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UKRI Open Access Review Consultation: Queen's University Belfast Response

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Q1. To what extent do you agree or disagree that it is clear what research articles are in-scope of UKRI's proposed OA policy (see paragraph 46 of the consultation document)? Strongly agree / **Agree** / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.

If anything is unclear, please explain why (1,350 characters maximum, approximately 200 words).

While Queen's agrees that the policy is mainly clear on what research articles are in scope of the proposed policy, we would welcome confirmation that commissioned review articles will not be included.

Q2. Are there any additional considerations that the UK HE funding bodies should take into account when defining research articles that will be in - scope of the OA policy for the REF-after-REF 2021? **Yes** / No / Don't know / No opinion.

If yes, please expand (1,350 characters maximum, approximately 200 words).

Please see paragraphs 29-31 of the consultation document before answering this question.

In the interests of reducing administrative burden and complexity for authors and institutions, Queen's would encourage UKRI to ensure that the two policies are closely aligned.

Q3. In setting its policy, should UKRI consider any other venues for peer - reviewed research articles which are not stated in paragraph 47 of the consultation document? Yes / **No** / Don't know / No opinion.

If yes, please expand (700 characters maximum, approximately 100 words).

Q4. Are there any specific challenges for you, your community or your organisation in terms of complying with the requirement in UKRI's proposed policy for immediate OA of in-scope research articles?

Yes / No / Don't know / No opinion.

Please explain and, where possible, evidence your answer. UKRI notes that there will be a period allowing for implementation before the policy comes into force (see paragraph 70 of the consultation document). (2,650 characters maximum, approximately 400 words.)

Complying with the policy poses a number of challenges to Queen's around funding and resources. The requirement for immediate OA will likely increase the demand for Gold OA, which will in turn require an increase in the Queen's UKRI block grant. Currently, the block grant is not sufficient to cover all APCs so its use is restricted by the University to fully OA journals.

In addition, many of the major scholarly publishers such as Elsevier and Springer Nature, impose embargoes on accepted manuscripts, which will greatly restrict green OA under the proposed policy, and again put pressure on institutions to meet the policy via the Gold route. Smaller publishers may also struggle to support the required infrastructure for the green route, which may reduce choices for authors.

Jisc's ongoing transformative agreement negotiations with publishers have also created a number challenges for Queen's:

- *Some agreements entail price increases above inflation and the impact of the COVID-19 outbreak on the University's finances is not yet known*

- *It has been difficult to assess each new agreement thoroughly because so many are being negotiated in such a short space of time*
- *The institutional journals budget will require topping up using the UKRI block grant to pay for the OA component of certain agreements, which will be difficult to manage and may result in less money being available for APCs for pure OA journals*

Q5. Should UKRI's OA policy require a version of all in-scope research articles to be deposited in a repository, irrespective of whether the version of record is made OA via a journal or publishing platform? **Yes / No / Don't know / No opinion.**

Please explain your answer (700 characters maximum, approximately 100 words). Please note that some Research Councils already require articles to be deposited in specific repositories, as detailed in the terms and conditions of funding. UKRI does not expect this to change.

Queen's supports the view that mandating deposit in an open access repository will increase the dissemination of articles, help to ensure their preservation, and increase the efficiency of compliance reporting.

Q6. For research articles, are there any additional considerations relating to OA routes, publication venues and embargo periods that the UK HE funding bodies should take into account when developing the OA policy for the REF-after-REF 2021? **Yes / No / Don't know / No opinion.**

If yes, please expand (2,000 characters maximum, approximately 300 words).

Please see paragraphs 29-31 of the consultation document before answering this question.

Queen's supports UKRI's intention to maintain commonality between the UKRI Open Access Policy and REF Open Access compliance, where possible, as it helps provide a clear and consistent message to researchers and therefore reduces any additional administrative burden. However, we would encourage UKRI to fully consider any equality, diversity and inclusion impacts of open access requirements, this is especially pertinent in light of the current pandemic, which may have long-term implications.

Q7. To what extent do you agree or disagree that where compliance with UKRI's OA policy is achieved via a repository, a CC BY licence (or Open Government Licence where needed) should be required for the deposited copy? **Strongly agree / Agree / Neither Agree nor disagree / Disagree / Strongly disagree / Don't Know / No opinion.**

Please explain your answer (1,350 characters maximum, approximately 200 words).

The University agrees that requiring a single license type for all articles irrespective of the compliance route would help avoid confusion and reduce complexity for authors. However, some concern has been expressed by authors that many publishers will not permit this option and in some areas, especially in arts, humanities and social sciences, it was felt that a more restrictive license would offer authors greater protection for their work. The University would welcome additional discussions between UKRI and publishers, and further guidance to reassure authors.

