



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. *

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

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

Yourself as an individual

An organisation

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

IV. Please specify the name of your organisation. *

University of Cambridge

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

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
- b. Medicine, health and life sciences
- c. Physical sciences, engineering and mathematics
- d. Social sciences
- e. Interdisciplinary research



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:

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):

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:
Retired researchers, visiting scholars**



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 / **Agree** / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.

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

Journals can publish articles that are not research articles in their own right, but which are written by researchers and which contribute to the academic record. The UKRI policy must address the fact that there can be grey areas around eligibility of certain article types such as letters and reviews and indicate (in line with current practice) that what matters is whether the content is original research or not.

OA publishing platforms are mentioned in the description of what is in scope, but not defined. Our researchers would welcome clarity around which OA publishing platforms comply with the proposed OA policy, or as a minimum, what criteria such platforms must meet in order to be considered compliant.

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

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

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

We cannot assume that non-UKRI funded authors will be willing and able to comply with UKRI policy. As a result, they might be reluctant to collaborate with UKRI-funded researchers. The policy may deter international collaborations, and international researchers might find the UK a less attractive place to work if they feel that publication decisions will not meet their career goals.

The key point for the visual arts is the inclusion of images which may be copyright and that museums and private collections may be happy to release for small print runs but reluctant to release for digital open access collections. Exceptions may be required within the REF policy to account for research that has no funding to cover costs associated with third-party content.



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.

If yes, please expand (700 characters maximum, approximately 100 words).

We note that preprint servers are not a solution to UKRI's ambition to make the version record (or as close as possible) openly available, and that not all preprints receive open peer review even where the functionality exists and that there is a risk that widespread availability of preprints could negatively impact on viability of journals.

At the same time, there are some disciplines where the preprint is now so important that routes to compliance through preprint availability, especially where the preprint becomes the version of record, must be considered in the development of the UKRI OA policy. If preprints were acceptable from a policy perspective, this would significantly reduce the administration around open access compliance at researcher and organisational level.

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.)

The University of Cambridge is both a research-intensive university, publishing ~10,000 articles a year, and a publisher of ~400 journals across a range of subjects through Cambridge University Press (CUP).

For CUP the roadmap to complete OA for all research articles is through Read and Publish deals and we are progressing well. We believe we are being progressive and flexible, but the timing of this is still a challenge and it is imperative that the goal of speed doesn't prevent authors from publishing in hybrid journals through the transition period, even if their institution is not (yet) in a transformative agreement. This transition may be further impacted by Covid-19.

As a research-intensive university, gold OA will not be affordable for all articles and this means Green is also going to be required in the short- to medium-term. If we are to maintain the practice of publishing in our current range of journals, transitioning to publish-and-read (via read-and-publish), the University estimates an over 3-fold increase in expenditure (~£5.4m subscriptions + £2m APCs c.f. ~£23m with an average APC of £2.3K for ~10K articles per year). We can't afford this.

Collectively we believe that this contradiction in approach is not sustainable and necessitates a UKRI policy that is more flexible while still supporting a much bolder shift in



publishing practice that will require significant changes from all stakeholders. We are actively embracing these opportunities and want to discuss them further with UKRI and other funders.

There are also challenges relating to balancing the needs of different disciplines and application of policies that work reasonably well in STEMM to research in AHSS. As an example, the cost and limitations for use of images in disciplines such as Art History are prohibitive for open access publishing. This applies not just to images of works in public or private collections, but in particular to images of the work of major 20th-century and contemporary artists, where reproduction fees are often prohibitive and rarely allow OA use. Disciplinary differences must be considered carefully in the development of any OA policy.

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 / No / Don't know / No opinion.

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.

If an OA-compliant journal has been chosen for publication and the version of record is thus made OA available, researchers see little added value in insisting that authors also deposit the accepted manuscript in an institutional repository. Issues of preservation and discoverability need to be addressed if articles are not deposited in repositories. Our preference would be to use a solution such as the Jisc Publications Router which would enable harvesting of Gold articles into repositories without additional effort on the part of the researcher.

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? 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.

In an ideal world, deposition into the University's repository would be primarily for archiving and preservation. However, during the transition to fully OA journal publishing, the deposition of journal article accepted manuscripts enables OA publication for some content.

We support the requirement to deposit the accepted version of the manuscript as enabling OA publication and believe this requirement should continue for the UKRI policy. At present,



there is considerable bureaucracy associated with proving compliance with the REF policy, for example it is not always easy to identify an acceptance date and confirm that the paper has been deposited within a three-month window of that date. We would advocate focusing on measuring REF compliance based on OA availability at the point of publication or on deposit in a repository with public availability after an embargo period.

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? Strongly agree / Agree / Neither Agree nor disagree / **Disagree** / Strongly disagree / Don't Know / No opinion.

