HEFCE 2014/07 Policy for open access in the post-2014 Research Excellence Framework

Annex B: Outcomes of consultation

Executive summary

1.   This annex presents the outcomes of our July 2013 'Consultation on open access in the post-2014 Research Excellence Framework' (HEFCE 2013/16), and indicates how we have responded to them. It is published simultaneously with the final policy (available for download alongside this annex at www.hefce.ac.uk/pubs/year/2014/201407/).

2.   The central principle of the policy is that outputs submitted to a post-2014 Research Excellence Framework (REF) should be made available in an open-access form. We consulted on the details of this principle: the **criteria** that would be used to judge whether an output was open-access, the **definition** of which outputs would be within the scope of the policy, and the approach we would take to dealing with **exceptions** to this requirement.

3.   As a result of the consultation, the policy proposals have been refined in the following ways:

- a shift towards the deposit of outputs in an institutional or subject repository at the point of acceptance

- a separation and clarification of the requirements for deposit, discovery and access

- additional clarity on embargo periods and licences

- a refinement of the definition of conference proceedings

- a stronger connection, through the exceptions route, of the policy regarding researchers not employed by a UK HEI at the time of submission for publication

- a more targeted and effective approach to dealing with exceptions.

4.   In drawing up and refining this policy we have consistently aimed for requirements that are reasonably achievable. We want to ensure that the parameters of this policy are workable and do not deter any institution from submitting its best outputs to the REF. To this end, we have shifted towards a more sensitive approach to compliance that recognises existing constraints.

5.   We firmly believe that open access and research excellence go hand in hand: a hallmark of high-quality research is that it is disseminated as widely as possible. This policy will quickly deliver a substantial increase in the proportion of the UK's outputs that are openly available to all, bringing significant benefits to researchers, institutions, and the wider economy and society. We are committed to working with institutions to support them in their work to make the greatest possible strides towards open-access research.

Introduction

6.   The four UK higher education funding bodies believe that research arising from our funding should be as widely and freely accessible as the available channels for dissemination allow. Open access to research enables the prompt and widespread dissemination of research findings. It benefits the efficiency of the research process and allows publicly funded research to drive economic growth. It delivers social benefits through increased public understanding of research.

7.   Researchers have long been willing to share the outputs of their research freely, for the benefit of all. There has been a significant rise in open access to research over recent years, driven by new technologies, increasing numbers of publishers and learned societies offering open access options, and the rise of new open-access journals. Institutions seeking to maximise the impact of their research have embraced open access; funders have followed suit with an increasing number of open access mandates now in place.

8.   The four UK higher education funding bodies have consulted extensively with the higher education sector and other stakeholders during 2013 on how we should rise to the challenge of increasing open access to the research we fund. In February 2013, we wrote separately to all UK higher education institutions (HEIs) to ask for advice on how we might implement an open access requirement in the post-2014 REF. Following advice received in reply to that letter, we formally consulted on an updated set of policy proposals in July 2013.

9.   This annex sets out the outcomes of the formal consultation. It outlines how we have responded to the feedback we received in response to the consultation, and the rationales for the decisions we have made. The final policy is published in the main body of this report, and a detailed analysis of the feedback is available in Annex C (both available for download alongside this annex at www.hefce.ac.uk/pubs/year/2014/201407/).

10.   The consultation and resultant policy make a number of assumptions about aspects of the next REF that have not yet been formally decided. This has been necessary to provide due notice to the sector of the policy requirement. The main assumption is that there will be a post-2014 REF that operates on substantially the same basis as the 2014 REF. For example, we assume that there will be four main panels with disciplinary remits broadly similar to those of the current REF main panels. We commit to keeping the aspects of this policy that are dependent on detailed assumptions about the next REF under close review.

Outcomes of consultation

11.   We received almost 200 written responses to the consultation. We welcome the wide support that our consultation received for the approach we have taken and the general thrust of the proposals. We note that most of the concerns that have been voiced relate to the detail of the proposals, with a particular focus on the detail of how we should treat exceptions. Detailed feedback has enabled us to finesse the policy requirements to make them as clear, sensible and workable as possible for all.

