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Submitted to REF 2029 Open Access Consultation
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Transparency Statement

Your Details

1 Are you answering on behalf of your organisation or institution, or as an individual?

Organisation or institution

2 What is your organisation/institution?

Organisation:
University of Kent

3 Country

England

Other:

Section A: open access developments in the sector

4 What are the most important changes in the open access landscape since the development of the REF 2021 open access policy?1) How do these differ across disciplinary areas?2) What are the implications of these changes for the REF 2029 open access policy?

OA landscape changes:

The OA requirements for the last REF impacted UK HE research culture. These requirements and UKRI's created the catalyst that raised the profile of OA publishing. However, self-archiving the AAM in a repository is perceived as a 'poor relation' to Gold OA publishing. The author's preference has always been to direct readers towards the journal site. Prevalence of paid-for OA led to librarians' concern around double dipping. Read and Publish agreements negotiated by Jisc since the last REF responded to this concern. They created a lever to shift the publishing landscape and encourage publishers to adapt their publishing models. Kent has benefited from these agreements, with the majority of our research articles now published immediately OA. Ease of publishing through agreements, combined with delay in refreshing the OA REF requirements, means the importance of Green OA has diminished, together with researcher awareness of acceptance dates, embargoes and detailed REF requirements. The 'frictionless' approach supported through R&Ps is valued by researchers but creates fundamental issues for equity of access to publishing within the UK and beyond. As such the levers for change must extend to research assessment reform, in addition to support for equitable OA publishing models. Within a financially challenged UK HEI sector, it is essential to maximise impact of funding for OA to support 'best-in-class' OA models and to incentivise open research practices. Requirement specifics concerning deadlines, dates of deposit, acceptance, and interpreting publisher self-archiving policies, alongside managing Gold and Green OA routes, has created complexities and staffing resource implications. As such, they have proved a distraction from the principal aim of increasing the amount of research that is openly available. The complexity is exacerbated by the fact that UKRI and other funders have similar, but not identical, requirements. Monitoring multiple different criteria is onerous. Effective UK-wide solutions are not possible because of the variety of research infrastructure systems in use. This has resulted in each institution investing in local developments and brought with it duplication of effort and inequities across institutions.
The proposed new OA REF requirements would exacerbate this situation, rather than improve it. Suggested solutions: 1.Move away from detailed requirements and instead introduce a 'recognition and reward' system based on the overall percentage of OA outputs that an institution submits. This could be an indicator in the People, Culture and Environment element. This aligns with the need to reform research assessment. 2.Make the REF 2029 OA requirements identical to UKRI's. 3. Start afresh from Jan 2025.
All outputs should be deposited in a repository immediately upon publication whether an embargo is required or not. We have a duty to archive the UK's body of research to enable Open Research

Section B: journal articles and conference proceedings

Section B: publication, deposit

5 Should deposit requirements post acceptance be maintained where publication isn't immediately open access?

Yes

If yes, why? What would be an appropriate time limit for deposit post acceptance?:

We strongly recommend that all articles regardless of whether they have been published Gold or Green OA should be deposited in a repository immediately upon publication regardless of whether an embargo is required or not.

This is because:

many institutions use their repository as the source of their REF submission.

there is evidence of journal sites disappearing and articles being "lost". We have a duty to archive the UK's body of research outputs and ensure that they are preserved for the future. If this is not a requirement, an unintended detrimental consequence may be a poorer and incomplete body of UK research. This would affect future Open Research.

our experience from the REF 2021 OA requirements indicate that it is harder to encourage academics to deposit if it is not a specific requirement

We do not wish to have the burden of monitoring any time limit post acceptance or post publication. There are sufficient exceptions for this to be achievable.

It is increasingly difficult to obtain acceptance dates from journal publisher pages

Section B: access, licensing

6 Do you agree with alignment to the UKRI open access policy in respect of licensing for journal publications by requiring licensing terms equivalent to CC-BY or CC-BY-ND licensing for journal publications?

Yes

What, if any, negative or positive impacts might there be from this change?:

We welcome alignment with UKRI's policy because this simplifies our guidance for our researchers

However, publishers are currently offering a whole range of licences even when the institution has paid up front for OA under a Read and Publish agreement. This causes confusion.

Section B: pre-prints, alternative platforms

7 Do you agree with recognition of alternative platforms as meeting open access requirements as primary platform for publication?

Yes

Please provide any further comment:

We suggest that Research England need to be clear about whether articles that have not been peer-reviewed are eligible for the REF.

We have adapted our repository to be able to record pre-prints but have defined these as not yet fully peer reviewed.

We believe that repositories should be able to accommodate alternative publishing platforms to further Open Research.

