

# Taylor & Francis input to UKRI Open Access Review

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## Summary

We support UKRI's call for immediate access to research. Open Access (OA) has strong potential to increase the **impact, effectiveness, and efficiency** of research. We are making great strides: we have acquired leading OA publishers and platforms F1000 Research, Co-action and Dove Medical Press; we have converted over 50 journals to a full OA model; we have invested in developing article level workflows to support OA; and we are continuously exploring new open access models including new arrangements with institutions. As a result, OA has grown significantly across our portfolio and **more than half of the UK research outputs published in our journals from 2016 to 2018 are already freely available.**

**We urge UKRI to focus on requiring immediate access only to the final published research output or version of record**, with the certainty this OA route provides of research being **trusted**, validated, discoverable, curated and preserved in perpetuity. We believe that a **permissive policy approach** is the best way to achieve UKRI's aims. Encouraging a **diverse ecology** will help support the development of innovative models and diversification of existing models, will accelerate the growth in OA and will allow new entrants to join the research communication ecosystem, encouraging competition. As we have outlined in our response, the **zero embargo Green OA** route is an unsustainable mechanism that implies creation of content that is not paid for. This actually runs counter to UKRI's long term aspirations around opening up research outputs.

**We encourage future OA policy in the UK to support a variety of publication venues**, including those most preferred by their communities, irrespective of their open access model, as they are the vehicles that drive research, being used and trusted by their communities. We are exploring options for hybrid journals other than the APC-OA model that will allow them to make their publications more widely available. We are keen to explore with UKRI, other funders, and researchers how we can best support these journals as they move to OA, and how we can offer sustainable publication venues across disciplines.

**We believe that ensuring support for learned societies and professional member organisations is crucial to sustaining the quality, independence and trust in UK research.** These bodies advocate for specific important issues, foster collaboration, and coordinate globally around key initiatives. They champion public engagement with research and are increasingly orienting the focus of research in their disciplines towards real world challenges.

We understand that cost effectiveness and value for money are key drivers for UKRI. The strong evidence we have submitted aligns with these objectives: an effective, reliable and quality service which provides open access to the version of record in terms of increased citation, usage and attention, compared to versions behind the paywall. OA content on our platform Taylor & Francis Online attracts more usage and more attention than that behind a paywall<sup>1</sup>. **Open access, appropriately funded and resourced, benefits all stakeholders.**

We believe that rapid open access to quality assured research, effectively disseminated, needs the input of a **strong publishing sector** to be successful. We believe that UKRI has a key role to play in fostering this diverse ecology, including supporting emerging models around OA. This keeps us as professionals innovating and competing, and ensures that UK research retains its global reputation for excellence.

**We support an Open future.**

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<sup>1</sup> Articles published Open Select with Taylor & Francis typically receive over 6 times as many downloads\* and 32% more citations\*\* compared to those that are not published Open Select. \*Usage in 2017-2019 of articles published in 2015-2019. \*\*Citations received up to Jan 31st 2020 of articles published in 2015-2019 in journals listed in Web of Science®.

## Responses to consultation questions

**NB: Some questions have been skipped**

I. Please provide a named contact and email address so that UKRI can contact you regarding your responses.

\*

Caroline Sutton, Director of Open Research at Taylor & Francis. Email: [caroline.sutton@informa.com](mailto:caroline.sutton@informa.com).

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

Yes.

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

b. An organisation

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

Taylor & Francis Group

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

Open Research

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

Multinational, with offices in UK. Parent company domiciled in UK.

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

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

b. Publisher (including employees and representative bodies)

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.

No

X. If responding on behalf of a company, please provide your Company Registration Number (if known):

1072954

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

a. ≥ 250 (large business)

XIII. If applicable, which researcher career stage(s) do you, your organisation or your group represent? Select all that apply.

d. Other (including retired researcher, citizen researcher) – please specify:

We serve researchers across all career stages and disciplines, and as such regularly interact with them and seek their views. We have included some of their feedback in our responses to Qus 6, 7, 8, 19, 32, 43, 62, 63, 64.

## 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)?

Disagree.

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

Funded research outputs are published under a variety of descriptions, including but not limited to research articles, commentaries, registered reports and discussions. It would be helpful if UKRI could provide **clear definitions** as to exactly which research outputs are in and out of scope of the policy. It is also unclear as to whether UKRI intends for only **peer reviewed** research outputs to be covered by the policy. Our experience with researchers and institutions indicates a tendency to apply the policy to all outputs produced by a funded researcher as an 'insurance policy'. Specifically, we frequently field queries from authors of book reviews and special issue guest editorials who believe that their pieces are considered a mandated output.

As we note in Q2, we publish many research outputs outside of traditional articles and reviews that have value to their communities, with new forms of output constantly emerging. We advise UKRI to **consider including a broader range of outputs in their policy**.

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? (200 words)

Yes.

Many of our journals publish non-traditional content that has value to a wider audience – we provide some examples below:

- [Ethnic and Racial Studies](#) publishes book reviews, symposia on issues of current contention, discussion pieces and longer articles that provide an overview of particular fields of research.
- [Educational Psychology in Practice](#) publishes applied research as well as case studies and book reviews aimed at practicing educational psychologists.
- [Social Work with Groups](#) has an audience including social work educators, students and allied professionals. It publishes the latest examples of evidence-guided group work and presents innovative approaches for classroom and field instruction.
- [Communication Methods and Measures](#) has a recurring "Teacher's Corner" section with tutorials and recommendations about new software or methods for teaching communication courses -- [this](#) article in particular had 13,000+ views.

C.25% of UK authored content is classed as non-core content (global average 15%), suggesting that this rich range of research output is especially valuable in the UK. We recommend that these outputs are included. There should be no negative impact on the range of material published in journals to protect the richness and diversity of the UK research ecosystem.

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? (100 words)

Yes.

UKRI may wish to future proof its policy by creating a process or reviewing mechanism allowing for the assessment of new types of research outputs to ensure they are not excluded from the policy.

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.

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.)

We support a policy that increases the proportion of research outputs that are immediately available, whilst ensuring that adequate funding is in place to support their creation, dissemination and curation on an Open basis. **Making research outputs immediately available is most effective when that research output is trusted.** We ask UKRI to focus on opening up access to the definitive version of record which we, as publishers, have helped create and validate, enrich and curate.

Zero embargo Green OA will not achieve the aim of immediate open access. It is dependent on subscription-funded infrastructure. We will not produce content at cost that we are not paid for. We will retain embargoes on our journals in order to be remunerated for our role. We invest in the creation of validated research outputs from before the point of submission onwards. The bill for **infrastructure to support submission and peer review runs into millions of pounds annually**, often covering costs related to articles that are ultimately not accepted for publication. The concept of an 'Accepted Manuscript' has become increasingly anachronistic, with this version becoming ever closer to the final published article due to publisher investment in workflow efficiencies, content enrichment and conversion from submission to allow us to manage an annual content submission increases that have been in excess of 10% globally (based on past three years, growth in UK submissions is 5-10%).

Although we believe that there are better routes to OA, **embargoed** green OA may have some value in opening up access to material. This approach allows us to strike a balance between opening up access and maintaining our ability to recoup our investment in validating and refining a research output. Much research has value for many years based on usage half lives. A third of our journals have usage half lives that are over 5 years (see chart), far beyond the embargo periods we have in place.

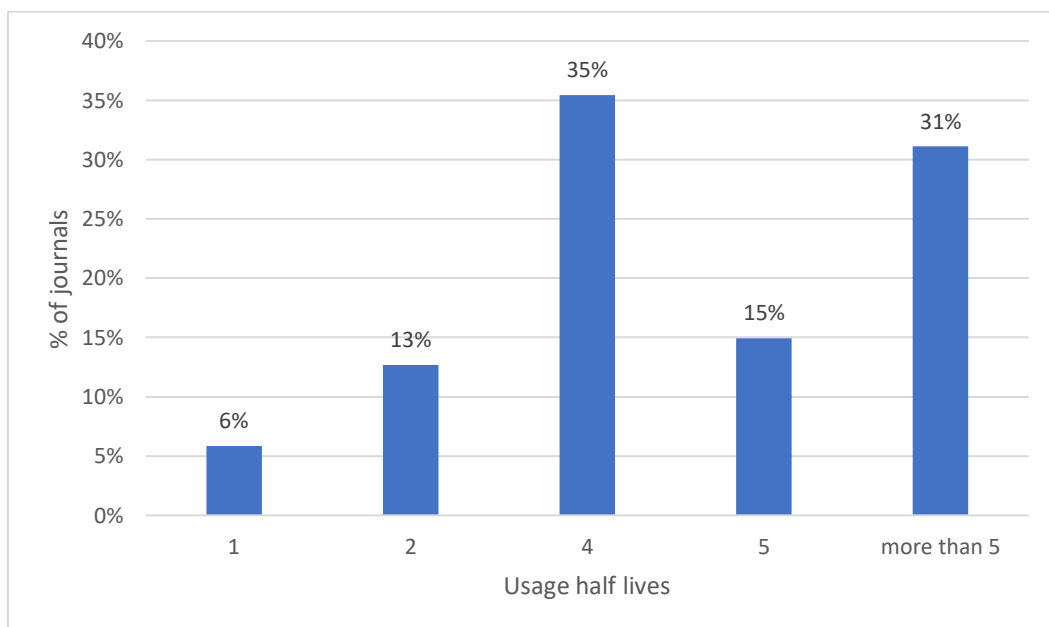


Figure 1: Usage half lives of T&F journals (median age of content accessed during 2017 by journal<sup>2</sup>)

**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?**

<sup>2</sup> Journals grouped by usage half life, based on age of downloads during 2017. E.g. a Usage Half-Life of 2 means that in 2017 half the content being downloaded in that journal was over 2 years old in terms of the volume year.

No.

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.

Repositories serve a valuable function in showcasing an institution's (or subject area's) research. **Mandating** deposit however arguably duplicates effort which could be better invested in, for example, incentivising researchers to deposit themselves (rather than staff spending time and effort uploading content which is already openly available and discoverable elsewhere).

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.

If yes, please expand (2,000 characters maximum, approximately 300 words). Please see paragraphs 29-31 of the consultation document before answering this question.

We asked researchers in [our 2019 researcher survey](#) about their views around OA (see Figure 2). On average, UK respondents (n=157) strongly agreed that **there was value** in anyone being able to access their research (aggregated score from UK respondents was 4.6/5 on a scale of 1 (strongly disagree) to 5 (strongly agree)). This suggests that there is still work for us to be done in opening up access, which is why we support UKRI's aim around immediate access, provided the approach is feasible.

UK researchers were however almost unanimous in asserting their right to choose where to submit their work (4.4/5).

Q3: To what extent do you agree with the statements below? (n=157)

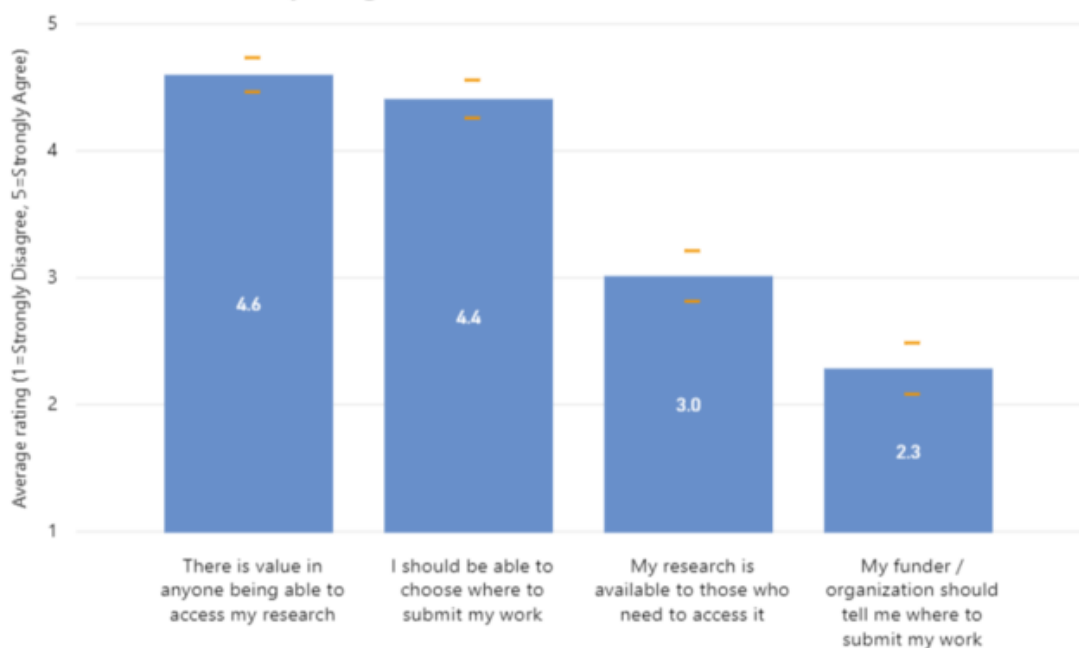


Figure 2: Source: Taylor & Francis 2019 Researcher Survey

When we asked researchers in our (separate) Author Survey about their reasons for submitting to a particular journal, the two most important factors were rated as the Aims and Scope of the journal, and the journal reaching 'the community in my subject area' (see Q19 for more detail).

