

- On Open Access
- Response from the RGS-IBG

We respond below with our views on each of the questions asked in the consultation.

1. We welcome advice on our expectations for open-access publications, as at paragraph 11.

The Royal Geographical Society (with IBG) is the learned society and professional body for geography in the UK.

- We welcome the equal treatment of Gold and Green OA in HEFCE's proposed policy.
- However, the expectations as outlined are very strongly led by RCUK policy, particularly on embargo periods and licences. Some of these, we believe, are open to question (see comments below).
- To sustain quality peer review and journals, capable of showcasing world-leading UK scholarship, at a minimum embargo periods need to be 12 months for STEM and 24 months for HSS, now and in the longer term.
- In addition, increasing resources will be diverted from supporting research to supporting bureaucratic structures to decide upon and disseminate limited funds for APCs. The bureaucratic burden on institutions will be significant (see also comments on repositories below).

We remain very concerned about the financial resources to adequately support Gold OA and the equity of access to such funds across disciplines, institutions, career stages etc. There are significant implications for how institutions will treat researchers, potentially with negative effects disproportionately falling on those on fixed term contracts not expected to be there for next REF. Inevitably a two-tier system will evolve and there will be constraints for many UK academics on how much and where they can publish 'Gold'.

Many of the most appropriate journals for academics in the humanities and social sciences (HSS) are based outside the UK. The OA agenda is developing in Europe and the US in different ways and it would be flawed to assume that journals based elsewhere will quickly become compliant with policies stipulated by UK funding bodies. Even in the US, where there are preferences emerging from federal bodies (NIH, NSF), many publishers/presses are state universities who may well elect not to comply.

If UK academics are pressured into not publishing in leading journals in their fields, this both restricts academic freedom and risks damaging the international reputation of UK research. There may also be unintended consequence on journals in emerging economies in the Global South and those scholars who work on these parts of the world who believe their research should be published locally/regionally to maximise opportunities for collaboration and impact.

It would be counter-productive if requirements for OA publication (at the time of submission) curtailed the import of leading international scholars to the UK because they had been employed and publishing in a country without such mandates/resources, or have a negative effect on the diversity of those submitted to future REFs (in terms of who has access to Gold OA funds based on contract type/periods of leave).

We argue strongly for a review to be built in to assess the implications of HEFCE's policies, and this should be structured in such a way that it is early enough to allow interventions to address any emerging negative consequences and yet late enough to have gathered appropriate evidence. Throughout the document there is a lack of clarity about the 'transition period'. Is this referring to the RCUK proposed transition of five years? Through to next REF? The end-point of this transition is also unclear.

Our over-riding sense of the geographical community is one of confusion and concern about OA. While there is support for the principle of OA, there are legitimate concerns about the potential impacts of implementation at a time of considerable (and likely increasing) financial resource constraints. Existing uncertainty in the community is also being compounded by the possibility of implementation of these changes in the middle of the 2014 REF, rather than during the subsequent REF period and after the RCUK review (in 2014).

Taking note of the amount of material in the publishing pipeline, and the time period over which academics plan and write up their research, any requirements for OA should not take effect until at least 2017 (i.e. for material submitted in that year and afterwards.).

2. We welcome further advice on repository use and on techniques for institutional repositories to cross-refer to subject and other repositories.

We remain concerned that there is an inadequate appreciation of the resources needed to develop and maintain repositories and the future-proofing required to ensure a sustainable legacy archive of scholarly outputs. There is potential for the extensive duplication of repository provision, which could see costs escalate. HEFCE should use this juncture to consider the full implications of separate institutional repositories before moving forward. It is also likely that confusion about different versions of publications and data sets will emerge due to the multiplicity of repositories and the mobility of authors who may deposit research in a number of institutional repositories worldwide. A number of kite-marking and author ID initiatives have been developed (e.g. CrossMark, ORCID) and the application of these should be explored to reduce these problems.

Learned Societies as well as HEIs need to be involved in these discussions and the development of advice to ensure users and disciplines as well as funders and universities are appropriately served. More details are also needed about repositories and the functionality required to support text and data mining.

There are widespread misunderstandings throughout the HE sector in terms of copyright and usage licences so institutions will need to be capable of providing advice to authors on an individual basis, another burden.

3. While we expect that sufficient clarity and reassurance on embargoes and licences will be achieved through the Research Council discussions, we welcome responses which address these issues.

As noted above we believe the RCUK policy, particularly on embargo periods, is flawed and still lacks clarity (we cross reference our response and that of the House of Lords to the latest RCUK consultation). Embargo periods, at a minimum, need to be 12 months for STEM and 24 months for HSS regardless of the Gold OA provision available to the author or by the publication concerned.

HEFCE and RCUK have indicated support for traditional publishing routes through the provision of Gold OA funding and a continuing (and welcome) emphasis on peer-review and quality. They both recognise that not all publications (by a long way) will be Gold funded. Therefore, embargo periods need to ensure the sustainability of the Green route through viable publishing business models.

There is a genuine and real concern from scholars about their IPR and the implementation of the CC-BY licence. We believe there is a fundamental difference between STEM-type subjects and HSS, given the more common use of patents and trademarks by the former.

One size does not fit all and scholars should be given options of appropriate CC-BY-NC-ND licence combinations. HSS publications also often include material drawn from other sources, which may be subject to different licence restrictions. While these can be exempted from an article level licence, the material then made OA is reduced; but this may not be necessary with more restrictive (but still OA) licences.

There are further ethical issues in terms of the use of research material by commercial organisations (e.g. in-depth qualitative research with vulnerable participants). More restrictive licences could better allow this to be released into the public domain and avoid any impact on the kinds of research conducted and funded (e.g. if research participants are unwilling to be part of research to be made available for commercial use).

4. We welcome advice on the best approach to exceptions and on an appropriate notice period. Any cases made for exceptions should be underpinned by clear evidence.

We welcome the principle that there will be exceptions, but we believe that 80% is a high bar.

Guidance on this issue needs to be developed by those with appropriate disciplinary expertise. Similarly, cases for exceptions need to be reviewed by those who understand the funding and nature of publishing in a disciplinary context.

It is very important that HEFCE consider exceptions broadly – both in terms of the types of outputs (see comments below about the monographs/books and their diversity as one example) and also academics at different career stages (early career researchers who may have published as postgraduate students), institutional affiliations (in the UK and overseas), and contracts (part time and full time) (see comments in first section).

5. We seek 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, we ask for advice on whether an expectation of a given percentage of compliance as described above (paragraph 18c) would eliminate the need for a special-case exception for monographs.

We believe it is inappropriate to expect repository of monograph text at all and believe it needs its own special-case exception. The output of monographs varies significantly across disciplines (and sub-disciplines) and the balance of those disciplines varies across institutions. Without a blanket exception, this will be a very uneven burden across institutions.

The issue of monographs also needs to be thought about broadly to consider edited volumes and book chapters. This too is further complicated by international publishers and collaborators.

6. We invite 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.

It is premature to be implementing a requirement of open data. There has been insufficient progress on this issue, on the resources to support this in a meaningful way and on an understanding of likely impact.

If/as such discussions go forward, it is critically important that those from the social sciences are involved to ensure appropriate attention to the full suite of ethical issues associated with the release of such data.

Similar comments apply as above in terms of access and re-use licences, repository management, multiple versions being made available etc. In terms of practicalities, especially careful attention needs to be given to metadata, data formats and support for compliance.

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