



# 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. \***

Dr Ross Mounce, Director of Open Access Programmes, ross.mounce@arcadiafund.org.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 (Arcadia Fund)  
~~c. Other (including part of an organisation, department, informal group) please specify type:~~

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

Arcadia Fund

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

Not applicable.

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

England.



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

- a. Arts and humanities YES
- b. Medicine, health and life sciences YES
- c. Physical sciences, engineering and mathematics ~~YES~~ NO
- d. Social sciences NO
- e. Interdisciplinary research YES
- f. Not applicable

If you, your organisation or your group is responding on behalf of a specific discipline within an area indicated above, please describe it using a maximum of five key words separated by spaces:

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

- ~~a. Researcher(s)~~
- ~~b. Publisher (including employees and representative bodies)~~
- ~~c. Learned society or academy with an in-house publishing arm (including employees)~~
- ~~d. Learned society or academy which outsources publishing to a third party (including employees)~~
- ~~e. Learned society or academy which does not publish (including employees)~~
- ~~f. Providers of scholarly communication infrastructure or services (including employees and representative bodies)~~
- ~~g. Library or research management (including departments, employees and representative bodies)~~
- ~~h. Higher education institute (HEI) (including departments, employees and representative bodies)~~
- ~~i. Business that conducts, uses or publishes research and/or innovation (including employees and representative bodies)~~
- ~~j. Research and/or innovation funder (including employees and representative bodies)~~
- ~~k. Member(s) of the public~~
- ~~l. Other research performing organisation (including departments, employees and representative bodies) – please specify:–~~
- ~~m. Other user or producer of research outputs – please specify:–~~
- n. Other - please specify: We are a charitable foundation with a mission to preserve endangered cultural material and biodiversity which both supports and draws on research and to promote open access to research

**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) YES
- ~~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: BBSRC and NERC (for Ross Mounce)

**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):** We are a Liechtenstein-registered charity and thus do not have a UK Charity Registration Number

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

- ~~a. ≥ 250 (large business)~~
- ~~b. < 250 (medium-sized business)~~
- c. < 50 (small business)
- ~~d. < 10 (micro 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:



## 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)?** Strongly agree.

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

"OA publishing platforms" (OAPPs) as defined in footnote 23 seem to be just original publishing platforms – open access to the originally published content does not seem to be a requirement by some interpretations. Irrevocable open access, achieved through Creative Commons licencing, to the published content should be made more explicit and robust in the definition of OAPPs.

**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?** No.

**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?** No

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

Arcadia Fund is a member of the Open Research Funders Group (ORFG). As you will see from [Crossref metadata](#) most of the research outputs funded through our grants are in conservation biology but we have also supported interdisciplinary research in other fields eg on climate change through the analysis of ice cores; glaciologists and historians working together and ) research to advance non-destructive imaging techniques to help read ancient texts such as Egyptian papyri and the Dead Sea Scrolls. Our funding is primarily through UK institutions (universities, museums and archives and conservation NGOS) but we are not limited to this geography, and also make grants to non-UK institutions eg Harvard, UCLA, and the National Library of Israel. As an organisation we want research outputs to be made immediately available without embargo. Arcadia already requires material resulting from our grants to be made available within a year . We will consider requiring immediate open access for our



funded research outputs from 2022 onwards – but this will not be retrospectively applied for already awarded grants; new grants only.

**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**

**Please explain your answer** (700 characters maximum, approximately 100 words).

The UK already has an extensive and expensive network of repositories – these should be used to their fullest. Repository deposit will undoubtedly aid compliance checks. Repository copies will also provide a form of digital preservation should the original published version vanish from the web.

**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**

**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).

A variety of choices should be required including but limited to: CC0 / public domain dedication, CC BY, and CC BY-SA. Plan S permits CC BY-SA so it would be very odd if UKRI did not permit this choice of licence. All of these licenses are clearly compliant with the definition of open access. Licenses with 'Non-commercial' (-NC) restrictions on use are clearly by definition not open access.