Pulling the responses from the Researcher and Author Surveys together, we conclude that researchers do want to have the right to choose where to publish their research because it will reach their community and advance research or contribute to discourse in the field.

**Future OA policy should allow researchers to choose the best venue for their research outputs**, not just because it supports greater academic freedom, but because this helps publications to reach their intended audience and to have the desired impact.

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 disagree.

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

Currently many articles made (Gold) OA via the journal are published under a CC BY licence. We see no issue with these articles being made available under the same licence in a repository, and this has been our policy for a number of years.

CC BY on the Accepted Manuscript version however, where the final published article is published on a subscription basis will allow **third parties to repackage and sell content without incurring any of the costs involved in producing this version**. This could jeopardise subscriptions and undermine our ability to produce the final published article, upon which this version depends.

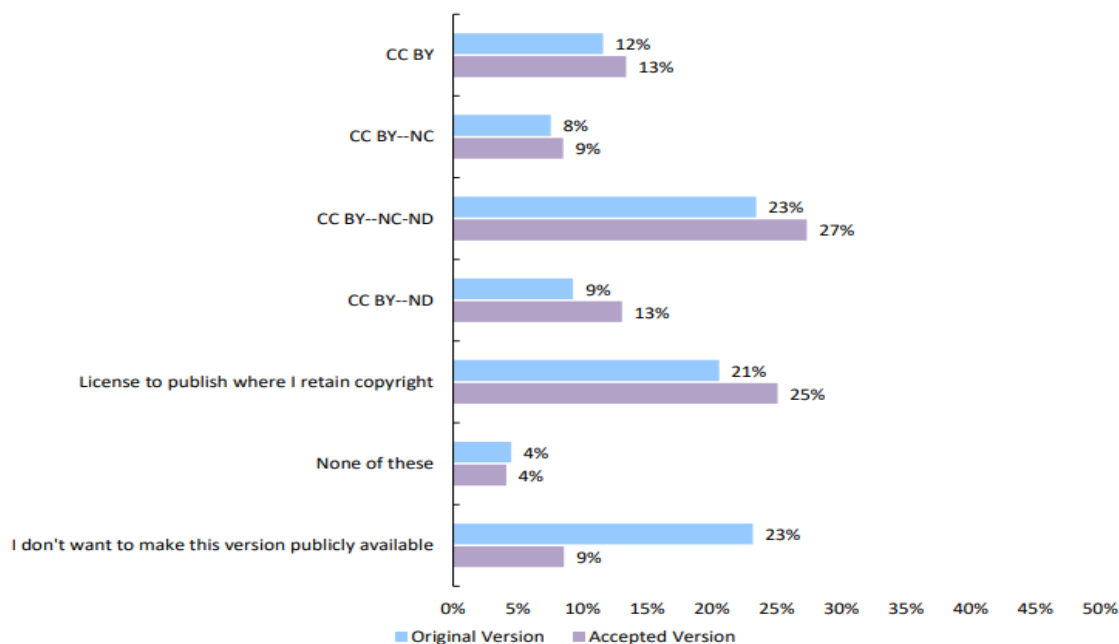
Feedback to our 2019 Researcher Survey (see below) showed a strong preference for licensing work under CC BY-NC-ND (27% of respondents)

**We suggest that UKRI follows researcher and publisher preference and allows deposited articles to be licensed under a CC BY-NC-ND licence, to allow for reuse that does not undermine the viability of this version being produced.**

Q10  
Q11

In the previous question we asked you about your license preferences for the final published article (Version of Record). What license would you prefer to use to publish or post online the Original (preprint) version of your work?

What license would you prefer to use to publish or post online the Accepted (postprint) version of your work?



Percentages given per total number of respondents who answered each question (Q10 n=1,606; Q11 n=1,587).

Figure 3: researcher feedback on licence preferences for Accepted and Original Manuscripts (2019 Researcher Survey)

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

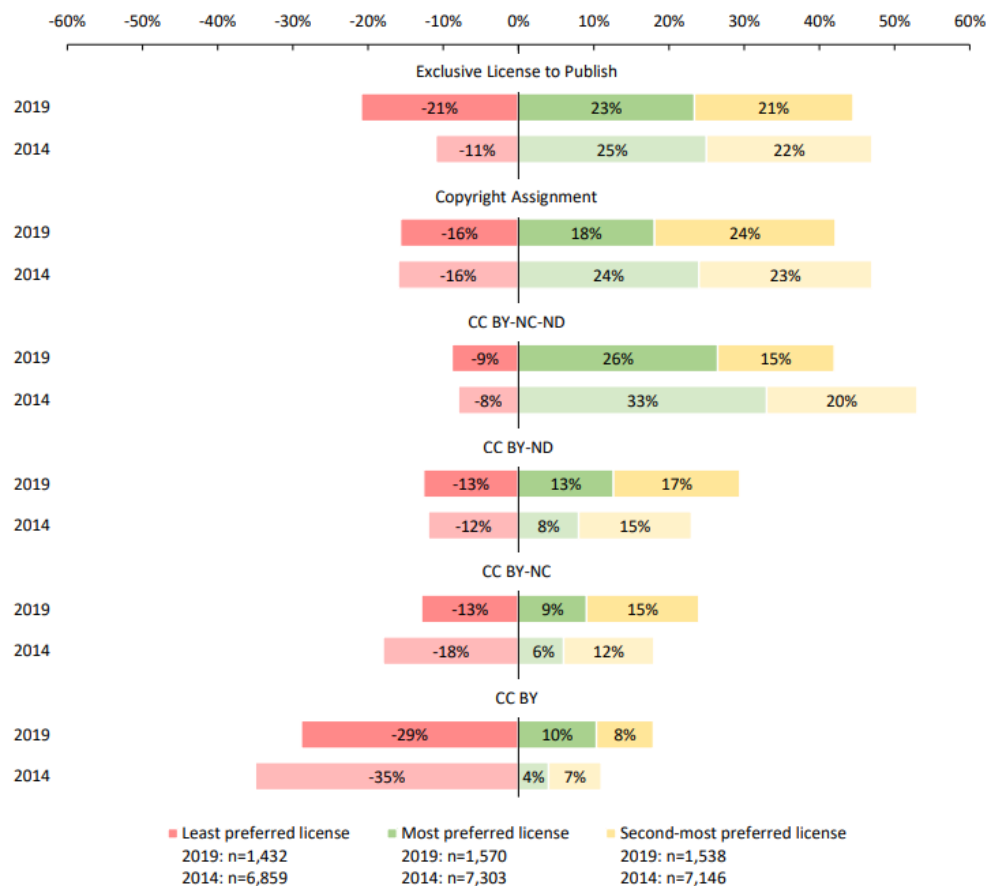
Disagree.

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 suggest that UKRI 1) permits researchers to choose between two licences as a standard process (not a case by case exception) and 2) that the choice is between CC BY and CC BY-NC-ND.**

On 1) From a workflow standpoint, a case by case exception process is likely to include manual elements, hence be inefficient. Allowing a **choice** of licence both serves author preferences and will allow us to build workflows that guide them to the appropriate licence options, without needing to build in manual process steps. We have already invested in infrastructure to restrict licence choice to compliant options only for a range of funders, when the author selects a Gold Open Access option.

On 2) Many researchers prefer a CC BY-NC-ND licence, as evidenced through feedback to surveys that have run over the past seven years (see figure 4). We also prefer a CC BY-NC-ND licence as this diminishes risk of resale of articles by third parties who haven't incurred any costs in producing that content (as outlined in our response to Q7).



2014 figures are taken from the Taylor & Francis Open Access Survey, June 2014, available at: <https://www.tandfonline.com/openaccess/opensurvey> or on Figshare at: [https://figshare.com/authors/Open\\_Access\\_Taylor\\_Francis/589654](https://figshare.com/authors/Open_Access_Taylor_Francis/589654)

Figure 4: researcher feedback on licence preferences, feedback to 2014 and 2019 surveys

Q9. Would the proposed licensing requirements for UKRI's OA policy, which exclude third-party content (see paragraph 55 of the consultation document), affect your or your organisation's ability to publish in-scope research articles containing third-party content?

No.

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

We have responded No, as we already have mechanisms in place to demarcate the rights status of third-party content in the final version of the article. If the Accepted Manuscript is deposited, we advise that third party content is removed from this version, so that there is no potential liability for repositories in hosting this content without permission.

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

Yes.

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

If research article is a broad term covering different forms of research output (including poetry and visual outputs), UKRI must carefully review and consider licensing implications for each form of output, taking into account its specific



characteristics. Many contributors to our journals publish non- traditional content which they are happy to make available to a wider audience, but where they wish to retain some level of control over reuse, and to retain rights as the creator of the work. For example:

- [Theatre, Dance and Performance Training](#) publishes a section called ‘Training Grounds’, a space where practitioners can contribute ideas, thoughts and lively provocations based on their own training background, experience or collaborations with others so that this can be shared and used within a training context by other practitioners. [Contemporary Theatre Review](#) also publishes a similar “Backpages” section for these types of contribution.
- [Visual Communication Quarterly](#) often publishes artist portfolios, accompanied by an artist statement.

Q11. For research articles, are there any additional considerations relating to licensing that the UK HE funding bodies should take into account when developing the OA policy for the REF-after-REF 2021?

No.

Q12. Which statement best reflects your views on whether UKRI’s OA policy should require copyright and/or rights retention for in-scope research articles?

**d. UKRI should not have a requirement for copyright or rights retention**

- 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).

Authors publishing research outputs in our journals on a Gold OA basis (where the final version is available OA on our platform) already retain copyright and rights as standard which enable the author to reuse their work however they choose (typically linked to a Creative Commons licence outlining clear reuse conditions for third parties). Rights retention and reusability is supported by the Gold OA model, often an Article Publishing Charge (APC), sponsorship, or institutional level arrangement.

As part of our standard publishing agreements (typically where the final article is published on a subscription basis), including copyright transfer, authors retain the freedom to share their work in a number of ways, including through sharing [free eprints](#), posting their Accepted Manuscript, reusing their work in future works, and distributing printed copies. We offer [guidance to authors](#) on our Author Services site. This approach ensures that researchers have a variety of means through which they can share their work, and goes some ways towards achieving UKRI’s goals, while ensuring that we can recoup the investment we have made in validating, enriching (e.g. tagging), disseminating and curating that work.

**We recommend that UKRI focuses on routes to immediate access for the version of record (Gold OA) to allow for rights retention and facilitate maximum reusability of the research output.**

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.** – Taylor & Francis was one of the first 16 members of Crossref and has ensured that all of our content has PIDs – including material deposited to the Figshare repository, and content published prior to the introduction of the DOI. This has been immensely valuable in terms of discoverability, version control and dissemination.

