

## HEFCE LETTER: OPEN ACCESS AND SUBMISSIONS TO THE REF POST-2014 RESPONSE FROM THE PUBLISHERS ASSOCIATION 25 MARCH 2013

### Introduction

1. The Publishers Association (The PA)<sup>1</sup> welcomes this early opportunity to input into the anticipated HEFCE consultation due to take place later this year. Continued consultation, engagement and co-ordinated action from all parties are essential to ensure open access policy is implemented in a sustainable and effective way. Achieving a consensus on the best way forward has not, as implied at Para 5, been overshadowed by the concerns of publishers and learned societies for their income, but by concerns about the sustainability of peer review, the suitability of one-size-fits-all open access policies to all disciplines, and the practicality of some funders' open access policies and funding. We look forward to an ongoing and constructive dialogue with HEFCE along these lines, as their thoughts develop and as we approach formal consultation (and beyond).

### Models of Open Access

2. The PA welcomes HEFCE's acceptance of Government policy at Para. 9, and its agreement that institutions can use HEFCE funds provided for research in support of this policy. We respect the fact that HEFCE does not wish to express any preference as regards publication via either the Gold or Green route. Nevertheless, it would be helpful for HEFCE to set out in greater detail the differences between the two routes to publication and how these both fit into HEFCE's *Expectations for Open Access* at Para 11 and Para 12.
3. Whilst HEFCE states in Para 12 that the "primary objective of this proposal is to stimulate immediate open-access to publication", this implicit preference for Gold OA seems incompatible with the specifications laid out at Para 11, where HEFCE's proposed criteria would indicate a preference for Green OA. Setting out clearly the distinction between Gold and Green routes to publication will clarify this, and in turn will aid discussion about embargo periods and licences to ensure all funding bodies are aligned. Regarding Green OA publication, it is vital that embargo periods and user licences are such that the underlying subscription model, on which Green OA depends, is not put at risk.

### Embargo Periods

4. HEFCE asks for views on how open access publication can be accomplished "in a simple, robust, fair and transparent way which allows for reasonable expectations and is sympathetic to particular disciplinary issues" (Para. 10). The PA believes that the key to achieving this is to make sure that all stakeholders are aligned in their views about how Open Access should progress, specifically that individual funder policies align with Government policy. The simplest graphic representation of this policy, in particular regarding embargo periods, is set out in The PA decision tree, endorsed by BIS and included in the latest iteration of RCUK Policy and Guidance (as at 20 March). Ensuring all funder policies are aligned with Government policy will reduce any scope for confusion, in particular for researchers and institutions, and will make the transition to Open Access as smooth as possible.

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<sup>1</sup> The Publishers Association ("The PA") is the leading representative voice and trade organisation for book, journal, audio and electronic publishers in the UK. Our membership includes publishing houses in the academic, educational and general trade sectors. Collectively, their revenues total £4bn, 80% of the overall total for the sector.

5. Similarly, at Para 15, whilst it is welcome that HEFCE wants to ensure coherence in the system by aligning its policy with that of other major research funders, for the avoidance of doubt HEFCE should be explicit that its policy on embargos will match Government policy, as graphically represented in the PA decision tree. Specifically, HEFCE should determine embargo periods of at least 12 months in STM and 24 months or more in HSS, where no APC fund has been paid to the publisher.

## Licences

6. We welcome the statement at Para 11 that sets a broad frame of reference for the licences that might be deployed to support Open Access – those which “allow the reader to search for and re-use content (including by downloading and for text mining) both manually and using automated tools..” - and welcome the fact that HEFCE has decided not to mandate a specific *type* of licence (for example CC-BY) that must be used. We believe strongly that this is the right approach and that ultimately the specific choice of licence used should remain with the researcher in discussion with their institution and with their publisher.
7. However, we would observe that the broad frame of reference at Para. 11 better reflects the likely shape of a licence that will apply to articles published under the Gold OA route (although this is still under consideration), whereas the specifications laid out at Para 11 are reflective of Green OA. The structure of licences available under the Green route will need to be developed in close consultation with publishers.
8. To this end, we also welcome HEFCE’s desire to see the development of effective licences in terms that recognise the interests of all stakeholders (Para 16). As set out in our response to RCUK’s Policy and Guidance, The PA would like to suggest a working group to explore these issues in further detail. The PA would be happy to make its offices available for the working group to meet, and would welcome the opportunity to work closely with stakeholders including HEFCE to ensure all relevant parties are present for a meaningful (and ongoing if necessary) discussion.

## Institutional Repositories

9. It is clear that HEFCE envisages an important role for institutional repositories in achieving their Open Access requirements, whether under the Gold or Green publication routes (Para. 13, for example). The Finch Report recommended that the infrastructure of subject and institutional repositories should be developed so that they play a valuable role complementary to formal publishing. One of the key action points regarding repositories, to achieve the above recommendation (point xvii, p10 of the Finch Report) was to take particular care about rules relating to embargo periods. In other words, author self-archiving can be part of a sustainable publishing ecosystem if publication costs are covered by subscriptions over an appropriate embargo period.
10. Whilst it is welcome that, at Para 11, HEFCE states that repositories “may provide access in a way that respected agreed embargos” we would suggest repositories “must” do this, not least to comply with Government policy and to ensure the viability and sustainability of publishing under Green OA. As stated above, it would be extremely useful if HEFCE set out its own policy on embargo periods, specifically that these will align with Government policy and with The PA decision tree.
11. We would also welcome clarity that it will not necessarily be the final peer-reviewed text of a published output that will need to be deposited in a repository to be compliant with HEFCE policy, as intimated at Para 4, and that instead HEFCE will employ the flexibility intimated at

Para 11: “though not necessarily identical to the publisher’s edited and formatted version.” Publishers have different policies regarding which version can be deposited (usually either the preprint or accepted manuscript) and HEFCE’s policy should reflect this.

12. It would also be useful for HEFCE to set out how institutional repositories might be developed further, for example by provided aggregated usage information and more importantly, links back to publisher-hosted authoritative Versions of Record. We support the proposal made by STM that Gold OA Versions of Record could be accessed either directly on the Institutional Repository or through a DOI link to it on the publisher’s website. Such DOI links could be readily achieved with the DOI system already used by CrossRef. A reference by HEFCE to these being the preferred means of access would be a further incentive for publishers to adopt sustainable OA policies.
13. We would also urge HEFCE to discuss its requirements on deposit of papers with RCUK. It is our understanding that RCUK policy will require deposit of papers in a subject repository or similar and if HEFCE requires deposit in an institutional repository there is a danger of a duplication of effort and cost in the development and maintenance of such repositories. We look forward to further discussion with all parties about how this duplication can be avoided.

## **Monographs**

14. The PA welcomes HEFCE’s recognition that we are some way from a robust and generally applicable approach to OA publication for monographs. As the Finch Report set out, for numerous reasons it is at present very difficult to encompass monographs within the discussions about OA. Whilst there are some early path-finder projects, there are not yet any OA business models for monographs that are sustainable and the dominant model remains the traditional publishing model in which both print and electronic copies are sold or licensed under subscription. Any decision on whether monographs should be brought within scope, and under what conditions, can only be reached after a thorough exploration of the issues with all stakeholders, and after experimental models have had time to mature for a body of evidence and experience to emerge to inform policy. It would therefore seem sensible to return to this issue for the REF post-2020, and not before.

*Richard Mollet  
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Publishers Association  
25 March 2013*