Q8. To what extent do you agree or disagree that UKRI's OA policy should have a case-by-case exception allowing CC BY-ND for the version of record and/or author's accepted manuscript. **Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.**

Please explain your answer. UKRI particularly welcomes evidence supporting: specific cases where ND is considered necessary; an ND exception not being necessary; any implications an ND exception could have for access and reuse (2,000 characters maximum, approximately 300 words).

Consideration should be given to permitting a CC BY-ND license without it being seen an exception, as some researchers feel that a CC BY license would not offer sufficient protection for their work. However, if it included in the policy, the process for granting CC BY-ND exceptions should be clear and easily integrated into existing workflows in order to prevent publishing delays and unnecessary work.

In addition, the University would welcome further clarity on why a CC BY-NC license has been ruled out.

Q9. Would the proposed licensing requirements for UKRI's OA policy, which exclude third-party content (see paragraph 55 of the consultation document), affect your or your organisation's ability to publish in-scope research articles containing third-party content?

Yes / No / Don't know / **No opinion.**

If yes, please explain how (1,350 characters maximum, approximately 200 words).

Q10. Are there other considerations UKRI should take into account regarding licensing requirements for research articles in-scope of its proposed OA policy? **Yes** / No / Don't know / No opinion.

If yes, please expand (1,350 characters maximum, approximately 200 words).

We would welcome clarification in the policy that the licence applied to the in-scope works covers use of the copyright solely in the work itself (i.e. the specific journal article) and not any tangential works of copyright which may be published along with, or in parallel, to the work. Such tangential works may include Software (and copyright therein), datasets (and Database rights therein covered under relevant copyright law), and background data or know-how (such as questionnaires).

There seems to be confusion in some quarters that a CC-BY licence applied to a journal article would also cover, for example, Software produced as a consequence of or in relation to that article. This would not be the case, and such Software would (and should) be subject to a different licence. This clarification would be useful to ensure that universities continue to have the unfettered ability to commercialise, where possible, such tangential works

It would also be useful to include the details of licensing agreements and policy requirements at the grant award stage, to avoid any confusion for authors, and to allow them to communicate these details clearly to co-authors and partners.

Q11. For research articles, are there any additional considerations relating to licensing that the UK HE funding bodies should take into account when developing the OA policy for the REF-after-REF 2021? **Yes** / No / Don't know / No opinion.

If yes, please expand (2,000 characters maximum, approximately 300 words).

Please see paragraphs 29-31 of the consultation document before answering this question.

It would be helpful if the licensing requirements for both policies were consistent, to reduce the administrative burden and to support a clear and consistent message to authors. We

would also welcome as much advance notice as possible, in order to ensure that we are sufficiently prepared.

Q12. Which statement best reflects your views on whether UKRI's OA policy should require copyright and/or rights retention for in-scope research articles?

- a. UKRI should require an author or their institution to retain copyright and not exclusively transfer this to a publisher
- b. UKRI should require an author or their institution to retain specific reuse rights, including rights to deposit the author's accepted manuscript in a repository in line with the deposit and licensing requirements of UKRI's OA policy
- c. UKRI should require an author or their institution to retain copyright AND specific reuse rights, including rights to deposit the author's accepted manuscript in a repository in line with the deposit and licensing requirements of UKRI's OA policy**
- d. UKRI should not have a requirement for copyright or rights retention
- e. Don't know
- f. No opinion

Please explain your answer. UKRI particularly welcomes views as to whether it is necessary to require copyright and/or rights retention if its policy were to require a CC BY licence, which enables reuse. If you selected answer b or c, please state what reuse rights you think UKRI's OA policy should require to be retained (2,000 characters maximum, approximately 300 words).

Please note that views are not sought on whether institutions should hold the copyright to work produced by their employees as this is subject to Section 11 of the Copyright, Designs and Patents Act 1988 and institutional copyright policies.

While Queen's agrees with Statement C, and believes that requiring that copyright and specific reuse rights remain with authors is the option that fits best with the ethos of OA and Plan S, there are some concerns around what publishers will permit, and how we ensure that authors have the necessary support and knowledge when signing agreements, otherwise this may limit the range of publishers authors can use.

Q13. Regarding research articles in-scope of UKRI's OA policy, to what extent do you agree or disagree with each of the seven proposed technical standard requirements for journals and OA publishing platforms?

For each of the seven standards (see paragraphs 67a-67g): Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.

For each of the seven standards (see paragraphs 67a-67g of the consultation document), please explain your answer (700 characters maximum, approximately 100 words, per standard).