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 CCO public domain dedication; the metadata standard must adhere to international best practice such as the Crossref schema and OpenAIRE guidelines

**Disagree.** – We support the call to adhere to international best practice and donate a subset of article metadata (citation metadata; authors, title, journal name, year, pagination, DOI) to the digital commons via CrossRef. We are a signatory of [I4OC](#) and invest heavily in content enrichment. However, the larger definition of article metadata (e.g. affiliation data, abstract and keywords, funding data, author contact details) is a rich bibliographic resource and a traded good in the information economy. To give this away for free creates opportunities for third parties to commercialise our work and erodes our incentive to invest in metadata quality improvement.

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

**Agree.** – We already offer machine readable information on the OA status and embed a URI to the relevant Creative Commons licence as standard.

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

**Strongly agree.** – As part of the service publishers provide, we commit to hosting the final published version of a research output in perpetuity. As part of our archival strategy, [we have arrangements](#) with archives such as LOCKSS, Portico and CLOCKSS to ensure that this version will always be available, even in the case of an emergency or disaster. This means that our content will be actively preserved and available, even if it is no longer offered by Taylor & Francis Group or a successor.

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

**Agree.** – We are a signatory of I4OC and support its aims. As noted above, we already donate a subset of article metadata (citation metadata; authors, title, journal name, year, pagination, doi) to the digital commons via CrossRef (but have concerns about making wider metadata openly available as outlined in our response to question 13b).

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

**Agree.** – We were pleased to see the recent BETA release allowing for bulk updates, as we find that the update process can be time consuming. We would welcome more transparency from the SHERPA team about usage of the tool, commonly asked questions, and so on to help us provide better information around our policies to those using the SHERPA tools.

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 have encouraged the use of ORCID from submission for a number of years and find that generally authors are happy to sign up to this initiative once they have been briefed about its benefits. This greatly helps with disambiguation and reduces the likelihood of fraud (through for example fake email addresses). **We suggest that UKRI also supports and rewards the use of the [CRediT](#) scheme in identifying the role of all contributors to research.**

**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**

a. PIDs for research outputs must be implemented according to international standards such as DOI, URN or Handle

**Agree.** – Where the Accepted Manuscript version is deposited, the DOI should link to the final published article to ensure that users can link to the definitive version of the output which will include any updates or changes.

**No response to b-d as these are directed towards repositories**

~~b. article-level metadata must be implemented according to a defined application profile that supports the proposed UKRI OA policy and is available via a CC0 public domain dedication; this should include the persistent identifier to both the author's accepted manuscript and the version of record; the metadata standard must adhere to international best practice such as the OpenAIRE guidelines~~

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

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

e. the repository must be registered in the Directory of Open Access Repositories (OpenDOAR)

**Agree.** – To ensure that best practice is followed this seems a sensible requirement.

**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 (400 words)

Yes.

Publishers already work to many of these standards as part of developments to services and infrastructure. Whilst mandating these requirements for repositories as well seems logical, there are cost implications (for example there is a cost involved with every DOI registered). Given that some of this cost will be spent to replicate pre-existing standards and infrastructure, and given its interest in cost effectiveness, UKRI may wish to consider the benefits of this approach. We suggest that UKRI considers the function of repositories and primary publication venues (journals and platforms) separately and focuses on technical standards that serve the relevant function. Interoperability between publishers and repositories must be supported with funding and implementation. This must be coordinated cross-publishers and cross repositories/institutions to streamline efforts and to develop a common framework and approach.

We note that UKRI often doesn't have 'lines of sight' to link research outcomes to funding, including QR funding. **We recommend that UKRI supports development of PIDs for grant IDs to better link funding to research outcomes taking note of best practice tagging recommendations such as <https://jats4r.org/funding>.**

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.

Please explain your answer (200 words)

UKRI should encourage researchers to share underlying research materials and **follow emerging standards and best practices**. We recommend that UKRI recognise the varied nature of research data across different subject areas and the existence of different emerging practices, as our experience implementing [data sharing policies](#) and [Data Availability Statements](#) has underscored. Publishers are investing in technology to better capture metadata to link research outputs and are contributing to the development of infrastructure and policies to support open research together with other stakeholders through entities such as [CODATA](#) and the RDA, including interest groups such as the [Data policy standardization and implementation IG](#).

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**

- 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 (300 words)

We have answered 'a.' but want to strongly recommend that the policy applies to **articles \*submitted\* from 1 January 2022**.

The current wording focuses on articles \*accepted\* for publication after 1 January 2022. This will create ambiguity as articles will have been submitted during 2021 in the months leading up to this point where the policy is still being implemented and bedded in. The Swiss National Science Foundation's [OA policy](#) focused on articles \*accepted\* for publication; this has caused confusion and uncertainty for researchers who have submitted articles to hybrid journals that were deemed not to be compliant by the time the articles were accepted.

**We strongly recommend that UKRI alters the policy to make it clear that it applies to research outputs \*submitted\* for publication from 1 January 2022.**

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.

Yes.

If yes, please expand (300 words)

As noted above, we recommend that the policy applies to articles **submitted from** whatever date becomes the implementation date to reduce ambiguity around content submitted for consideration to journals in the lead up to this date.

Q19. Do you think the proposals outlined in Section A will have any financial cost implications for you or your organisation?

Yes.

Please expand, providing evidence (300 words)

We have almost 300 full OA journals and in addition, following our partnership with F1000 Research, [Open Research publishing platforms](#), that would serve as compliant venues under a prescriptive UK OA policy. However, researchers want to publish in the journal of their choice, because it **allows their research to reach their community** (see global feedback to our Author Survey, community reach is ranked as 2<sup>nd</sup> most important factor in submission decision).

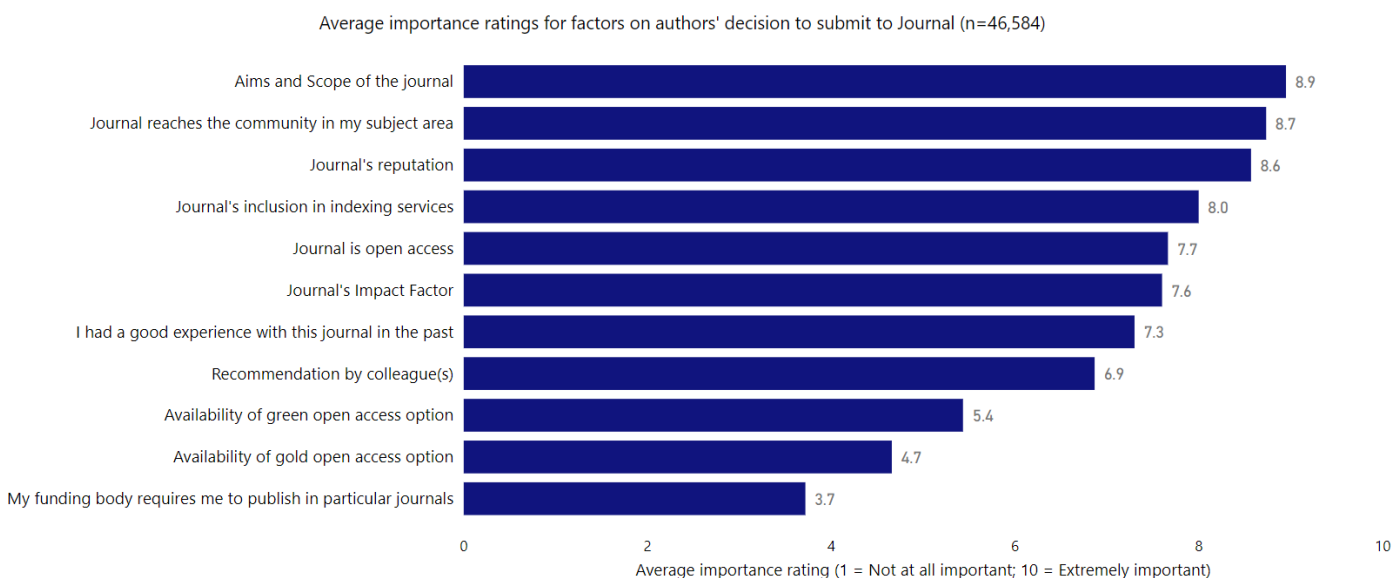


Figure 5 T&F Author Survey response data (responses 1 Jan 2018-10 March 2020)

Many of these journals work under the hybrid model and can't suddenly change to a full Gold OA (APC-based) model without subsidisation. The global community that they represent, of which UK researchers are an important part, is not universally able to support this model because there is no single unified global approach to OA – nor should there be. Locking UK researchers out of these venues jeopardises the UK's leadership in research. Conversely, **a flexible and permissive OA policy will allow UK research and researchers to contribute effectively to global discourse by publishing in diverse venues used by peers throughout the world.**

**Implementation** of RCUK and HEFCE policies required the input of staff from across the business, from Customer Services to Editorial, Production to Technology. The two areas of focus were:

- communication and advocacy, creating guidance and briefings for researchers, editors and society partners and obtaining their buy in.
- systems and workflow development: moving over 1,500 of our journals to an OA model (typically hybrid), updating licensing, back office systems and production workflows; accommodating the related JISC OA arrangement

As a rough estimate, initial implementation took some **26 person weeks**. We imagine that a similar amount of time will be dedicated to implementation of future UKRI policies.

Q20. Do you think the proposals outlined in Section A of the consultation document will result in financial benefits for you or your organisation?

No.

Please expand, providing evidence (300 words)

We understand that UKRI already funds OA for UK HSS research. However, the same cannot be said globally where funding mechanisms for HSS only receive a [tenth of the government funding](#) that STEM receives.

The Gold OA APC model is a challenging model for selective, well regarded and high-quality journals. Often HSS journals publish 20 to 30 research outputs per year (out of hundreds of submissions) which help to advance discourse in these fields (many STEM journals have a similar profile). Outputs are not just core primary research articles (Qu2), but content that is of importance to the community that the journal serves. **These journals would not function as full OA journals under a gold OA APC model; the small number of accepted articles would have to bear the cost of the much higher pool of rejected articles – the resulting APC would be unaffordable.** The hybrid model allows us to manage APC levels as OA articles are published under a marginal cost model. They only have to cover the cost of their own production and not the overheads that are currently supported through subscription funding. We are working to develop new models around OA for HSS which are not dependent on APCs, but this is dependent on global trends and additional funding being made available.

**It is critical that UKRI's policy does not jeopardise the UK's cultural and creative economies, and the UK's global leadership in research in HSS disciplines.** A permissive policy approach will allow HSS research in the UK to find a viable route to Open and ensure a continued role for outstanding learned societies and researchers who set a high bar for research excellence in the UK.

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.

Please expand (300 words)

The mechanisms of the transformative deals are evolving. From our experience, many research-intensive institutions would end up contributing more money than under the previous subscription-based model. Some research-intensive institutions have hence raised concerns with their consortium about future projected spend in a publish-focused model (institutions that are more focused on teaching are forecasting spend decreasing in future under this model). Whilst the funding distribution issue may be mitigated by discussion and agreement within consortia around allocation of spend, funders like UKRI could provide an essential role in 'filling the gap' where research-intensive institutions find themselves unable to support a pure-publish model. This could be especially valuable where institutions publish a high amount of HSS material which cannot typically be supported by an author pays OA model if the institution is unable to fund. We have direct experience with this issue with European consortia and have been invited to participate in multi-stakeholder workshops to explore solutions, which we welcome.

Many research organisations are also incurring costs through publishing charges paid directly by authors. This is creating a likely imbalance across research organisations, as funding is channelled through different routes and not centrally processed or tracked. Another advantage of the transformative agreements, and our investment in the supporting infrastructure, is centralising publishing costs. UKRI could play a role in ensuring that adequate funding is channelled across research organisations to address this changing balance.

We have a number of transformative agreements in place, combining both reading and Gold OA publishing. These models facilitate a decrease in reading spend in line with the increased investment in publishing. The Taylor & Francis contract with Jisc runs until end of 2020 and we are already actively working with them to agree a transformational model to start in 2021.

