

## Higher Education Funding Council for England's (HEFCE) consultation on open access in the post-2014 Research Excellence Framework

### Response from CILIP (October 2013)

**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)?**

CILIP believes that the criteria for open access are appropriate. We share the concerns of many players in the research communications ecosystem about the implication of Gold open access during the transition phase to full open access<sup>1</sup> and therefore welcome HEFCE's proposal to accept material published via the Green route and the central role given to the repository in housing these outputs.

**Question 2a: Do you agree with the role outlined for institutional repositories, subject to further work on technical feasibility?**

Yes. As we stated in our response to HEFCE's first consultation on open access in the post-2014 Research Exercise Framework (REF), for library and information professionals in several universities already recognise that the institutional repository is a good system for providing, electronically, a record of research outputs for the purposes of the REF and have been using it to meet this end for several years<sup>2</sup>.

We welcome HEFCE's intention that outputs accessible through shared facilities maintained by HEI's that do not have their own institutional repositories will also meet the necessary criteria. There is a cost to designing and maintaining an institutional repository, so shared repositories that benefit from economies of scale, and which also broaden access, should be encouraged and supported.

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<sup>1</sup> These concerns are set out in CILIP's response to HEFCE's first consultation on the Post-2014 REF (<http://www.cilip.org.uk/cilip/advocacy-awards-and-projects/advocacy-and-campaigns/academic-research-libraries/academic-0>) and in our response to the Business, Innovation and Skills Committee report into open access, which was published in September 2013 (<http://www.cilip.org.uk/cilip/news/end-gold-rush>)

<sup>2</sup> <http://www.cilip.org.uk/cilip/advocacy-awards-and-projects/advocacy-and-campaigns/academic-research-libraries/academic-0>

**Question 2b: Should the criteria require outputs to be made accessible through institutional repositories at the point of acceptance or the point of publication?**

CILIP favours a requirement that outputs are made accessible at the point of acceptance rather than the point of publication. Publication dates can be uncertain and can sometimes be several months after acceptance, meaning outputs will be unavailable for longer than if deposit is at the point of acceptance.

**Question 3a: Do you agree that the proposed embargo periods should apply by REF main panel?**

In the interest of making research outputs publicly available, shorter and consistent, or no, embargo periods are the desired outcome. However we know that some publishers, particularly in the humanities, arts and social science fields, have serious concerns about the possible impact of this. The Business, Innovation and Skills (BIS) Committee report into open access, published in September 2013, called on the Government and RCUK to monitor and evaluate the impact of their open access policy on embargo lengths across all subject areas. CILIP agrees. Researchers in all disciplines need access to the latest research, so policies that limit that access should be evidence based. We therefore support the alignment of HEFCE's policy on embargo periods with that of the Research Councils so long as the BIS Committee's call is heeded.

**Question 3b: Do you agree with the proposed requirements for appropriate licences?**

We are unable to comment on this as the consultation document does not set out what the licence and re-use requirements will be. However, we do welcome the dialogue that HEFCE is having with other key stakeholders over licensing issues and its commitment to simplicity and clarity on licensing matters. It is important that doubt over how materials can be used is removed to encourage the re-use and sharing of scholarly outputs. Standard licensing terms also cut administrative costs, as there will be fewer variant terms and conditions to keep a record of.

**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?**

Yes. With regards to monographs, in our response to HEFCE's earlier consultation on the post-2014 REF we said that an exemption should be evidence based. It appears that evidence submitted for that consultation has shown that, at the present time, such an exemption is justified. We welcome HEFCE's commitment to working with scholarly publishers to extend the benefits of open access to these output types in the future.

CILIP supports the principle of open data, but we also welcome the decision to delay making mandatory the provision of access to data pertinent to those publications submitted in a future REF. Datasets come in a wide variety of formats, sizes and complexities and the challenge of managing – and finding adequate space to store – these datasets has still to be addressed. In addition to the technical challenges, the legal, ethical, economic and competitor issues surrounding access to research data are complex. We would like to see an increase in the number of data librarians with the skills to advise on and manage these issues.

**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?**

While we recognise that authors and repository managers will have the most pertinent evidence of the feasibility of the proposed timescale, CILIP can see no reason why the start date for 2020 REF eligibility should not be immediately after the 2014 REF rather than 2016.

**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?**

Yes, we agree that the requirement should only apply to those outputs which are authored (in whole or in part) by a researcher employed at a UK HEI at the time of submission for publication. CILIP would not wish to see a barrier created for researchers wanting to move into UK HE.

**Question 7: Which approach to allowing exceptions is preferable?**

CILIP favours option A (i.e. full compliance, with an option for exceptions on case by case basis). A percentage-based approach places a greater burden of HEI's and is a disincentive to strive for full compliance. Considering exceptions on a case-by-case basis provides an adequate level of flexibility during the transition phase.