12.   The consultation proposals have been praised for their complementarity with the open access policy operated by Research Councils UK (RCUK), and with the policies of other funders. We believe that the RCUK policy for open access and this policy will harmonise, stimulating the wide uptake of open access through all available routes and mechanisms during this period of transition. As the context of open access continues to evolve, we will continue to work closely with RCUK and other funders to explore and resolve the remaining issues regarding open access.

13.   We recognise that the world is on a journey towards greater open access, and that this journey takes time. While this policy takes a pragmatic and realistic approach to implementing requirements for journal articles and conference proceedings to be free to read, we want to enhance these by encouraging all efforts to move towards open access more generally. We have not pushed for strict rules on licensing, but we recognise the benefits of more permissive

licensing in providing more efficient and automated access to research, and we want to reward institutions that enable these benefits. We have not pushed for open access to monographs or non-text outputs, but we believe that this is an achievable goal for the future and should be encouraged and supported. While we recognise the potential of publisher-provided open access (commonly known as 'Gold' open access) to create faster and more efficient access to research, we believe that universities and colleges are best placed to make judgements about how their research funding may be used to pay for the costs of publication.

Specific areas of the consultation and our response

14. The consultation sought views in nine areas:

> a.   the appropriateness of the open access criteria
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> b.   the role for repositories as the locus of deposit
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> c.   the point of deposit (acceptance or publication)
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> d.   the approach to differentiate embargo periods by REF main panel
>
> e.   the requirements concerning licensing
>
> f.   the focus on journal articles and conference proceedings only
>
> g.   the suggested two-year notice period before implementation
>
> h.   the focus on outputs listing a UK HEI in the address field
>
> i.   the two approaches to exceptions.

15.   These areas are covered in detail below. We analyse the feedback we received and explain how it has helped to shape our final policy. Where possible, we have taken each area in turn, but many of the areas are so closely linked together that we have addressed them as a whole. A detailed summary of the feedback is available in Annex C.

Criteria for open access

16.   In our consultation document, we proposed to treat as 'open-access' outputs which fulfilled all of the following criteria:

*   accessible through a UK HEI repository, immediately upon either acceptance or publication, although the repository may provide access in a way that respects agreed embargo periods[1]

*   made available as the final peer-reviewed text, though not necessarily identical to the publisher's edited and formatted version

*   presented in a form allowing the reader to search for and re-use content (including by download and for text-mining), both manually and using automated tools, provided such re-use is subject to proper attribution under appropriate licensing.

17.   We welcome the broad support from respondents for the above criteria, while recognising the specific concerns that have been voiced in several areas relating to clarity and specificity, and the impact of loose criteria on the effectiveness of the policy. We have streamlined the

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[1] Embargo periods refer to delayed access to the full text of the output.

criteria to address concerns that certain aspects were not clear or specific enough, and have refined the requirements further to establish clearer parameters for authors and institutions.

The role for institutional repositories

18.   We welcome the significant support for the function we envisage for institutional repositories, as well as for our recognition of the important role that shared repositories can play for some smaller institutions.

19.   We agree that further development work will be required to enable institutions to work within the criteria, and have been in close discussion with repository staff and Jisc to specify a programme of work in this area. We are reassured by statements from many institutions and repository staff that the policy proposals are broadly workable, and indeed that some institutions are already fully compliant with the policy proposals. However, we recognise the varying state of development of repository services, and intend to work closely with the sector over the coming months and years to support implementation of this policy.

20.   We further recognise that some institutions use their research information systems to manage their research outputs, and that some such systems provide repository or repository-like functionality. We have made a provision in our policy for institutions to use these systems in place of standalone repository systems where they are able to support the open access requirements of this policy.

Deposit requirements

21.   Our policy has been adjusted in several areas to strengthen and clarify the aspects that relate to depositing outputs. We have decided to refocus our policy to require deposit in the repository of the output itself, rather than the metadata record, for reasons set out in the following paragraphs. We have also separated the deposit requirements from the accessibility requirements to make them simpler to understand and implement, and to clarify that we require the 'closed' deposit of embargoed material. This is in response to concerns that our policy needed to be clearer about what was required and permitted to be deposited, and where and when it should be deposited. The open access criteria now follow a revised taxonomy that we believe gives greater clarity and precision.