- a. persistent digital object identifiers (PIDs) for research outputs must be implemented according to international standards such as DOI, URN or Handle

Agree

- b. article-level metadata must be used according to a defined application profile that supports UKRI's proposed OA policy and is available via a CC0 public domain

dedication; the metadata standard must adhere to international best practice such as the Crossref schema and OpenAIRE guidelines

Agree

- c. machine-readable information on the OA status and the licence must be embedded in the article in a standard non-proprietary format

Agree

- d. long-term preservation must be supported via a robust preservation programme such as CLOCKSS, Portico or an equivalent

Agree

- e. openly accessible data on citations must be made available according to the standards set out by the Initiative for Open Citations (I4OC)

Agree

- f. self-archiving policies must be registered in the SHERPA RoMEO database that underpins SHERPA/FACT

Agree

- g. unique PIDs for research management information must be used and must include the use of ORCID to identify all authors and contributors

Agree

All the standards mentioned above are appropriate, however, some caution may be required around mandating the use of ORCID iDs (standard g) as this may prove problematic for institutions to dictate when dealing with international co-authors.

Q14. Regarding research articles in-scope of UKRI's OA policy, to what extent do you agree or disagree with each of the five proposed technical standard requirements for institutional and subject repositories?

For each of the five standards (see paragraphs 68a-68e): Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.

For each of the five standards (see paragraphs 68a-68e of the consultation document), please explain your answer (700 characters maximum, approximately 100 words, per standard).

- a. PIDs for research outputs must be implemented according to international standards such as DOI, URN or Handle

Agree

- b. article-level metadata must be implemented according to a defined application profile that supports the proposed UKRI OA policy and is available via a CC0 public domain dedication; this should include the persistent identifier to both the author's accepted manuscript and the version of record; the metadata standard must adhere to international best practice such as the OpenAIRE guidelines

Agree

- c. machine-readable information on the OA status and the licence must be embedded in the article in a standard non-proprietary format

Agree

- d. unique PIDs for research management information must be used and must include the use of ORCID to identify all authors and contributors

Agree

- e. the repository must be registered in the Directory of Open Access Repositories (OpenDOAR).

Agree

As per the answer to Q13, all the standards mentioned above are appropriate, however, some caution may be required around mandating the use of ORCID iDs, as this may prove problematic for institutions to dictate when dealing with international co-authors.

Q15. To support the adoption of technical standards for OA, are there other standards, actions and/or issues UKRI should consider? **Yes** / No / Don't know / No opinion.

Please explain your answer (2,650 characters maximum, approximately 400 words).

Queen's would welcome the introduction of uniform technical standards, and would encourage UKRI to work with publishers and institutions to support this.

Q16. To support the implementation of UKRI's proposed OA policy requirement for research articles to include an access statement for underlying research materials (see paragraph 69), are there any technical standards or best practices that UKRI should consider requiring?

Yes / No / Don't know/ No opinion.

Please explain your answer (1,350 characters maximum, approximately 200 words).

We support the continued requirement for research articles to include an access statement for underlying research materials, but would also welcome an addition to the policy whereby authors are encouraged to use a DOI or equivalent persistent identifier to link to their dataset, and to deposit it in an open access repository with appropriate metadata, unless prevented by ethical or commercial considerations.

Q17. UKRI's OA policy is proposed to apply to in-scope research articles accepted for publication on or after 1 January 2022. Which statement best reflects your views on this?

a. The policy should apply from 1 January 2022

b. The policy should apply earlier than 1 January 2022

c. The policy should apply later than 1 January 2022

d. Don't know

e. No opinion

Please explain your answer. UKRI particularly welcomes detailed evidence as to the practical implications of the choice of date. If you selected b or c, please also state what you consider to be a feasible implementation date (2,000 characters maximum, approximately 300 words).

Given the current situation around COVID-19, 1 January 2022 seems to be a reasonable timescale. However, it may not be possible to commit to this at present until the full implications of the coronavirus pandemic is known.

Q18. For research articles, are there any considerations that UKRI and UK HE funding bodies need to take into account regarding the interplay between the implementation dates for UKRI's OA policy and the OA policy for the REF-after-REF 2021?

Yes / No / Don't know / No opinion.

If yes, please expand (2,000 characters maximum, approximately 300 words).

It is important that the UKRI's OA policy and the OA policy for REF-after-REF 2021 should align as closely as possible, as any variance between the two could be confusing for researchers. However, as mentioned above, there may be implications, as yet unknown, due to the coronavirus pandemic.

Q19. Do you think the proposals outlined in Section A will have any financial cost implications for you or your organisation?

Yes / No / Don't Know / No opinion.

Please expand, providing evidence to support your view, where possible (2,000 characters maximum, approximately 300 words).

We refer to our response to Q4, we anticipate there will be an increased demand for the Gold OA route which will required additional funding to pay APCs. Further to that research from Universities UK (2016) indicated that there has been an increase in APCs costs in recent years. Transformative agreements may also result in additional funding being required for the institutional journal budget. In addition, there may be other financial implications on university budgets, due to COVID-19, which are yet unknown.

