

CONSULTATION ON THE SECOND RESEARCH EXCELLENCE FRAMEWORK

WRITTEN RESPONSE FROM THE PUBLISHERS ASSOCIATION

Introduction

The Publishers Association welcomes the opportunity to respond to the consultation on the second Research Excellence Framework.

The Publishers Association is the leading trade organisation serving book, journal, audio and electronic publishers in the UK. Our members include academic journal publishers such as Elsevier, Wiley, society publishers and University presses.

Question 11: Do you support the introduction of a mandatory requirement for the Open Researcher and Contributor ID to be used as the staff identifier, in the event that information about individual staff members continues to be collected in REF 2021?

The PA supports the use of ORCID and publishers have played a leading role in the development of the standard. A system which helps to provide a unique citable indicator for researchers helps with attribution and persistence in the scholarly record. Further, a unique people identifier is an essential component of a rich data environment for scholarly research. Given the proposals over portability and tracking, ORCID would seem to be an efficient and effective addition for the administration of the REF.

Question 36: Do you agree with the proposals for awarding additional credit to units for open access?

The PA shares HEFCE's goal to facilitate and increase access to research outputs. However, whilst we continue to support this overriding goal, we have some concerns about the proposal to give credit to research environments "that can demonstrate how the unit's approach to open access is above and beyond the policy requirements, in terms of the type of outputs that are published on an open access basis, and to submissions where outputs are presented in a form that allows re-use of their work." We would like to respond to parts of this proposal in turn.

- **"We intend that credit will be given to submissions that can demonstrate how the unit's approach to open access is above and beyond the policy requirements ..."**

Proposing to give credit to units that go "above and beyond" existing requirements would introduce an open-ended policy towards open access which undermines the commitment of stakeholders to work together on a managed transition to Open Access that was agreed by the Finch Group and embodied by the UUK Co-ordination Group. There are already instances of institutions contemplating actions based on how they might secure any additional credit. HEFCE may consider that there is an argument that introducing competition for additional credit on open access is a way to drive innovation or disrupt the existing ecosystem for the publication of research but it is misplaced in the context of the REF which is not an appropriate mechanism for this. The PA believes that the foundation of the REF exercise is the application of common, transparent and measurable benchmarking and this is what the REF policy should, first and foremost, aim to achieve by setting out a clear, unambiguous and objective assessment of quality and impact. The stated aims and principles of research assessment are equity, equality, and transparency and this particular suggestion runs counter to these principles and risks introducing uncertainty, and competitive distortion by introducing a reward for criteria that is not based on research excellence. Additionally HEFCE

is rightly looking to, in this second REF, reduce attempts game the system. This suggestion, however, runs contrary to that; it is likely to introduce not only a new means of gaming the system, but one that is very easily purchasable and therefore particularly susceptible to gaming.

Introducing such uncertainty is of particular concern given that the recent review of open access conducted by Professor Adam Tickell of Birmingham University which confirmed that the UK is making good progress in achieving the aims of the UK government's open access policy: to increase access to scientific research outputs in ways that are compatible with sustainability and research excellence. The report stated that by April 2017, almost all journal articles published by UK university academics will be available under Open Access routes. As set out in *Monitoring the Transition to Open Access: A report for the Universities UK Open Access Coordination Group*, over 18% of UK-authored articles were published via Gold Open Access route in 2014, ahead of the world-average, and a further 19% of articles from UK authors were posted either as preprints, accepted author manuscripts or final published article. This coupled with evidence submitted to the RCUK's review of implementation of open access policy (March 2015) found that 94% of higher education institutes had exceeded the 45% open access target set by RCUK for the first year of implementation, the UK remains on course to achieve its public policy aims.

As Tickell notes in his review, one of the reasons for the UK's superior progress towards open access has been stimulated by clear mandates from RCUK, the Funding Councils and major charitable funders. Throughout the process of formulating an open access policy, publishers supported a substantial expansion of the open access publication model, provided that this could be achieved sustainably and with no detrimental impact on the high quality of scholarly publishing in the UK. This has enabled the UK to transition to open access in a way which is suitable for all parties involved. The PA considers that the "above and beyond" incentive would drive a parallel policy framework and potentially complicate the ability of stakeholders to work together with a common understanding of compliance requirements.

