The British Library's Response to the UKRI Open Access Review Consultation

The British Library holds Independent Research Organisation status with [UK Research & Innovation](). This has enabled us to develop an AHRC-funded Collaborative Doctoral Partnerships Programme and to work with various partners to attract joint funding for major [research projects](). In addition to these UKRI-funded projects, the British Library seeks to support research across all disciplines. The British Library's [open access policy]() recognises the wide range of social, economic and cultural impacts that result from open access to the research conducted in the UK. This echoes our mission to make our intellectual heritage accessible to everyone, for research, inspiration and enjoyment.

We support the aim of [UKRI's proposed open access policy]() to ensure that the published outputs of publicly funded research are made widely and freely accessible to all from 2022, with no delay and with liberal allowances for reuse. The importance of enabling access is evident in publishers' responses to times of crisis or public emergency, with many seeking to enable at least temporary access to relevant research articles. We hope to see a more definite move to immediate open access as a result of the proposed policy and the policies being implemented concurrently by other [cOAlition S]() funders. Although we support the overarching principles of UKRI's proposed policy, there are a few areas which we would argue require clarification, and a number of areas which require redress or added emphasis.

Open Access Journals with No Cost to the Author

As a route which is free to all authors and allows them to continue to publish in the journals they wish to publish in, we support green open access and recognise the important role it continues to play in a transition to 100% open access. Repositories are generally well-indexed and a variety of discovery tools (including Unpaywall and Open Access Button) and aggregators (including Core and BASE) means that full-text is readily accessible to readers. However, the primary disadvantage of this route to open access is that manuscripts are generally embargoed for anywhere between 6-24 months after publication. This being the case we strongly support a policy of no embargo for green open access. It is worth recognising that some publishers already allow the deposit and release of manuscripts prior to publication and have [noted little impact on income]().

A primary concern of the proposed policy is the allowance for 'transformative' or 'transitional' agreements, and the possible allowance of paying for APCs issued by hybrid journals, with no indication of a date by which these should be phased out. In this sense, UKRI's stance diverts from the overarching [Plan S principles](). Early indications are that publishers are choosing to offer transformative agreements over other options like developing compliant green OA policies or a definite conversion of journals to full open access. This, we predict, will disadvantage authors in the UK and elsewhere who are not based in organisations with transformative deals in place. The complexity of transformative agreements may also make it difficult for researchers to identify whether or not a journal is compliant with UKRI policy. We would encourage UKRI to work with publishers and with organisations such as Jisc Collections to ensure publishers offer compliant green routes to open access for all authors, regardless of whether or not subscription deals are in place.

UKRI should also consider making funds available to support the development of non-APC-based publishing models (for both new and existing journals). We also strongly encourage UKRI to ensure all organisations in receipt of grant funding receive some funds to help support open access publishing. The current block grant cut-off of £10,000 means that organisations publishing a relatively smaller amount of research funded by UKRI are less enabled to offer their authors a range of publishing options or to invest in cost-effective infrastructure projects which benefit their researchers.

Open Access to Monographs

We are pleased to see a strong policy movement towards open access for monographs, with a start date of 2024 allowing time for publishers and researchers to adapt. It seems unlikely that an author would not be able to identify an appropriate publisher given the growing range of open access options for

monographs. Yet it should be emphasised that the BPC model may not work well at scale given the substantial charges issued by many publishers. As with journal articles, UKRI should discourage the development of an open access ecosystem which has tiers of entry where some UKRI researchers can easily obtain immediate open access while others have limited routes in. An emphasis should therefore be placed on routes which are free for the author, including compliant green OA policies. UKRI should also consider a direct investment in open access book publishing initiatives it considers to be of current interest or potential future interest to UKRI researchers. The results of the COPIM project should indicate potential opportunities.

Where a repository is used for book manuscripts, access to the accepted version should be sufficient for researchers who do not have access by other means, given that even for books the accepted manuscript should be almost identical in content to the version of record. For some authors, it may be problematic to use a repository where extensive amounts of third-party content is used. However, given effective copyright training (e.g. in the use of the 'for criticism and review' copyright exception), and the allowance for some manuscript content to be redacted, this should not be an insurmountable barrier.

One area which will need further attention is the definition of a 'trade book', as this could inadvertently place many books out-of-scope of the policy. A scholarly publishing programme may well identify some monographs as having wider appeal and thus define them as trade books while the primary audience remains a scholarly one. In many cases, the wider market for these books will remain modest compared to true trade books or textbooks. We would argue that the emphasis should be on enabling access - for free - to a wider audience, rather than using the potential for enhanced sales to be used as a reason to exempt a book from the open access policy.

