

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)?

Strongly agree

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

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?

No

If yes, please expand (1,350 characters maximum, approximately 200 words). Please see paragraphs 29-31 before answering this question.

Q3. In setting its policy, should UKRI consider any other venues for peer-reviewed research articles which are not stated in paragraph 47? *No*

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

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). (2,650 characters maximum, approximately 400 words.)

There are significant concerns that the costs associated with meeting the proposed OA requirements are having a detrimental effect on research funding – as noted in the consultation “analysis by the Universities UK Open Access Coordination Group found that between 2013 and 2016 the average OA article processing charge (APC) increased by 16% (compared with a rise of 5% in the Consumer Price Index), alongside a 20% increase in expenditure on journal subscriptions”. We have seen figures of £2k-£4k cited as costs for article publication and these seem unjustified by the levels of service provided by some commercial publishers. Other members of our community are troubled by the growth of publishers that have extremely poor editorial standards but provide a route to low cost OA publication.

These issues are not adequately considered in the UKRI consultation document.

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?

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.

There is a lack of clarity in the consultation about what is meant by a (the?) repository in this context – if the article is already available under the OA provisions outline in the consultation then it is already available via a repository.

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 before answering this question.

There is a feeling in our community that the consultation reinforces existing thinking around Gold OA models rather than exploring new concepts for publication or encouraging research into alternate models more consistent with both promoting high quality research and maximising the benefits of public funding for science and engineering.

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 OGL where needed) should be required for the deposited copy?

Agree

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

There is an increasing expectation that UK researchers will engage in high-impact work with both commercial end-users and also with overseas academics. In both cases, it can be difficult for these co-authors to agree to the licensing conditions proposed here – for instance, Federal employees working in a US government research lab. One approach to establishing the value of these proposals would be to gather evidence of their effect on a subset of recent publications from a sample of UKRI funded projects. The existing consultation lacks such an evidence-based approach to assessing the impact of these proposals.

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.

Agree

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).

See the cases identified in the answer to Question 7.

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

Yes.

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

Computing science research often builds on third party content including but not limited to software components, agreed test cases/corpus, international standards for software development. Previous answers have also mentioned the need to address third-party end-user requirements. All these concerns require additional consideration within the proposals.

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

No

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

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

Yes

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

Our answers to previous questions focus on those areas of computing science research that are likely to have the greatest impact, there is a concern that without additional consideration, these proposals may create barriers to the publication of results from those areas of scientific and engineering endeavour that have the greatest potential to increase the economic prosperity and social well-being of the UK public.

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?

3. 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

Please explain your answer. UKRI particularly welcomes views as to whether it is necessary to require copyright and/or rights retention if its policy were to require a CC BY licence, which

enables reuse. If you selected answer b or c, please state what reuse rights you think UKRI's OA policy should require to be retained (2,000 characters maximum, approximately 300 words).

Please note that views are not sought on whether institutions should hold the copyright to work produced by their employees as this is subject to Section 11 of the Copyright, Designs and Patents Act 1988 and institutional copyright policies.³⁰

This provides greatest guarantees that academic authors have the incentive to publish high impact research in an OA forum. In many areas of computing there are significant disincentives for conducting research in academic rather than commercial organisations and some aspects of the UKRI proposals may exacerbate those disincentives.

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?

- a) persistent digital object identifiers (PIDs) for research outputs must be implemented according to international standards such as DOI,³¹ URN³² or Handle

Agree

- 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 CC0³⁴ public domain dedication; the metadata standard must adhere to international best practice such as the Crossref schema³⁵ and OpenAIRE guidelines³⁶

Agree

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

Agree

- d) long-term preservation must be supported via a robust preservation programme such as CLOCKSS³⁷, Portico³⁸ or an equivalent

Neither agree nor disagree

- e) openly accessible data on citations must be made available according to the standards set out by the Initiative for Open Citations (I4OC)³⁹

Disagree

- f) self-archiving policies must be registered in the SHERPA RoMEO database⁴⁰ that underpins SHERPA/FACT

Neither agree nor disagree

- g) unique PIDs for research management information must be used and must include the use of ORCID to identify all authors and contributors.⁴¹

Agree

For **each** of the seven standards (see paragraphs 67a-67g): 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), **please explain your answer** (700 characters maximum, approximately 100 words, per standard).

