

Open Access and Submission to the Research Excellence Framework post-2014

Submission from the Physiological Society March 2013

Summary

The Physiological Society fully supports the move towards open access and has provided a 'gold' open access (OA) option for our two journals since 2005. In addition we have just announced the launch of Physiological Reports, a fully 'gold' OA journal. We welcome this opportunity to input into your consultation plans. We have a number of recommendations that we hope will be helpful, in summary:

- HEFCE and RCUK should work together on developing closely aligned positions on exactly what conditions must be met to be deemed OA compliant to avoid confusion and unintended non-compliance.
- Academic freedom must be maintained and policies introduced by HEFCE and RCUK must avoid the need for universities to set up selection systems that duplicate peer review and constrain when and where academics are able to publish their work.
- If well developed and established subject based repositories are in existence these should be the primary location for the deposit of research publications.
- Embargo periods for green open access should match those suggested in the Finch report, namely 12-24 months.
- The mandated use of CC-BY should be delayed until the affects that it will have on intellectual property rights and industrial & international collaborations has been fully assessed.
- During the transition to 100% OA compliance (RCUK currently estimate a five year transition period) HEFCE must be flexible and willing to update its policies regarding OA.

Introduction

1. The Physiological Society brings together over 3000 scientists from over 60 countries. Since its foundation in 1876, our members have made significant contributions to our knowledge of biological systems and the treatment of disease.
2. We promote physiology and support those working in the field by organising world-class scientific meetings, offering grants for research, collaboration and international travel, and by publishing the latest developments in our two leading scientific journals, *The Journal of Physiology* and *Experimental Physiology*.

3. A major concern of the Physiological Society is that the implementation of OA should not infringe on academic freedom. Policies introduced by HEFCE and RCUK must avoid the necessity for universities to set up selection systems that duplicate peer review and constrain when and where academics are able to publish their work.

Expectations for open access in post-2014 REF

4. Whilst acknowledging that OA policies remain fluid and in constant development, it would be highly desirable for HEFCE and RCUK to develop closely aligned policies on the fundamental aspects regarding what will be deemed OA compliant. This will help to avoid the potential for confusion and unintended non-compliance.
5. An example of this is HEFCE's proposed definition of what it "treats as open access", which is out of step with the recently published RCUK guidelines. The RCUK guidelines, which admittedly are also currently subject to consultation, make it clear that there is no requirement for articles published via 'gold' open access to be placed in a repository. Their position on articles published via 'green open access' route requires the article to be deposited in "any repository". The current HEFCE proposal would require both green and gold publications to be deposited in the author's own institutional repository.

The role of institutional repositories

6. The requirement for institutional repositories to store all published material will result in a significant increase in the quantity of material to be handled by these repositories. In conjunction with the need for the repositories to be easily accessible for searching by both manual and automated tools, this requirement will be far from trivial to deliver on a practical level.
7. HEFCE should assess the capability of institutions to fulfil this requirement and the increased burden this will place on HEIs.
8. In a number of subject areas existing well developed and widely used repositories are already in use, such as Europe PubMed Central¹ and ArXiv². It seems unnecessary to use limited resources to duplicate existing services, which are unlikely to provide supplementary value.
9. We recommend that if suitable subject based repositories are already in place that they should be the primary location to which research publications should be deposited.

¹ <http://europepmc.org/>

² <http://uk.arxiv.org/>

10. Additionally, it is potentially questionable whether academic advancement would be better facilitated by institutional repositories as opposed to subject-based repositories.