**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).

Parts of the UK research community, notably some historians want to have the option of applying a NoDerivs (-ND) restriction to their work. This would cause harm to prospective re-users and indeed prevent some forms of re-use (e.g. unauthorised



translations, or re-use in Wikipedia or other Wikimedia projects) of these restrictively licensed works. But, if granted, it would ameliorate some vocal opposition to the OA policy and , although NoDerivs restrictions are not ideal, it might be worth ceding this ground for now, for the sake of the rest of the policy. If NoDerivs restrictions are granted, their application should be closely monitored to ensure they remain exceptional and not the norm. We would be highly concerned that some publishers and learned societies might encourage and ‘coach’ authors into applying NoDerivs onto as many of their works as possible, possibly by offering pricing discounts on APCs if ND is chosen. The American Chemical Society already charges an additional \$1,000 for the more permissive CC BY license, with the more restrictive CC BY-NC-ND licence being the cheaper ‘default’. If this becomes inadmissible, publishers could easily move in 2022 to CC BY-ND as the default and CC BY being priced at an additional \$1000 to deter authors from choosing it.

Creative Commons (2020) themselves think that sharing academic publications under “No Derivatives” licenses is misguided:

<https://creativecommons.org/2020/04/21/academic-publications-under-no-derivatives-licenses-is-misguided/>

**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 (but it would affect our grantees who actually do the research, writing and submitting of research articles that we have funded)

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

The DCMS needs to ameliorate the false economy shenanigans going-on between its museums and its funded academic researchers. We have seen many reports of DCMS-funded UK museums routinely making it difficult and/or expensive to reproduce digital images of items from their collections within academic works as 3rd-party © material. Licensing units at DCMS-funded UK museums, galleries, and archives should be encouraged to support the UKRI OA policy by permitting UKRI-funded researchers to use appropriate digital images within funded research works for free or at the very least at a reduced price and without the need to specify how big the “print run” for the academic work will be which is obviously not applicable in the realm of digital, permanent, OA online.

The British Museum (BM) currently publishes images under CC BY-NC-SA 4.0 which has 2 major issues a.) “copyfraud” BM cannot be the © holder for simple scans of 2D objects created in 1900 or before – the true © holder is long deceased and the © of the



work is in the public domain b.) The -NC that the BM chooses forces researchers to enter timewasting negotiations and potential payments if they wish to publish reproductions of BM images within UKRI-funded research outputs, for which the UKRI policy would clearly not permit (nor should it) the -NC restriction.

**Q10. Are there other considerations UKRI should take into account regarding licensing requirements for research articles in-scope of its proposed OA policy?**

Yes

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

UKRI should also offer CC BY-SA 4.0 as Plan S does. We also note that CC BY-SA 4.0 is compliant with Wikipedia and Wikimedia Commons and thus works under this licence (and CC BY but not CC BY-NC nor CC BY-ND) can appear in part or in full on Wikimedia projects. See <https://commons.wikimedia.org/wiki/Commons:Licensing>

One of the most common forms of re-use, adaption, and wider impact for open access research content, is re-use on Wikipedia – one of the world’s most visited websites – the go-to for information on any topic. Content licenced under CC BY-ND will automatically be denied the oxygen of exposure/usage on various Wikimedia Foundation projects, including Wikipedia, Wikisource, Wikiversity, Wikibooks and Wikimedia Commons because of the ND license restriction and thus will seriously harm the return on investment in that research.

**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**

**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).

We prefer a) to b) because we cannot be certain of the future. If only limited reuse rights were retained it would not be future-proofed against changes in the open access landscape or internet and technology landscape. Overly limited reuse rights will undoubtedly result in edge-cases, loop-holes, and exploits which might mean that some outputs no longer stay open access online. Option a) would better proof against scenarios such as repository closures, mergers, and institutional bankruptcy.

**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

a. strongly agree

b. agree

c. agree

d. disagree

e. disagree

f. agree

g. agree

- a) PIDs are essential if we are to keep track of open access, particularly green open access. b) article-level metadata should be submitted to the registration agency of the PID e.g. and made openly available for all within the registration agency system so that it is maximally useful. A dump of CC0 data not available from within the registration agency system e.g. DataCite or Crossref would be extremely impractical fragmentation. c) make that ALL published versions of the research output inclusive of XML, PDF, EPUB and HTML (where provided). d) Although preservation is of course important, the way this is currently written could turn into gatekeeping that excludes many good open access journals. Define “robust”. e) Whilst we support I4OC, that support is for publishers to ‘open’ their metadata at Crossref. Not all publishers supply granular citation data to Crossref though, so this point needs reformulation; if granular citation data is supplied to Crossref it must be set to ‘open’. f) This is a good idea but it should not be limited to Sherpa/Romeo as other databases may arise and surpass Sherpa/Romeo in time. g) ORCID is good and has wide adoption.