22.   We noted concern that our phrasing that allowed outputs to be 'accessible through' a repository has created widespread confusion about what is required to be deposited in the repository at the point of acceptance or publication. It was also felt by some that external services, such as subject repositories, were given too little emphasis in the policy proposals, in spite of the significant part they play within some disciplines. We fully support the use of subject repositories such as arXiv, which have done much to drive open access within disciplines while bringing substantial benefits to the research community, and we would welcome the development of subject repositories in other disciplines, such as chemistry. We have sought to place a stronger emphasis on shared and subject repositories in our policy as part of our deposit requirements.

23.   In this context, we have noted the arguments that institutional repositories should remain the locus of deposit for research outputs. Deposit of outputs in the repository allows the institution to retain and access a wider range of research outputs immediately on acceptance, irrespective of whether open access is also provided immediately. It further strengthens the potential for more imaginative use of research findings by the research base through, for

example, text-mining. Full-text deposit mandates have allowed some institutions to integrate repository software and Current Research Information Systems, to interoperate and automatically populate staff and departmental web pages with instantly accessible outputs, enabling them to showcase their research in a more consistent manner.

24.   We also recognise that some authors may not have access to a repository, for example researchers who are not employed by the institution (such as visiting fellows). We would encourage authors without access to an institutional or subject repository to deposit their work in an open repository service such as OpenDepot. We also recognise that many institutions routinely allow affiliated researchers to deposit their works in their repositories, and we welcome this. However, we recognise that some concerns may remain and have sought to treat cases where researchers do not have access to a repository at the point of acceptance as an allowable exception.

25.   Some respondents have expressed concern about researchers moving between UK higher education institutions, and questioned whether the deposited research records ought to move as well. As long as the open access requirements of this policy continue to be met during the transition, we would have no issue with research outputs moving between repositories. We believe it is for the employing institution to decide how much assurance they need that the open access requirements had been met by the previous institution, but have made provisions in the policy to deal with cases where problems have occurred.

Timing of deposit

26.   On the question of whether an output should be made available on the publication date or the acceptance date, we received a large number of comments in support of each. While respondents tended to favour using the publication date as a reliable record, there is significant concern about the precision and verifiability of both dates, with the numerous complexities of verifying the publication date being particularly striking[2].

27.   Arguments for using the date of publication tended to rest on institutions' desires to make as few requests of authors as possible during the publication cycle, to reduce the risk of proliferation of versions where a Gold open-access version is available, and to respect existing institutional arrangements to harvest metadata and other content from external publications databases.

28.   Supporting arguments for the date of acceptance tended to rest on the greater potential for author engagement, the potential for neat integration into authors' workflows, the existence and proven success of deposit-on-acceptance mandates in some institutions, and the ability of a carefully constructed deposit-on-acceptance mandate to accommodate all the concerns around duplication, proliferation and harvesting.

29.   On balance, we believe that the arguments for deposit on acceptance are stronger and have reflected this in our policy. We require that outputs are deposited as soon as the author receives notice that the output has been accepted by the publication (usually by e-mail or letter), allowing a grace period of three months to cater for any circumstances that might prohibit immediate deposit.

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[2] Many of these have been identified as part of a project to develop a monitoring framework for open access, which is being led by the Research Information Network on behalf of a wide group of stakeholders.

Version of deposit

30.   We have noted comments that our terminology of 'final peer-reviewed text' may be unfamiliar to some institutions and authors. We have augmented the wording of our policy to include the various other names by which this particular version of the output may be referred to ('accepted author manuscript', 'final author version', or 'post-print'). We have also made allowances in the policy for the deposit of final published versions of record when they become available: repositories will be allowed to update or augment their records with a final published version of the output (as long as this does not undermine previously granted access rights).

31.   We recognise that, in some cases, the author's submitted draft is provisionally accepted for publication under the condition that amendments are made to the manuscript based on advice from the referee. It is our position that such outputs do not constitute the 'final peer-reviewed text', and that there is ordinarily an additional step in the workflow before the output is accepted for publication. We consider this latter point to be the point of acceptance for the purposes of this policy. Earlier drafts will be admissible to the REF as a working paper.

