

## Full List of Consultation Questions

### Background Information Questions

To enable UK Research and Innovation (UKRI) to effectively analyse responses from different stakeholder groups, respondents are requested to provide some background information about themselves. Questions marked with an asterisk (\*) are mandatory. In the online response for some questions, including mandatory questions, will only appear for specific types of respondent.

**I. Please provide a named contact and email address so that UKRI can contact you regarding your responses. \***

Charles Whalley (charles.whalley@bps.ac.uk)

**II. Please indicate if you are also happy for UKRI to contact you about the outcomes of the consultation. \***

Yes

**III. Please indicate who you are responding on behalf of. \***

a. Yourself as an individual

b. An organisation

c. Other (including part of an organisation, department, informal group) – please specify type:

**IV. Please specify the name of your organisation. \***

British Pharmacological Society

**V. Please specify the name of your group/department. \***

n/a

**VI. Please specify which country you, your organisation or your group are based in.**

United Kingdom

**VII. Which disciplinary area(s) would you associate you, your organisation or your group with? Please select all that apply. \***

b. Medicine, health and life sciences

**VIII. What best describes the capacity in which you, your organisation or your group are responding? \***

d. Learned society or academy which outsources publishing to a third party (including employees)

**IX. UKRI will share responses to this consultation (excluding personal data) with its sponsor department, the Department for Business, Energy and Industrial Strategy (BEIS), and other UK government departments and agencies, to explore OA issues. Have you or members of your group applied or been part of an application for grant funding from the following? If applicable, please select all that apply.**

a. UKRI (including AHRC, BBSRC, ESRC, EPSRC, Innovate UK, MRC, NERC, Research England, STFC, as well as predecessor bodies, HEFCE and RCUK)

b. UK Space Agency

c. Department for International Development (DFID) and subsidiary bodies

d. Department of Health and Social Care (DHSC) including National Institute for Health Research (NIHR) and other subsidiary bodies

e. Department for Environment, Food and Rural Affairs (DEFRA) and subsidiary bodies

If you or members of your group have applied or been part of an application for grant funding from other UK government departments or their subsidiary bodies, please specify the awarding body:

**X. If responding on behalf of a company, please provide your Company Registration Number (if known):**

**XI. If responding on behalf of a charity, please provide your Charity Registration Number (if known):**

1030623

XII. If responding on behalf of an organisation, please indicate your staff headcount (if known).

c. < 50 (small business)

XIII. If applicable, which researcher career stage(s) do you, your organisation or your group represent? Select all that apply.

a. Postgraduate researcher

b. Post-doctoral researcher

c. Research leader (responsible for intellectual leadership and overall management of research projects)

d. Other (including retired researcher, citizen researcher) – please specify:

*Undergraduates, clinical trainees, retired researchers, those with an interest in pharmacology*

## Section A: Research Articles

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)? **Agree.**

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

*The phrase "articles accepted for publication on or after 1 January 2022" is ambiguous as to whether it refers to the date of the acceptance decision or the date of publication.*

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? **No opinion.**

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.**

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.)

*Assuming there are funds available for authors to publish gold open access in the Society's journals, there are no obstacles. However, actions that may divert authors or institutions away from this route (e.g. by encouraging zero embargo green open access, or by explicitly proscribing hybrid journals) will make it harder for the Society's publications to comply with the policy, and may undermine efforts to transition the Society's journals to fully open access. There are also challenges regarding the discoverability of versions of articles on repositories, which can be avoided if the final version is made open access within the author's journal of choice.*

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? **No**

**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.

*It is difficult to see what would be gained by duplicating effort, other than an added burden on authors and repositories. Where the investment has been made in publishing OA via a journal or publishing platform, readers should be directed to that definitive version.*

**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?** **No opinion.**

**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?** **Disagree.**

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

*Being more permissive with licensing for compliance via green OA may allow some reassurance to authors (or institutions/employers) uncomfortable with the licensing options available for gold OA.*

**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.** **Agree**

**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).

*Although the mechanisms for case-by-case exceptions might be administratively difficult, more licence options would better allow authors to publish gold open access (and so achieve the aims of this policy) while respecting their wishes around the reuse of their work. For authors publishing open access in the Society's journals (for which a variety of licences are available), the majority choose CC BY-NC, with CC BY and CC BY-NC-ND being equally popular.*