**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)

a. Disagree b. Agree c. Agree d. Agree e. Agree

We disagree with a. because Crossref membership and assignments of DOIs are expensive. It is also time consuming to create and upload metadata associated with the DOI.

**Q15. To support the adoption of technical standards for OA, are there other standards, actions and/or issues UKRI should consider? Yes**

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

UKRI should insist on funder metadata deposit with Crossref DOIs and that citation data should be set to "open" at Crossref for all funded outputs. Arcadia Fund suffers from both false positives and false negatives when trying to find research its grantees has supported – better reporting of funder metadata would help track compliance. On open citation data – why pay for research to be published and be made to pay again for access to citation data? UKRI should not let publishers charge twice for the suite of publishing services (which includes metadata creation and upload to Crossref), especially when most large publishers have already set their citation data open.

**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?** No opinion

**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).**

UKRI have done a good job on signalling and consulting the move to this policy – it has given publishers and all other stakeholders plenty of time to prepare and adapt. The coronavirus pandemic has only made it clearer to everyone involved with research that the only sensible future is open access to research. The authentication systems that enable off-campus authenticated access to subscription resources appear not to have coped with the demand arising from the pandemic, one publisher (Royal Society Publications) has made a remarkable public statement about this: “It has come to our attention that a number of researchers are having problems accessing our content via institutional logins due to the increased load on IT systems caused by everyone working from home, or by problems with CASA and device pairing at their institution. We have therefore decided to make all our content freely available until further notice.” Source:

<https://blogs.royalsociety.org/publishing/covid-19-pandemic-royal-society-publishing-service/>

**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?** No opinion.

**Q19. Do you think the proposals outlined in Section A will have any financial cost implications for you or your organisation?** No



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

By January 1st 2022, the UKRI open access policy will be 'stronger' or equal to the Arcadia Fund open access policy. We do not pay APCs. APC-free open access journals and green open access routes are to be encouraged. <https://www.arcadiahfund.org.uk/about-peter-baldwin-lisbet-rausing/open-access-and-digital-preservation-policy/>

**Q20. Do you think the proposals outlined in Section A of the consultation document will result in financial benefits for you or your organisation? No opinion**

**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? No**

**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? No opinion.**

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

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

It would be useful to have a standardized overview of profit/surplus at each publisher organization. Per article costs are probably unwise as not all articles are equal in cost to each other. Doug Kell's review of iron chelation (doi: 10.1186/1755-8794-2-2), 79 pages with 2469 references, is one such example that will have undoubtedly cost the publisher quite a lot to process. Because it is burdensome, per article breakdowns of charges should only be levied on the largest publishers – set a clear threshold which can be easily assessed and only those above the size threshold need to give an averaged breakdown of costs and profit per article for each and every journal.

**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:**

- 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~~

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

All analyses demonstrate that hybrid OA is poor value for money when compared to full/pure open access. A post by Dr Philip Boyes and Dr Danny Kingsley explains the problems of hybridOA: <https://unlockingresearch-blog.lib.cam.ac.uk/?p=969>

**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

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

Repository development, maintenance, and facilitated deposition of manuscripts into repositories are all costly processes. It seems fair that UKRI should pay something towards the upkeep.

**Q26. To help accelerate policy adoption, should UKRI introduce any other restrictions on how UKRI OA funds can be used?** No opinion.

**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

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

Subscribe-to-open and membership models are both good models for sustaining open access journals. Institutions should be encouraged to spend some of their UKRI funds on these models.



**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

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

We are skeptical about the value of “transformative agreements” for achieving meaningful change towards cost-effective open access publishing in a sufficiently short time period. When such agreements are made, the details of them must be published in full on the ESAC Transformative Agreement Registry. We note that at the time of writing there are only 11 agreements between Jisc and publishers recorded at ESAC. Only sign a transformative agreement if it covers ALL of the journals of the publisher – don’t let the publisher carve out exceptions for ‘prestige’ titles or exclude popular OA venues as early Springer deals did.

**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

**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).

UKRI should support infrastructures which gather information on green open access policies (such as SHERPA RoMEO) and open access journals (such as the Directory of Open Access Journals), and this support should be kept under periodic review to ensure that the supported infrastructure is still best-in-class relative to other not-for-profit initiatives doing the same thing (or better).