- **"...in terms of the type of outputs that are published on an open access basis, and to submissions where outputs are presented in a form that allows re-use of the work"**

The PA supports licenses that allow re-use of research outputs as long as it is made clear that this would be for non-commercial reuse. The PA is concerned that by highlighting submissions where outputs are presented in a form that allows re-use of the work as part of the criteria, the REF is imposing a supervening preference for CC-BY licenses and therefore making policy determinations beyond its scope and purpose. While these licenses might be appropriate in some areas, HEFCE is aware that in disciplines such as humanities and social science, where interpretation and context are crucial, authors have voiced concerns that the use of CC-BY carries the risk of the misuse of research; for example by presenting extracts in ways that appear to contradict or undermine the author's meaning. These concerns are sufficiently serious for some authors to refuse to publish on this basis. The RCUK in its open access review noted the issues CC-BY licences can pose for arts and humanities research, citing analysis by the University of Nottingham which showed that the proportion of articles where a compliant gold option was available was noticeably lower for those funded by the Arts and Humanities Research Council, at 77%, compared with 90% of RCUK-funded articles. Meanwhile the RCUK review also noted that authors obliged to comply with a CC-BY license might be prevented

from using certain material in their research whose copyright is owned elsewhere as they will not be able to reassure copyright owners about its subsequent reuse elsewhere.

The PA accepts that there are positives from the use of the CC-BY licence, and many of our members offer this type of license to researchers. However, given the different considerations that need to be made, we believe that the decision over whether to publish under a CC-BY license should ultimately lie with the author, rather than be something which is a requirement or is encouraged by the funders. The importance of the freedom of choice for researchers on where and how to publish was highlighted in the open access report written by Professor Tickell. Introducing this mandate would reduce choice for researchers.

Annex C: Open Access monographs

Although the consultation does not ask any questions about the principles set out in Annex C, the PA would like to make a short note about the points made in this section.

Annex C.5. notes; “We do not intend to set out any detailed open-access policy requirements for monographs in a future REF exercise in this annex. However, setting a direction of travel now will allow academics, institutions, publishers and others to take appropriate steps. We see a clear need to develop some principles that can govern the introduction of a policy requirement in future.”

Annex C.6.a. notes “There are powerful and valid reasons why open access should be extended to monographs and other long-form publications. Open access has brought substantial benefits to scholarly communication in journals; within reason, and as far as is practical, it is right that other research outputs are required to take advantage of open-access options. We wish to see a gradual but definite move towards open access for monographs.”

We accept that there are powerful reasons why long-form research outputs should be open access. However, one of the fundamental issues is determining what constitutes the research output. There is usually a full Author Original Version or preprint version of a journal article. The same is not the case for monographs. Whilst a proportion of monographs are developed from completed PhDs, the transformation that takes place even in these instances demonstrates that there are significant differences in the value-added contribution of publishers to the published work.

In a significant proportion of instances the scholarly monograph is contracted based on a proposal rather than a completed manuscript and the publisher has a key role in developing and curating the published title. Commentators on the Crossick Report and more generally have questioned whether scholarly monographs and their publishers might be a proxy for quality but it is legitimate to extend this question to the extent to which the monograph is also a proxy for long-form research output. There are some significant questions about what can, and should, be open and there should not be a presumption that this is the published monograph. The evolving OA ecosystem for journals might offer points of comparison to the sequence of processes for monographs but there are significant differences between, and within, the two and investigations into sustainable OA options for monographs are still in their infancy.

We also wanted to comment on section C.6.d which states:

“The monograph should at least be free to read, and ideally be licensed in a way that gives freedom to copy and reuse the published material. The community should move towards adopting more permissive licenses, such as the Creative Commons Attribution licence (‘CC BY’), when these are congruent with disciplinary norms and practices. More restrictive licences, such as the Creative Commons Attribution NonCommercial-NoDerivs (‘CC BY-NC-ND’), should be considered as

acceptable alternatives for open-access monographs to allow norms and practices around more permissive licensing to evolve and be monitored.”

The suggestion within this is that only CC-BY makes it possible for others to re-use published material. We would like to refute this suggestion as there are already in place other sophisticated and well-used paths for making material available for re-use (both commercially and non-commercially). These include copyright exemptions, STM permissions guidelines, the Copyright Hub, PLS Clear, Rightslink and publisher’s own permissions departments that work to make it possible for others to re-use published material.