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

There are significant disciplinary differences that need to be considered. Researchers in certain disciplines including parts of AHSS and Clinical Medicine have specific concerns around the loss of the context within which an academic argument has been made. There is a risk that derivatives could misrepresent the original work and this could be particularly important in matters such as public policy or safety. There is the additional potential for confusion where a more liberal licence at article level leads to activity that conflicts with the conditions attached to the use of images within those articles.

On the other hand, the CC BY licence is the most liberal of the six Creative Commons licences and the most appropriate for complete openness. e.g. someone can use a figure or data from your paper without permissions as long as it is properly attributed. Importantly it opens articles to commercial activities that are seen as desirable in certain scientific disciplines.

CC BY should be the preferred licence, but ND should be available without application for all articles, chapters, and monographs and no derivatives versions of the CC BY licences should be considered acceptable alternatives without application when academically justified.

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. Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.

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).

We would prefer the criteria for use of an ND licence to be defined clearly so that there is no need for case-by-case exception. If this is not possible, we agree that an exception



should be available but strongly advocate for a light touch approach to administering it, ideally by devolving responsibility to the institution rather than to UKRI. Criteria should be developed to clearly define when CC BY-ND, CC BY-NC and CC BY-NC-ND are acceptable to avoid unnecessary burdens and time delays for all parties to the publication process. Exceptions could be recorded and reported retrospectively to enable deeper understanding of the academic considerations at play in different disciplines, but no approvals process should be required.

With humanities and social sciences there are concerns that a requirement for CC-BY would severely restrict choice of journal since many publishers in these disciplines do not offer it as an option.

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

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

Our understanding is that the copyright exception for research use does not extend to the inclusion of those images in commercially published research articles. We would welcome greater clarification on UKRI's interpretation of this point.

Rights holders can be resistant to allowing their work to be included as copyright-protected material within open access online works. While we generally support the licensing requirements of UKRI's OA policy, the complications created around third-party content must be considered when determining the criteria for allowing CC BY-NC and -ND.

A dialogue between UKRI and the UK museums, galleries, and libraries community to encourage a more liberal and consistent approach to image rights would be helpful but this is an international issue that cannot be easily or quickly addressed. Nor does it only affect the visual arts but users of other major categories of illustrative material such as maps.

Q10. Are there other considerations UKRI should take into account regarding licensing requirements for research articles in-scope of its proposed OA policy? Yes / No / Don't know / No opinion.

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



UKRI should make the licensing requirements prominent and explicit at grant award stage to ensure that authors are aware of their obligations and communicate these to non-UKRI co-authors at the earliest opportunity.

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? 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.

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).

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.

We fully support the direction of travel towards an Open Access publishing landscape, while also recognising the challenges around affordability for research universities and viability for university presses and smaller publishers. We need a mixed green/gold economy while we develop innovative approaches that will lead to radically different solutions that provide a more balanced and sustainable approach to scholarly publishing in future.



We therefore agree that authors should retain copyright in their work and the ability to deposit articles within the institutional repository, provided that publishers are able to set short (6 month) embargoes for accepted manuscripts. A rights retention framework is only reasonable and feasible if it allows for short embargoes: journals may decline to publish authors if the embargo cannot be enforced. The Institutional Archiving Agreement, agreed by publishers under the auspices of the Publishers Association, is an existing example of this approach. The policy on this point and any associated processes must be very clear to avoid confusion and must be designed to avoid any additional burden on the author or the institution.

A CC BY licence is unlikely to be acceptable to any third-party supplier of materials- text, images, used in the article, so clear exceptions must be built into the policy to address this point. Disciplinary differences matter and must be supported within the new UKRI policy.

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 **Strongly agree. PIDs allow for consistent linking, citation, tracking and retrieval of research outputs and should form the backbone of any modern publishing system. Publishers and repositories should be encouraged to use PID versioning to enable citation of all manuscript versions (e.g. submitted, accepted, published) that may be published.**

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

Agree.

c. machine-readable information on the OA status and the licence must be embedded in the article in a standard non-proprietary format

Strongly agree. Discovery of OA content via automated services is essential to ensuring that the best and most accessible publications have the greatest possible impact.



d. long-term preservation must be supported via a robust preservation programme such as CLOCKSS, Portico or an equivalent

Strongly agree. These services are essential for the preservation of the scholarly record. If a publisher cannot commit to using such services, automatic preservation in a suitable open access repository should instead be a minimum requirement.

e. openly accessible data on citations must be made available according to the standards set out by the Initiative for Open Citations (I4OC)

Strongly agree. We support the goal of making citation data as open and accessible as possible.

f. self-archiving policies must be registered in the SHERPA RoMEO database that underpins SHERPA/FACT

Strongly agree - We agree that a central store of consistently represented journal policies is useful, and that SHERPA-RoMEO is the best currently available service for this. SHERPA-RoMEO must be well funded to provide a robust service.

g. unique PIDs for research management information must be used and must include the use of ORCID to identify all authors and contributors

Agree - We agree that ORCIDs should, in time, be collected for all authors and contributors. The difficulty is the timescale. CUP is focussing first on corresponding authors. Several logistical and other issues must be worked through in order to collect (and verify) ORCIDs for non-corresponding authors, and we need more time for this. The challenge for smaller publishers may be even greater.