While many of the requirements simply aid indexing, others seem to add little value while significantly increasing the potential costs associated with persistent OA publication. The consultation also fails to address wider concerns across the community in terms of citation gathering which has, in some cases, had promoted behaviours that are not in the long-term interests of high-quality 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?

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

Agree

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

Agree

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

Agree

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

Agree

- e) the repository must be registered in the Directory of Open Access Repositories (OpenDOAR).⁴²

Agree

For **each** of the five standards (see paragraphs 68a-68e): 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), **please explain your answer** (700 characters maximum, approximately 100 words, per standard).

Q15. To support the adoption of technical standards for OA, are there other standards, actions and/or issues UKRI should consider?

No opinion.

Please explain your answer (2,650 characters maximum, approximately 400 words).

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), are there any technical standards or best practices that UKRI should consider requiring?

No opinion.

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

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?

The policy should apply later than 1 January 2022

Please explain your answer. UKRI particularly welcomes detailed evidence as to the practical implications of the choice of date. If you selected b or c, please also state what you consider to be a feasible implementation date (2,000 characters maximum, approximately 300 words).

Our answers to previous questions have urged some consideration of alternate approaches to existing OA mechanisms and to a wider analysis of the negative impact of a "citation culture" on early career researchers. We would also welcome an evidence-based approach to any recommendations – especially where they might have an effect on high impact collaborative research with commercial and overseas organisations.

The UK HE funding bodies recognise that due notice will be needed prior to implementation of the OA policy for the REF-after-REF 2021, which will be consulted on in detail after UKRI's OA policy is announced (see paragraphs 29-31). It is therefore anticipated that the OA policy for the REF-after-REF 2021 will not come into effect on 1 January 2021 (that is, at the beginning of the publication period for the REF-after-REF 2021 exercise). The REF 2021 OA policy should be followed until further notice.

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?

No opinion.

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

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 to support your view, where possible

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

As mentioned previously there are significant concerns that the costs associated with meeting the proposed OA requirements are having a detrimental effect on research funding – as noted in the consultation "analysis by the Universities UK Open Access Coordination Group found that between 2013 and 2016 the average OA article processing charge (APC) increased by 16% (compared with a rise of 5% in the Consumer Price Index), alongside a 20% increase in expenditure on journal subscriptions". We have seen figures of £2k-£4k cited as costs for article publication and these seem unjustified by the levels of service provided by some commercial publishers. Other members of our community are troubled by the growth of

publishers that have extremely poor editorial standards but provide a route to low cost OA publication.

Although some of these costs can be met by diverting UKRI funding to pay for them, we do not think that there is sufficient evidence of the benefits outweighing the loss in potential funding for active research. There are also concerns that institutionally funded research will also have to assume these costs if any consequent non-UKRI project publications are to be eligible in future REF exercises.

Q20. Do you think the proposals outlined in Section A will result in financial benefits for you or your organisation? Yes / No / Don't Know / No opinion.

No

Please expand, providing evidence to support your view, where possible

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

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

There is a well-evidenced analysis of the changing costs and concerns over the lack of value for money in a JISC article; "Much of the difficulty arises from the fact that the market is not transparent: list prices for subscriptions and Article Processing Costs sometimes bear little relation to what institutions are actually paying. Moreover, the price of the APCs is just one part of the true figure"... One institution we spoke to recently spent more than £28,000 in annual subscriptions with just one publisher, and also published 12 journal articles with the same company. Those 12 APCs amounted to an extra £21,000 paid by the university to that single publisher"... At Jisc Collections, we have carried out a detailed analysis of data from 23 UK institutions between 2007 to early 2014 and this reveals a sharp increase in the number of APC payments being made from centrally managed university funds over the last two years."

<https://www.jisc.ac.uk/blog/unravelling-the-true-cost-of-publishing-in-open-access-15-dec-2014>

Q22. Can you provide any evidence on cost increases and/or price rises (including in relation to OA APCs and subscriptions) and reasons for these? Yes / No / Don't know / No opinion.

Yes

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

The UKRI consultation itself provides evidence of this rise in cost.

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

The Finch review considered a number of possible offset models and these should be reconsidered alongside mechanism for justifying payments based on standards of transparency agreed alongside any renewed UKRI OA policy.

Q24. Regarding UKRI's consideration about restricting the use of its OA funds for publication in hybrid journals (see paragraph 80), please select the statement that best reflects your views:

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.

Please explain and, where possible, evidence your answer (2,650 characters maximum, approximately 400 words).

This is justified by the previous observations about cost, impact and transparency.