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.

Please expand (300 words)

The list price APC often does not reflect the actual price paid for OA, see [Delta Think's analysis](#). Our present UK sales arrangement offers institutions a heavily discounted (75%) APC, helping institutions to manage budgets. However, there are practical aspects of ensuring policy compliance – **including high (and often hidden) administrative overheads plus additional cost for infrastructure to make agreements work**. The RCUK block grant was devised partly to support these increased costs, and we would encourage UKRI to follow this example in their implementation.

Spend by UK institutions has increased over the past 3 years. This spend covers: additional administration; growth in UK Gold OA content (average 5% per annum over the past 4 years in our journals); and a growth in the amount of subscription content that is available to their researchers to read. As well as access to our pre-existing archive of over 4 million articles, UK institutions typically receive access each year to over 95,000 additional subscription-based articles through their arrangements with us.

We understand that there are concerns about paying an OA and a subscription charge on the same piece of content. Where OA growth is affecting subscription content in a journal [we review and adjust subscription pricing](#). We take all OA content into account under this policy, including OA content that has been supported by transformative deals. We envisage that continued expansion of OA content from the UK will lead to a decrease in subscription costs for global customers – showing how the UK's support for OA is effectively a British subsidy to the rest of the world.

Lastly, we question some of the forecasts projecting a dramatic increase in expenditure in a 100% OA model and ask that **this be reviewed as part of the independent economic assessment with findings and methodology shared openly**.

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

Yes.

Please expand. Views are also welcome on how greater transparency might inform future funding levels (300 words)

With regards to library and consortial customers, we have always been transparent about the terms of our deals, have never insisted on confidentiality, and were the first publisher to disclose the full terms of our [transformative deal with the Dutch consortium VSNU](#).

We take the same approach with our authors and have clearly articulated policies on both the services that we offer, alongside spelling out how we avoid double-dipping when an author chooses to publish OA in a hybrid journal (see more detail above).

We commit to being more transparent: we must be clearer about what an APC covers, to give authors, funders and policymakers a better sense of the services they will receive and to allow them to compare that to other publishers and journals. Our objective is to make it easier for funders and authors to compare services and 'value' across journals and to make decisions about where to submit based on the services that they would expect to receive. We are also working on displaying more information and metrics on our platform so prospective authors have a better sense of how long it will take their work to be reviewed and published; the peer review process it will go through, and the reach of the journal.

Separately, we have invested in workflows and infrastructure, including creation of our [Research Dashboard](#) to provide institutions with greater insight around articles published by faculty and greater visibility of an institution's research output and article metadata. These tools also provide authors, funders and institutions a better sense of what the cost is for OA and other services. Tools and workflows are evolving as we learn more about how best to serve customer needs and as new policies are developed.

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:

c. UKRI OA funds should be permitted to support OA publication in hybrid journals

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 (400 words)

We offer researchers 280 fully OA publication venues and our portfolio has expanded to include leading OA publishers, Co-Action Publishing, Dove Medical Press and OA publisher and platform provider F1000 Research. **More of our UK-based authors have chosen to publish in fully OA venues in recent years, with over a third of our OA content from 2017 to 2019 published in full OA journals, compared to a fifth from 2014 to 2016.** However, we ask for UKRI to continue to fund gold OA in hybrid journals, as **these are still the most popular venues for UK researchers.**

Funding Gold OA articles in these hybrid journals ensures UK research continues to contribute a strong voice in the high-quality global discourse curated by these journals. It will also catalyse OA in these academic communities and keeps future routes to open possible for these communities.

The hybrid journal serves a useful mechanism for HSS disciplines in particular, as it is in these fields that we, like other publishers, have struggled to establish full OA venues due to the nature, size, and selectivity of typical HSS journals (see Q20). We do have full OA journals in HSS fields, including our *Cogent* series and are hoping that our acquisition of F1000 will help us explore new routes to Open in HSS. Nevertheless authors prefer to publish in established titles, typically in hybrid journals, because they trust these journals and they are the **best channel to ensure research outputs reach the community** (see survey feedback, Q6). OA amplifies the impact of research published in these journals, typically receiving over 6 times as many downloads\* and 32% more citations\*\* compared to those that are published behind the paywall (\*Usage in 2017-2019 of articles published in 2015-2019; \*\*Citations received up to Jan 31 2020 to articles published 2015-2019 in journals listed in Web of Science®).

**We recommend that UKRI supports a diverse ecology of OA models including allowing for the publication of Gold OA outputs in hybrid journals.** This achieves its key aims around immediate access and sustaining confidence in research quality.

Q25. To what extent do you agree or disagree that UKRI OA funds should be permitted to support OA costs that support institutional repositories?

Agree.

Please explain and, where possible, evidence your view (400 words)

Green OA is not a solution to the need for immediate access. Much of the investment in repositories risks duplicating infrastructure that has already been built by publishers, platforms and content aggregators. There is also a high level of manual intervention and administrative workload required to support repositories.

However, we understand that repositories fulfil a **function** separate to that of journals or primary publication platforms – acting as a **showcase** for an institution's research, linking to their Research Information and Research Outcomes systems to raise the profile of their researchers. While we see value in UKRI supporting repositories, we recommend that UKRI focuses its funding on helping repositories better fulfil their function as institutional showcases, rather than



in recreating the function served by journals and primary publication platforms (validation, dissemination, curation, etc. of research outputs). We recommend a **focus on reducing waste and manual effort** (e.g. manual data entry). UKRI may also wish to work with institutions to develop incentives-focused frameworks that reward researchers for depositing their work (whether research output or working papers, data, etc).

Q26. To help accelerate policy adoption, should UKRI introduce any other restrictions on how UKRI OA funds can be used?

No.

Please explain your answer, including any views on how this could be implemented (200 words)

We believe that a **permissive policy approach** will help achieve UKRI's aims more rapidly. Being open on *how* to achieve open access will help support the development of innovative models (and diversification of existing models), accelerate the growth in OA and allow new entrants to join the research communication ecosystem, encouraging competition. Given the pace of technological development, a liberal funding approach will encourage experimentation, and offer support for emerging models, new forms of content, changing research practices towards Open Research as the default. UKRI may wish to consider **distribution mechanisms** for funding – not just through block grants which may create inequalities amongst researchers, but through dedicated funding linked to grants.

Q27. There are many business models that can support OA. A common model for journals is based on APCs, but there are also other models (such as membership models and subscribe to open). Are there changes or alternatives to the present UKRI funding mechanisms that might help support a diversity of OA models?

Yes.

Please expand (400 words)

Our key recommendation to UKRI is to be open to a **diversity of OA models**, including but not limited to APC-based, platform-based, and transformative models. As well as current approaches, many new models will emerge in the coming years. We recommend that UKRI considers how to drive a change in research behaviour and culture needed towards Open Research practices, ideally through rewarding researchers for being Open.

**The UK is already making good progress in its OA agenda.** Half of the UK-authored research we've published from 2016 to 2018 is already openly available, either through the final published article being immediately open access, or through the current Green OA route which allows embargo periods. We're seeing average annual growth rates of **around 5%** in terms of the final published article from UK authors being made **immediately** openly available (Gold OA) and anticipate that this figure will grow, partly through funding and advocacy amongst researchers, and partly by reducing administration and complexity for researchers. Our transformative deals in Europe have successfully grown OA – over 75% of Dutch research output, over 80% of Swedish research, and 60% of Austria's research is OA. These arrangements were implemented in the years since our agreement in the UK (offering discounted APCs). We will suggest that a future UK arrangement adopts a similar 'Read & Publish' model as this has proven to be more effective as a means to grow open access.

Under these agreements, we have not seen any evidence that the model has influenced researcher choice as to where to publish, it has simply made the OA route easier for authors publishing in their chosen journal. This would suggest that supporting a diversity of models in order to maintain a choice of publication venues for researchers, as well as rewarding Open practices rather than a specific model, would drive the most effective change.

Q28. As discussed in paragraph 74 of the consultation document, transformative agreements are one way of moving to OA in a more cost-effective way. Are there approaches to managing transformative agreements or other mechanisms and developments that UKRI should consider to help manage the transition to OA in a way that is cost-effective and offers public value to the UK?

Yes.

Please expand (400 words)

From our experience with managing these agreements we recommend:

- working with Jisc and UK institutions to adopt a flexible and evidence-based approach to each of the transformative agreements across publishers
- keeping researchers out of the APC payment loop to reduce administrative burden for them
- insisting on metadata and standards to help make content discoverable and facilitate its impact.

We highly recommend that UKRI and JISC work closely together on practical elements so that the OA policy and implementation detail align – for example in terms of defining eligible research outputs and researchers (e.g. corresponding author only).

In the same way that the balance of reading and publishing is changing across different research organisations, the same is true of publishers. Therefore, it is critical that each publisher agreement is evaluated in its own right, supported by the relevant data. Agreement between stakeholders on a set of guiding principles, rather than specific criteria applied across all contracts, would allow institutions to ensure that they achieve the best possible agreement with each publisher.

Our suggestions are informed by experience working with institutions in the UK and elsewhere, and focus on reducing administration for all parties and streamlining workflows as much as possible through common approaches. **Policy alignment** will benefit all UK stakeholders by reducing waste, encouraging efficiencies and streamlining workflows.

Submissions to our journals from UK corresponding authors continue to increase by at least 5% a year and we are investing in workflows and systems development to enable us to handle this continued increase efficiently and in a cost effective manner – we must invest to meet the requirements of the new policy (as we have done in the past) but having a clear policy from UKRI will allow us to automate many aspects of the journey that UK authors and research outputs take with us.

Q29. Are there any existing or new infrastructure services that you think UKRI should fund the maintenance and/or development of, to support the implementation of its OA policy for research articles?

Yes.

If yes, please state what these are and explain and, where possible, evidence why UKRI should provide support (400 words)

We suggest that UKRI (continues to) fund the maintenance and development of the SHERPA services, we were pleased to see the recent release around self-service updates to records and bulk updates.

The [Directory of Open Access Journals](#) is a valuable resource for authors and other stakeholders in the research ecosystem and we think that there is value in UKRI sponsoring the Directory.

As noted in an earlier response, we also advise UKRI to support development of a persistent identifier (PID) for grant funding, to better help link funding with research outcomes (this could also cover QR funding as we understand from the UKRI briefing that there is a lack of knowledge about the distribution mechanisms for QR funding / block grants within institutions). This approach would give more transparency around the outcomes of funding, could make the

block grant funding allocation fairer (by ensuring that early career researchers as well as established researchers have their fair share of funds) and will help to showcase the Return on Investment of funding.

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

Disagree.

Please explain and, where possible, evidence your answer (200 words)

We understand the appeal of a 'one stop shop' to showcase UK research output but question whether this is an effective use of funds. Researcher behaviour tends to be to jump from search engines to a piece of content, and then to jump back out (see for example [CIBER's 2016 study of researcher behaviour](#) noting that researchers often defer to search engines to access a specific piece of research). Publishers invest heavily in search engine optimisation and discovery; helping researchers find the content they need. **Our platform is the #1 visited academic publishing platform in the UK, and in the top 50 most visited sites in the UK (Alexa ranking #49 as of 22 May 2020).**

We also question the value of replicating the role of pre-existing institutional and subject repositories (and the cost involved in this replication, including in hosting versions of content that will in all likelihood already be available elsewhere). **Should there be an appetite to explore this route we suggest that UKRI investigate how to support existing institutional and subject repositories.**

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

Yes.

If yes, is there a recognised definition of 'public emergency' and/or protocols that UKRI should consider if this policy is implemented (200 words)

We are signed up to the NLM's Emergency Access Initiative (EIA) which is activated in emergencies where normal routes to information are cut off due to infrastructure being affected (for example in [2017 due to hurricanes Irma and Harvey](#)).

We are also signed up to the Wellcome-coordinated initiative which supports the principles set out in the [2016 Statement on data sharing in public health emergencies](#), and commit to ensuring that the World Health Organization (WHO) has rapid access to emerging findings that could aid the global response.

