



Consultation on open access in the post-2014 Research Excellence Framework

A joint response from the Medical Schools Council, Dental Schools Council, Pharmacy Schools Council and the Council of Healthcare Science in Higher Education

1a 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)?

Strongly agree Agree Neither agree or disagree Disagree Strongly disagree



1b Do you have any comments on this proposal?

The following response to the HEFCE Consultation on open access is the result of collaboration between the Council of Healthcare Science in Higher Education, the Dental Schools Council, the Medical Schools Council and the Pharmacy Schools Council*.

Our organisations submitted individual responses to the original call for advice from HEFCE, referred to as the 'February letter' in the consultation document. The responses were united in maintaining that the approach to open access should be sufficiently flexible to ensure that institutions are able to adhere to the principles of open access, while also reflecting the diversity of REF submissions.

Overall there is agreement that the criteria presented for open access meet this requirement for flexibility. The statement that research can be made available as the final peer-reviewed text and does not have to be presented in the publisher's edited and formatted version is particularly helpful. This condition takes into account the lag time in publishing between the submission and publication of research and should support institutions to include research which has recently been included within their REF submission.

It is also beneficial that the criteria for open access allow institutional repositories to respond to embargo times. Nevertheless, the criteria refer to 'agreed' embargo times and, while there is a suggestion that this should be aligned with the Research Councils' open access policy, Research Councils UK (RCUK) have stated that they will review their approach to open access next year, with subsequent periodic reviews also proposed. This means there remains a degree of uncertainty as to the extent to which the academic publishing industry will respond to evolving expectations of embargo periods. The consultation document does acknowledge gaps in the evidence base on open access, further demonstrating the importance of open access policy being rooted in flexibility.

As an additional point, our organisations recognise the acknowledgement that there will be no requirement for REF submissions to also include open access to data. Our organisations suggest that any future consideration of open access to data should also recognise and respond to the paramount need to respect patient confidentiality.

*A brief summary of the work of organisations has been provided below.

The Council of Healthcare Science in Higher Education (CHS) builds a unified identity of academic healthcare science by representing the interests of the sector. We work to improve and maintain quality in healthcare science education and training. Academic healthcare science comprises life sciences, clinical physiology, medical physics and clinical engineering.

www.councilofhealthcarescience.ac.uk

The Dental Schools Council (DSC) acts as the authoritative voice of all undergraduate dental schools within universities in the UK, the DSC provides a principal source for informed opinion and advice on all matters concerning dental education and research including relations between dental schools, medical schools, the National Health Service and other clinical care providers.

www.dentalschoolscouncil.ac.uk

The Medical Schools Council (MSC) represents the interests and ambitions of UK medical schools as they relate to the generation of national health, wealth and knowledge through biomedical research and the profession of medicine. The membership of the Medical Schools Council is made up of the Heads or Deans of the 32 UK undergraduate medical schools, plus the postgraduate London School of Hygiene and Tropical Medicine. www.medschools.ac.uk

The Pharmacy Schools Council (PhSC) represents the collective interests of 27 UK schools of pharmacy by providing a source of expert opinion and advice on matters concerning pharmacy education from the perspective of UK schools. <http://www.pharmacyschoolscouncil.ac.uk/>

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

Strongly agree Agree Neither agree or disagree Disagree Strongly disagree



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

Acceptance Publication



2c Do you have any comments on these proposals?

An initial concern was the need to avoid duplication of effort and that there are already a number of repositories available throughout the health disciplines. However, the consultation document acknowledges that institutional repositories are in varying stages of development and that some institutions benefit from having pooled resources through the creation of shared repositories. The statement that outputs accessible through shared facilities would meet open access requirements is particularly important as it ensures that institutions will not have to duplicate efforts in meeting open access requirements.

The consultation document refers to the fact that a decision has not yet been taken as to whether accessibility should follow immediately from acceptance or publication. There are both benefits and disadvantages to both approaches; accessibility from acceptance will mean that research can be included in a REF submission that may not be published until after the close of the relevant REF

round, something that may be particularly relevant when considering the time it can take for work to be published. Furthermore, applying the open access criteria at the point of acceptance seems to be coherent with the suggestion that open access should apply to final peer-reviewed text rather than applying to the published and formatted version. Nevertheless, there are questions as to how this approach will take into account embargo times in a way that is manageable for institutions. It is welcome that embargo periods will be respected, but detail as to how this will work in practice is required. Further clarification is also sought on paragraph 28, where it is suggested that outputs can be made available at the institution where the academic is employed at the time of either acceptance or publication. This seems to contradict paragraph 58 which states that open access should only apply to academics at the time of an output's submission for publication, while we assume that it would be based on submission rather than acceptance or publication, there is the potential for this to be clarified.