Q20. Do you think the proposals outlined in Section A will result in financial benefits for you or your organisation?

Yes / No / Don't Know / No opinion.

Please expand, providing evidence to support your view, where possible (2,000 characters maximum, approximately 300 words).

Please refer to our answers to Q4 and Q19 above.

Q21. Can you provide any evidence of a changing balance of costs across research organisations arising from an emphasis on publishing costs rather than read costs?

Yes / No / Don't know / No opinion.

Please expand (2,000 characters maximum, approximately 300 words).

While Queen's does not have access to this information, the Universities UK's Monitoring the Transition to OA report (<https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Documents/2017/monitoring-transition-open-access-2017.pdf>) states that, "although subscription expenditure is rising too, APCs represent a sharply rising proportion of all expenditure on journals".

Q22. Can you provide any evidence on cost increases and/or price rises (including in relation to OA APCs and subscriptions) and reasons for these?

Yes / No / Don't know / No opinion.

Please expand (2,000 characters maximum, approximately 300 words).

We refer to the Delta Think report on OA charges (<https://deltathink.com/news-views-open-access-charges-consolidation-continues/>), which concluded that APC prices continue to rise, with hybrid APCs costing more than pure OA APCs.

Q23. Do you think there are steps publishers and/or other stakeholders could take to improve the transparency of publication charges?

Yes / No / Don't know / No opinion.

Please expand. Views are also welcome on how greater transparency might inform future funding levels (2,000 characters maximum, approximately 300 words).

Publishers could demonstrate greater transparency by itemising their publication charges. For example, the Fair Open Access Alliance (FOAA) invites publishers to make the structure of their fees transparent and has produced a Breakdown of Publication Services and Fees, which could be used: <https://www.faiopenaccess.org/foaa-breakdown-of-publication-services-and-fees/>

Universities should also be encouraged to continue to share APC data and make it publicly available. For example, Queen's produces spending reports for Jisc, which are published in the institutional repository (<https://pure.qub.ac.uk/en/publications/queens-university-belfast-apc-expenditure-report-april-2018-march>).

Q24. Regarding UKRI's consideration about restricting the use of its OA funds for publication in hybrid journals (see paragraph 80), please select the statement that best reflects your views:

- a. UKRI OA funds should not be permitted to support OA publication in hybrid journals
- b. UKRI OA funds should only be permitted to support OA publication in hybrid journals where they are party to a transformative agreement or similar arrangement
- c. UKRI OA funds should be permitted to support OA publication in hybrid journals
- d. None of the above**
- e. Don't know
- f. No opinion

While Hybrid APCs are more expensive than pure OA APCs (see question 23 above) hybrid journals may sometimes be preferred by researchers (as has been the experience at Queen's). Therefore, hybrids should continue to be supported while publishers and scholarly societies transition to pure OA. We are conscious that many journals are not covered at present by transformative agreements, especially in arts, humanities and social sciences, and would therefore advocate for the continued permissibility in the short-term of funding OA in hybrid journals. However, we support the aspiration in Plan S that hybrids should not be supported longer-term and encourage UKRI to consider how to incentivise publishers and scholarly societies to make the change.

While supporting hybrids, UKRI should consider mandating the use of the UK Scholarly Communications Licence (UK SCL) (see question 28) and implementing a national repository (see question 30) to strengthen green OA

Q25. To what extent do you agree or disagree that UKRI OA funds should be permitted to support OA costs that support institutional repositories?

Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.

Please explain and, where possible, evidence your view (2,650 characters maximum, approximately 400 words).

As demonstrated elsewhere in our consultation responses, the University anticipates increased costs associated with complying with the proposed UKRI OA Policy. Our institutional repository is one of the major routes to policy compliance for researchers and therefore it would be appropriate that it is financially supported by UKRI OA Funds.

Q26. To help accelerate policy adoption, should UKRI introduce any other restrictions on how UKRI OA funds can be used?

Yes / No / Don't know / **No opinion.**

Please explain your answer, including any views on how this could be implemented (1,350 characters maximum, approximately 200 words).

The University supports flexibility around how UKRI OA Funds can be used. However, clear guidance would be required if UKRI decides that OA funds can be used for costs associated with publication, such as submission, colour and page charges.

Q27. There are many business models that can support OA. A common model for journals is based on APCs, but there are also other models (such as membership models and subscribe to open). Are there changes or alternatives to the present UKRI funding mechanisms that might help support a diversity of OA models?

Yes / No / Don't know / No opinion.

Please expand (2,650 characters maximum, approximately 400 words).