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 **Strongly agree. We agree that all research outputs should have an appropriate PID assigned to them. Wherever possible PID version should take place to identify different versions of the same output (e.g. submitted, accepted, published).**

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 **Agree. We would particularly encourage UKRI to consider supporting the RIOXX metadata application profile.**

c. machine-readable information on the OA status and the licence must be embedded in the article in a standard non-proprietary format **Agree. However, embedding licences in to accepted manuscripts could place undue burden on the institution. At a minimum the licence should be available in the repository's accompanying metadata.**

d. unique PIDs for research management information must be used and must include the use of ORCID to identify all authors and contributors

Agree, noting the logistical realities regarding use of ORCID for all authors which have implications for the timescale within which this could be achieved. It is not clear that institutions can or should force researchers to accept the use of ORCID and certainly cannot require co-authors outside of the UK to used ORCIDs. We recommend that the clause should only apply to UKRI authors and contributors where they have an ORCID.

e. the repository must be registered in the Directory of Open Access Repositories (OpenDOAR) **Strongly Agree. In previous RCUK and REF policies, the definition of what constitutes a suitable repository is not clear. We would strongly urge UKRI to consider registration in OpenDOAR as being the key test as to whether a repository is 'suitable' or not.**

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).

UKRI should require Funder Data and Access Licenses according to Crossref's standards. Author affiliation data is less standardized, but UKRI could support ROR and Grant IDs and Ringgold (a commonly used proprietary standard). UKRI could recommend (not require) CrediT for author contributions.

UKRI should support the further development and adoption of the RIOXX metadata application profile.

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).



The JATS standard for article metadata has recommended best practice for dataset linking which journals and publishers should follow. UKRI should consider recommending that "data availability on request" is not an appropriate Data Availability Statement (DAS) and that all research publications should carry a DAS even if there is no supporting data. We support the notion that all data are assigned a persistent identifier, as stated in the FAIR principles, in order to allow clarity of citation which is an important component of Principle 8 of the UK Concordat on Open Research Data. scholix.org is looking promising as a standard solution for putting data citation metadata to practical use, linking datasets to research articles throughout the academic record.

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).

We support the 2022 start date with the following caveats:

- With the disruption caused by COVID-19 there should still be at least a year's "runway" between decision on new rules and the implementation date
- Clarity is required on the policies around third-party content before implementation
- From the perspective of our university press, zero embargo Green OA is not a sustainable route to OA and would hinder our ability to transition away from subscriptions whilst also undermining the subscription base. Covid-19 is already slowing down the conversion of institutional subscriptions to Read and Publish agreements. We cannot be sure we will complete the transition to Read and Publish by the end of 2024 although this is our goal. UKRI will therefore need to provide some degree of flexibility in funding OA from 2022. .
- We also note other areas of potential difficulty for achieving full compliance from 2022 getting ORCIDs for all authors rather than corresponding author.

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).

It is important that UKRI and REF policy are aligned to avoid unnecessary administration and confused messaging. The rules in force at the start of a REF period should prevail for that REF period. Changing the rules during a REF period causes confusion for researchers and difficulty for administration and monitoring compliance.

Any COVID-19 disruption and resultant logjam of delayed publication and implementations must be taken into account.

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).

Gold Open Access routes to compliance result in very significant costs disproportionately levied on research intensive organisations. We cannot expect many publishers to offer Green OA with a CC BY licence and zero-month embargo. If zero-month embargoes are required, the only route to compliance in many journals will be Gold OA (whether through fully OA journals, hybrid, or transformative deals). Under the current arrangements, the University already fully utilises the annual UKRI OA block grant (£1.4 million in 2019) with significant restrictions on payments for hybrid Gold, and yet in 2019 only 50% of papers acknowledging Research Council funding were processed for Gold OA. To achieve the goals of the new policy (as stated) the University would require at least twice the level of block grant funding from UKRI (approx. £3-4 million p.a.).

Transformative agreements are currently only supported in the UK by Wellcome and UKRI (specifically the Research Councils). This potentially leaves a significant funding shortfall for many of the agreements. If transitioning to open access is the ambition of the UK Government, then developing a coordinated national approach for all UK researchers (including those 'only' in receipt of QR funding) would allow institutions to sign-up to more deals and effect a faster transition to open access.

For CUP's transformation from subscription to OA, we are projecting a 15% decline in revenues because many of our current customers have low article outputs and will not pay us under a pay-to-publish model, whereas those who publish significantly can't afford significant increases. Parallel to these expectations for revenue reduction, we are also needing to invest significantly in technology and workflows, and we will need to publish more



articles. Altogether this means CUP's surplus, which is already modest in comparison to commercial competitors, will be adversely affected.

