

Open Access and Submissions to the Research Excellence Framework Post-2014

A response from the Society of Biology

The Society of Biology is a single unified voice, representing a diverse membership of individuals, learned societies and other organisations. We are committed to ensuring that we provide Government and other policy makers - including funders of biological education and research – with a distinct point of access to authoritative, independent, and evidence-based opinion, representative of the widest range of bioscience disciplines.

Introduction

1. The Society of Biology welcomes this early request for opinion while HEFCE develops its policy and is pleased to offer these comments, gathered in consultation with our members and advisors for your consideration.
2. The Society has individual Members and Fellows, many of whom will assess or be returned in the Research Excellence Framework exercises, as well as Member Organisations. These organisations include learned societies who publish journals independently or under contract with commercial publishers. We welcome HEFCE's recognition that learned societies have a broad view and responsibility in this area. While journal publishing in itself provides important support to their respective disciplines, it also generates income that enables and funds crucial additional support for research and other desirable academic activities.¹

HEFCE's expectations for open-access publications, as set out at paragraph 11.

3. We welcome the indications that HEFCE will show flexibility in allowing both 'gold' and 'green' route open access publications and that acceptable journal embargo periods will be respected. In addition the presentation of the material to allow text and data mining as appropriate under license and attribution agreements is welcome in principle.² However, there are some details to be considered here. Although there is an expectation that the Research Councils (RCUK) will develop a position on licensing, its implementation may not be absolute at the beginning of the next REF period (January 2014). Indeed RCUK have indicated that complete compliance with their policies will not be expected within the first five years. Careful communication and guidance would be required to ensure that those who think they are legitimately availing of their funders' latitude did not inadvertently exclude their work from the REF.
4. In addition, the discoverability of data and text may differ between the article of record (as held by publishers) and the final manuscript (as held by authors), because of the enhanced features and semantic mark-up that a published article can carry.

¹ Open Access and Submissions to the Research Excellence Framework post-2014 consultation document, paragraphs 5,6

² The Society of Biology position statement on Journal Content Mining is available at <http://www.societyofbiology.org/aboutus/committees/journals/journalcontentmining>

5. The policy set out in paragraph 12 is highly pertinent however and may prove problematic for those whose top choice journal does not have an acceptable open access option. HEFCE states its intention (paragraph 15) to follow the practice of the other 'major funders' but by no means all research, indeed a minority in some areas, is funded by RCUK and the Wellcome Trust. Some charitable funders may be slow to provide funds for 'gold' charges where embargo periods in the journal of choice are beyond the RCUK requirement, restricting the researcher's ability to place their research in the most appropriate journal for their discipline and topic. Sustainable embargo periods for journals in some areas of the biosciences, for example ecology and environmental science, are reported to us as in excess of 12 months.
6. We recognise and concur that the aim of immediate open access is laudable, but it is essential that the journey towards this aim is not littered with casualties among journals and learned societies. This is a real risk once policies are applied to all those hopeful of being returned in the REF because this involves a 'far higher number of papers than are the result of RCUK funding alone.'

HEFCE's proposals on repository use and on techniques for institutional repositories to cross-refer to subject and other repositories.

7. Given the relationship of institutions with HEFCE and with their academics, the centrality of an institutional repository deposition makes sense. In addition it should smooth the process of making returns from the institution's perspective. However, some funders require deposition with repositories such as PubMed and academics are concerned about the need for multiple deposits of material to different sites. We welcome the suggestion that the institutional repository could link to subject or other repositories, if necessary or preferred.
8. As there is a real likelihood that many repositories, each with individual operating features, will emerge, a degree of guidance for the sector to ensure the best possible outcome in terms of discoverability and interoperability would be welcome when HEFCE communicates its policy.

HEFCE's expectation that sufficient clarity and reassurance on embargoes and licences will be achieved through the Research Council discussions.

9. We are hopeful that the RCUK position on embargoes will be clarified following the current consultation. If the assessment of policy implementation and impact in 2014 indicates that changes to the embargo policy are needed it would be helpful to know whether HEFCE would take these decisions into consideration for the remainder of the REF period or would leave the initial policy in place? The eligibility of acceptably embargoed publications for return in the REF is welcome.
10. The issue of licenses is complex and we are aware that a range of views are being put forward to the RCUK consultation from different stakeholders. This may be an area where practice and the ability to adapt practice, will differ across specialisms. It is also an area where funder expectation will be important and again we would urge HEFCE to engage with diverse funders to develop a broad view of the relevant issues and likely implications throughout the HEFCE-funded sector of the application of RCUK policies; as this is not a necessary consideration for RCUK in coming to their judgement.

HEFCE's invitation to provide advice on the best approach to exceptions and on an appropriate notice period. (*Any cases made for exceptions should be underpinned by clear evidence.*)

11. We consider it most likely that individual or case-by-case applications would be appropriate. However, given the risk involved in rejection of the application, and because conditions in paragraph 12 would rule out any retrospective extension of access making the material eligible, we would recommend the

publication by HEFCE of the guidance that would apply to its decision-making at the earliest opportunity so that researchers and institutions can make informed choices.

12. Given the length and complexity of some peer review and publication processes and the length of time that can elapse as a result, we would recommend a notice period of 18 months from the date of publication of HEFCE's final policy.

HEFCE's request for comment on when it may be thought inappropriate to expect repository deposit of monograph text. Alternatively, given the percentage of submitted material which is in monograph form, whether an expectation of a given percentage of compliance (paragraph 18c) would eliminate the need for a special-case exception for monographs.

13. We recognise the special circumstances that relate to monograph publication and the vulnerability of the system for these important outputs. We understand that they may, in the short term, require careful attention and special support, including exemptions from the general access requirements.
14. We are concerned that accounting for percentages will be problematic and contestable for institutions, and we are not convinced that this is a viable alternative to seeking specific exemptions (providing guidance is provided).

HEFCE's invitation to comment on whether respondents feel this is the appropriate approach or whether they feel that sufficient progress has in fact been made to implement a requirement for open data as well. (*We will consider any representations that such a requirement may reasonably now be developed but would also need advice on how this might be achieved.*)

15. We welcome and support HEFCE's agreement in principle to the sharing of research data and share a view of the advantages of access to supplementary data for published peer-reviewed papers wherever possible. However, in practice we do not think that a requirement to provide access to data is appropriate at this stage, and that there are instances where it is never likely to be so, including for cases of commercial sensitivity or reasons of national or personal security.
16. In order to support proper access to underlying data, further development of repositories may be necessary and high standards of researcher curation of data would be needed along with semantic marking and appropriate linkage.

Conclusion

17. HEFCE's policies will have the greatest effect upon researchers in the UK in terms of behaviour and outcomes. The policies will have implications for all HE institutional researchers, regardless of their funding source, be it commercial or through private trusts and charities. We would therefore welcome the development of guidance to accompany the developed policy, in line with findings from the consultation on RCUK policy and supporting guidance, and ask for some review activity from HEFCE after the RCUK open access review in 2014. This review should also ascertain any collateral damage to Learned Societies and its impact, and we ask for a statement of intention to avoid this wherever possible.

The Society of Biology is pleased for this response to be publically available. For any queries, please contact Jackie Caine at Society of Biology, Charles Darwin House, 12 Roger Street, London, WC1N 2JU. Email: policy@societyofbiology.org

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