As indicated in the answers above, it is important that institutions are able to use OA funds flexibly so they can explore alternative business models. For example, initiatives such as Open Library of Humanities (OLH) are much more affordable than the APC business model but require an upfront membership fee rather than payment on publication.

Q28. As discussed in paragraph 74, transformative agreements are one way of moving to OA in a more cost-effective way. Are there approaches to managing transformative agreements or other mechanisms and developments that UKRI should consider to help manage the transition to OA in a way that is cost-effective and offers public value to the UK?

Yes / No / Don't know / No opinion.

Please expand (2,650 characters maximum, approximately 400 words).

We encourage UKRI to consider mandating the introduction of the UK SCL to strengthen the green OA route. Without it, if Queen's does not sign a transformative agreement for a publisher that requires an embargo, researchers may not be able to comply with UKRI policy if they submit articles to that publisher. Additionally, as transformative agreements tend to be associated with larger publishers, there is a danger that smaller publishers with less capacity will be overlooked. These challenges limit authors' choice of publication venues, and the ability of the University to reject transformative agreements that do not provide value for money.

Q29. Are there any existing or new infrastructure services that you think UKRI should fund the maintenance and/or development of, to support the implementation of its OA policy for research articles?

Yes / No / Don't know / No opinion.

If yes, please state what these are and explain and, where possible, evidence why UKRI should provide support (2,650 characters maximum, approximately 400 words).

As Sherpa tools such as RoMEO and services such as OpenDOAR and the Jisc Publications Router are all key components of the institutional repository infrastructure and will help facilitate compliance with the proposed policy, it would be appropriate if they are supported through UKRI funding. In addition, UKRI should consider funding the CORE Repository Dashboard Premium Edition, which can be used to track REF compliance, as not all universities will be able to afford this service.

Q30. To what extent do you agree or disagree that UKRI should provide or support a national shared repository?

Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.

Please explain and, where possible, evidence your answer (1,350 characters maximum, approximately 200 words).

Consideration should be given to the development of a national shared repository, similar to the Wellcome Open Research and Gates Open Research platforms, providing it does not duplicate the efforts of institutional repositories. A national repository would help facilitate reporting and ensure that researchers can publish irrespective of whether they have access to gold OA funds and therefore support compliance with the proposed policy.

Q31. Should UKRI require preprints to be made OA where there is a significant benefit with regard to public emergencies?

Yes / No / **Don't know** / No opinion.

If yes, is there a recognised definition of 'public emergency' and/or protocols that UKRI should consider if this policy is implemented?

(1,350 characters maximum, approximately 200 words.)

During the current crisis, early access to new and vital research is of great importance and this should be acknowledged and encouraged. However, the requirement to make preprints OA might be difficult to mandate, it could mean additional administrative burden for universities, and the value would vary greatly depend on the discipline.

Q32. Are there any supporting actions that UKRI could take alongside its OA policy to support the use of preprints in all disciplines?

Yes / No / **Don't know** / No opinion.

If yes, please expand (1,350 characters maximum, approximately 200 words).

The creation of a national repository could provide a single platform to upload preprints.

Q33. To what extent do you agree or disagree that the types of monograph, book chapter and edited collection defined as in-scope and out-of-scope of UKRI's proposed OA policy (see paragraphs 96-98) are clear?

Strongly agree / **Agree** / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.

If you disagree, please explain your view (2,000 characters maximum, approximately 300 words).

Clarification on the status of published translations would be helpful, as to whether they would be deemed 'out of scope' according to the same logic that governs scholarly editions.

Q34. Should the following outputs be in-scope of UKRI's OA policy when based on UKRI-funded doctoral research?

- a. Academic monographs **Yes** / No / Don't know / No opinion
- b. Book chapters **Yes** / No / Don't know / No opinion
- c. Edited collections **Yes** / No / Don't know / No opinion

Please explain your view (1,350 characters maximum, approximately 200 words).

While we would agree with this in principle, we would welcome further information on how this would work in practice. This may be difficult to enforce with individuals who have left the institution or who are no longer employed in a UK university. In addition, concern has been expressed that early career researchers and those who have recently completed their PhD may not necessarily have access to funding for book-processing charges, and yet publication would be essential to job offers and career progression.

Q35. To what extent do you agree or disagree that UKRI's OA policy should include an exception for in-scope monographs, book chapters and edited collections where the only suitable publisher in the field does not have an OA programme?

Strongly agree / **Agree** / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.

Please explain and, where possible, evidence your view (1,350 characters maximum, approximately 200 words).

There is concern that, in some disciplines, authors may be pushed to lower standard publishers where there are quality issues, in order to find a publisher who has an OA programme that complies with the policy. An exception would allow authors to focus on quality publishers. Hopefully the need for an exception will diminish over time, as publishers develop their OA options for monographs, and we would encourage UKRI to engage with publishers to support this.