Discovery requirements

32.   Even embargoed outputs should be discoverable. The previous iteration of the policy made allowances for this by requiring that outputs be accessible through the repository 'immediately', though the embargoed text itself may be closed-access. We noted comments that the wording was potentially confusing, so we have separated the ideas of discovery and access in the policy. The discovery requirements in the policy are neither new nor additional; we have simply codified more clearly what we would have expected to be achieved under the previous iteration of the policy.

Access requirements

33.   Open access should, as a minimum, allow for the discovery and free readership and download of research outputs. Beyond that minimum, questions of access are inextricably bound up with those of licensing, and we deal with both together. During consultation, our approach to licensing received broad support but numerous requests for clarification. Many respondents felt that the current licensing situation was too fluid to justify the introduction of strict rules. However, it was felt by many that our proposed approach was too broad or unclear, and that we should be giving examples of use-cases for text-mining or specifying examples of 'compliant' licences. Others felt we should be asking only for free access now, and should work towards more permissive and automated access as a longer-term goal.

34.   We have decided to adopt a two-tier approach to deal with this. The first tier of the policy is as follows: outputs that allow anyone to search, read and download the text without charge will be compliant with the access requirement in the policy. This so-called 'gratis open access' can generate huge benefit to researchers and the wider public, and is eminently achievable within the existing licensing environment. However, we recognise the benefits that more permissive licences can bring, not least that they can facilitate the automated use and re-use of content, which will help researchers to analyse and reuse the corpus of knowledge far more efficiently and imaginatively than before. We strongly encourage institutions to provide access to outputs in a way that enables this so-called 'libre open access', and intend to give credit to those that do so in the research environment component of the next REF. Further details of this will be developed in the coming years as part of our planning work for the next REF.

Persistence of discovery and access

35.   We received advice that, as initially worded, it would have been technically possible for institutions to comply with the policy by meeting the open access criteria only temporarily. Recent events have led us to become concerned about open-access outputs becoming closed or unavailable at a later date. We believe that a core feature of open access to research is that such access is permanent, and we have indicated this in our revised policy.

Embargo periods

36.   We believe that embargo periods should be as short as possible to maximise the return on public investment in research provided by open access. In our consultation, we sought to recognise that the sustainability of the publishing infrastructure in the various disciplines depends on striking an appropriate balance between the incomes of publishers and learned societies, and public benefit. We recognise that many believe that variable embargo periods are an appropriate way of achieving this balance. We received broad support for our proposal to align with this view by specifying maximum embargo periods and varying them by REF main panel.

37.   Many respondents recognised the challenges and risks associated with setting embargo periods now. In particular, many felt that the embargo periods we set now should be flexible and open to review in future, with an emphasis on the need to monitor the national and international picture. We recognise the more general risk to open access of publishers' embargo periods lengthening to the maxima we set in this policy, and have balanced this against the perceived risks of setting overly short embargoes or none at all.

38.   We have listened to concerns that the proposal to align with RCUK embargo periods may present some difficulties in the practical implementation, particularly as the RCUK embargo periods vary according to branches of a decision tree that are not obviously and immediately applicable to the REF. Further, we cannot predict the outcomes of the planned 2014 review of the RCUK open access policy and any effect this may have on embargo lengths. In the spirit of keeping things as simple as possible for authors, we have decided to align with the outermost RCUK embargo periods of 12 months for science, technology, engineering and mathematics and 24 months for arts, humanities and social sciences as they map onto the REF main panels, and have specified these in certain terms in the policy. We remain committed to monitoring the situation concerning embargo periods as it develops over the coming years.

Definition of outputs that must meet the open access criteria

39.   In our consultation document, we proposed that the requirement to comply with the open access criteria in the post-2014 REF should apply to outputs meeting the following definition:

- the output is a journal article or conference proceeding

- the output is published after a two-year notice period (from 2016 onwards)

- the output lists a UK HEI in the 'address' field.

Type of output

40.   Our stated long-term ambition is to see the benefits of open access extended to all research outputs, but we share the view of many others that requirements for the post-2014 REF should only apply to outputs in media where open access is reasonably achievable now. Following advice received during both stages of consultation, and in view of the open access

policies of other major funders, we have decided to restrict the definition to journal articles and conference proceedings.