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

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

Yes, this would help ensure that no research ‘falls through the cracks’ if an institution does not yet have a functioning or properly-staffed institutional repository. If popular and successful, it might even help some institutions to gradually decommission their own repositories over time in favour of the national repo, to create a more centralized system which might offer some economic efficiencies, especially for smaller higher



education institutions which simply cannot staff, maintain, and update their repositories adequately under the current system.

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

**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.)

Use the World Health Organization’s Public Health Emergency of International Concern (PHEIC) as an independent trigger and definition. If we are to admit that preprinting is beneficial why not encourage the practice outside of public emergencies too?

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

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

To help develop, sustain, and promote, a shared national repository which supports preprints, as well as postprints, across all disciplines.



## 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?** Disagree

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

The criteria for trade books are too loose. There should be a high minimum print run and the book must be available in many brick and mortar bookshops to be considered a trade book. Otherwise a great many will try and claim their work is a 'trade book' when it is no such thing.

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

- a. Academic monographs Yes
- b. Book chapters Yes
- c. Edited collections Yes

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

Tax-payer funded longform scholarship should be made open access for the public to enjoy just as shortform scholarship is. Without equivalent demands on openness for both short and longform scholarship it would setup a dangerous situation in which taxpayer funded STM research was available to the public for free, whilst taxpayer funded AHSS research was not – we suggest such a situation is not advantageous to AHSS disciplines in the long-run. For scholarship to be valued, it must be seen and read. To be seen and read widely it must be open access, online. Why should longform research be allowed to deliver less return on investment to the taxpayer? It should not. Both longform and shortform taxpayer-funded research should be open access.

**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 Disagree



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

There is no evidence for the need for such an exception. There are broad remit publishers for longform scholarship. If there is a demand for open access monograph publishing, as there will be thanks to the UKRI policy and other OA monograph policies around the world, publishers will adapt to the demand or lose valuable trade to other competing publishers. If this exception is permitted, there could be adverse and unintended consequences : some publishers may choose to prevent OA publishing for some fields, in advance of the UKRI policy coming into force, merely as a way to maintain legacy business models in those fields. Publishers *can* do open access, but if given an excuse they will try not to.

**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? No**

**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).

On average, the majority of sales for academic monographs are within the first 12 months (see the Fullstopp 2019 report "Open Access Monographs in the UK: A data analysis" for supporting data, specifically Figure 3.7.2). Even thereafter some people like to buy a printed copy even if they have access for free to a digital version. So it is not the case that once the monograph gets made freely available that all sales of printed copies will halt. Assertions relating to patterns of "citation half-life" should be completely ignored as these have no actual causal relation to the economics and business models of academic publishing. Fields such as palaeontology produce both journals and monographs where it is not uncommon to cite 19<sup>th</sup> century literature – this



has not necessitated longer publisher-set embargo lengths for palaeontology journals or monographs. Supporting data (<https://doi.org/10.6084/m9.figshare.106815.v1>) illustrates that palaeontology literature cites articles with a mean age of >18 years from the publication date of the citing article, yet most palaeontology subscription journals happily co-exist with zero day or six month embargoes (<https://doi.org/10.26879/968>).

**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).**

There is no evidence that book chapters have a significantly different sales pattern. Thus the embargo should be the same.

**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).**

There is no evidence that edited collections have a different sales pattern. Thus the embargo should be the same.



**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**

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

Traditionally published monographs sell most of their copies within the first twelve months of publication – the implication is that if the embargo is 12 months or longer then many readers will still need to buy, even when knowing a free copy will be available 12 months later, as purchasing appears to be done with some urgency whilst the content is fresh. Additionally, as previously stated, whether the book is immediately open access, open access after an embargo of 12-months, or open access after an even longer embargo – these books still sell print copies even after they have been made freely available online as some readers prefer to have a print copy. In some cases, open access helps readers browse a book, to confirm their feeling that they would like to buy a print copy of it and that it would really be worth doing so. The series of OAPEN studies, particularly [OAPEN-CH](http://www.snf.ch/en/funding/science-communication/oapen-ch/Pages/default.aspx), demonstrated in controlled trials that there are statistically significant differences between overall sales of print copies between open access and not open access monographs. See <http://www.snf.ch/en/funding/science-communication/oapen-ch/Pages/default.aspx>

**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**

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

From a taxpayer perspective, the peer-reviewed manuscript is the content they have a right to – 'green' open access for longform scholarship should certainly suffice. Green open access under liberal Creative Commons licenses would also facilitate textmining and other forms of re-use aside from just 'human reading'. The Book Publication Charges for some 'gold' open access routes are priced very high and seem unaffordable for most researchers.

