

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

Medical Schools Council Response

March 2013

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.

We welcome the opportunity to comment on HEFCE's call for advice on 'Open Access and Submissions to the Research Excellence Framework post-2014'. We agree that the approach outlined is welcome for publicly funded research and that the proposal appears reasonable. MSC feels that the following are priorities for consideration in this area:

1. Clarity on process, informed by funder and publisher practice

When setting the rules and definitions that govern the process, absolute clarity is required. One aspect of this is giving details of what constitutes a "reasonable embargo time". We are aware that, for example, *Nature* does not permit a 'gold' route to open access and imposes an embargo of six months before an output is placed in the public domain. We feel that the green route, alongside the gold route is an appropriate approach to open access. If final guidance is in significant conflict with major journal publishing practice, there will be a cost implication for institutions. Similar issues arise with 'circulation'. Therefore, consideration of embargoes within the context of research funder and publisher requirements is essential. This issue is referenced in paragraph 15 of the document, though we believe it is in some conflict with bullet point 1 of paragraph 11, which requires information to be deposited "immediately upon publication".

It will also be important for HEFCE to review the attendant licence requirements of funders and publishers. We are aware that members of the academic community have some concerns about the CC-BY licence (which appears to have emerged as the standard licence for open access) as it only requires attribution. Exploration of these concerns will be important. Discussion of both licence requirements and embargo periods should be conducted within the context of the influence and financial imperative of publishers.

Additionally, an important issue is how metrics might be used in any subsequent REF exercise after 2014. Searching available and currently used databases for citations would capture all publications (open access or otherwise), but if the search for REF purposes was limited to those publications in institutional sites the results would be very different. Clarity about how the next REF exercise might be conducted is essential in providing useful guidance on open access and could avoid the risk of game playing.

2. Allowing sufficient time to support the process

While there is some funding available from research councils to help with making research more openly accessible, more widespread adoption would be expensive and medical charities in particular may struggle to support this financially¹. We are concerned that the implied timeline of all REF relevant publications being open access from January 2014 is too restrictive and will be challenging for institutions to manage. As a result, careful consideration of capacity to support the process is required.

3. Maximising existing resources

MSC encourages HEFCE to reduce duplication of effort in the area of institutional repositories. For the biomedical sciences, EuropePubMed is already functioning well. Indeed many of our members run their own successful repositories that allow internal monitoring for compliance. Consequently, it is important that additional effort and expense is not channelled into creating a new repository.

¹ AMRC submission to House of Commons Business, Industry and Skills Select Committee on Open Access publishing: http://www.amrc.org.uk/news-policy--debate_consultation-responses_external-consultations-by-year#2013