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).

Our success as a research institute and university press depend upon our successful and complete transformation to open research. In the short term it is more likely that there will be negative financial impacts as a result of these proposals, but if we can innovate in this area it might be that in the long term we could find financial benefits.

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).

Across the University the total cost of journal subscriptions and open access publishing continues to rise. The academic university is concerned about the overall costs associated with a shift from pay-to-read to pay-to-publish. See our responses to Q19 and Q22 for more on the costs associated with this shift.

CUP is rebalancing revenues from low producers of content to high producers of content and investing in new systems to scale up OA publishing workflows. Transformative agreements are inherently more intensive to negotiate and report on after signing, which is leading to significantly increased costs (new systems, new staff).

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).

[This is probably the best analysis we've done on this topic <https://unlockingresearch-blog.lib.cam.ac.uk/?p=2219> and is based on figures before we restricted spending on hybrid]

The University's average APC spend rose from £1,794 in 2013 to £2,336 in 2018 (for UKRI and COAF funds), an average rise of 7% p.a. Owing to the rising costs the University introduced new rules in August 2018 to slow down the spend in hybrid journals. Had this



action not been taken then it was highly likely that the University would have exhausted its UKRI block grants.

The reasons for the increase in cost are many and varied. Certainly, many more authors are aware that open access funding is available to them and thus seek out funding for their publications. However, most of the expenditure between 2013-2018 was on hybrid journals (approximately 80%); we have not seen a significant shift to publishing in fully OA titles. Therefore, the rising average APC is largely due to price rises from publishers of hybrid journals, where it should be noted, there are significant differences. Take for example Taylor & Francis (£107,778 for 120 articles) compared to Wolters Kluwer (£119,551 for 35 articles). Both publishers operate mostly hybrid OA journals and yet the relative value is significantly different. CUP's prices fall between those: our standard APCs are £1,985 (rising by, on average, less than inflation each year) although our Read and Publish agreements typically translate to a lower cost per article published. CUP also has a strong and clear policy for reducing subscription prices as OA content increases.

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).

The University would welcome greater transparency about the publication process including around costs. Transparency must balance the burden of gathering and presenting the data with the benefits of the data being available. Pricing transparency at a journal level is becoming increasingly meaningless as we move from a journal subscription model to a publishing services based model, but authors should be able to understand how a given publisher's income is used at a more general level where that is the case.

Publishers should make clear and unambiguous statements to allow authors to understand how article processing charges or transformative agreements are used to support their publications. Publishers could, for instance, list the distinct services they provide, and metrics like total papers published per year, so that authors can assess the value themselves. CUP has chosen the Fair Open Access Alliance framework for providing cost/price transparency, although will be releasing a cost breakdown at our whole list level as % not £ amounts.

Some investigatory work has already been achieved through the price transparency project which was sponsored by UKRI and Wellcome on behalf of cOAlition S. We would recommend that UKRI considers the findings and practical implications of that work.



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).

We share the concern that hybrid journals can result in institutions paying to publish and again for read access to content (although CUP has a clear approach to avoid this double dipping) and so it is highly desirable to move beyond the hybrid model.

We also recognise the reality that publishers are unlikely to have transformative agreements covering all UKRI funded researchers by 2022. We do not know how long that will take and Covid-19 already appears to be slowing the adoption of transformative agreements. Without Transformative Agreements in place hybrid journals can be an important option to facilitate sustainable Open Access publishing, and not funding publishing in such journals would disproportionately favour the largest publishers who are most likely to be able to put TAs in place soonest.

We would therefore support the option for libraries to use funds to support OA publication in hybrid journals where there are genuine challenges around the transition to full OA and implementation of Transformative Agreements, but not in cases where publishers are simply choosing not to seriously engage with OA. We advocate for local determination of what is appropriate so as not to penalise the long tail of smaller and learned society publishers.

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).

Repositories are key underpinning infrastructure for one of the proposed routes to compliance for the UKRI policy. As such, there should be funding available from UKRI to



support them. If this is not done through the current block grant mechanisms then UKRI should set up a second funding stream to allow long-term planning and capacity building, ideally on a more consistent basis than year-on-year funding.

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).

UKRI should restrict the use of OA funds to pay additional publication fees such as page and colour charges.

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).

UKRI should remain open to innovations in the publishing realm. The way in which money has been distributed to institutions has restricted the sorts of OA activities we could fund. The University would welcome the ability to use OA funds to support innovative approaches to open access. There would need to be some parameters to give confidence that this use of funds would be considered acceptable. UKRI could also support innovation in developing new OA models through a dedicated funding calls.

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).

UKRI could give institutions more flexibility to manage the OA funding in the way that most benefits open access publishing for their researchers.

