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# **BPS response to HEFCE's consultation on open access in the post-2014 Research Excellence Framework**

## **Question 1**

*Do you agree that the criteria for open access are appropriate (subject to clarification on whether accessibility should follow immediately on acceptance or on publication)?*

The criteria outlined in paragraph 25 are broadly acceptable, however the requirement for an output being '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', is concerning – the output should become available or the repository provide access in a way that must respect agreed embargo periods. We would consider that a 12-month embargo period is appropriate for STEM subjects. It would be appropriate for HEFCE to align with Government/funder requirements to state that a 12-month embargo period is appropriate.

## **Question 2**

*Do you agree with the role outlined for institutional repositories, subject to further work on technical feasibility?*

There is a risk that development and maintenance of institutional repositories will place a high resource burden on HEIs. There is a potential burden on authors in terms of ensuring deposit (or access) via more than one repository. While HEFCE has suggested steps to reduce this burden (paragraph 28) it is likely to extend the process for authors. However, the role of the institutional repository should include enabling HEIs to monitor compliance with HEFCE requirements.

*Should the criteria require outputs to be made accessible through institutional repositories at the point of acceptance or the point of publication?*

From the point of view of Gold open access, making outputs accessible via the repository may be easily achieved at the point of publication, as it will be possible to link directly to the version of record.

Generally the point of publication rather than acceptance may be more logical. For an author publishing via Green open access the embargo period is likely to begin at the point of publication.

More widely, it will potentially benefit authors, as they should be more aware of the terms under which the work is published and therefore more able to ensure compliance. This is of course an extra burden on authors.

*Do you have any comments on these proposals?*

Our Members are authors of research articles, and our business model (which is currently reliant on income from our journals) depends upon enabling authors from around the world to publish in as simple and standardised a framework as possible. Therefore, regarding repositories, our primary concern lies in reducing the burdens placed on authors wherever possible.

As owners of scholarly journals we hope to see HEFCE acknowledge the need to respect reasonable embargoes (in our discipline, 12 months) in the usage of repositories. We also consider that it would be useful to see a statement outlining which version of the article HEFCE anticipate being available via a repository stated – in the case of Green open access this should be the accepted manuscript. In the case of Gold it may be appropriate to link from the repository directly to the version of record at the point of publication.

### **Question 3**

*Do you agree that the proposed embargo periods should apply by REF main panel, as outlined above?*

As stated above, a 12-month embargo period in STEM is appropriate. It would be appropriate for HEFCE to state this in the policy, as this would align with Government and RCUK positions (where an open access option is available).

*Do you agree with the proposed requirements for appropriate licenses?*

It is appropriate to allow authors to select licenses that meet the broader requirements of paragraph 25. Further discussion would be useful to confirm licenses that HEFCE consider acceptable to ensure authors have clear guidance prior to submitting.

### **Question 4**

*Do you agree that the criteria for open access should apply only to journal articles and conference proceedings for the post-2014 REF?*

This limitation is appropriate.

### **Question 5**

*Do you agree that a notice period of two years from the date of the policy announcement is appropriate to allow for the publication cycle of journal articles and conference proceedings?*

This notice period is appropriate.

### **Question 6**

*Do you agree that the criteria for open access should apply only to those outputs listing a UK HEI in the output's 'address field' for the post-2014 REF?*

No comment

### **Question 7**

*Which approach to allowing exceptions is preferable?*

*If selecting option b:*

- *Do you agree that the percentage targets are appropriate?*
- *Do you believe the percentage target should apply consistently or vary by REF main panel?*

*Do you have any comments on these proposals?*

No comment

**About BPS**

BPS is the primary UK learned society concerned with research into drugs and the way they work. Our members work in academia, industry, and the health services, and many are medically qualified. The Society covers the whole spectrum of pharmacology, including laboratory, clinical, toxicological and regulatory aspects.

Clinical pharmacology is the medical speciality dedicated to promoting safe and effective use of medicines for patient benefit. Clinical pharmacologists work as consultants in the NHS and many hold prominent positions in UK Universities.