Embargoes

11. The Association of Learned Society and Professional Publishers (ALPSP) and The Publishers Association conducted research on what affect a six month embargo would have on library subscriptions to journals. For scientific, technical and medical journals almost half (46%) of respondents declared they would cancel some or all of their subscriptions. This study highlights the considerable problems that a six month embargo could cause for some journals.
12. It is clear that there are considerable differences between individual disciplines (even within subject groupings) with regard to the half-life of citations and the length of time an article will be valued by the community. Any policies adopted by HEFCE should adopt a flexible approach on a discipline basis.
13. The embargo period of 12-24 months for 'green' open access proposed by the Finch group also matches with our experience and expectations. At present the Physiological Society publishes two journals – the Journal of Physiology (JP) and Experimental Physiology (EP), both of these journals offer the opportunity to publish via gold OA, with all other articles becoming free to view 12 months after publication. The key figures for our journals are:

INDICATOR	JP	EP
Two-year Impact Factor	4.881	3.180
Five-year Impact Factor	4.988	0.885
Cited half-life	>10.0	5.8
Eigenfactor Article Influence score	1.888	1.045

14. JP, while having an Impact Factor that has been around 5 for the last few years, has sustained a long citation half-life and consequently is the highest rated physiology journal based on the Eigenfactor. This indicator uses a number of indicators beyond simply the one dimensional Impact Factor. Even our second journal, EP, sustains a citation half-life of 5.8 years.
15. Nevertheless these figures indicate that a 12 month delayed 'green' OA option is appropriate and sustainable for the life sciences, providing free access during periods of continuing citation.

16. In addition many other countries have adopted the 12-month delayed 'green' access model as the timelines of choice. Consequently a 6 month embargo could seriously affect UK academics, should funding be insufficient to provide article-processing charges (APCs) and would, in any case, be out of step with the global consensus.

Licenses

17. The objective of making publicly funded research openly available is one that must be supported. However the implementation of this and the use of CC-BY variants must be considered carefully.

18. First whatever stance is adopted should take a pragmatic approach taking into account the following points:

- The arrangements should safeguard the ability of academic researchers, and commercial collaborative partners where appropriate, to protect any intellectual property.
- Any licensing should exclude open commercial use via reach through rights or open licenses – in the past the UK has lamented the ability to protect IP arising from publicly-funded research and such rights could worsen the situation.
- Options should be provided in relation to CC-BY variant licences to authors so as not to compromise submissions to UK journals from overseas nor existing collaborative partnerships with commercial partners – however this also requires that there are clear explanations on the variant options of CC-BY licence and their implications.

19. Over the years the CC-BY-NC licence has served the academic community well and facilitated the open publication without compromising arising IP.

20. HEFCE alongside RCUK and the government should carefully consider the impact of any CC-BY requirements on IP, and the knock on effect that this will have on industrial and international collaborations. We believe that a flexible approach should be adopted with clear guidance for authors.

Exceptions

21. RCUK have openly admitted that they only expect 45% of research papers to be published open access in year one of their policy, which is due to come into force 1 April 2013, with this figure to rise to over 50% in year two. It is therefore reassuring to see that HEFCE acknowledge that some flexibility on OA compliance will be required, with the next REF period due to start on 1 January 2014 (during year one of the transition period).

22. It also must be recognised that there is potential for research papers to be submitted for publication prior to the finalisation of the HEFCE OA policy, which are then subsequently published post 1 January 2014. To preclude these publications on the basis of non-compliance would be unreasonable. It would seem somewhat self-defeating for a policy aimed at maximising the impact of UK funded research, to incentivise delayed publication of research findings to ensure they are compliant with HEFCE policy.
23. The consultation document has proposed three possible ways of handling exceptions. With some flexibility during the transition phase the first two proposals (identifying categories of material to be exempt and introducing a case-by-case exemption system) would seem to have the potential to provide a sensible and workable way to allow for valid exceptions.
24. The third option provided, which would involve the specification of a percentage of all outputs from an individual institution to be compliant will pose significant challenges. RCUK have been clear that they expect a transition period of five years, but are planning on conducting review the implementation of the OA policy in 2014 and periodically thereafter. Therefore, if an arbitrary percentage compliance figure was to be set, it should be realised that some flexibility may be required in view of the results of RCUK reviews (or for that matter any other review) into the transition to OA.
25. We would strongly recommend that HEFCE develop clear guidelines with regard to how it will handle exceptions during the transition period. However, included within these guidelines, must be built in capacity to update the policy when additional evidence becomes available.

Open data

26. Open data remains very much in infancy in comparison to open access, we therefore agree with the view of HEFCE that it is too early to include this as a formal requirement for future REF's at this point in time.

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