principles of research assessment – that of peer review – it would be most appropriate if the issue of exceptions could be considered by panels when drawing up the next guidance for submissions, or else – since such panels would not be able to do this retrospectively – ask current REF panels and subpanels to do so. An overarching general rule may be useful as a guideline, but disciplines (or groups of disciplines) should have the option to diverge from this if deemed necessary. We are cautious about a ‘one size fits all’ policy approach.

Advice on exceptions for monographs and book chapters

- 14 Open access for monographs and book chapters is a less mature area compared to open access for journal articles (and the same is true, and even more so, for non-written outputs, such as in the performing and visual arts). The fair approach would be to welcome open access monographs and book chapters if submitted to the next REF, but not to apply any specific rules. To subsume monographs under a possible 80% compliance rubric would not be helpful; some analysis by the Academy suggests that monographs and book chapters comprised around 66% of some humanities RAE2008 submissions and around 33% of some social science submissions. Submissions from main panels C and D, which include humanities and social sciences disciplines, make up around 50% of the total based on recently published data.³ This means that the compliance percentage would have to be lowered very substantially indeed to include them, if such a rule was taken up for the post-2014 REF.

³ HEFCE news item of 15 January 2013 on REF submission intentions, available at <http://www.hefce.ac.uk/news/newsarchive/2013/name,76316,en.html>

Advice on a requirement for open data

- 15 We support the principles of open data as set out in the Royal Society report, *Science as an open enterprise* (June 2012).⁴ Sharing data and evidence is a fundamental part of research. There has been much progress in this area, but we do not think that at this stage the time is right to compel disciplines to comply with a formal requirement. We point out also that much research in the humanities (in particular) does not involve the presentation of data sets. However, should institutions wish to submit this material as outputs, they should not be dissuaded from doing so. As with our view on open access, we do not believe a 'one-size-fits-all' approach would be appropriate. For example, there are occasions when research ethics requirements (around such things as individual confidentiality) may prevent openness.
- 16 There may be potential to incorporate the use of open research data into the environment and impact elements of the REF. This will be a way to encourage adoption, and reward it where it is used, but without impinging on the assessment of the quality of research outputs.

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⁴ Available at: <http://royalsociety.org/policy/projects/science-public-enterprise/report/>