



# Full List of Consultation Questions

## Background Information Questions

To enable UK Research and Innovation (UKRI) to effectively analyse responses from different stakeholder groups, respondents are requested to provide some background information about themselves. Questions marked with an asterisk (\*) are mandatory. In the online response for some questions, including mandatory questions, will only appear for specific types of respondent.

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

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

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

- a. Yourself as an individual
- b. An organisation**
- c. Other (including part of an organisation, department, informal group) – please specify type:

**IV. