

University of Kent's response to Research England's REF 2029 Open Access Policy consultation

What's worked for OA since 2014

The introduction of OA requirements for the last REF both influenced and impacted on UK HE research culture. From our perspective as professionals enabling researchers to publish open access, the requirements from Research England and UKRI created the catalyst that has raised the profile of open access publishing for researchers.

For researchers, however, our impression is that the practice of self-archiving the Author Accepted Manuscript 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.

The prevalence of paid-for OA (APCs) led to librarians' concern around 'double dipping'. The Read and Publish (R&P) agreements negotiated by Jisc since the last REF responded to this concern. These agreements 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 R&P agreements, combined with a delay in refreshing and promoting the OA REF 2029 requirements, means the importance and use 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 both 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' open access models and to incentivise open research practices.

Challenges for OA since 2014

The specifics of Research England's requirements concerning deadlines, dates of deposit, dates of acceptance, dates for embargoes, exceptions and interpreting numerous publisher self-archiving policies, alongside managing Gold and Green OA routes, have 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 and different criteria is complex and onerous.

Efficient and effective UK-wide solutions are not possible because of the variety of research infrastructure systems in use. This has resulted in each institution having to invest in their own local developments and brought with it the associated duplication of effort and inequities across institutions with differing levels of resource.

The proposed new OA REF requirements would exacerbate this situation, rather than improve it.

Recommendations

1. We cannot see how it will be practically achievable to monitor and manage (i) the old REF requirements for the period between January 2021 and December 2024; (ii) the new requirements for REF 2029; and (iii) UKRI's established requirements. The delay in addressing and confirming the new OA REF requirements has made it very difficult to ensure that our academic staff both adhere to and are aware of them.

Our suggested solutions are:

- Research England moves away from detailed requirements and instead introduces a 'recognition and reward' system based on the overall percentage of OA outputs that an institution submits. This could be one of the indicators of the People, Culture and Environment element. This aligns with the need to reform research assessment.
- Research England makes the Open Access requirements for REF 2029 identical to UKRI's.
- As a minimum, we request that the compliancy requirements for the period Jan 2021–Dec 2024 are removed to enable us to start afresh from Jan 2025 onwards.

2. We recommend that all articles, book chapters and books, regardless of whether they have been published Gold or Green OA, should be deposited in a repository immediately upon publication 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'. Libraries have a duty to archive the UK's body of research outputs for their institution 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.

3. We support recognition of alternative platforms for open access. We are aware that publishing practices are already evolving, and funders have responded to this; e.g. NIHR and the Bill Gates Foundation.

Consequently, repositories will have to adapt to enable the recording of research outputs that appear on alternative publishing platforms. To support Open Research, we have adapted our repository to be able to record pre-prints but have defined these as not peer reviewed.

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

The role that libraries and institutional repositories play in capturing and preserving their unique institutional archive of research outputs must be recognised and supported.