As well as making Covid-19 research available on our own [site](#), and through a [dedicated Gateway](#) created by F1000 Research, we are working with other publishers and OSTP to supply validated research outputs on Covid-19 through the NLM's [LitCovid portal](#).

What the current crisis has made clear is the need for and value of [validated, trusted research outputs](#). We suggest that UKRI supports the above initiatives. Including making preprints available, but with **appropriate disclaimers around how readers should interpret this material pre-peer review.**

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

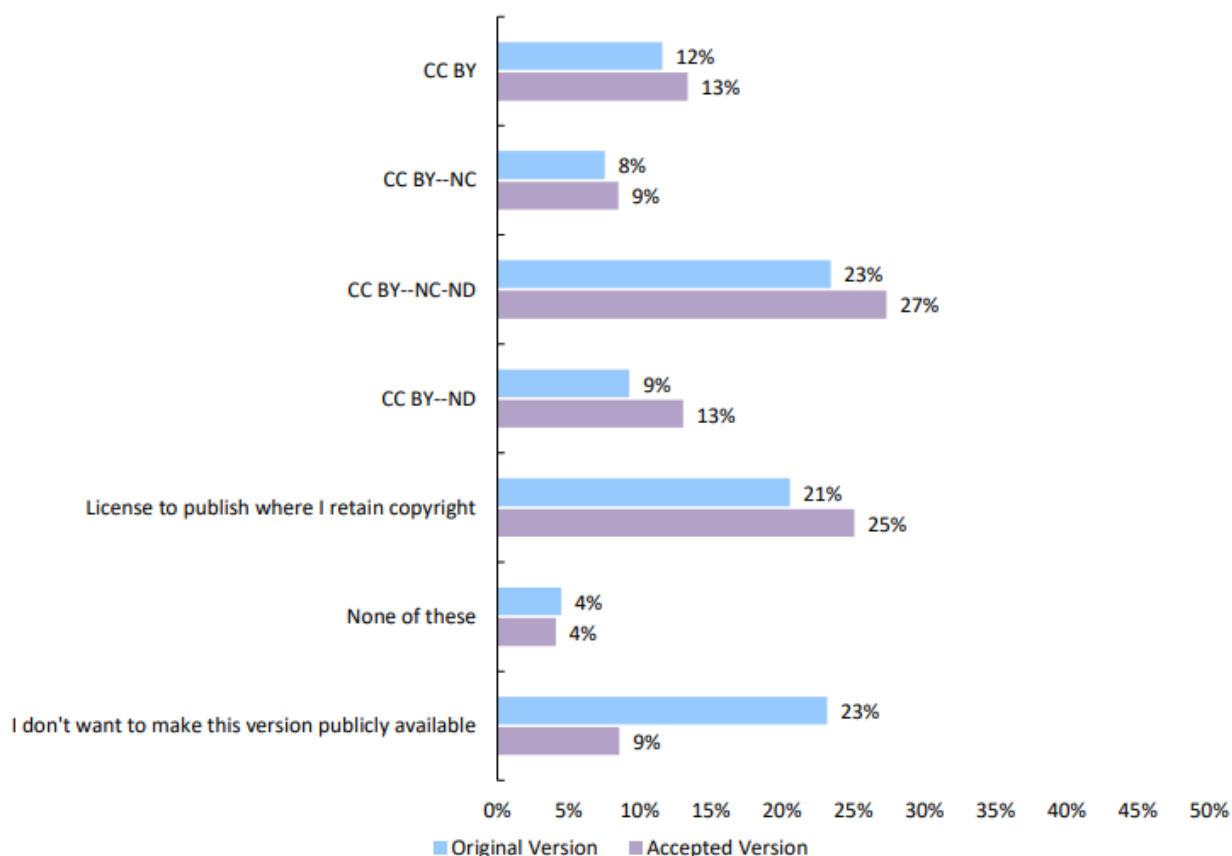
Yes.

If yes, please expand (200 words)

There does appear to be value in preprints being made OA as standard (such as usage and citation, based on analysis in [this preprint](#)). However, it is important that the preprint status is clearly indicated to avoid issues arising such as with the recent [Coronavirus article](#)). However, this does not replace the need for a validated and trusted final version. There appears to be some discomfort amongst researchers in sharing this version, with around a quarter of respondents (26% in HSS disciplines) not being comfortable with making the Original Manuscript openly available, based on feedback from all respondents to our 2019 Researcher Survey.

**Q10** In the previous question we asked you about your license preferences for the final published article (Version of Record). What license would you prefer to use to publish or post online the Original (preprint) version of your work?

**Q11** What license would you prefer to use to publish or post online the Accepted (postprint) version of your work?



Percentages given per total number of respondents who answered each question (Q10 n=1,606; Q11 n=1,587).

Figure 6: researcher views on licensing of original manuscript, 2019 Researcher Survey

**We recommend that UKRI takes an incentives-based approach to encourage researchers to deposit their preprints, perhaps focusing in those fields that would most benefit from research being immediately available.** This could form part of a broader policy approach that rewards open researcher workflows and behaviours.

Alongside support for preprints, we reiterate our earlier comment about ensuring support for emerging forms of content, for example [registered reports](#), which make content available earlier in the research cycle than present norms.

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) are clear?

Disagree.

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

We agree that trade books should be exempt from the policy however more clarification is needed in terms of the definition. Although the definition described in the UKRI proposed policy is useful more clarity is needed. It may be too easy to claim a title is a trade book in order to opt out of the OA policy if the definition is not clear.

The varying nature of monograph publishing should also be considered here, particularly in terms of how 'research' is defined across different disciplines. This makes it very difficult to clearly understand what would be in scope.

We would also be interested to know if the revised policy considers professional/practitioner books, do they fit into the definition of what constitutes a trade title? We would like professional/practitioner books to be considered as out of scope outputs alongside trade books, but again a clear definition is important.

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

a. Academic monographs: Yes.

b. Book chapters: Yes.

c. Edited collections: Yes.

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

Yes, we agree that these outputs should be considered in-scope. However, we feel that more work is needed on clearly defining each output.

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?

Agree.

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

We believe that authors should have the right to choose the most suitable output for their research so allowing exceptions when there really is no other option available would facilitate this.

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.

If yes, please expand (2,000 characters maximum, approximately 300 words). **Please see paragraphs 29-31 before answering this question.**

UKRI should provide clear definitions of what is or is not in scope with some flexibility built in and detailed guidance is also important.

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?

**b. A longer embargo period should be allowed**

- 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).

We currently allow Green OA for chapters (18 month embargo for HSS / 12 months for STEM chapters). This policy does not apply to full books and we have no plans to allow full books to be made OA via the Green route. The current embargo periods for chapters reflects the differences in the sales lifecycle across research disciplines.

Embargoes strike a balance between opening up access to materials and maintaining a publisher's ability to invest in infrastructure, digitisation and preservation as well as the core values and services that we provide, such as peer review, editing, proofreading, typesetting, e-book conversion, printing and archiving. Much of the research we publish continues to have value for years if not decades after its publication, particularly in HSS disciplines.

The majority of sales occur within the first 36 months but in some cases, sales still occur up to ten years after publication. Taking this into account, Green OA is not a viable route. To move towards a more sustainable open access model we must fully support a full Gold OA route for monographs and edited collections. We are fully committed to finding a solution that works for all stakeholders.

**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?**

**d. Different maximum embargo periods should be required for different discipline areas**

- 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).

Our current embargo period is 18 months for HSS chapters and 12 months for STEM chapters. This reflects the differences in the sales lifecycle across research disciplines and is also aligned to our journals OA policy. Taking this into account we would recommend an embargo period of 18 months for Humanities and Social Sciences chapters and 12 months for STEM chapters.

**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?**

**b. A longer embargo period should be allowed**

- 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).

Same response as for monographs. No evidence to suggest that sales lifecycle is different for edited collections. We are in support of Gold OA as the preferred model for monographs and edited collections.

**Q40. Do you have any specific views and/or evidence regarding different funding implications of publishing monographs, book chapters or edited collections with no embargo, a 12-month embargo or any longer embargo period?**

Yes.

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

Currently there is no properly funded policy solution available for publishing monographs, book chapters or edited collections open access.

We are committed to opening up access to the definitive version of record which we have helped create and validate, enrich and curate. Monographs and edited collections funded via the 'Gold Model' (a Book Publishing Charge or BPC) allow publishers to be remunerated for our role in the publication process. Publishers provide important services such as peer review, editing, proofreading, typesetting, e-book conversion, printing and archiving. Allowing a monograph or edited collection to be made OA via the Green route makes it very difficult for publishers to cover costs associated with the publication process, even with an embargo in place and undermines the final version of record that has had so much time and expertise invested in it.

Publishing a monograph or edited collection OA with a zero embargo in place will mean that libraries are far less likely to opt to buy the book which would have a detrimental effect on future viability of monograph publishing.

Not having a clear funding framework in place may deter publishers from investing in monograph publishing in future in order to focus on more financially viable outputs. The investment in editorial and quality assurance in monograph publishing could be damaged if a clear funding solution is not presented.

**Q41. To what extent do you agree that self-archiving the post-peer-review author's accepted manuscript should meet the policy requirement?**

Disagree.

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

Green OA is not a long-term solution and involves expenditure on duplicating existing infrastructure to a lower standard. Much of the research we publish continues to have value for years if not decades after its publication, particularly in HSS disciplines. Green OA undermines the value publishers add and ultimately destroys itself as it undermines the process through which books are validated and published.

The difference between journal publishing and monograph publishing has to be taken into careful consideration here. A blanket policy across books and journals is not viable. Appropriate consideration should be given to the publisher's investment in producing the Accepted Manuscript (AM) version and whether it is viable for a publisher to give this away for free. Developing an initial proposal and the peer review process can take years of investment and editorial support.

**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.

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

Currently there is no viable model for funding OA monographs, book chapters and edited collections. The Green OA route is not suitable for monographs and edited collections as outlined in our response to question 41. Recognising the differences between books and journals is vital here. Chapter policies should be an exception. Publication costs for monographs and edited collections are much higher than for individual journal articles and the value added by publishers and investment in the AM version must be taken into consideration when considering appropriate embargo periods and Green OA. HSS disciplines in particular produce research that has a very long shelf life.

UKRI should make it easy for researchers to publish via the Gold OA route by providing sufficient funding.

UKRI should consider the implications for international collaboration and consider policies in other countries. The UKRI policy should not disincentivise international collaboration.

**Q43. To what extent do you agree or disagree with CC BY-ND being the minimum licencing requirement for monographs, book chapters and edited collections in-scope of UKRI's proposed OA policy?**

Disagree.

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

CC BY-ND does not fully meet the needs of researchers in HSS. The general consensus from HSS authors is that the preferred licence type is CC BY-NC-ND. Difficulties arise with less restrictive licence types when research can be reproduced and taken out of context, particularly in HSS disciplines. CC BY-ND does not always offer enough protection against misuse or misrepresentation of research.