Retaining Copyright, Maximising Reuse

Publicly funded research should be made freely available with terms that permit maximum reuse to enable the emergence of various academic, social, economic and cultural benefits. There is precedence for this in some US institutions, and on a national level in France and the Netherlands where authors by law retain the right to release papers after 6 months (12 months for AHSS papers in France) if they acknowledge public funds. Requiring no embargo is a logical next step. It should be noted that an updated version of the UK-SCL would allow organisations to easily meet the terms of the UKRI policy.

The proposed UKRI policy affords the possibility of the CC BY-ND license as a valid exception, perhaps in response to some concerns about more liberal licenses opening up the possibility of plagiarism and for authors' views to be misappropriated. With CC BY-ND being the minimum valid license for monographs, we predict many commercial publishers would default to this license, which could prevent some of the more useful derivative uses such as text mining and the production and distribution of translated works. We believe the -ND component should not be necessary in most cases since copyright law, which the Creative Commons scheme builds upon, already protects authors from pernicious reuse.

Preprints, Data and Out-of-Scope Outputs

The growth of post-publication peer review alongside a range of preprint servers indicates that there is an increasing acceptance that preprint material is valuable. The problem with proposing to mandate the release of preprints only in the case of public emergency is that it implies that the release of preprints should be an exceptional occurrence. Of course, it is vital that relevant research is released in the case of public emergency but UKRI may wish to reword this policy so that it encourages a general move towards the release of preprints. The release of research in the case of emergency should also apply to data and underpinning materials, the importance of which has already been demonstrated by the data sharing going on around the COVID-19 pandemic.

Although a broader open research policy may require a separate review and consultation process, we would like to see a stronger message about the value of open data, and other areas of open research, in the near future. We would argue that data, code, software and other underlying research outputs should be at least properly cited using a persistent identifier.

Technical Requirements and Infrastructure

Repositories have played a vital role in the transition towards open access and it is pleasing to see that the proposed policy emphasises their continued importance. The policy contains a range of technical requirements for publishers and repositories, some of which are essential in aiding the discovery of full-text and the interoperability of metadata. However, some introduce barriers to entry for less well resourced publishers or repositories. Support (financial and otherwise) for using registration services, including Crossref and DataCite, may be required. The standards set out for open citations by I4OC may be particularly difficult for some journals to meet unless support is provided or tools developed which makes easier or automates the process of registering metadata. Another aspect that requires further attention across repositories and publishers is Digital Accessibility, so that everyone can access and make use of research outputs. Further guidance and support in this area would be welcome.

Initiatives aimed at improving the open infrastructure for persistent identifiers will be particularly vital to deliver the proposed policy, so that outputs can be efficiently accessed regardless of the version of publication made open access. We would argue that DOIs should be supported over other identifiers and a definition of 'persistent identifier' should be adopted in line with that agreed by the [European Open Science Cloud](). Identifiers such as author IDs, affiliation IDs and grant IDs will also ensure interoperability and many repository platforms can already handle these. However, for repositories, these IDs should be recommended but not mandatory given that it may be impossible for repository administrators to find this information unless it is provided by authors or publishers.

Affordable and scalable preservation initiatives will also be important to invest in to ensure access to outputs in the long-term. The proposed policy focuses on commercially-driven solutions, which again poses issues for smaller-scale publishing operations as well as independent journals. It should be considered how other mechanisms, like UK Legal Deposit processes and preservation layers for repositories, may contribute to the long-term preservation of outputs.

Given that smaller and scholar-led publishers may struggle to meet some of the technical criteria, investing in the infrastructure which enables these publishers to participate would be welcome, especially in disciplinary areas like the humanities which are lacking in funding. The [Open Library of Humanities]() provides evidence that these initiatives can be successful in the longer-term and can reach a point of financial stability. Investment in repository infrastructure projects which address a gap in current provision may also be considered. For instance, the British Library's [shared repository]() offers the opportunity for independent research organisations - many of which do not have repository provision - to make their outputs open access. UKRI may consider implementing eligibility criteria similar to those implemented by the [French National Open Science Fund](). This directs funding to initiatives which: are financially transparent; are committed to FAIR principles and open metadata; have robust and transparent procedures for selecting advisory boards; and participate in the open source community.

Final Remarks

The British Library reiterates its support for the aims of Plan S, which the proposed UKRI policy draws upon. We recognise the hard work researchers, librarians, publishers, the open source community and others have made to date, and we do not underestimate the continued effort required to reach the goal of 100% open access. In particular, we note that a more global shift in policy and the behaviour of researchers is needed to effect change, given that UK research amounts to [7% of the global total](). Extending the proposed policy to the UK's Research Excellence Framework would greatly increase the number of researchers this policy would apply to, and in turn the incentives for all stakeholders to adapt.

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