

Developing strategies to ensure compliance with funders' open access policies

Funding bodies for higher education institutions (HEIs) in the United Kingdom (UK) have recently introduced policies with a strong focus on open access (OA). The Research Councils UK (RCUK) 'Policy on Open Access' mandates OA compliance through either hybrid or pure OA journals, or through self-archiving. The Higher Education Funding Council for England (HEFCE) has recently introduced a self-archiving policy for journal articles and conference proceedings. Both policies have necessitated new practices among UK HEIs that relate to advocacy, adoption of internal OA policies, managing article processing charges (APCs), and monitoring and reporting compliance with them. This case study details the path Royal Holloway University of London, has taken to navigate its way through these recent changes and challenges.

Background: UK funders' open access policies

Over the past two years, the UK has been experiencing a growing interest in open access (OA), with its government and funding bodies taking an active stance to improve free-of-cost access to scholarly literature. The controversial 'Finch' report¹ was the first official government document to recognize the importance of openness to publicly funded research and was followed immediately by a policy on OA from RCUK². Only a year later, in March 2014, HEFCE introduced its own 'Policy for open access in the post-2014 Research Excellence Framework'³, which is expected to cause major changes in the landscape of the future Research Excellence Framework (REF), an exercise that assesses the research quality of UK HEIs.

There are several similarities between the policies. Firstly, both policies require open access to journal articles and conference proceedings only, recognizing that this practice is already widely accepted and applied, both by researchers and publishers. Secondly, when OA access is provided via the green route, i.e. self-archiving in a repository, both policies allow a maximum 12-month embargo period for science, technology, engineering and mathematics (STEM) and a maximum 24-month embargo period for arts, humanities and social sciences (AHSS) subjects. Finally, both policies require the adoption of a more liberal licence than the traditional 'all rights reserved', with the minimum requirement being that authors should retain the right to self-archive their outputs in a repository.

The two main differences between the policies are that, firstly, the RCUK OA policy is a preferentially-gold policy, which means that compliance is preferred via paid-for publication in a journal. To support the gold route to OA, RCUK has distributed a block grant to most UK HEIs to cover the article processing charges (APCs) related to this type of publishing. Unlike RCUK, the HEFCE policy is a green policy, thus, compliance is possible only when the output is self-archived in a repository, either institutional or subject. The second, and probably most important difference between the two policies, is that the RCUK policy applies only to RCUK-funded researchers in any UK HEI, while the HEFCE OA policy applies to all researchers in UK HEIs. Therefore, it is clear that the HEFCE policy will have a greater impact both on shifting the researchers' publishing



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33 habits and on the adoption of new strategies and implementation of new practices at the administrative level in all UK HEIs.

Institutional processes to comply with UK funders' OA policies

Currently, the vast majority of UK HEIs are busy preparing their workflows to successfully respond to these challenges. At Royal Holloway, there are several institutional policies in place^{4,5,6} to encourage deposit of OA publications into the repository. Our Library's Open Access Team devotes a considerable amount of time to advocacy, emphasizing the general importance of OA, and also to the specifications of each of the two OA policies. The focus is on disseminating these messages as widely as possible in two ways: through our Library Research Support website⁷, which we update constantly, and through face-to-face meetings with researchers in departmental and faculty meetings. In addition, we have created postcards, circulated news in staff and faculty newsletters and sent targeted e-mails to all interested parties. Last year, we introduced both one-to-one and group training on OA, with varied topics depending on the needs of each individual or group. For example, we provided hands-on training on how to self-archive an output into our information management system, Pure, or ran lecture-style sessions on the details of the funders' OA policies.

'... we provided hands-on training on how to self-archive '

In this constantly changing environment, the importance of creating strong communication channels between the various stakeholders in the institution was more prominent than ever before. As a result, we are collaborating closely with the Research and Enterprise (R&E) office to exchange opinions, offer and receive advice, and define common future research support targets. We have developed a close relationship with the institution's REF Working Group and are reporting on a regular basis to the College's Research Committee.

Workflow for administering APCs

The APC process is laid out in the College's 'Policy for the Administration of the RCUK Block Grant for Open Access to Fund Article Processing Charges'⁸. The policy indicates that authors should apply for funding before they submit their output for publication, as there is no guarantee that funding will be available at the time of the article's acceptance for publication. When an application is processed, the requested amount is secured and it can be released again if the author informs us that the article was rejected. We also ask researchers to create a record for their publication in Pure, where they are responsible, in the first instance, for entering the metadata and the author's accepted and final peer-reviewed manuscript.

Researchers can apply for funding through a form on our website⁹, which afterwards is processed by the Open Access Team in the Library. APC funding requests are managed via spreadsheet, where details such as the name and contact details of the principal investigator (PI), department, respective RCUK grant number, provisional title of the output, journal or conference proceeding title, publisher and the amount of the requested APC are recorded. All APC applications are also cross-checked by the R&E office to ensure that no APC funding was allocated in the original grant application. When the output has been accepted for publication and the Library receives the invoice, we process the payment through our Finance department. In addition, during 2013/2014, the Library participated in the Jisc APC Pilot project¹⁰.

