Pharmacy Schools Council

Open Access and Submissions to the Research Excellence Framework

Foreword:

The Pharmacy Schools Council (PhSC) represents the collective interests of all 26 UK schools of pharmacy by providing a source of expert opinion and advice on matters concerning pharmacy education from the perspective of UK schools. We welcome the opportunity to respond to the *Open Access and Submissions to the Research Excellence Framework* call for advice, research is fundamental to progress the study of pharmacy and open access can potentially support the translation of research into industry and improvements to healthcare. Open access is a complex area affecting institutions, the funders of research and the academic publications industry, however, this complexity does not reduce the importance of publically-funded research being widely accessible. Nevertheless, research assessment is designed to be a judge of quality; however accessibility has no bearing on quality, further demonstrating the importance of fully understanding the consequences of introducing this reform.

Using the Research Excellence Framework (REF) as a driver to increase open access must avoid unintended consequences for institutions. While it is beneficial that both 'green' and 'gold' routes towards open access are acknowledged, there needs to be careful consideration of how the academic publications industry is likely to react. There are some points that require further clarification and we look forward to receiving further detailed proposals during the main consultation period. These requested clarifications specifically relate to embargoes and exceptions.

Embargoes and the 'green route'

There are a number of areas relating to embargoes that require further consideration. Paragraph 11 establishes the expectations of how open access will be defined, however, while the first bullet point suggests that publications should be deposited immediately, it is acknowledged further in the document that access to the repository should allow for an agreed embargo period. This should be clarified and clearly communicated in guidance to institutions, taking into account the realities of academic publishing. The guidance also needs to consider how to define a 'reasonable' amount of time for an embargo and the relationship of this to the two sets of embargo periods listed by Research Councils UK (6-12 months where Article Processing Charge (APC) funding is available, 12-24 months where it is not). It would be helpful to understand which journals allow a 'gold' route, which imposes an APC, and those that pursue a 'green' route which introduces an embargo time. This can then potentially be used to set the boundaries for a reasonable amount of time. This information is contained within the SHERPA RoMEO service and can provide data associated with particular disciplines. Furthermore, the SHERPA service is launching a new tool, SHERPA Fact, which will link Open Access policies and funder policies to support the Research Councils UK (RCUK) actions. This is expected to go live on 1st April 2013.

In addition, the document recognises that the costs and savings of open access to institutions are unknown, highlighting the need for more analysis to understand the effects of the move to open access. This analysis

should focus on identifying and addressing any potential unintended consequences of the move to open access, such as the use of embargo periods to force excessive APCs or pressure to publish in less-appropriate journals on the basis of the publisher's archiving policy, and should also allow engagement with the academic publications industry.

Exceptions

Paragraph 12 states that work which has been published in an ineligible form and then retrospectively made available should not be eligible for submission, something that may require further consideration is how the academic publications industry can influence whether this is approach is feasible. This is particularly important considering the limited amount of time before the proposed transition will come into force.

Nevertheless, the reference to exceptions which will potentially be introduced during the transition towards open access does help to address this issue. The suggestion that exceptions will be structured by stating that a given percentage of all outputs submitted by an institution should meet the open access requirement is potentially the easiest way to govern exceptions and it is important that this criterion is clearly communicated to institutions. It is also important that the full consultation process allows institutions the opportunity to comment on what would be an appropriate percentage. This approach may, however, disadvantage institutions whose research specialism is in an area where it is difficult to meet the criteria. This may be overcome by adopting options (a) or (b) but the latter would be likely to impose a large resource burden. The effects of this on outputs which differ from primary research papers in standard journals should also be considered.

While some funders will allow limited costs to be incorporated to cover APC, which potentially could restrict outputs; it is important to remember that this is not the majority of funders. Furthermore, the document references free open access journals; however there are concerns about the sustainability of these platforms which should also be considered when developing the full proposals. A review of how open access can be funded should be undertaken before the full consultation document is released.

Timing of the transition

While tying open access to REF submissions is a robust lever, the timing of the transition appears quite limited. The consultation exercise should consider how prepared institutions are, while the scheduling of the transition should allow adequate time to develop an effective communications strategy which will include all interested and affected parties.

Concerns around the timing of the proposed transition also affect the suggestion that open access should be applied to data. While this is an aspiration for the future, it is highly likely that the timeframe to introduce this is too restrictive and so it would be premature to make this a formal requirement.