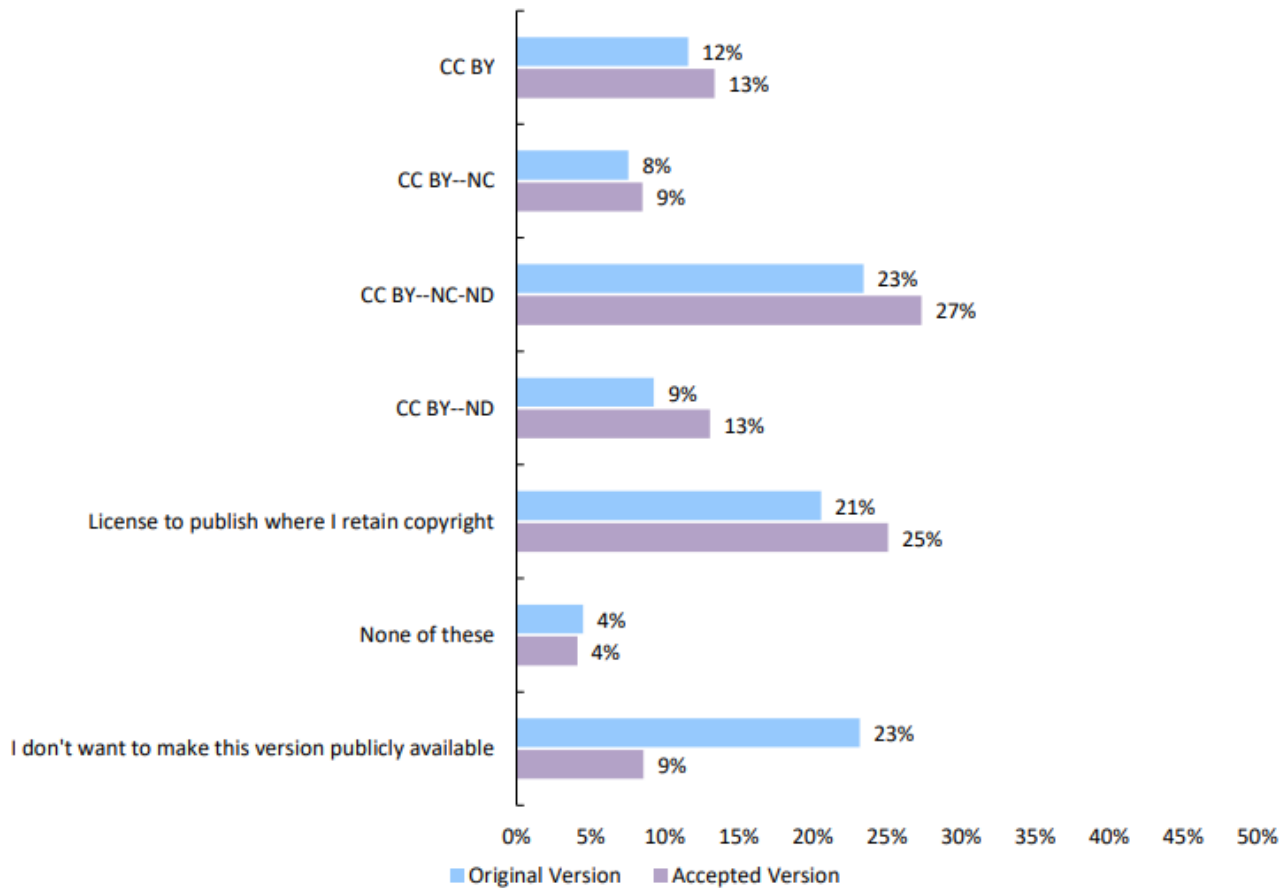
We suggest that UKRI follows researcher preferences in allowing them the maximum choice of licence type. We currently recommend CC BY-NC-ND as our preferred licence type but offer authors complete flexibility to suit their particular circumstances. CC BY-NC-ND has consistently been the most popular licence choice over 7 years of researcher surveys.



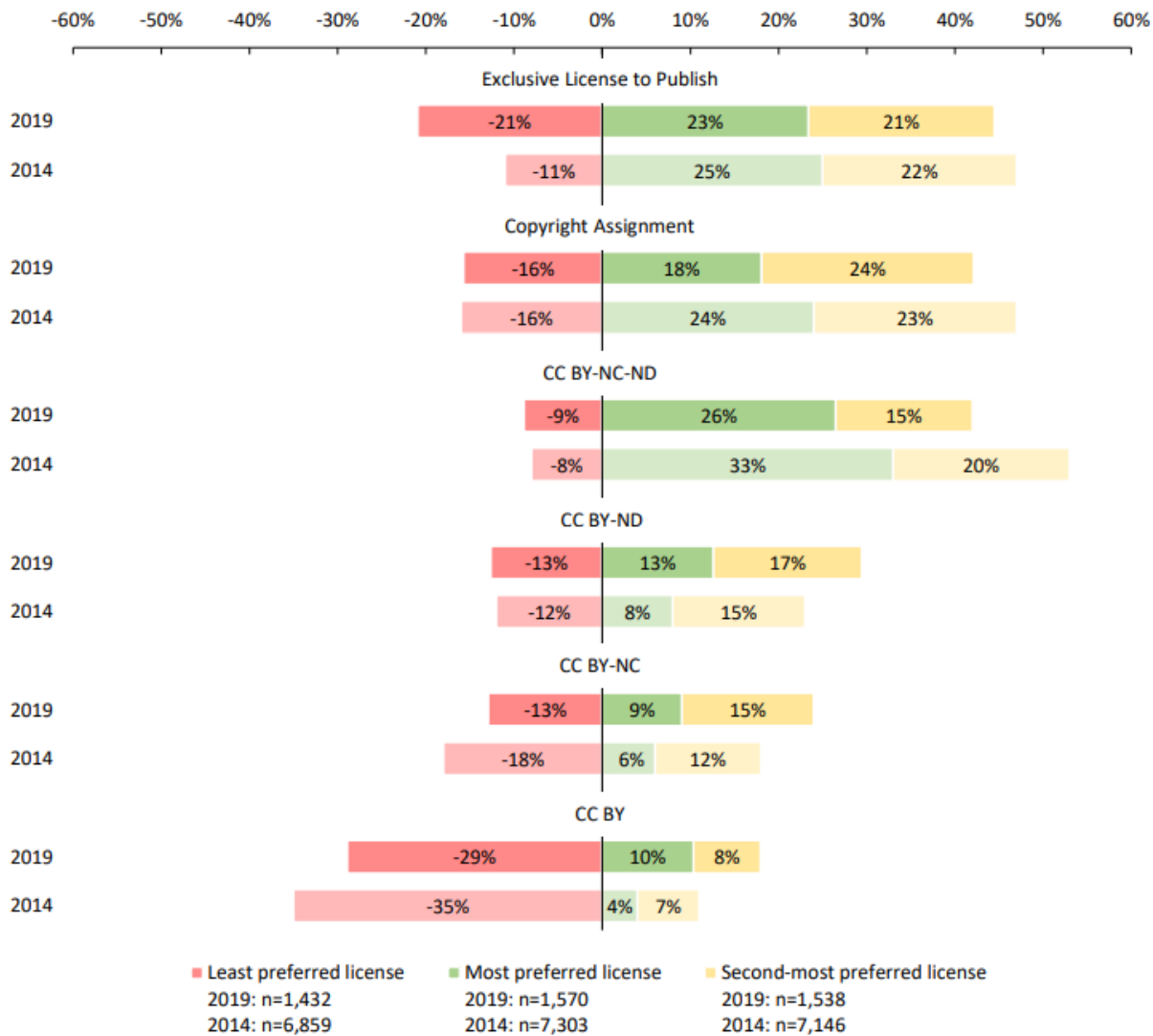
Q10  
Q11

In the previous question we asked you about your license preferences for the final published article (Version of Record). What license would you prefer to use to publish or post online the Original (preprint) version of your work?

What license would you prefer to use to publish or post online the Accepted (postprint) version of your work?



Percentages given per total number of respondents who answered each question (Q10 n=1,606; Q11 n=1,587).



2014 figures are taken from the Taylor & Francis Open Access Survey, June 2014, available at:  
<https://www.tandfonline.com/openaccess/opensurvey> or on Figshare at:  
[https://figshare.com/authors/Open\\_Access\\_Taylor\\_Francis/589654](https://figshare.com/authors/Open_Access_Taylor_Francis/589654)

Figure 7: researcher feedback on licence preferences for various manuscript versions, feedback to 2014 and 2019 surveys

Q44. To what extent do you agree or disagree that UKRI's OA policy should include an exception for in-scope monographs, book chapters and edited collections requiring significant reuse of third-party materials?

Agree.

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

The definition of significant reuse is particularly important here. Who should be responsible for covering the costs associated with permissions, where will these funds come from? Certain disciplines such as art history, literature and visual studies will benefit from exceptions here as monographs, book chapters and edited collections in these disciplines often rely on significant reuse of third-party materials.

Q45. To what extent do you agree or disagree that if an image (or other material) were not available for reuse and no other image were suitable, it would be appropriate to redact the image (or material), with a short description and a link to the original?

Agree.

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

In certain cases, this is unavoidable, and the solution proposed is appropriate.

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.

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

Efforts should be made to obtain appropriate permissions before exceptions to the policy are made. Significant use should pertain to whether or not the solution proposed above would be a viable option. For example, would redacting the images mean that the book no longer makes sense. As mentioned above certain disciplines such as art history, literature and visual studies may benefit from exceptions here as monographs, book chapters and edited collections in these disciplines often rely on significant reuse of third-party materials.

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?

No.

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

-

Q48. Regarding monographs, book chapters and edited collections, are there any additional considerations relating to licensing requirements and/or third-party materials that you think that the UK HE funding bodies should take into account when developing the OA policy for the REF-after-REF 2021?

No.

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

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?

**d. UKRI's OA policy should not have a requirement for copyright or rights retention**

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.

It should be noted that copyright or rights retention also affects the print version of the book, not just the OA version. Our preference is for authors to retain copyright, but we believe that this should be their choice.

**Q50. Regarding the timing of implementation of UKRI's OA policy for monographs, book chapters and edited collections, which statement best reflects your view?**

**c. The policy should apply later than 1 January 2024**

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 are fully committed to working with stakeholders to implement a suitable OA policy for monographs, book chapters and edited collections. However, there is a lot of detail that still must be worked through with the widest possible input from stakeholders and therefore we recommend a longer implementation date.

**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 that might be helpful?**

Yes.

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

Advice on funding available to authors would be useful. Information around the implications of different licence types. UKRI should consider the potential for rewards or incentives for authors/institutions to publish OA perhaps a part of a broader policy approach that rewards open researcher workflows and behaviours. Cultural change amongst academics is key to implementing a new OA policy.

**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.

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

There is a lot of detail that must be worked through with the widest possible input from stakeholders and the policy should apply later than 1 January 2024.

**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.

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

We are focused on opening up access to the definitive version of record which we have helped create and validate, enrich and curate. Monographs and edited collections funded via the 'Gold Model' (a BPC) enable publishers to invest in infrastructure, digitisation and preservation as well as the core values and services that we provide. **The policy should focus on immediate Gold OA and helping authors to achieve this.** We have concerns around where funding will come from particularly in HSS –clarity should be provided on the levels of OA funding that will be available to HSS authors.

Green OA is not a viable option for monographs and edited collections and **a transition to Green OA for these outputs will damage the viability of monograph publishing for UK authors.** As a global publisher, Green OA may potentially disadvantage UK authors by making it more difficult to publish, as we have no plans to change our global embargo policies. The differences between books and journals must be recognised. We have some concerns around the majority of OA funding being allocated to journal articles. Will book authors have access to sufficient levels of OA funding to allow the transition to OA for monographs and edited collections, particularly in HSS disciplines? Will funding be distributed equally? Early career researchers will find it more difficult to get funding. We publish large amounts of research by early career researchers and are concerned that they might be disadvantaged. Monograph publishing is more heavily weighted towards HSS scholars so this policy could set them even further apart from STEM than they are already.

Chapters should be an exception here and the embargoed Green OA route would be a viable option, but a clear funding policy solution needs to be implemented for monographs and edited collections to make open access a viable and sustainable option.

Q54. To support the implementation of UKRI's OA policy, are there any actions (including funding) that you think UKRI and/or other stakeholders should take to maintain and/or develop existing or new infrastructure services for OA monographs, book chapters and edited collections?

Yes.

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

Any OA policy must be backed up by the appropriate levels of funding to cover book publishing charges (BPCs) and facilitate Gold OA for monographs and edited collections. We do not believe that the Green OA route is a sustainable option for monographs and edited collections even with extended embargoes in place. A clear outline of funding mechanisms is needed so that publishers and researchers are able to make informed decisions.

We urge development of a rewards scheme/incentives for authors/institutions to publish monographs, book chapters and edited collections OA, working with all stakeholder groups.