Challenges in monitoring compliance

There are several challenges to be faced when advocating for funders' OA policies and monitoring compliance with these policies.

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Published outputs

In terms of compliance with the RCUK OA policy, the main challenge is to identify all outputs that have resulted from RCUK funding and are affiliated with our institution. Whilst the Library is aware of the gold OA publications due to the APC funding being administered centrally, the green OA publications are more difficult to discover. Although there is functionality in Pure to record the relations between the outputs and their respective funding, we rely on PIs to create these relations as they are best placed to know that information. Hence, if authors have not added this information to Pure, or, conversely, have created relations in the system without the funder being acknowledged in the publication, the Library is not in a position to have accurate data on the RCUK-funded publications. Monitoring compliance with the policy is also difficult due to the many criteria that an output must meet to be fully compliant.

Having had the practical experience of implementing the RCUK policy, we foresee that the implementation of the HEFCE OA policy will shift publication habits relating to the timing of the output's deposit into a repository. According to the policy, the output 'must have been deposited as soon after the point of acceptance as possible, and no later than three months after this date (as given in the acceptance letter or e-mail from the publication to the author)¹¹. This requirement presents three challenges. First, the three-month period for self-archiving might be seen as too short for busy authors, while those who are not well informed on the policy may miss the submission deadline. Second, compliance with the policy is not possible retrospectively, thus all outputs must be deposited into a repository immediately upon acceptance for publication and the decision regarding their inclusion or exclusion from the REF assessment will be made at a later stage. Third, unless also the corresponding author on the output(s), the researcher might not be aware of the acceptance date. (There is, however, a policy exception for such cases.) For output validation purposes, we request authors to self-archive into the repository both the Author's Accepted Manuscript and the publisher's acceptance letter.

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Licences

Along with the free-of-charge access to content, an open licence is the basis of the full 'libre' type of OA; this type of licence allows users not only to read, but also to reuse and manipulate the outputs further. The adoption of Creative Commons¹² licences is embedded in the requirements of both OA policies. Currently, a challenge that academics face is choosing the right licence to help them comply with the specific funder's policy. Whilst HEFCE is not specific on the type of licence as long as it allows the author(s) to self-archive into a repository, the RCUK OA policy requires a Creative Commons Attribution (CC BY) licence for gold OA outputs, whereas for green OA outputs the Creative Commons Non-Commercial (CC BY-NC) licence is preferred. Thus, we find that helping authors understand the requirements of each policy and choose the right licence for the outputs is an important part of OA advocacy work.

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Embargoes

Both policies follow the same embargo periods, permitting an embargo of a maximum 12 months for STEM and 24 months for AHSS. During the first year of the implementation of the RCUK OA policy, though, we saw a discrepancy between the embargo periods permitted by the policy and allowed by publishers; this was more common in the AHSS journals, where publisher embargo periods exceeded the ones set by the policy. We managed the issue either by contacting the publisher to explain the funder's requirements and negotiating a shorter embargo period on behalf of the author(s), or by suggesting to the author(s) alternative journal titles that would comply with the policy. Regarding the latter issue, we found that academics were willing to discuss alternative options with us and to accept our suggestions.

35 As for communication with the publishers, some of them never responded to our query, and some allowed the shorter embargo period, while others did not.

A few Royal Holloway researchers have already expressed similar concerns relating to the HEFCE OA policy, and we therefore regularly report to HEFCE the journal titles that do not comply with the embargo periods specified in their OA policy. We hope that this information will complement HEFCE's earlier analysis of the REF submission and will help them to take a view at a later point about the possibility of further analysis.

Conclusion

Royal Holloway is a strong supporter of open access and welcomes both the RCUK and the HEFCE OA policies. Introduction of the policies has meant that the College, along with other UK HEIs, has had to reassess and redesign the processes in place to manage and advocate for open access. For our Open Access Team, it has also been a great opportunity to foster closer working relationships with other stakeholders across the College. We recognize that there are challenges yet to resolve locally and at a national level, and hope that the funders' policies can be further realigned to reduce the confusion among academics.

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Most importantly, the release of the RCUK and in particular the HEFCE OA policies has reinforced the change towards OA in UK HEIs and in the international publishing landscape, with OA considerations becoming an important factor for researchers when planning dissemination of their research. Both policies promote free-of-charge dissemination and reuse of research results, with the ultimate aim of making research that is funded by the taxpayers' money freely available to anybody and allowing reuse of the content for faster and more cost-effective scientific development.

Competing interests: The authors have declared no competing interests.

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To cite this article:

Pontika, N and Rozenberga, D, Developing strategies to ensure compliance with funders' open access policies, *Insights*, 2015, 28(1), 32-36; DOI: <http://dx.doi.org/10.1629/uksg.168>

Published by UKSG and Ubiquity Press on 5 March 2015