**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?** **No.**

**Q10. Are there other considerations UKRI should take into account regarding licensing requirements for research articles in-scope of its proposed OA policy?** **No opinion.**

**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?** **No opinion.**

**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?**

**d. UKRI should not have a requirement for copyright or rights retention**

**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.

*The UKRI OA policy should adopt the fewest possible requirements to achieve its desired overall outcome. Surplus requirements place burdens on authors and on the work of monitoring compliance. They also narrow the extent to which journals can vary in their publishing practices while still complying with the policy. Narrowing this window not only limits the choice of journals for authors, but also limits the capacity of journals to innovate within the parameters set for them.*

*In this instance, where the proposed UKRI requirements elsewhere already mandate the outcome – immediate OA under a CC BY licence – it seems superfluous to also mandate the copyright or licencing conditions to support that outcome.*

**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 of the consultation document): 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
- 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
- c. machine-readable information on the OA status and the licence must be embedded in the article in a standard non-proprietary format
- d. long-term preservation must be supported via a robust preservation programme such as CLOCKSS, Portico or an equivalent
- e. openly accessible data on citations must be made available according to the standards set out by the Initiative for Open Citations (I4OC)
- f. self-archiving policies must be registered in the SHERPA RoMEO database that underpins SHERPA/FACT
- g. unique PIDs for research management information must be used and must include the use of ORCID to identify all authors and contributors

**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 of the consultation document): 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
- 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
- c. machine-readable information on the OA status and the licence must be embedded in the article in a standard non-proprietary format
- d. unique PIDs for research management information must be used and must include the use of ORCID to identify all authors and contributors
- e. the repository must be registered in the Directory of Open Access Repositories (OpenDOAR)

**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).

**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 of the consultation document), 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).

**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?**

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).

**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).

**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).

*Requiring immediate open access to the author's accepted manuscript via a repository, with no embargo, has the potential to undercut the Society's subscription sales. Whereas paid-for open access within the Society's journals provides alternative income to offset a reduction in subscription articles, an author's accepted manuscript gains its value from having been validated and improved, at not insignificant expense and effort, by a given journal. The Society's journals, for example, pay honoraria to our Editors to reimburse their expenses on the journal; support an Editorial Office, with staff to manage the peer review process; run Editorial Board meetings to develop policies and guidelines that guide the journals' editorial work; and provide staff to support all these efforts; and all of this besides the ongoing investment made in platforms and services made by our publisher from which the Society benefits. If a journal is not able to recoup this expense via subscription sales because customers can already access the accepted version without embargo, there are financial cost implications. In 2018, 84% of the Society's income derived from its publishing activities. The majority of this publishing income in turn derives from subscription sales. Any adverse effect on the Society's journal's subscription sales will therefore have a significant effect on all the Society's activities.*

**Q20. Do you think the proposals outlined in Section A of the consultation document 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).

*The only points in which the proposals differ from the existing RCUK policy (i.e. no embargo on accepted manuscripts, potential proscription on hybrid journals) represent diminished publishing income for the Society. The result is, at best, neutral.*

**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).



**Q22. Can you provide any evidence on cost increases and/or price rises (including in relation to OA article processing charges (APCs)s and subscriptions) and reasons for these?** Yes / **No** / Don't know / No opinion.

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

**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 should be more transparent about the nature of the services they provide, rather than necessarily what the costs are in providing these services. Initiatives to, for example, convey what proportion of an APC is spent on, say, editorial office services, are inconsistent, liable to be gamed, and incentivise reductions in service (which is not the same as cost-effective publishing services).*

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

c. **UKRI OA funds should be permitted to support OA publication in hybrid journals**

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

*Hybrid journals, like those owned by the Society, allow the broadest range of authors across the world (with a variety of appetites and capacities to pay for open access) to publish in the journal of their choice. As a mechanism to support a transition to open access, hybrid journals are author-centric and are relatively simple to administer and understand. Since 2012, the proportion of articles published as OA in the Society's hybrid journals has increased from 3% to 18%. This progress is at a rate determined solely by author or library customer choice and will continue only if funders (like UKRI) continue to support hybrid publications.*

**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).

**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).

**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).

**Q28. As discussed in paragraph 74 of the consultation document, 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).