41. We received advice that, while the open access publication of conference proceedings is achievable or widespread in many disciplines already, in some disciplines (particularly in the humanities and social sciences) the proceedings of conferences are typically gathered together and edited and published as a book or as part of a book series. It is the view of many respondents that these outputs ought to be treated in the same way as monographs and other long-form outputs, by being exempted from the open access requirements. We agree with this. We received advice that a neat way to distinguish between these two types of conference proceeding would be to treat proceedings published with an International Standard Serial Number (ISSN) as being in scope, but those published with an International Standard Book Number (ISBN) as out of scope. In some cases, though, book series are published with an ISSN, and we are also treating these as being out of scope. The policy has been updated to reflect this.

Outputs not in scope

42. We recognise that there is significant potential for other types of research output to benefit from open access publishing, and welcome the commitment to open access from the arts world in particular. We also note that there exists a wide variety of views about the applicability or feasibility of open access publishing to certain types of output, including monographs and non-text outputs. We wish to support movements towards open access for these research outputs, and fully intend to work closely with the research community on opening access to all research outputs, but we will not be introducing broader requirements now.

43. Relatedly, many respondents warmly welcomed our commitment to exploring the issue of open access and monographs. HEFCE has established a project, in partnership with the Arts and Humanities Research Council and the Economic and Social Research Council, to help us to understand the issues better, and help to identify potential ways forward. The project, being led by Professor Geoffrey Crossick, will explore a wide range of issues connected to monograph publishing and open access, including the academic-cultural significance of the monograph, current trends in monograph publishing, and the potential for open-access monograph publishing to increase the impact of the humanities and social sciences while retaining the key scholarly features of a high-quality research publication and dissemination system.

Notice period

44. In our consultation document, we proposed that a notice period of two years following the introduction of the policy could be allowed before compliance was expected. This was partly to allow outputs accepted for publication before the policy announcement to go through the whole publication cycle before the open access requirements were introduced. As we have now decided to opt for depositing at the point of acceptance, this rationale is no longer valid: articles being accepted now can be deposited straight away, and we note that some institutions have stated that they are ready to comply with such a policy now. We also believe that some of the current momentum towards open access may be lost by waiting two years to introduce a requirement for deposit on acceptance, rather than publication.

45. However, we recognise that it takes time to implement the practical measures to facilitate and advocate for open access and to get authors depositing their works as a matter of routine, and that some institutions (particularly those not in receipt of open access funds from other

sources) may need time to achieve this. We have also received feedback that repositories will require time to implement changes to their systems to support all of the open access criteria. Therefore we have decided that, while we would strongly encourage institutions to begin implementing this policy now, we will not require compliance with the policy until 1 April 2016.

Publication address field

46.   We received significant support for our proposal that outputs published by authors working outside a UK HEI should not be required to meet the open access criteria. However, we have also noted a significant number of concerns that authors working outside UK HE, but in collaboration with a partner within UK HE, would be required **but not necessarily able** to fulfil the criteria. This could discourage both inward mobility of researchers to the UK and collaborations with UK HEIs. We also received feedback that authors affiliated to but not employed by a UK HEI, such as some early career researchers, researchers on a teaching-only contract, and visiting fellows, may find it difficult to fulfil the criteria.

47.   It was not possible to find a neat solution to these difficulties that did not introduce further complexity; we have therefore decided to omit this aspect of the definition, and instead treat cases where the criteria could not be fulfilled because the individual whose outputs are submitted to the REF was not working in UK HE at the time of submission for publication as an allowable exception to the policy.

48.   We also received feedback that limiting outputs to those that list a UK HEI in the publication address field would mean that the open access criteria might not apply to researchers working in university hospitals, who sometimes list the hospital address or hospital trust address in the output's address field. While we recognise the issue, it does not obstruct institutions wishing to comply with this policy, and we believe that the limitation is offset by the relatively established status of open access publishing in medical and biomedical sciences.

Exceptions

49.   We believe that our proposals will achieve a substantial increase in open access to UK research, within reasonable and achievable boundaries. However, we recognise that many stakeholders have significant concerns about the feasibility of achieving open access in their field, particularly those learned societies for whom a transition to open access publishing of journals or conferences may not yet be practical. We have recognised that we will need a method of dealing with cases where compliance with our open access requirements is not possible.