Q36. Are there any other considerations that the UK HE funding bodies should take into account when defining academic monographs, book chapters and edited collections in-scope of the OA policy for the REF-after-REF 2021?

Yes / No / Don't know / No opinion.

As highlighted in previous answers, Queen's would welcome consistency across the policies.

Q37. Regarding monographs in-scope of UKRI's proposed OA policy, which statement best reflects your view on the maximum embargo requirement of 12 months?

- a. **12 months is appropriate**

- b. A longer embargo period should be allowed
- c. A shorter embargo period should be required
- d. Different maximum embargo periods should be required for different discipline areas
- e. Don't know
- f. No opinion

Please explain and, where possible, evidence your answer. If you answered b, c or d please also state what you consider to be (an) appropriate embargo period(s) (1,350 characters maximum, approximately 200 words

Q38. Regarding book chapters in-scope of UKRI's proposed OA policy, which statement best reflects your view on the maximum embargo requirement of 12 months?

- a. **12 months is appropriate**
- b. A longer maximum embargo period should be allowed
- c. A shorter maximum embargo period should be required
- d. Different maximum embargo periods should be required for different discipline areas
- e. Don't know
- f. No opinion

Please explain and, where possible, evidence your answer. If you answered b, c or d please also state what you consider to be (an) appropriate embargo period(s) (1,350 characters maximum, approximately 200 words).

Q39. Regarding edited collections in-scope of UKRI's proposed OA policy, which statement best reflects your view on the maximum embargo requirement of 12 months?

- a. **12 months is appropriate**
- b. A longer embargo period should be allowed
- c. A shorter embargo period should be required
- d. Different maximum embargo periods should be required for different discipline areas
- e. Don't know
- f. No opinion

Please explain and, where possible, evidence your answer. If you answered b, c or d please also state what you consider to be (an) appropriate embargo period(s) (1,350 characters maximum, approximately 200 words).

Q40. Do you have any specific views and/or evidence regarding different funding implications of publishing monographs, book chapters or edited collections with no embargo, a 12-month embargo or any longer embargo period?

Yes / No.

Please note that funding is further considered under paragraph 110 of the consultation document (question 53).

We would encourage UKRI to explore the full range of publishers and their embargo periods, and the options available to authors; and whether BPCs will likely increase in order to allow for shorter embargo periods and reduced sales, and whether this be offset by an increase to UKRI OA funding to institutions to ensure compliance.

Q41. To what extent do you agree that self-archiving the post-peer-review author's accepted manuscript should meet the policy requirement?

Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.

Please explain and your view (1,350 characters maximum, approximately 200 words).

As not all researchers will have access to the funds necessary for book processing charges (BPC), self-archiving will ensure that the author's work is available and compliant with the proposed policy.

Q42. Regarding monographs, book chapters and edited collections, are there any additional considerations relating to OA routes, deposit requirements and delayed OA that the UK HE funding bodies should take into account when developing the OA policy for the REF-after-REF 2021?

Yes / No / Don't know / No opinion.

If yes, please expand (2,650 characters maximum, approximately 400 words).

Queen's would welcome consistency across the policies.

Q43. To what extent do you agree or disagree with CC BY-ND being the minimum licencing requirement for monographs, book chapters and edited collections in-scope of UKRI's proposed OA policy?

Strongly agree / **Agree** / Neither agree nor disagree / Disagree / Don't know / No opinion.

Please explain and, where possible, evidence your view (1,350 characters maximum, approximately 200 words).

Some researchers in arts, humanities and social sciences have expressed concern that the requirement for a CC BY license might mean that their work could be reproduced by predatory publishers, therefore CC BY-ND should be permitted as an alternative.

Q44. To what extent do you agree or disagree that UKRI's OA policy should include an exception for in-scope monographs, book chapters and edited collections requiring significant reuse of third-party materials?

Strongly agree / **Agree** / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.

Please explain your view (1,350 characters maximum, approximately 200 words). Questions 45-46 concern how 'significant reuse' may be defined.

There is concern that third-party permissions are already challenging, as many copyright holders place limitations on use, either by term or by unit sales. Clearing permission for use of copyright material in EBooks frequently incurs substantial additional costs. Clearing permission for OA use is more challenging still, and many copyright holders will not allow use of their material if it is made freely available and copiable online.

Q45. To what extent do you agree or disagree that if an image (or other material) were not available for reuse and no other image were suitable, it would be appropriate to redact the image (or material), with a short description and a link to the original?

Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / **Don't know** / No opinion.

Please explain your view (1,350 characters maximum, approximately 200 words).

E-book users are likely to expect a book to be the same across all formats. Concern has been expressed that the proposal for the use of a 'tombstone' page is not a credible alternative, especially if there were a number of images (or other material) not available for reuse in the monograph.