They could also consider whether they would wish to get more involved with the conversations directly with the publishers, working with Jisc. A single transformative



agreement covering the whole of the UK would be the single most decisive and impactful development allowing CUP to publish all our UKRI research output as open.

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).

UKRI should contribute to the costs of running and improving SHERPA, Publication Router and other key underpinning infrastructure on which the successful and efficient implementation of the OA policy depend. It seems to us that SHERPA would especially benefit from additional resourcing in order to develop additional functionality that would facilitate implementation of the OA policy.

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).

We can see advantages and disadvantages to a national shared repository. It should be more cost effective than requiring so many institutional repositories and would be particularly helpful for smaller institutions that are not in the position to resource their own repositories. At the same time, there are strong arguments for research universities to have institutional repositories due to the high volume of content, the ability to provide local support and the ability to manage and preserve a unique and distinctive collection of research materials generated by researchers within that institution.

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.)

As we are seeing in the current COVID-19 scenario, preprints facilitate rapid sharing of relevant research enabling access to a large volume of information required to address the emergency. At the same time, we do not see how a policy of this sort could be monitored or enforced and have concerns that requiring researchers to focus on policy compliance could take them away (however briefly) from addressing the emergency. It is also worth noting



that preprints have not been through peer review and so extremely rapid review and open publication of content during crisis (as has been done by many publishers including CUP) may be a more robust approach.

We recommend that UKRI encourages the use of preprints where there is a significant benefit for public emergencies, while supporting the development of infrastructure and services that support rapid research communication across a wider range of disciplines.

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).

UKRI should recognise preprints as legitimate outputs in funding applications, while understanding that they have not always been peer reviewed.

UKRI could support and maintain a list of UKRI compliant repositories that meet the required technical, access and discovery standards to assist researchers in identifying appropriate venues and reduce the need for every university to develop its own guidance based on differing interpretations of what is acceptable.



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)

Disagree While definitions were clear for most publications several areas present difficulties, leading potentially to a large volume of requests for exclusion. Trade books are difficult to define and it is not clear who would have responsibility for defining them. Very popular academic publications may fall into the trade category, e.g. the work of Professor Mary Beard, and publishers may categorise lower circulation books as 'trade' books as well. The definition of "trade" might include price point and format. Textbooks may be even harder to define - the decision is usually up to the publisher. The distinction between edited collections and book chapters is unclear. An exhibition catalogue may represent a major research output but it is not clear where it would fit. The question also takes no account of the changing nature of research publishing, emerging forms of publication such as CUP's Elements or RHS short-format titles, and dynamic, iterative approaches to publishing research outputs in which text is updated online in the light of new findings. The field of digital humanities is disrupting formats, making the definitions in the proposed policy seem conservative and possibly restrictive.

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

- a. Academic monographs Yes / **No** / Don't know / No opinion
- b. Book chapters **Yes** / No / Don't know / No opinion
- c. Edited collections **Yes** / No / Don't know / No opinion

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

We are very concerned throughout by the potential impact of the policy on early career researchers. Since Cambridge doctoral theses are published OA (albeit with embargo where required), it is arguable whether OA requirements should apply to the book. In the humanities, publication of the book may follow several years after the doctoral work when the researcher has moved on so there are problems with applying the policy. Publication grants will be particularly difficult to obtain at an early stage of a researcher's career. While learned societies may have funds for this purpose even the largest in the humanities, the Royal Historical Society, can support publication of fewer than 10-12 OA monographs a year.



While it may be less problematic to publish chapters OA from a financial viewpoint, there may be technical barriers for publishers.

There is a problem here with the insertion of 'doctoral research'. Getting on the publication ladder is very hard for doctoral students and restricting the ways in which they can publish creates unnecessary difficulties. Doctorates are a training and what they produce in the way of research results is a bonus. Any OA requirement should start with post-doctoral funding, which is the earliest form of funding where producing a publication is a part of the research project itself.

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).

Strongly agree. Defining a 'suitable publisher' may be difficult in practice. There are few disciplines with just one publisher but particularly in the humanities and social sciences (e.g. art history, European literary studies), a significant proportion of publishing will be in the US where OA options have been slow to develop, or in countries with few OA publishers. This will have the effect of severely disadvantaging certain disciplines. This would exclude all UK academics from some of the most prestigious academic presses, in the world, e.g. major US university presses, which would put them at an international disadvantage.

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.

Yes. See above for response to Q33. The range of REF outputs will be wider. Indeed, the range of outputs in the current REF exercise is already broader than the UKRI definitions in the current REF exercise.

As for research articles (Q18), the goal should be to align the UKRI and REF policies. However, because of the larger number and wider range of books likely to be affected by



the REF policy, a more permissive books policy might be needed for the REF (see also Q42).

Again, the high costs associated with image rights for a highly illustrated book will make it uneconomic to publish the book OA.