Finally, the councils are keen to ensure that HEFCE's proposals to publish from 'acceptance' are considered when RCUK review their approach to open access next year. This will minimise the risk of any potential mismatch which could cause confusion for institutions.

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

Strongly agree Agree Neither agree or disagree Disagree Strongly disagree

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

Strongly agree Agree Neither agree or disagree Disagree Strongly disagree

3c Do you have any comments on these proposals?

The consultation document suggests that embargo times will be aligned to the appropriate Research Councils' open access policy; this is something that seems logical and also ensures there is the required degree of flexibility within the open access policy. However, we have previously raised concerns regarding the effects of applying open access at the point of acceptance on the clarity of implementing embargo times. Our organisations suggest there is a need to consider this further.

The document acknowledges that the appropriate licensing requirements still need to be clarified. We had previously stated that some in the academic community have concerns about the CC-BY licence which is often taken to be the standard licence for open access due to the fact that it only requires attribution. Nevertheless, it is suggested that Hefce will not specify what sort of licence should be applied to open access, again helping to support the flexibility of the policy. Such flexibility will help open access policy respond to the influence and financial imperative of the publishing industry.

4a Do you agree that the criteria for open access should apply only to journal articles and conference proceedings for the post-2014 REF?

Strongly agree Agree Neither agree or disagree Disagree Strongly disagree

4b Do you have any comments on this proposal?

From the perspective of our organisations, it appears to be sensible to limit open access to journal articles and conference proceedings as this reflects the diversity of the publishing industry under which the different types of media operate. This phased approach will offer an opportunity to fully understand the benefits and challenges of open access policy before exploring its potential application to other outputs.

We would also suggest that given recent debates around clinical trials and the suggestion that there is a bias towards publishing positive results that there should be encouragement to publish negative results in new journal media such as the Journal of Negative Results in BioMedicine.

5a 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?

Strongly agree Agree Neither agree or disagree Disagree Strongly disagree

5b Do you have any comments on this proposal?

A notice period of two years is an appropriate amount of time between the announcement of the policy and introducing an obligation for institutions to meet open access requirements. It is important that this time period is used by Hefce to implement a robust communication process so that institutions are fully informed as to what is expected. There is also a need to be mindful of Research Councils UK proposed review of their open access policies and clear communication is required on the resultant effects this review may have on embargo periods.

It is also encouraging that the consultation document takes into account the fact that outputs submitted for publication may take longer than two years to publish which further supports the need to grant exemptions.

6a 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?

Strongly agree Agree Neither agree or disagree Disagree Strongly disagree

6b Do you have any comments on this proposal?

The consultation document suggests that open access will only apply to outputs authored by an academic employed by a UK university at the point of submission. We are supportive that this approach is taken as it adequately responds to the mobility of academics.

7a Which approach to allowing exceptions is preferable?

a) full compliance, case-by-case exceptions b) percentage target

7b If selecting option b: Do you agree that the percentage targets are appropriate?

Strongly agree Agree Neither agree or disagree Disagree Strongly disagree

7c If selecting option b: Do you believe the percentage target should apply consistently or vary by REF main panel?

Apply consistently By REF main panel



7d Do you have any comments on these proposals?

Throughout our organisations' responses to the 'February letter' we highlighted the need for a flexible approach which takes into account the environment in which institutions operate. Consequently, we are very supportive of the admission from the consultation document that there is a need to incorporate exceptions within open access policy.

While the suggestion in the consultation document that exemptions could be granted on a case-by-case basis is a clear execution of flexibility, it is necessary to consider the administrative processes that would be needed to support this approach. It may be necessary for a criterion to be developed across the REF sub-panels to consider the allocation of an exemption, along with how to define 'exceptional circumstances' to ensure the equitable treatment of institutions. Furthermore, it may even be necessary for an appeals process to be created in order to respond to complaints regarding the process of allocating exceptions. This may create further complications for the administration of REF panels and therefore the proposals of percentage targets could be a more feasible approach

Therefore, we broadly support the proposal of percentage targets. However, we do have some reservations with this approach, particularly around the potential unintended consequence of percentage points acting as a quota. Consequently, we would welcome guidance on possible exceptions to be included in the wider REF guidance.

It is also acknowledged that percentage targets may create burdens in the development of REF submissions. It may be difficult to apply these fairly in practice given the different profiles of units submitted across institutions. Therefore, we would welcome clear guidance issued from Hefce regarding how open access is defined and the extent to which a piece of work contributes to a submission in order to assist institutions compiling a submission.

Were percentage points to be introduced, we would support the proposal that the target for open access should vary by REF main panel, this will reflect the different conditions under which different disciplines operate and ensure the policy can be implemented in a way that is fairer to institutions.