Q46. Do you have a view on how UKRI should define 'significant use of third-party materials' if it includes a relevant exception in its policy?

Yes / **No** / Don't know / No opinion.

If yes, please expand (2,000 characters maximum, approximately 300 words).

Q47. Do you have any other comments relating to licensing requirements and/or the use of third-party materials, in relation to UKRI's proposed OA policy for academic monographs, book chapters and edited collections?

Yes / **No**.

If yes, please expand (1,350 characters maximum, approximately 200 words).

Q48. Regarding monographs, book chapters and edited collections, are there any additional considerations relating to licensing requirements and/or third-party materials that you think that the UK HE funding bodies should take into account when developing the OA policy for the REF-after-REF 2021?

Yes / No / Don't know / No opinion

We agree that there should be consistency across policies, but note that in the area of monographs this may greatly impact author submission choices for the REF-after-REF 2021.

Q49. Which statement best reflects your views on whether UKRI's OA policy should require copyright and/or rights retention for in-scope monographs, book chapters and edited collections?

- a. UKRI should require an author or their institution to retain copyright and not exclusively transfer this to a publisher
- b. UKRI should require an author or their institution to retain specific reuse rights, including rights to deposit the author's accepted manuscript in a repository in line with the deposit and licensing requirements of UKRI's OA policy
- c. UKRI should require an author or their institution to retain copyright AND specific reuse rights, including rights to deposit the author's accepted manuscript in a repository in line with the deposit and licensing requirements of UKRI's OA policy**
- d. UKRI's OA policy should not have a requirement for copyright or rights retention
- e. Don't know
- f. No opinion

Please explain and, where possible, evidence your answer. If you selected answer b or c, please state what reuse rights you think UKRI's OA policy should require to be retained

(2,000 characters maximum, approximately 300 words). It is not necessary to repeat here, in full, information provided in response to question 12.

We refer you to our answer for Q12

Q50. Regarding the timing of implementation of UKRI's OA policy for monographs, book chapters and edited collections, which statement best reflects your view?

- a. **The policy should apply from 1 January 2024**
- b. The policy should apply earlier than 1 January 2024
- c. The policy should apply later than 1 January 2024
- d. Don't know
- e. No opinion Please explain and, where possible, evidence your answer.

Please explain and, where possible, evidence your answer. If you selected b or c, please also state what you consider to be a feasible implementation date (2,000 characters maximum, approximately 300 words).

Queen's has limited experience of making monographs, book chapters and edited collections OA so a long lead-in time is required to implement the necessary advocacy programme, training, processes and infrastructure.

As open access for monographs is relatively new, we would encourage UKRI to investigate possible costs, embargo periods etc. further with publishers, especially smaller ones which might have less capacity to support OA infrastructure.

Q51. In order to support authors and institutions with policy implementation UKRI will consider whether advice and guidance can be provided. Do you have any suggestions regarding the type of advice and guidance that that might be helpful?

Yes / **No**.

If yes, please expand (2,000 characters maximum, approximately 300 words).

Q52. Regarding monographs, book chapters and edited collections, are there any other considerations that UKRI and the UK HE funding bodies need to take into account when considering the interplay between the implementation dates for the UKRI OA policy and the OA policy for the REF-after-REF 2021 OA?

Yes / No / Don't know / No opinion.

If yes, please expand (2,650 characters maximum, approximately 400 words).

The University would welcome consistency across the two policies.

Q53. Do you have any views regarding funding levels, mechanisms and eligible costs to inform UKRI's considerations about the provision of funding for OA monographs, book chapters and edited collections in-scope of its proposed policy?

Yes / No.

If yes, please expand (2,650 characters maximum, approximately 400 words).

While not all publishers charge BPCs, the following article highlights the large costs that can be associated with making monographs open access, and the potential impact on library budgets.

Eve M P, Inglis K, Prosser D, Speicher L and Stone G, Cost estimates of an open access mandate for monographs in the UK's third Research Excellence Framework, Insights, 2017, 30(3), 89–102; DOI: <https://doi.org/10.1629/uksg.392>

As we have already detailed in our answer to Q4, there are already challenges around supporting gold open access, and it is likely that the Coronavirus pandemic could place further strains on available budgets. If OA monographs, book chapters and edited collections were mandated in the policy, Queen's would likely require additional funding UKRI to ensure compliance.

Q54. To support the implementation of UKRI's OA policy, are there any actions (including funding) that you think UKRI and/or other stakeholders should take to maintain and/or develop existing or new infrastructure services for OA monographs, book chapters and edited collections?

Yes / No / Don't know / No opinion.

If yes, please state what these are and, where relevant, explain why UKRI should provide support (2,650 characters maximum, approximately 400 words).