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).

There is a clear consensus the Cambridge academic community that no sustainable models for OA monograph published have yet been tested successfully. While there have been experiments, including Knowledge Unlatched, most have been limited in scale and success.

Green OA is not a viable option for monographs, as the loss of even a few sales would undermine their sustainability. New approaches are required, and CUP is already working on alternative approaches (see Q40) to allow much or all of new monographs to become OA if sufficient revenue is achieved under short or hopefully no embargo (see Q53).

We urge UKRI not to proceed with OA for monographs until further research and pilots have established viable models that will work at large scale, and to make funds available for this work, including infrastructural changes. In doing so they should work closely with publishers, learned societies, and libraries, and take account of the ongoing work of the COPIM project.

Amongst our concerns are the potential narrowing of publisher choice. Researcher must have access to a diverse ecosystem. Last REF about 8000 books were submitted to panel D, involving around 1200 different publishers. Such a narrowing would have a disproportionate impact on early career researchers.



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).

In addition to our answer to Q37 for monographs, we note that many publishers (including CUP) are not yet able to publish different chapters of a book under different licence (for example some chapters published as CC-BY). We are also concerned about the risk of double-dipping, or perceived double-dipping, which has already been such a difficult and undesirable feature of hybrid journals.

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).

This issues here are the same as for book chapters, that many publishers (including CUP) are not yet able to publish different chapters of a book under different licence (for example some chapters published as CC-BY). We are also concerned about the risk of double-dipping, or perceived double-dipping, which has already been such a difficult and undesirable feature of hybrid journals.

We believe that green OA as an option for book chapters is worth exploring, with appropriate embargoes.



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).

We believe that none of the current evidence or recent experience can be an indicator for future book purchasing behaviours, which we believe will radically change once it is commonly understood that all books will be OA after some period of time. It is impossible to predict the sales revenue of an individual OA monograph. Print sales vary by book, though digital sales are always essentially abolished by OA.

Sales of books within the first year will not normally be sufficient to sustain a publisher economic model. While figures produced by FullStopp in their 2019 report for Universities UK appear to support the view that half of print sales occur in the first year of publication that does not take into account the likely reduction in sales if purchasers know that it will be published OA at the end of the year. The realities of tight budgets will change purchasing behaviours following reductions in university funding post-Covid-19. The joint CUP and OUP monograph survey in 2019 (<https://global.oup.com/academic/pdf/perspectives-on-the-value-and-purpose-of-the-monograph>) demonstrated their fundamental importance to the community. Other routes to OA must be allowed (see our answer to Q56).

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).

Agree. Author's accepted manuscripts should meet the policy requirement where the publisher is unwilling to make the version of record available OA. However, this is dependent on satisfactory agreements with publishers over licensing Green OA content in repositories. There remains a level of academic scepticism over the value and quality of the AAM and a preference for funding arrangements that would make the version of record available OA if that is a requirement.

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.



Yes. Many more books would fall under the REF policy than the broader UKRI policy. For this reason, any policy that risks undermining the sustainability of book publishing will have a greater impact through the REF policy than the UKRI policy. Alignment between UKRI policy and the REF should be a priority to make compliance more straightforward for researchers. However, this does require the UKRI policy to be appropriate for the REF and this is a focus for concern, especially in the humanities and social sciences. UKRI grant funding in these disciplines is relatively low. The impact will therefore be more widely and keenly felt through the REF, including the lack of funding to support publication, the long publishing cycle for monographs, and disproportionate impact on early career researchers. Virtually all researchers will be brought into the scope of the policy if applied to those in receipt of QR funding so clarification on this point is absolutely essential.

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).

Researchers in certain disciplines including parts of AHSS and Clinical Medicine have specific concerns around the loss of the context within which an academic argument has been made. There is a risk that derivatives could misrepresent the original work and this could be particularly important in matters such as public policy or safety. There is the additional potential for confusion where a more liberal licence at monograph/chapter level leads to activity that conflicts with the conditions attached to the use of images within those articles. CC BY should be the preferred licence, but ND should be available without application for all articles, chapters, and monographs and no derivatives versions of the CC BY licences should be considered acceptable alternatives with academic justification.

For a sustainable approach to OA monograph publishing, CC BY-NC is required if paid-for sales after the end of the embargo period are required to financially support the work becoming open access. If print sales were not required to support the OA publishing, then CC BY-ND should be the minimum requirement. We remain concerned that insufficient testing of alternative monograph publishing models has taken place to be able to confidently predict which of these circumstances will prevail.

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.

Strongly agree. This will be essential for all illustrated books where the right to publish an image OA has not been cleared. While concerns have been expressed particularly in relation to heavily illustrated books, e.g. on art and architecture, even a small number may be significant. Rights owners may refuse or charge excessive fees, to the point where they are prohibitive in disciplines with very limited funding and where the cost of acquiring rights to publish is already high.