50.   In our consultation, we proposed two approaches to handling exceptions to the policy. The first approach was to require universal compliance with the policy of all outputs within the definition, with exceptions permitted on a case-by-case basis. The second approach was to require compliance of a pre-specified percentage of outputs meeting the definition, with this percentage applied either across the whole submission or varying by REF main panel.

51.   It was in this area of the consultation that we received the greatest weight of feedback, with robust arguments presented for and against both approaches and no clear overall majority of support for either. We have considered all the responses and evidence and have been persuaded that, in keeping with our policy aims, and with some important adjustments to allow for closed-access deposits, the arguments for universal compliance are stronger. We will

therefore be requiring universal compliance with the open access criteria for all outputs that meet the definition.

52.   Universal compliance is simpler to understand and to implement, generates valuable evidence of the reasons for any slow uptake of open access within institutions, and is more in keeping with the reasonable and achievable nature of the open access requirements. It sends the strongest and most positive signal about open access compliance to all authors. And, with the right conditions for allowed exceptions, it offers higher education institutions the maximum flexibility to choose their highest-quality research for submission to the REF.

53.   While we recognise that a percentage compliance approach may appear to be more permissive, this would undoubtedly depend to a significant extent on predicting the future. Though evidence exists about the current proportion of UK research that could meet our open access requirements now, it is not possible to predict how this will change over time. Nor is it possible to predict how this will translate into REF submissions, which makes achieving compliance difficult. Furthermore, we believe it would risk compromising the integrity of the research assessment process to ask institutions to shape their REF submissions around a fixed compliance target.

54.   Recent research shows that over 80 per cent of the world's research papers would comply with an immediate deposit mandate[3]. Meanwhile, an analysis of the 2014 REF submission shows that 96 per cent of submitted outputs would have complied if authors had deposited whenever they were able. With this in mind, we believe that the burden of reporting exceptions on a case-by-case basis is minimal. We intend to reduce this burden further by supplying a list of the allowable exceptions as part of this policy.

55.   A key principle of our exceptions policy is that institutions should not be penalised in the REF due to the actions of external bodies. We believe that the exceptions we have allowed in the policy can successfully cover the small proportion of outputs that do not comply, which reduces the external risks associated with universal compliance to a negligible level.

56.   Exceptions to the policy will operate at three levels. The first level relates to the outputs themselves becoming accessible. We have provided a number of cases where it is reasonable to expect authors to deposit the output, but where providing access to the output may be difficult or impossible. Often, cases like this depend on the behaviour or policies of external bodies, for example publishers or third-party rights holders. In these circumstances, we believe that there is benefit to making a 'closed-access' deposit in the repository, freeing the institution and author to work towards providing open access without being unduly concerned about compliance. Where the publication selected by the author was the most appropriate venue for the output, **closed-access deposits will be considered an allowable exception**, as long as the stated deposit and discovery requirements are met.

57.   The second level of exceptions is to cover issues relating to the action of deposit itself. We believe that the deposit and discovery of outputs in the repository are achievable within three months of acceptance for almost all outputs within scope, regardless of whether the text of the output is made openly accessible at that point. In some 'outlying cases, though, deposit may not be possible within three months, or at all. In these cases, the output will not be required to fulfil

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[3] Laakso, M. (2014). 'Green open access policies of scholarly journal publishers: a study of what, when, and where self-archiving is allowed.' Scientometrics. In press.

the open access requirements and will count as an allowable exception, though we expect that institutions will wish to work towards depositing all outputs, even retroactively, and working towards making them open-access.

58.   Thirdly, compliance may not be possible due to technical issues, and we have added some exceptions to the policy to deal with these.

59.   Finally, we have offered an 'other' category for those extremely rare cases where compliance was not possible for a reason not on the list, but anticipate that this would be used only in the most highly unusual of circumstances. A process for considering these rare cases will be developed as part of more detailed arrangements and planning for the post-2014 REF.

60.   The full list of allowable exceptions is given in the main policy document (available for download alongside this annex at www.hefce.ac.uk/pubs/year/2014/201407/). Repositories should now introduce mechanisms for recording these exceptions into their systems.