Q55. Are there any technical standards that UKRI should consider requiring and/or encouraging in its OA policy to facilitate access, discoverability and reuse of OA monographs, book chapters and edited collections?

Yes.

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

**Quality metadata that can be read, shared and exchanged between services is fundamental to discoverability.** The Book Interchange Tag Suite, (BITS), is the NISO XML-markup standard and works as a common standard to enable data exchange and the description of both text and graphical content. It is based on the successful JATS standard for journals and the two are mutually compatible meaning that it is easier for shared journals and books systems to manage metadata. ONIX has been the standard to date but BITS is proving to be a richer and more flexible standard, especially

for chapters, that leaves space for future developments in the books world. Taylor & Francis uses ONIX as standard currently and will continue to do so at a product (book) level but predict the appetite for BITS to increase in the next few years and we are actively putting in place updated systems to better support books metadata. The schema was developed in partnership between the scholarly publishing community and NLM (US National Library of medicine) and is available for free.

**Q56. Do you have any other suggestions regarding UKRI's proposed OA policy and/or supporting actions to facilitate access, discoverability and reuse of OA monographs, book chapters and edited collections?**

Yes.

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

The richer the data provided the more opportunities there are for discoverability and strengthening networks. By far the dominant ways readers discover works are through Abstracting and Indexing services such as Web of Science, and search engines: Google and Google Scholar primarily. Providing information beyond titles and chapter headings, such as ORCiDs, well-structured abstracts, funding information and thoughtful keywords means search engines, indexing databases and library catalogues have the "meat" to ensure readers are getting the best results. Taylor & Francis is committed to working with authors to help them understand how they can make their work more discoverable and would be happy to work with UKRI to encourage understanding amongst authors about how they as individuals can influence discoverability. UKRI could also work closely with cross-industry groups, such as [Metadata2020](#), [Crossref](#) etc to ensure that funder needs are well understood when shared infrastructure and standards are being discussed.

Open research principles with persistent identifiers for different forms of content aids discovery and encouraging adoption of [FAIR](#) standards (as far as possible for books) when sharing data will create a robust sharing framework. Taylor & Francis is currently considering the best way to progress an Open Research policy for books.

## 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 (300 words)

Yes.

Currently publishers such as Taylor & Francis are not involved in the manual reporting process for the UKRI block grants. However, we frequently interact with our library partners regarding compliance and understand that the current process is labour intensive for them. A focus on standards will help with this reporting process and will reduce both duplication of effort and ambiguity. Taylor & Francis has invested in infrastructure to utilise standards and provide quality metadata. We have made specific improvements to reduce non-compliance amongst mandated authors. For example, we limit the choice of licenses to compliant only options for authors who publish on a Gold OA basis and declare a funder with a licence mandate. We also invest in technology to improve reporting on research outputs. Our [Research Dashboard](#), currently available for library partners, offers an overview of research outputs (including the ability to download article metadata), enables opt-in to OA, reduces the administrative cost of individual article invoicing and helps with budget management. There are a variety of routes by which Taylor & Francis could support the process of reporting if desired.

Q58. Except for those relating to OA block grant funding assurance, UKRI has in practice not yet applied sanctions for non-compliance with the RCUK Policy on Open Access. Should UKRI apply further sanctions and/or other measures to address non-compliance with its proposed OA policy?

Yes.

Please explain your answer (300 words)

We believe that compliance monitoring and sanction application is a costly and labour-intensive exercise, so we suggest that measures **focus on incentivising researchers to comply**. We would suggest that UKRI aim to reduce administrative burden for researchers, and that the investment be in awareness raising around the OA policy, winning hearts and minds with researchers and ensuring the policy is adequately funded. If this is achieved, then non-compliance is unlikely to be an issue. An **incentives-based approach** is more likely to win the support of researchers and achieve the goals of the policy than a sanctions-based approach. UKRI could consider following the example of Wellcome who reward future grant funding on the basis of past compliance; this encourages compliance amongst researchers whilst reducing some of the burden around compliance reporting.

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)?

Agree.

Please explain your answer (300 words)

We support the focus on giving the opportunity to address and rectify the non-compliance before application of financial sanctions. This would align with our recommendation that UKRI focuses on incentives and winning the hearts and minds of researchers. Application of direct financial sanctions to a research organisation simply limits the funds available to publish future research outputs in compliant ways. We would recommend the Wellcome approach which incentivises compliance with future grants in mind.

## Section D: Policy Implications and Supporting Actions

Q60. Do you foresee any benefits for you, your organisation or your community arising from UKRI's proposed OA policy?

Yes.

Please expand (400 words)

Provided that the policy is implemented taking our recommendations into account (i.e. immediate access to the version of record), we see some benefits for us and the communities we serve:

- Immediate access: supporting **growth in OA** that is already happening – we have seen notable growth rates in gold open access for UK content as a result of current policies. The proposed policy could accelerate this growth trend, especially if it is coupled with a new JISC arrangement that will streamline current workflows.
  - Providing **funding mechanisms for HSS** authors to move to OA. Currently UK OA policy has helped a significant proportion of HSS research to go gold OA. Over the past 3 years, **54%** of our UK Gold OA content is from HSS disciplines, whereas HSS disciplines represent only **24%** of our global Gold OA content over the same time period. The proposed OA policy could continue to provide means for these disciplines (which receive a small proportion of funding) to choose gold OA.
  - Supporting a diversity of models to drive the **excellence of UK research**: articles published OA in our hybrid journals typically receive over 6 times as many downloads\* and 32% more citations\*\* compared to those that are published behind the paywall (\*Usage in 2017-2019 of articles published in 2015-2019; \*\*Citations received up to Jan 31 2020 to articles published 2015-2019 in journals listed in Web of Science®).
  - Alignment with the missions of the Research Councils and UKRI to drive public engagement and expand the **impact of funded research**.
- Clarity and efficiency through **policy alignment**, allowing us to streamline workflows, reducing waste, administrative burden and complexity for authors.

If the proposed policy is properly funded and implemented in a way that supports a diverse ecology, then this will ensure that the UK can continue to play a **leadership role** in producing excellent and world-renowned research. This will also support the UK's creative and cultural economies by opening research up to a broader audience. We want to make research **more impactful and widely accessible** and are keen to work with UKRI, UK institutions, researchers and other funders to achieve this. We see the proposed policy as the means to achieve this, if it is implemented in a considered manner with input from all stakeholders, and (as we suggest) with a focus on immediate access to the version of record.

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

Yes.

If yes, please expand, referencing specific policy elements and including any comments on how UKRI could address any issues identified (400 words)

Some of the potential risks include:

- **Immediate OA**: removing support for hybrid journals could slow or reverse UK OA growth trends as it reduces the number of venues available for researchers and may run counter to UKRI's aims on increased dissemination of research as a research outputs may not reach the community. A focus on immediate OA also disadvantages disciplines where immediate access is less critical than other disciplines, and that have less funding available but where scholars do not want to make an inferior version of their work openly available.
- **Ease of compliance**: introducing a more complex and prescriptive policy framework will create more complexity for all stakeholders, making compliance more challenging.
- **Equality / diversity and inclusion**:



- the Green OA route proposed poses challenges from an accessibility standpoint, offering readers access to an inferior version of an article that does not benefit from the functionality offered on the final published version, for example text to speech tools, screen readers, and font and layout options that help readers with learning difficulties interact with the text.
- Equally, an APC-based Gold OA model poses challenges for those allocating funding to their researchers – this can be an impossible choice between funding an APC for an early career researcher or an established and internationally known researcher (with a more guaranteed return on investment).
- A risk remains that researchers in HSS disciplines suffer as a result of a prescriptive policy that is not supported by dedicated and adequate funding and that focuses on immediacy of access at the expense of quality.
- Given indications of the impact of Covid-19 on submissions from female researchers, and on funding and research pipelines, UKRI should focus its efforts on supporting these researchers post-Covid.

We suggest that UKRI **continues to allow researchers to choose the best venue for their research, by supporting OA publication in the journal or on the platform of their choice**. UKRI should also ensure that grant funding includes support for Gold OA publication, to avoid for example early career researchers missing out on funds from a block grant.

Q62. Do you foresee any positive and/or negative implications of UKRI’s proposed OA policy for the research and innovation and scholarly communication sectors in low-and-middle-income countries?

Yes.

If yes, please expand, referencing specific policy elements and including any comments on how UKRI could address any issues identified (400 words)

UK researchers are keen to ensure that research in lower income countries is supported. With a score of 4.3 out of 5 in terms of importance, it was among the factors with the highest importance for UK respondents to support ongoing and sustainable research activities in their field.

Q16: How important do you think the following are for ongoing and sustainable research activities in your field? (n=121)

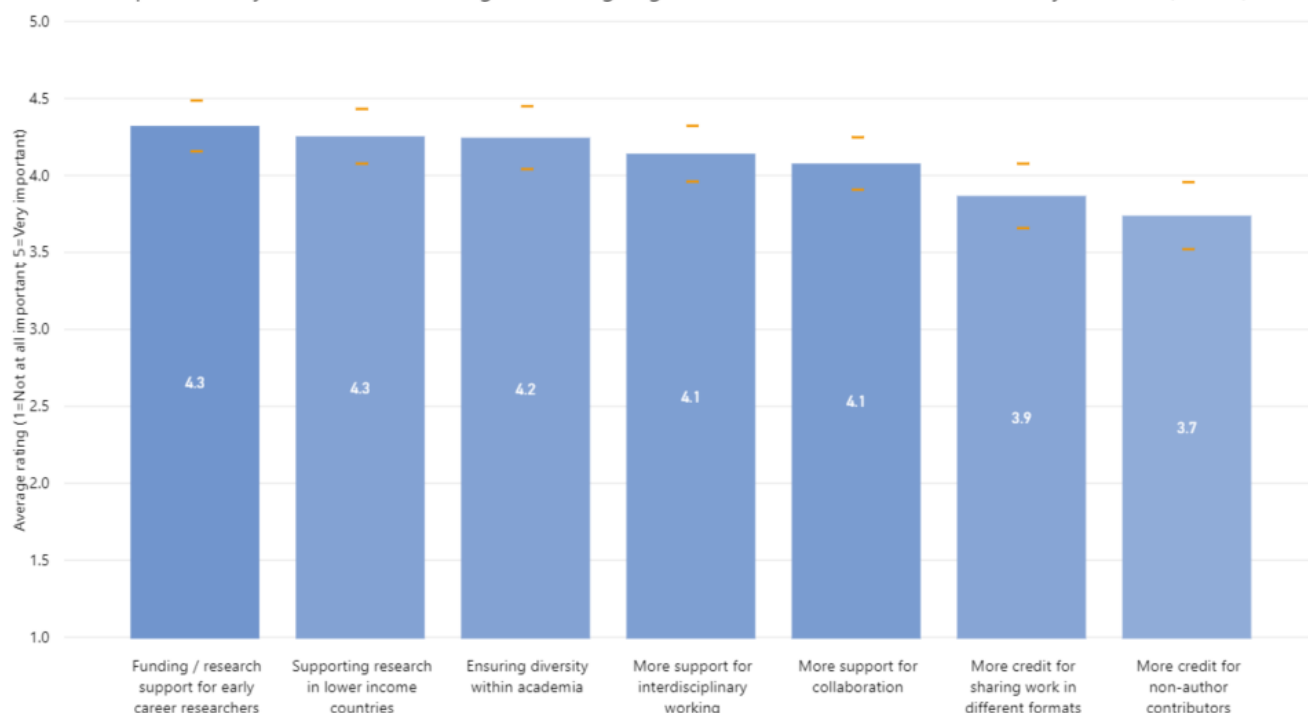


Figure 8: feedback from 2019 T&F Researcher Survey

Most high-quality journals have a global identity with **diverse global authorship**, all with different needs. Journals with a strong regional identity are often based in low-and-middle-income countries, and nevertheless seek to attract high quality submissions from a global authorship. They are likely to find this challenging in a prescriptive OA policy environment, especially one that is geared towards the current OA models, such as APC-based OA. Conversion to full Open Access poses a sustainability problem for journals based in LMICs due to their high levels of 'local' authors who often benefit from APC fee waivers when publishing in international or Global North-based journals.