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).

Strongly agree. This will be essential for all illustrated books where the right to publish an image OA has not been cleared. While concerns have been expressed particularly in relation to heavily illustrated books, e.g. on art and architecture, even a small number may be significant. Rights owners may refuse or charge excessive fees, to the point where they are prohibitive in disciplines with very limited funding and where the cost of acquiring rights to publish is already high. We note that there will be cost (including researcher / administrative time) implications for creating redacted versions of books. The problems of third-party images and copyright material are not adequately addressed in the current proposals.

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).

Yes. It should include ANY visual material in private collections or images from any collections where the image is not already in the public domain or where the illustrations are owned by a photographer or artist who has worked collaboratively on a monograph.

Significant could be defined as: if any of the redacted material (Q45) is both (i) not freely available elsewhere and (ii) is critical to the integrity of the research narrative, then that's significant.



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).

The issues raised relating to third-party copyright material in the visual arts apply also to disciplines such as earth sciences, geography, and polar studies, where mapping produced by third parties, covered by UK copyright and foreign jurisdictions, is a key element in the publication, whose exclusion would significantly reduce its value.

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.

We fully support the direction of travel towards an Open Access publishing landscape, while also recognising the challenges around affordability for research universities and viability for university presses and smaller publishers. We need a mixed green/gold economy while we develop innovative approaches that will lead to radically different solutions that provide a more balanced and sustainable approach to scholarly publishing in future (see our answer to Q56).

We therefore agree that authors should retain copyright in their work and the ability to deposit their work within the institutional repository provided that publishers are able to set their own embargoes for accepted manuscripts (on the understanding that these embargoes are likely to be far longer than those for research articles). A rights retention framework is only reasonable and feasible if it allows publishers to apply their own embargoes. They could licence back specific publishing rights including the ability to set reasonable embargo periods for items placed within repositories. The policy on this point and any associated processes must be very clear to avoid confusion and must be designed to avoid any additional burden on the author or the institution.

A CC BY licence is very unlikely to be acceptable to any third-party supplier of materials-text, images, used in the article, so clear exceptions must be built into the policy to address this point. Disciplinary differences matter and must be supported within the new UKRI policy.

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).

We need longer to establish models for books. We need to explore new approaches to increasing the accessibility of books, and we should not be constrained with tight definitions and timeframes that are not compatible with a sustainable high-quality book publishing program. The policy could start from 2024, providing the policy is more flexible than currently proposed.



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).

Many authors do not know what OA means, how it differs from "free", what CC licences are or how they differ, why they should make their content open, what that means for third party rights holders, and why publishers raise the questions or concerns about particular forms of OA under particular circumstances.

An advisory service that carried out negotiations with publishers for individual academic authors would be welcomed.

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).

If the UKRI policy requires OA for monographs, chapters and edited collections, the REF policy will need to be more permissive than the base UKRI policy because funding does not exist to publish monographs by the majority of researchers and because business models for OA monograph publishing at this scale have not yet been proven.

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).

We cannot ignore the central problem that full OA must either be directly be funded or must be achieved through new business models that have not yet been developed. CUP is already working on new approaches (see our answers to Q37 and 56).

OA book processing charges (equivalent of APCs for journal articles) are not a desirable or sustainable model, but may temporarily be required to allow books to be made OA while new, better approaches are adopted. UKRI should develop a realistic funding provision to cover the costs of OA publication, with publication costs built into grants.



Administration of a block grant for OA book publishing at university level will not be practical due to the wide range of costs associated with OA book publishing and the length of time between an agreement being made with a publisher and the publication of the book. We would prefer to see UKRI fund projects that lead to innovative new approaches to OA book publishing. Such projects should not recreate existing models or unsustainable approaches, but could support genuine innovation where sustainability has been properly considered in a business case.

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).

The publishing industry has already created infrastructure for publishing books. Public funds are not needed to create duplicate infrastructure but can be useful to create and sustain new components: Jisc's SHERPA suite is an example.

There are a number of actions that might placate third parties and publishers- covering images with watermarks that cannot easily be removed might be sufficient for third parties with royalty concerns.

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).

Publishers should use existing standards for books metadata (Crossref, MARC). Publishers should use Crossref standards for funder and access licenses (Funder Data and Access Indicators). Author affiliation data is yet to be standardized but ROR may become the standard for institutional identifier. In the meantime, GRID (open source) and Ringgold (proprietary) are in use and, to a degree, interoperable.

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).

We have two main suggestions and CUP is already working on both: (1) UKRI adopts a broader definition of 'open' for books, allowing publishers to explore a wider range of options to increase discoverability and accessibility. For example, content that is free to read (but



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not download) should comply with the policy. (2) UKRI should consider allowing books to be published under a 'transformative programme' that, while not necessarily guaranteeing any particular book becomes OA, does convincingly demonstrate firstly that a large number of books in the programme will become OA and secondly that the realistic goal for the programme is for all books to become OA. This would allow, for example, a 'subscribe to open' approach whereby books are made OA once sales reach a certain target.