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 (2,650 characters maximum, approximately 400 words).

This seems necessary to offset the increased costs associated with meeting the UKRI OA requirements, especially given the significant uncertainty of other revenue streams in UK Higher Education after the pandemic.

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 (1,350 characters maximum, approximately 200 words).

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 (2,650 characters maximum, approximately 400 words).

Previous sections have urged a more evidence-driven approach to any future OA requirements, including the identification of appropriate empirical means to assess the

impact of any future schemes. Without this, we run the risk of detrimental side-effects to the UK research base.

Q28. As discussed in paragraph 74, 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 helping manage the transition to OA in a way that is cost- effective and offers public value to the UK?**

Yes

Please expand (2,650 characters maximum, approximately 400 words).

The UK is fortunate to have a large community of experts in operations research and in modelling that are well-placed to support the wide range of subjective arguments that have been made in favour of different OA models. The proposals seem sound in many respects but they rely on intuition rather than sufficient evidence.

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 (2,650 characters maximum, approximately 400 words).

A programme of research into appropriate metrics for comparison of the effects of different OA policies and then the application of those measures to assess the costs and benefits of existing policy together with models to assess the extent of any changes.

Q30. To what extent do you agree or disagree that UKRI should provide or support a national shared repository? Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.

Strongly disagree

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

The costs associated with such a repository might better be used to fund original research.

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? (1,350 characters maximum, approximately 200 words.)

These are well understood in the context of the Civil Contingency Act under the Cabinet Office as outlined <https://www.gov.uk/guidance/preparation-and-planning-for-emergencies-responsibilities-of-responder-agencies-and-others>

Q32. Are there any supporting actions that UKRI could take alongside its OA policy to support the use of preprints in all disciplines? Yes / No / Don't know / No opinion.

No opinion

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

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?

Strongly disagree

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

Most monographs in Computing Science are only funded in part by UKRI – the proposals to do not deal with such situations, where for example a relatively modest contribution might incur the full OA obligations.

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

Academic monographs No

Book chapters Yes

Edited collections No

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

Book chapters in Computing Science capture the focussed output from UKRI-funded doctoral research, academic monographs and book collections almost always contain research funded from a variety of sources including but not limited to institutionally funded work, charities, commercial research etc that do not seem well aligned with the models described in this consultation.

Q35. To what extent do you agree or disagree that UKRI's OA policy should include an exception for in-scope monographs, book chapters and edited collections where the only suitable publisher in the field does not have an OA programme?

Strongly agree

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

For reasons outlined in previous questions including Q34.

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?

No opinion.

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

Q37. Regarding monographs in-scope of UKRI's proposed OA policy, which statement best reflects your view on the maximum embargo requirement of 12 months?

A longer embargo period should be allowed.

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).

Research monographs typically require significant effort beyond the research funded in most UKRI projects, hence the author should have some opportunity to benefit from the investment of their time otherwise there is no incentive to deliver these more sustained forms of output.

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?

12 months is appropriate

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).

See previous answers.

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?

12 months is appropriate

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).

See previous answers.

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).

As mentioned, Research monographs typically require significant effort beyond the research funded in most UKRI projects, hence the author should have some opportunity to benefit from the investment of their time otherwise there is no incentive to deliver these more sustained forms of output. No embargo would suggest that UKRO should provide funding for this form of activity that is not usual in EPSRC grants.

Please note that funding is further considered under paragraph 110 (question 53).

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

Strongly agree

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

Low cost and in keeping with many existing research practices.

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?

No opinion.

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

Please see paragraphs 29-31 before answering this question.

Q43. To what extent do you agree or disagree with CC BY-ND being the minimum licencing requirement for monographs, book chapters and edited collections in-scope of UKRI's proposed OA policy? Strongly agree / Agree / Neither agree nor disagree / Disagree / Don't know / No opinion.

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

Q44. To what extent do you agree or disagree that UKRI's OA policy should include an exception for in-scope monographs, book chapters and edited collections requiring significant reuse of third-party materials? Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know

No opinion.

Please explain your view (1,350 characters maximum, approximately 200 words).
Questions 45-46 concern how 'significant reuse' may be defined.

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

Strongly disagree.

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

All of these requirements illustrate the significant overheads that will be imposed on all researchers covered by this OA policy – in determining the exact copyright status of all such material within a publication. In the past, publishers would assist with such issues but under OA agreements, it seems increasingly the case that the author indemnifies the publisher and assumes all responsibility for such issues which also seem to give rise to increasing litigation. The proposals here seem to entirely neglect the liabilities and other issues that academics are often very poorly placed to judge during the course of OA publication.