**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? No opinion.**

**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? Disagree**

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



We fail to see how CC BY-ND is a “minimum”. In terms of the restrictions it places, it is a maximum not a minimum. It should only be permitted sparingly for the most sensitive works of scholarship.

**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? Agree**

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

The original text (and original images and media if there are any), without third-party material must still be made open access in-line with the UKRI policy. It would be helpful to redact the third-party material in the fully open access version in a way that explains to the reader what the material was, why it had to be redacted, and where it might be able to be viewed by the reader either online or in ‘meatspace’.

**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? Agree**

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

Something is always better than nothing. In many instances the third-party work will actually be viewable online for free at another website – just perhaps not available under a Creative Common license – thus it would be extremely helpful to link to where it can be seen. It should be explained *why* the material is redacted – so that more readers can become aware of copyright and licensing – it is still a poorly understood thing by many.

**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? No opinion.**

**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**

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

As per Plan S CC BY-SA and CC0/public domain dedication should also be acceptable alternatives.

**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? No

**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.**

It is madness to allow publishers exclusive rights to taxpayer funded research. UK institutions are put in the odd position of having to rent access to their very own research that they themselves produced. Avoiding this basic and easily avoidable problem will do a lot of good in the public interest, both nationally and globally. Refer to our answer given to Q12 for further points.

**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).**

Publishers have had ample time to prepare for this mandate, and by giving them until 2024 they still have plenty of time in which to adjust the running of their business models in cooperation with their stakeholders.

**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?**

No.

**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? No opinion.**

**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).

Green open access needs to be championed in the near term as at current pricing levels and funding levels gold open access for all monographs looks to be unaffordable. For supporting data see Martin Eve et al. (2017) 'Cost estimates of an open access mandate for monographs in the UK's third Research Excellence Framework' <https://doi.org/10.1629/uksg.392>

**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**

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

We have suggested funding support for DOAJ in the journal section. We would likewise suggest commensurate funding support for DOAB (the Directory of Open



Access Books), and the OAPEN Online Library and Publication Platform (<https://www.oapen.org/>) which actually hosts the fulltext books unlike DOAB and thus provides additional benefits particularly for (fulltext) textmining. If the UK are significant creators of OA books (going into DOAB&OAPEN) and significant users of DOAB & OAPEN, then UKRI should consider providing partial support for DOAB & OAPEN commensurate to their level of representation and usage of these platforms/services.

**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**

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

The publisher must make efforts to advertise the existence of a freely available version on the DOI-landing page of the publisher version of the work, and in all metadata supplied in the form of MARC records, ONIX feeds, and CrossRef DOI associated metadata. The licence of the work should be clearly given on the DOI-landing page and in all forms of associated metadata that the publisher supplies be it MARC or ONIX or DOI or all. If the publisher is known to not provide adequate metadata about open access and open access licensing, then withhold all Book Publishing Charges from that publisher until they provide it. Better still, warn authors not to submit to the publisher with a 'blacklist' of non-compliant publishers.

Some publishers both in journals and in monographs have been doing rather sneaky things to hide the existence of a freely accessible version. See Piwowar (2018) 'Where's Waldo With Public Access Links'

<https://researchremix.wordpress.com/2018/05/06/wheres-waldo-with-public-access-links/> For 'gold' open access works, ensure the publisher creates a link from which the entirety of the book can be downloaded as PDF (or other format e.g. EPUB) in one-click – far too many platforms break-up books into chapters with absolutely no provision of a link to download the work in its entirety – this is annoying for users.

**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**

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

Require green open access self-archived deposits of monographs to be deposited as a single file with the entirety of the textual output in that file. It would be a disaster



for ease of use if authors were to be permitted to slice-up their monographs into twenty pieces in the repository for the 'free version' done purely to satisfy bare minimum UKRI compliance purposes. Some authors may be actively hostile towards the existence of a green open access version of their monograph in a repository so the rules around the green open access deposition process need to be smartly thought-out so they cannot be 'sabotaged' by authors who only want readers to read the publisher version.