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.

If yes, please explain how (2,000 characters maximum, approximately 300 words).

The current manual reporting process is extremely time-consuming. The University is currently required to report to both UKRI and COAF at different points in the year. One single annual report for both UKRI and COAF would greatly reduce the administrative burden. Annual reporting across the UK would also make it easier to aggregate publication data, and we believe this could be coordinated through Jisc. This would require cooperation between UKRI and COAF/Wellcome, and would necessarily decouple grant expenditure reporting and open access compliance reporting.

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.

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

UKRI should take measures to encourage the adoption of their open access policy by supporting, wherever reasonably possible, authors who wish to make their work immediately open access. It is particularly difficult to be compliant when the principal or corresponding author is not required by their funder to comply. There are also difficulties with complying in articles that make significant use of third-party content.

If further sanctions are to be applied, they should be measured in their approach and be taken only when there is consistent and ongoing non-compliance. Should any such measures be taken, they should be applied to the individual or research group rather than at an institutional level and could take the form of delay or moratorium on the PI, or arguably just the paper authors, to apply for future UKRI funding where outputs are non-compliant.

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.

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

We agree with the proposal to notify the institution of minor breaches by letter but believe that this should be sent also to the principal investigator on the grant.



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We also agree with the actions associated with major breaches such as repeated non-compliance and believe that this should be linked directly to the research that has not been complying rather than more broadly to the institution.



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).

We believe in the benefits to research and society of OA and want to work with all stakeholders to get there as quickly, and sustainably, as possible.

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).

We believe that the models and speed of change favour large publishers, especially those in STM publishing. Their profit margins are higher than those of small and learned society publishers and they are therefore more likely to survive a reduction in sales revenues. There is a risk of bifurcating the entire academic publishing landscape in the humanities between those scholars with funding and those without. A growing proportion of humanities academics in the UK are employed on precarious or teaching-only contracts which may exclude them from access to OA programmes even when employed by universities that support them. UKRI could allow certain exceptions to facilitate the transition and provide funding for experimentation with new OA business models.

There is a potential impact on the willingness of international researchers to continue to work in the UK if other countries continue to reward publishing in high impact journals that are not compliant with UKRI policy. This could particularly impact the career progression of early career researchers. UKRI could work with international funders to influence a global change in research assessment that would minimise this risk.

The focus on paid OA risks disadvantaging authors who do not have access to OA funds, blocking their ability to publish with certain journals. This applies to researchers without an institutional affiliation, working at an institution that is unable to pay for read and publish deals and to researchers in low- and middle-income countries. UKRI should support innovative publishing models that enable these researchers to participate in, not just access outputs of, research.

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 to research benefits those wishing to access the latest developments in their field. Article and book processing charge models create unacceptable barriers to publishing unless waivers are used to subsidise publication by authors in low- and middle-income countries.

UKRI could support the development of publishing models such as 'subscribe to open' that enable open access to books once they reach a certain level of sales revenue, the readership in low- and middle-income countries could continue to be supported through schemes such as Research4Life, with authors in those countries benefitting from their books becoming OA as much as any other author around the world.

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).

There is a risk that direct funding of OA publishing can favour scale over quality, creating challenges for smaller publishers and those operating with tighter profit margins while potentially benefitting large-scale STM publishers.

The costs associated with book publishing are broader than those involved in producing a book. The book dissemination and discovery ecosystem is complex and requires financial support to sustain.

Culture change will be a barrier especially among more established PIs. We will need to work to raise awareness of the new policy and of the range of ways to comply with it.

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).

UKRI might usefully engage with the global community to address limitations in the CC license framework, particularly around enabling sales-based models without restricting the commercial use of the research material within the publications.



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.)

We support the goals and vision of the UKRI policy review, and we would like to make all research content immediately open. The transformation to OA must not introduce new barriers for unfunded authors publishing high quality research as OA.

For research articles, compliance with the proposed policy would be approached in different, mutually exclusive ways by publishers and researchers and their institutes. This inherent contradiction means the proposed policy must change, in particular by (i) allowing a modest (6 month) embargo for accepted manuscripts and (ii) not limiting the eligibility of hybrid journals for transformative agreements.

For monographs, we do not know how we could implement the proposed policy while maintaining quality and sustainability. New sustainable business models must be given time to emerge. In the meantime, publishers must be able to set embargos for accepted manuscripts.

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.)

We support UKRI's approach of ensuring that by complying with UKRI OA policy researchers will be compliant with the OA policy for the REF-after-REF 2021. We believe that the policies should be as closely aligned as possible to simplify messaging for researchers. At the same time, we have significant concerns about applying the proposed UKRI OA monograph policy to researchers that do not have access to research funds to support this.

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).



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