We would encourage UKRI to provide support to infrastructures such as a central repository, the Directory of Open Access Books, or similar initiatives.

Q55. Are there any technical standards that UKRI should consider requiring and/or encouraging in its OA policy to facilitate access, discoverability and reuse of OA monographs, book chapters and edited collections?

Yes / No / **Don't know** / No opinion.

Please expand (2,000 characters maximum, approximately 300 words).

Q56. Do you have any other suggestions regarding UKRI's proposed OA policy and/or supporting actions to facilitate access, discoverability and reuse of OA monographs, book chapters and edited collections?

Yes / No / Don't know / **No opinion.**

If yes, please expand (2,000 characters maximum, approximately 300 words).

Q57. Could the manual reporting process currently used for UKRI OA block grants be improved?

Yes / No / Don't know / No opinion.

If yes, please explain how (2,000 characters maximum, approximately 300 words).

Currently, the manual reporting process is labour intensive, inaccurate and not scalable so we would welcome UKRI providing an automated system. There is currently no method of tracking APCs paid by researchers other than by the Library and it is not possible to calculate the total number of URKI-funded articles produced at Queen's each year. Tools such as the Jisc Publications Router will help but we would welcome greater consistency across publishers, for example, their APC dashboards are all different. In addition, the APC

spending reports that can be generated using Jisc Monitor do not contain all the required information so have to be amended manually.

Q58. Except for those relating to OA block grant funding assurance, UKRI has in practice not yet applied sanctions for non-compliance with the RCUK Policy on Open Access. Should UKRI apply further sanctions and/or other measures to address non-compliance with its proposed OA policy?

Yes / No / Don't know / No opinion.

Please explain your answer (2,000 characters maximum, approximately 300 words).

While it is important to have sanctions in place to encourage compliance, clear guidance in grant applications is required to ensure authors are aware of the policy requirements. The university does and will continue to advocate and train authors around open access policies, however, we would query whether universities should face sanctions when authors breach the policy, against guidance.

Q59. To what extent do you agree or disagree with the example proposed measures to address non-compliance with the proposed UKRI OA policy (see paragraph 119)?

Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.

Please explain your answer (2,000 characters maximum, approximately 300 words).

Q60. Do you foresee any benefits for you, your organisation or your community arising from UKRI's proposed OA policy?

Yes / No / Don't know / No opinion.

Please expand (2,650 characters maximum, approximately 400 words).

There will be the obvious benefits that open access provides; and the potential for the policy to increase the efficiency of processes such as compliance reporting.

Q61. Do you foresee UKRI's proposed OA policy causing and/or contributing to any disadvantages or inequalities?

Yes / No / Don't know / No opinion.

If yes, please expand, referencing specific policy elements and including any comments on how UKRI could address any issues identified (2,650 characters maximum, approximately 400 words).

If publishers continue to impose embargoes and universities do not sign transformative agreements, then publishing options for researchers will be limited, especially for those who do not have access to sufficient funds for gold OA.

Q62. Do you foresee any positive and/or negative implications of UKRI's proposed OA policy for the research and innovation and scholarly communication sectors in LMICs?

Yes / No / Don't know / No opinion.

If yes, please expand, referencing specific policy elements and including any comments on how UKRI could address any issues identified (2,650 characters maximum, approximately 400 words).

Q63. Do you anticipate any barriers or challenges (not identified in previous answers) to you, your organisation or your community practising and/or supporting OA in line with UKRI's proposed policy?

Yes / **No** / Don't know / No opinion.

If yes, please expand, including any supporting actions you think UKRI could undertake to remove or reduce any barriers identified (2,650 characters maximum, approximately 400 words).

Q64. Are there any other supporting actions (not identified in previous answers) that you think UKRI could undertake to incentivise OA?

Yes / **No** / Don't know / No opinion.

If yes, please expand (2,000 characters maximum, approximately 300 words).

Q65. Do you foresee any other implications (not identified in previous answers) for you, your organisation or your community arising from UKRI's proposed OA policy?

If yes, please expand (2,000 characters maximum, approximately 300 words).

Yes / **No** / Don't know / No opinion.

Q66. Do you have any further comments relating to UKRI's proposed OA policy?

Yes / **No**.

If yes, please expand (2,650 characters maximum, approximately 400 words.)

Q67. Do you have any further comments relating to commonality between UKRI's proposed OA policy for outputs acknowledging UKRI funding and the OA policy for the REF-after-REF 2021?

Yes / **No**.

If yes, please expand (2,650 characters maximum, approximately 400 words.)

Q68. Do you have any further thoughts and/or case studies on costs and/or benefits of OA?

Yes / **No**.

If yes, please expand (2,650 characters maximum, approximately 400 words).