## Section C: Monitoring Compliance

**Q57. Could the manual reporting process currently used for UKRI OA block grants be improved?** Don't know

**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

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

Wellcome Trust has applied sanctions for non-compliance and has steadily improved its overall rate of compliance. Other open access policies e.g. in Australia (NHMRC) where no sanctions appear to have been applied for non-compliance have not resulted insignificantly satisfactorily increasing levels of open access.

Wellcome Trust has applied sanctions for non-compliance and has steadily improved its overall rate of compliance. Other open access policies e.g. in Australia (NHMRC) where no sanctions appear to have been applied for non-compliance have not resulted insignificantly satisfactorily increasing levels of open access. Be warned that UK taxpaying open access activists may desire to mount a legal challenge against UKRI if UKRI does not apply appropriate sanctions in observed instances of non-compliance with the UKRI open access policy. We strongly believe the public has a right of access to UKRI-funded research, and that UKRI has a responsibility to ensure that research outputs are made openly available online.

**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)?** 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**

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

Arcadia's environment grantees – working to conserve and restore biodiversity and landscapes will undoubtedly benefit from more open access to cutting-edge research. We note that a recent analysis of a survey of conservation practitioners by the International Union for the Conservation of Nature (IUCN) indicates that “half (49%) of the respondents find it not easy or not at all easy to access scientific literature” [1].

We also think that more open access will result in better UK environment policy. We can't help but note that the UK Parliamentary Office for Science and Technology (POST) has “shocking” (poor) access to research and appears to rely on university-affiliated placement students to access paywalled research [2]. This is a view more generally supported by Nick Hillman too, who wrote: “Policymakers have no access to academic journals. There is no institutional Westminster or Whitehall log-in, so politicians and civil servants generally see less academic research than the greenest undergraduate” [3].

[1] Larios et al (2020) “Access to Scientific Literature by the Conservation Community” <https://doi.org/10.1101/2020.03.30.010058>

[2] De Palma (2015) “Why all PhD Students should do a policy placement” <https://therostrumblog.wordpress.com/2015/01/12/why-all-phd-students-should-do-a-policy-placement/>

[3] Hillman (2016) <https://www.timeshighereducation.com/comment/the-10-commandments-for-influencing-policymakers>

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

**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).

We answer “yes” so we can explain why we actually feel this is a “no”. As the coronavirus pandemic has demonstrated, when nearly ALL physical libraries both ‘research’ and ‘public’ are closed it has made many scholarly works, particularly books completely inaccessible. Yet this is what the situation has been like in ‘normal’ times



for those with disability, or illness, or who do not live near to a well provisioned physical library. None of the arguments that will be advanced about inequalities, will outweigh the huge benefits to equality of access that the UKRI OA policy will bring.

**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.**

**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).**

Yes, there are great positives, particularly the embrace of green open access and 'diamond' (APC-free) open access as they are models that LMICs can easily embrace too. UKRI would do well to study and cooperate with AmeliCA and SciELO if it wants to create policy and infrastructures that work globally, inclusive of LMICs.

**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? No**

**Q64. Are there any other supporting actions (not identified in previous answers) that you think UKRI could undertake to incentivise OA? No.**

**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? No**

## **Section E: Further Comments**

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

UKRI funded research should require citation data for outputs to be set to 'open' at Crossref. . So that if the citation data for the research output is not 'open' it will not be compliant with the UKRI policy. This metadata is part and parcel of the work that the publisher normally undertakes and that funders and institutions pay for. The taxpayer should not be charged twice for it. Most of the major publishers including Wiley and Springer Nature already have the data open. Only a few publishers are holding-out against this. If UKRI included a requirement for open citation data it might force the remaining 'closed' publishers into changing their position on this issue, at the very least they can open the citation for UKRI-funded articles whilst keeping citation for



non-UKRI-funded articles 'closed' if they so wish – this can be controlled at the per article level just as paywalled access is toggled on and off between different articles within 'hybrid' journals. See Shotton (2018) "Funders should mandate open citations" for more on this point <https://doi.org/10.1038/d41586-018-00104-7> .

**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? 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.**

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

The coronavirus pandemic is a timely reminder that immediate access to cutting-edge research is priceless. We simply cannot continue to prioritise the "needs" of shareholders and owners of publishing companies for profit/surplus, over the more vital need for humanity to access to knowledge as soon as possible.