Monitoring and audit

61.   We received a number of comments in the consultation about what evidence institutions might want to keep to demonstrate compliance with the policy. Beyond the simple approach to reporting exceptions set out in the policy, we do not intend to ask for evidence of compliance or otherwise with this policy to be submitted to the next REF, and intend to verify compliance through the REF audit process instead.

62.   Given the stage of development of the post-2014 REF, we consider that it would be premature to set out detailed audit requirements now. However, it is our firm intention that the policy should be straightforward to implement. With this in mind, we initially intend that any audit of open access in the post-2014 REF will ask institutions to provide assurance about their processes and systems for recording open-access information, while taking a light-touch approach to verifying supporting information.

63.   To support the likely scope of any audit arrangements, we would recommend that institutions retain (or are able to obtain) a record of the key dates (acceptance, deposit, and embargo start and end dates). To support this, we intend to work with Jisc on a metadata profile that institutions can adopt to ensure compliance with the policy, which will ideally build on existing Jisc work in this area. We will be working closely with Jisc over the coming months to ensure that institutions are well-supported in implementing any changes to their systems and processes in response to this policy.

Consequences of non-compliance

64.   We believe that open access and research excellence go hand in hand, and that the policy we have set out is both reasonable and achievable now. However, we also believe that the quality assessment processes of the REF should not be influenced by an author's choice of publication. A number of respondents felt that outputs that are deemed non-compliant with the open access policy should remain admissible to the REF. However, given that the approach we have taken to exceptions will allow for institutions to achieve very high levels of compliance, we believe such a provision would be unnecessary and would risk undermining a key principle of the policy.

Flexibility and review

65.   We believe that this policy strikes a balance between our twin aims of increasing the proportion of open-access UK research and respecting the limits of what is possible within the current climate. We are mindful, though, that we are implementing a policy that must remain relevant and achievable for a number of years, and that the context of open access publishing will continue to evolve between now and the next REF.

66.   It will therefore be necessary for this policy to remain flexible. However, it remains our view that our policy expectations embody the principles of open access, which are widely articulated and agreed upon and will not be the subject of review. The various mechanisms for open access have been incorporated into our proposals as flexibly as possible, to provide a sufficient level of certainty to the sector. For example, we have expressed no preference for the route by which outputs are made open-access, and have not set a requirement for a specific licence type.

67.   As noted above, the revised policy includes provisions for the REF to be as sympathetic as possible to authors' choice of publication. These provisions include a partial exception to the policy for cases where the author's chosen publication does not comply, for instance, with the stated embargo periods. Though we believe current conditions will allow most of the UK's research outputs to comply fully with the policy, its success over the medium to long term will depend on how the various actors in the system choose to respond to it. If it becomes apparent that our policy is having a neutral, or detrimental, effect on the UK's journey towards open access, we will revisit this policy to reconsider these provisions.

68.   In the longer term, we are committed to monitoring this policy to gauge its effectiveness. This is likely to happen in partnership with the Research Councils and other funders, including through a new open access oversight group (recommended to be established by the November 2013 report of the Finch group[4]). We intend that any findings from this monitoring work will be used to assess our policy formatively, and to support the sector's transition to open access.

Equality and diversity

69.   This policy has been designed with a specific eye on the potential impact on equality and diversity. We have introduced a number of important amendments to the policy to make it easier for all researchers to comply, irrespective of where they choose to publish, which we believe address concerns about the potential for open access to affect different researcher groups unequally.

70.   We are also mindful of the concerns that have been raised about the potential for inequality in the distribution of funds for publication within HEIs. While we expect HEIs to have, or to begin developing, robust policies and procedures governing the allocation of publication funds, we recognise that managing this is the responsibility of autonomous institutions. We expect, however, that the evidence of support for equality and diversity requested in the research environment template will be extended to include open access policies in the post-2014 REF.

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[4] 'Accessibility, sustainability, excellence: how to expand access to research publications', available online at www.researchinfonet.org/publish/finch/

Further information

71.   For further information, please contact Ben Johnson (b.johnson@hefce.ac.uk, 0117 931 7038), or openaccess@hefce.ac.uk.