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?

No opinion.

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

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 opinion.

If yes, please expand (2,650 characters maximum, approximately 400 words). Please refer to paragraphs 29-31 before answering this question.

Q49. Which statement best reflects your views on whether UKRI's OA policy should require copyright and/or rights retention for in-scope monographs, book chapters and edited collections?

- a) UKRI should require an author or their institution to retain copyright and not exclusively transfer this to a publisher

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.

In OA models where the author or their institution is paying for publication, it seems invidious to also assume they will sign over exclusive copyright.

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

1. The policy should apply later than 1 January 2024

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).

Consistent with all previous answers we would strongly argue the need for sufficient evidence to be obtained to support any OA interventions that may increase the burdens on academic research at a time of growing international competition and significant uncertainty across the UK academic sectors.

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).

It is essential that the implications and expected obligations under any revision to OA policy and explained in a clear and consistent manner and that they do not significant detract from the time available to conduct primary research.

The UK HE funding bodies recognise that due notice will be needed prior to implementation of the OA policy for the REF-after-REF 2021, which will be consulted on in detail after UKRI's OA policy is announced (see paragraphs 29-31). It is therefore anticipated that the OA policy for the REF-after-REF 2021 will not come into effect on 1 January 2021 (that is, at the beginning of the publication period for the REF-after-REF 2021 exercise).

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?

No opinion.

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

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)

Some consideration must be paid to the overheads associated with these OA proposals – in particular those related to monographs and also to the impact on Early Career Researchers, given the already high workloads that many face.

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?

No opinion.

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

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?

No opinion.

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

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).

UK Computing Science has a world-leading reputation in the areas of information retrieval and data science, the topics summarised in this question are not easily addressed within existing standards especially given the rapid pace of technical innovation and of the provision of commercial research search tools. This community is well-placed to provide more constructive guidance on strategies for supporting access to these OA resources.

Q57. Could the manual reporting process currently used for UKRI OA block grants be improved?

No

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

Many members of the research community have doubts about the side-effects associated with the existing and the proposed OA policy. If sanctions are to be taken then there needs to

be a far more objective analysis of the wider benefits from the particular mechanisms that are chosen.

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?** No

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

Many members of the research community have doubts about the side-effects associated with the existing and the proposed OA policy. If sanctions are to be taken then there needs to be a far more objective analysis of the wider benefits from the particular mechanisms that are chosen. There are obvious market failings in the existing publishing industry that need to be addressed before there is sufficient confidence to take sanctions against individuals or institutions. The existing REF provisions have a more persuasive force than many of the measures outlines in the existing proposals.

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

Disagree

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

Covered in answers to Q57 and Q58.

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

No

Please expand (2,650 characters maximum, approximately 400 words).

We are worried by the lack of detailed empirical evidence in support of the proposed changes – especially as they relate to negate side-effects and to market weaknesses that lead to significantly increased costs and a focus on understanding copyright issue/publication laws rather than on primary research.

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 (2,650 characters maximum, approximately 400 words).

Early career researchers will have active disincentives to invest time in the development of academic monographs. Researchers in larger groups will have more support leading to further side-effects that may counter-act the present government's focus on regional diversification of the UK research base.

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 LMICs?

No opinion.

If yes, please expand, referencing specific policy elements and including any comments on how UKRI could address any issues identified (2,650 characters maximum, approximately 400 words).

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 (2,650 characters maximum, approximately 400 words).

Conduct a study to assess and quantify the impact of different OA policies on the UK research base – especially those areas of engagement with industry and high-impact research projects using, for example, commercial data.

Q64. Are there any other supporting actions (not identified in previous answers) that you think UKRI could undertake to incentivise OA?

No opinion.

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

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?

No opinion.

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

Q66. Do you have any further comments relating to UKRI's proposed OA policy?

No.

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

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

Yes

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

Strong alignment is essential – especially where OA policies might negatively affect other areas of the future REF addressed in previous responses.

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

Yes

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

One of the concerns over existing OA policies is that they have never been subject to a formal CBA – the area is characterised by subjective arguments and introspection. A common theme throughout this response has been the need for UKRI to develop a sufficient evidence base to persuade the research community of the need for these proposals to support UK science and engineering – beyond those with an interest in publication policy.