

UKCRC/CPHC Response to HEFCE Open Access Consultation.

The UK Computing Research Committee (UKCRC), an Expert Panel of BCS The Chartered Institute for IT, the Institution of Engineering and Technology and the Council of Professors and Heads of Computing (CPHC), was formed in November 2000 as a policy committee for computing research in the UK. Its members are leading computing researchers from UK academia and industry. Our evidence reflects the experience of researchers who each have an established international reputation in computing.

The Council of Professors and Heads of Computing (CPHC) represents the interests of a membership engaged in the management of University Computing education and University Computing research within the UK Higher Education sector. CPHC is an independent body, registered as a charity, and, although we work closely with all the Professional and Statutory organisations relevant to our sector, we are not affiliated to any other body.

This response is a joint response from the two organisations.

The Current Position in Computing Science

Computing Science research has a strong tradition of open access publication. For many years the typical model of publication for individuals working in academic CS research labs has been to make available, via a personal or institutional Web repository, a copy of each author's "accepted manuscript" (or some other version, normally after peer review). This makes each paper globally accessible and the costs of maintaining personal/institutional Web portals of this sort are absorbed as part of the normal baseline of research activity within a well-founded laboratory. The accepted manuscript is also, typically, published in a journal or conference proceedings (in CS, major international conference proceedings are at least as important and impactful as journals). The value of this second stage of publication is to make the paper more visible through table-of-contents listings, email alerts and indexing on searchable publication databases. It is also a means of improving and endorsing the quality of the paper, through the process of independent peer review and quality control that a prestigious conference/journal provides. The cost of this second stage is met either (for conference papers) by the fees paid by conference attendees or (for journal papers) by the subscription paid by those receiving the journal. Some of our journals are produced via our learned societies (such as ACM or IEEE) and for these the cost of publishing is partly funded through membership subscriptions and partly through subscriptions from university libraries and other subscribing organisations. The main publishers of conference proceedings (such as ACM and IEEE) do not currently support Gold Access for conferences, although they do for journals. Overall, the effect is that the Computing Science community has Green open access as its dominant style of publication with an element of Gold where subscriptions allow.

Consultation questions

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)?

Strongly Disagree

Do you have any comments on this proposal?

Although UKCRC and CPHC strongly supports open access, and thinks this should be encouraged by HEFCE and the Research Councils, we oppose the policy of introducing criteria other than research excellence into the REF research selection process.

Past research assessments have allowed academics and institutions to select their outputs for submission based on what they consider to be the best representation of the quality of research. The outputs were then assessed by assessors based on well defined research quality criteria.

This proposal now establishes fundamentally different criteria on the output selection – outputs published by publishers or organisations which do not abide by publication policies set by Funding Councils, are banned from submission to REF, independent of their quality. Open Access should **not** be a REF selection criteria.

This establishes a precedent of output selection not based on quality but on political policy. The next step could be banning outputs due to the politics or country of the publisher, venue of a conference etc.

However, if the policy is forced on the community, then we consider the criteria for open access are broadly acceptable with slight modification – see question 2 below.

Question 2

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

Agree

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

Publication

Do you have any comments on these proposals?

We agree that HEFCE should support individual and shared institutional repositories. Economies of scale can be achieved, if many institutions use the same repository rather than each 'doing their own thing'. The repository should enable academics to set up a web page of publications, which can be tagged and sorted based on topic, date etc. and minimise the effort required by the academic for entering information. This implies the repository should source information on publications from publishers or web-based resources. The author could then be reminded to upload the relevant submitted version

e.g. for Green Open Access. The repository should always provide a link to the publisher's version of the paper.

Although we think that authors should make their publications available as early as possible, it requires considerable manual effort to enter information at time of acceptance, whereas this can often be automated after publication on publishers web pages, so the criteria should only insist on publication time plus about three months to allow automated processing

We do not see the necessity for insisting on outputs being accessed only through UK HEI repositories, as some communities use international ones such as ACM Author-izer Service, ArXiv, PubMed etc. Part a for the criteria should be rephrased as follows:

“Outputs are accessible through a UK HEI *or any other suitable open access repository*, within three months of publication, although the repository may provide access in a way that respects agreed embargo periods”

However if this does come into force it is likely to result in considerable reduction in quality of papers submitted to REF. If an academic forgets to upload a paper into the repository within the allowed timescale, after either acceptance or publication, the paper cannot then be loaded into the repository at a later time and so will be ineligible for submission to REF. This is likely to happen quite frequently with busy academics, so many outstanding papers in the top journals will no longer be eligible for submission to REF, as paper selection will no longer be based purely on quality but papers have to meet a political policy.

Question 3

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

Neither agree or disagree

Do you agree with the proposed requirements for appropriate licences?

agree

Do you have any comments on these proposals?

We do not support publisher embargoes on Green Open Access. Green Open Access should be allowed immediately after publication. However, we do not consider that REF is the right means of persuading publishers to agree to this.

We agree that pressure should be put on publishers to reduce embargo periods for Green Open Access, but we do not support banning REF submissions of outputs, from publishers that do not meet these criteria.

We agree that appropriate licenses are needed for third party use of open access content.

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?

Strongly agree

Do you have any comments on this proposal?

Yes we definitely agree that any criteria for open access should apply only to journal articles and conference proceedings. Many other forms of outputs submitted to REF, such as monographs, books, works of art, specific reports are often not available as open access.

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?

Strongly disagree

Do you have any comments on this proposal?

The criteria application should be based on *submission date* rather than an arbitrary publication date, in order to cover many journals which take more than 2 years to accept and publish papers i.e. the criteria should apply to papers *submitted after* the policy comes into force.

Question 6

Do you agree that 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?

Agree

Do you have any comments on this proposal?

If we have to accept this bad policy, then applying it to outputs that have a UK HEI 'address' in the output at least covers people who join UK institutions during the REF period. However the policy will still be detrimental to international collaboration as authors from other countries will have to agree to publish in 'REF approved' venues.

This will also have a detrimental affect on careers of researchers working at institutions which do not have adequate support for Open Access. They will not be offered academic posts at other institutions, as their papers may not have been made available within the deadlines set by this policy. Checking up on the Open Access status of publications of people previously working at other institutions will introduce a substantial administration burden.

Question 7

Which approach to allowing exceptions is preferable?

Percentage

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?

We oppose applying for exceptions on individual outputs, due to the administrative burden this causes to those individuals, their institutions and the body responsible for approving the exception.

If we are forced to accept open access as a REF selection criteria, we consider a percentage target is preferable but this should be the percentage of outputs to which the policy applies i.e. *60-70% of conference and journal papers*, not all outputs. This could then be the same target for all panels as those panels where outputs are typically not conferences or journals, would not require reduced targets.