*A requirement for publishing within hybrid journals covered by transformative agreements is a preferable approach for funders such as UKRI than requiring zero embargo green open access, as it supports journals in their transition to open access. The only caveat is that these requirements must remain simple, as there is some uncertainty around what constitutes a valid 'transformative agreement' and a burden upon researchers in assessing whether such an agreement is compliant with any definition (and so making a journal a compliant venue for their research).*

**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).

**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).

**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).

*UKRI should encourage preprints for all articles, rather than needing to arrive at a definition of 'public emergency'.*

**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).

*A concern for preprints is the long-term sustainability of their platforms. Actions by UKRI to financially support subject and national preprint repositories, with an aim for long-term sustainability, would be welcome.*

## Section B: Monographs, Book Chapters and Edited Collections

**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 of the consultation document) 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).

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

- Academic monographs Yes / No / Don't know / No opinion
- Book chapters Yes / No / Don't know / No opinion
- Edited collections Yes / No / Don't know / No opinion

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

**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).

**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.

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

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

**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.

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



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

**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).

**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).

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

**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).

**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.

**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).

**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.

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

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

**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.

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.

**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. 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).

**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 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).

**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).

**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).

**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).

### **Section C: Monitoring Compliance**

**Q57. Could the manual reporting process currently used for UKRI OA block grants be improved?** Yes / No / Don't know / **No opinion.**

**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.**

**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 of the consultation document)?** Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / **No opinion.**

### **Section D: Policy Implications and Supporting Actions**

**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).

*Any benefits have already been, and will continue to be, achieved via the existing policy. There are no additional benefits to the changes proposed, except, perhaps, a greater impetus to existing measures. Nevertheless, the Society support the overall goal of an equitable transition to open access.*

**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).

*Imposing greater conditions on the 'green' route to compliance (namely, no embargo) will require more authors to either publish via the 'gold' route or be turned away from their journals of choice if those conditions are not palatable to the journal or publisher. As the 'gold' route will typically require payment of an APC, this will require authors to have access to appropriate funds. Additionally, proscribing hybrid journals may also reduce the freedom of authors to publish in the journal of their choice.*

**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 low-and-middle-income countries?** 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).

*Open Access policies that push for pure OA journals, particularly by proscribing hybrid journals, may benefit authors in low-and-middle-income countries in their capacity (by reducing barriers to read) as readers while adversely affecting them in their capacity as authors (by increasing barriers to publish)*

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

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

## **Section E: Further Comments**

**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).

- In general, the Society supports a transition to OA, where it can be done sustainably and equitably, and so welcomes the policy as a further push to the UK's move in this direction.*
- The recent JISC deal with Wiley, whereby UK authors at participating institutions can publish Gold OA in the Society's journals at no cost to themselves, should help support our members to comply with this policy, and exemplifies how the Society aims to transition; namely, through the hybrid model, providing the widest possible access to the peer reviewed, typeset version of record, and allowing freedom of author choice. We would oppose the proscription of using UKRI funds for APCs in hybrid journals, because moves to limit hybrid OA may reverse the Society's progress in transitioning.*
- Allowing the accepted version to be immediately available has the potential to divert readers (and subscribers) from the final version of an article, or to disincentivise gold OA (reducing progress towards OA transition). The Society is also limited in what we can do with embargoes with what our publisher is comfortable with, considering they manage sales on our behalf (and zero embargo green OA may affect subscription sales).*
- The new policy suggests some areas of new complexity (e.g. in repository conditions, case-by-case licence exemptions, mandatory preprint deposition in instances of 'public emergency'). The Society recommends the new policy be only as complex as necessary to achieve its stated aim – of full and immediate open access for its funded research – to reduce the administrative burden on journals, authors and their institutions, and to allow the broadest range of solutions to the challenge of a sustainable transition to open access.*
- It is important that interventions in scholarly publishing, such as the UKRI Open Access Policy, consider which publishers and publications are likely to benefit (either deliberately or inadvertently).*

*Journals owned and led by learned societies are published directly for the benefit of their respective disciplines. There is, in these journals, an alignment in interests between multiple stakeholders in this environment, including, perhaps most importantly, researchers themselves. The UKRI Open Access Policy should aim to support these journals as much as possible.*

**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).