There are a variety of models emerging in LMICs to encourage Open Scholarship, including journals and platforms. As with technology, where populations skipped desktop computers and went straight to mobile, we may see LMICs skip certain stages of OA (the APC model?) in the move to an Open Research environment. In order to support a global research ecosystem and knowledge commons, we encourage **UKRI to retain a permissive policy stance, which will allow a variety of models to flourish, including those in LMICs which may not be APC-based**. We encourage UKRI to engage with DfID as noted in the consultation briefing session to ensure alignment across UK government departments. Additionally, UKRI should engage with groups such as [INASP](#) as well as STM's taskforce for Global South OA to discuss and potentially co-create approaches that will work for LMICs.

Q63. Do you anticipate any barriers or challenges (not identified in previous answers) to you, your organisation or your community practising and/or supporting OA in line with UKRI's proposed policy?

Yes.

If yes, please expand, including any supporting actions you think UKRI could undertake to remove or reduce any barriers identified (400 words)

The UK has played a leadership role for OA for a number of years. As a result of current policies, the UK has seen OA grow considerably, to the point that significantly more UK research is openly available than the global average (estimated at 54% in the 2017 UK Monitoring the Transition to OA report). It is unclear what the policy will be for the rest of the world, so whilst we applaud the UK's drive for OA, we must take global trends into account, and develop models that suit a **diverse global approach and support international collaboration**. Eight years after the publication of the 'Finch' report it remains unclear whether the UK is setting a standard for the rest of the world, or is taking a different approach. We must champion researcher choice in a global market and ensure that no researcher is left without a voice, no matter their funding source.

From our experience supporting researchers with their compliance requirements for a number of years, we recommend that UKRI **provides support and guidance to researchers to ensure they understand and can comply with the policy. Any changes to existing policy should not create roadblocks or make compliance more difficult for researchers**, especially given the 80% compliance rate with current REF policy noted in para 17 of the UKRI consultation document.

Existing UK OA policies and their related support and guidance appear to have encouraged researchers to form habits around OA; feedback to our [2019 survey](#) shows that UK researchers were more likely to have published research open access in the past year than the overall respondent group (46% vs 42%). Additionally, compared to the overall respondent group, UK respondents were almost twice as likely to have archived either the original version of their work (27% vs 15%) or the accepted version (34% vs 18%) in an open access repository in the last year. **We recommend that UKRI's revised OA policy builds on this engagement from UK researchers by incentivising them to continue building on this behaviour.**

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 (300 words)

Yes.

We recommend that UKRI focus on **ease of compliance** for UK researchers and develop an **incentives-based approach** to encourage OA behaviours, rather than a sanctions-based approach, primarily through supporting actions to foster **systemic change to rewards and incentives structures**, but also be ensuring that there is **adequate funding** in place to support a managed transition to OA.

Specifically, UKRI should work with institutions to change assessment criteria and review panel behaviour to reward researchers who engage in open research practices. We also strongly recommend that UKRI work with institutions to raise awareness of their policy amongst researchers. In our 2019 researcher survey, even though more UK respondents were aware of OA initiatives than the global average, only 14% were aware of Plan S (compared with 5% of the overall respondent group).

When asked about priorities for supporting ongoing and sustainable research communication in our [2019 researcher survey](#), UK researchers felt it was important for more funders and institutions to support open access publication, rating it at 4.2 on a scale of 1 to 5 (not at all important to very important). They also wanted to see more credit for public engagement activities (3.9) as well as receiving credit for publishing their work open access (3.8) – suggesting that if UKRI work to incentivise open research behaviours more generally they may find the researcher community more than willing to engage.

Q15: How important do you think the following are for ongoing and sustainable research communication in your field? (n=123)

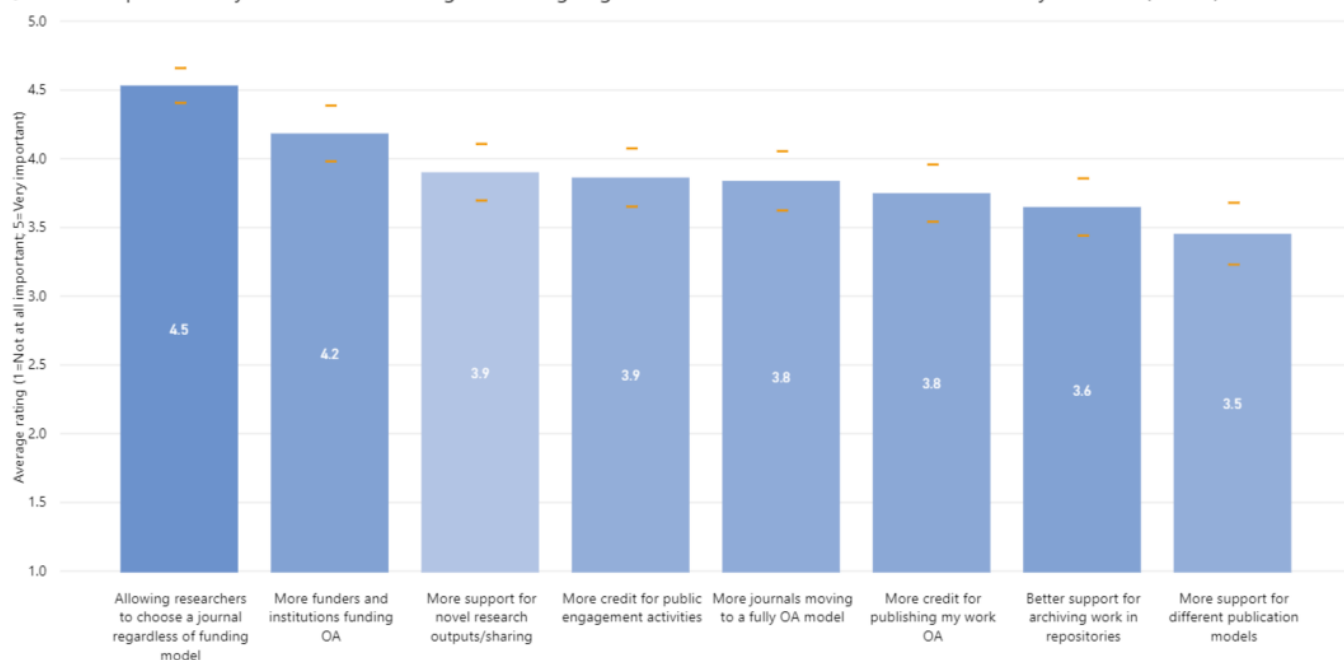


Figure 9: UK researcher feedback from 2019 researcher survey

Our Open Research vision covers the whole gamut of the research cycle, and is not just about making outputs openly available, but making sure that supporting data is available and that outputs themselves have been produced with rigour, are replicable and are responsible. We have teams dedicated to building our capacity and expertise around research integrity and open research and working actively with communities.

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.

We foresee that the increase of OA content in some of our journals with a high proportion of UK authorship, as a result of the policy, will lead to an increase in the number of journals converting to a full OA model (critical to the decision to convert would be a commitment to ongoing funding for these journals from UKRI).

Based on our experience with previous policy implementation, we anticipate that we will need to field significantly more queries from UK based authors at all points of the publication journey, with resource implications.

UKRI has outlined its aims around immediate OA, maximum reuse and sustaining confidence in research quality. Access also must take into account **accessibility**: ensuring that readers can access research outputs that benefit from the functionality offered on the final published version, for example text to speech tools, screen readers, and font and layout options that help readers with learning difficulties interact with the text. [We have made accessibility a priority](#) on our platform Taylor & Francis Online.

**We believe that supporting publication of the version of record on an OA basis, regardless of venue, is the best way to achieve these aims.**

## Section E: Further Comments

Q66. Do you have any further comments relating to UKRI's proposed OA policy? Yes / No.

Yes.

If yes, please expand (400 words)

On immediate access

- The UK is well on the path to open, and UKRI has a great opportunity to accelerate this progress. **We recommend that UKRI focuses on opening up access to the definitive version of record, through support for a diversity of OA models.**

On maximum reuse

- Given the nature of intellectual property and knowledge transfer in different disciplines, coupled with researcher preferences around licensing, UKRI should consider a **CC BY-NC-ND licence option, particularly in HSS disciplines.**

On value for money

- **UKRI's support of an open market environment through an inclusive policy approach**, will foster competition through diversification of business models, with new models and new entrants emerging that will ensure that publishers earn their place in the marketplace.
- One of our criteria in agreeing transformative agreements is '**sustainability**' – for us and customers, and this will form part of our negotiations with JISC. We are a lean organisation, handling an annual growth in submissions of some 10%, and will continue to invest to support process improvement and efficiencies.

On ease of compliance

- **UKRI should ensure that any policy does not make it harder for researchers to comply** – especially given current high compliance rates.
- Publishers continue to invest significantly in infrastructure and workflows to support researchers with compliance and reduce waste and inefficiencies, given research output is growing exponentially and shows no signs of slowing

On sustaining confidence in the quality of UK research

- UKRI could work with institutions to **build incentives-based framework to encourage researchers to adopt open practices throughout the research cycle**. Real transformation can only happen in parallel with systemic cultural change.
- The UK should be proud of its learned societies and professional member bodies – they represent and support diverse communities of research and practice and their 'brand' is aligned with quality and trust, is recognised globally, and helps boost the UK's standing and reputation in research. **UKRI should ensure that its policy supports these bodies, and their communities.**
- **UKRI should ensure that its policy doesn't create or exacerbate inequalities for early career researchers, independent researchers and those with disabilities or learning difficulties** in order to help institutions retain existing and emerging talent, and to champion a level playing field for UK-based researchers.

Q67. Do you have any further comments relating to commonality between UKRI's proposed OA policy for outputs acknowledging UKRI funding and the OA policy for the REF-after-REF 2021?

No.

If yes, please expand (400 words)

Q68. Do you have any further thoughts and/or case studies on costs and/or benefits of OA?

Yes.

If yes, please expand (400 words)

Beyond citations, our analysis suggests that OA does facilitate impact by getting research into the hands of those that need it:

- Almost **three quarters of the articles we have published from the UK on an OA basis have been cited**, compared with half of the UK articles published on a subscription (plus possibly green OA) basis.
- When analysing broader impact, via Altmetric attention scores, around **60%** of UK articles published over the past three years on a subscription (with possible green OA) basis have attracted attention. By contrast **over 80%** of UK articles published on a gold OA basis have attracted attention.

This covers research from across all disciplines, and when focusing on attention rather than citation, more HSS research has the spotlight. Highlights include:

- Richard Cowell, Geraint Ellis, Fionnguala Sherry-Brennan, Peter A. Strachan & David Toke (2017) Rescaling the Governance of Renewable Energy: Lessons from the UK Devolution Experience, *Journal of Environmental Policy & Planning*, 19:5, 480-502, DOI: [10.1080/1523908X.2015.1008437](https://doi.org/10.1080/1523908X.2015.1008437) (Altmetric score 2,084; 17 citations)
- Stephen Gorard & Nadia Siddiqui (2018) Grammar schools in England: a new analysis of social segregation and academic outcomes, *British Journal of Sociology of Education*, 39:7, 909-924, DOI: [10.1080/01425692.2018.1443432](https://doi.org/10.1080/01425692.2018.1443432) (Altmetric score 727; 5 citations)
- Nick Drydakis, Peter MacDonald, Vangelis Chiotis & Laurence Somers (2018) Age discrimination in the UK labour market. Does race moderate ageism? An experimental investigation, *Applied Economics Letters*, 25:1, 1-4, DOI: [10.1080/13504851.2017.1290763](https://doi.org/10.1080/13504851.2017.1290763) (Altmetric score 770; 6 citations)

We suggest that UKRI **considers impact beyond citations and commissions research in to how OA research facilitates broader societal and economic impact and / or supports knowledge exchange, including consulting with [SMEs](#) and policymakers.**

**Ends**