We believe for this to operate effectively our proposal in Question 5 regarding deposit would be essential. ie. deposit in a repository immediately upon publication

Section B: embargo periods

8 Do you agree with the proposed changes to embargo periods for journal publications for main panels A and B (12 months reduced to six months) and main panels C and D (24 months reduced to 12 months), in light of changing standards and practice?

No

What, if any, negative or positive impacts might there be from this change?:

This would not align with either UKRI or with current REF 2021 so just creates confusion and an administrative burden for little gain. We recommend that either the same embargo periods are retained or abandoned altogether.

Section B: tolerance limits, implementation date

9 Do you agree that changes to the open access policy for journal-based publications should be implemented from 1 January 2025?

Yes

Please provide any further comment:

Could you consider extra credit for those with no or lower numbers of non-compliant items?

10 Do you consider that tolerance limit for articles and conference proceedings should be retained at 5% of any submission?

Yes

please provide any further comment :

It will not be possible for us to implement two different sets of requirements from within our repository or to monitor and report upon compliance. This is in addition to separate UKRI requirements which are similar but not identical. This has significant implications for professional services staff.

The delay in addressing new requirements has made it very difficult to ensure that academics adhere to and are aware of the requirements. The different requirements for UKRI and the introduction of Read and Publish agreements has meant that the acceptance date has diminished in importance.

Our suggested solution is for the REF 2021 OA requirements to not apply for the period Jan 2021-Dec 2024 and to start afresh in Jan 2025. This would greatly reduce the administrative burden for staff.

Section B: exceptions

11 Do you agree with the proposed exceptions for journal publications?

Yes

Should any of the above be removed?:

It has never been clear what evidence is required by Research England to support these exceptions.

Will there be any penalties or credits for the institution for the number of exceptions used?

There are technical implications for monitoring adherence to two different sets of exceptions that differ between REF 2021 requirements and REF 2029 requirements.

What, if any, additional exceptions might be required?:

Section C: longform outputs (monographs, book chapters and edited collections)

Section C: publication, deposit and embargo

12 Do you agree that there should be no deposit requirement for longform publications, but that they should be made immediately available as open access upon publication (or no later than 24 months following publication if subject to an embargo)?

No

Please provide further comment:

We strongly recommend that all long from publications regardless of whether they have been published Gold or Green OA should be deposited in a repository immediately upon publication regardless of whether an embargo is required or not.

This is because:

many institutions use their repository as the source of their REF submission.

We have a duty to archive the UK's body of research outputs and ensure that they are preserved for the future. If this is not a requirement, an unintended detrimental consequence may be a poorer and incomplete body of UK research. This would affect future Open Research.

our experience from the REF 2021 OA requirements indicate that it is harder to encourage academics to deposit if it is not a specific requirement

We do not wish to have the burden of monitoring any time limits

13 Do you agree with the proposal of a maximum embargo period of 24 months for longform publications?

No

Please provide any further comment:

We propose that this should mirror the UKRI OA longform policy where a maximum embargo period of 12 months is permitted for books and chapters. Having another, but different embargo period, causes unnecessary confusion for librarians and academics. There are sufficient exceptions proposed (eg. Exception 7) to mitigate where this cannot be achieved.

Very few publishers currently allow the author accepted manuscript of a whole book or edited collection to be made available in a repository at any stage so Exception 7 will be relied on heavily anyway.

Section C: access, licensing

14 Is licensing for third party materials not being granted a reasonable ground for exemption from open access requirements?

Yes

Please provide any further comment:

We recommend that you make it clearer that third party material can be licensed separately and independently from the whole long-form publication

15 Is sharing of a version of an output without third-party materials if licensing can't be obtained, mirroring the UKRI open access policy for longform outputs, appropriate to meet the open access requirements for REF 2029 policy?

Yes

Does this present issues for output submission and assessment?:

Section C: tolerance level

16 Do you agree with the principle of a tolerance level for non-compliant longform outputs?

Yes

Please provide any further comment:

17 Do you agree with the proposed tolerance level of 10% for longform outputs?

Yes

Please provide any further comment:

Section C: implementation

18 Do you agree with the proposed date for implementation of an open access policy for longform outputs in REF 2029 being for all longform publications for which contracts are agreed from 1 January 2026?

No

Please provide any further comment.:

This should be January 2025, or the same date that the new OA REF requirements come into effect. Otherwise, librarians and technical teams carry the burden of managing, reporting and monitoring multiple timeframes

Section C: exceptions

19 Do you agree with the proposed exceptions for longform publications?

Yes

Should any of the above be removed?:

The implications for staff resource and technical adjustments to repositories to record these are unreasonable and we cannot realistically see how we could achieve this.

Are there other exceptions you think are necessary for longform outputs? Please provide evidence in support.: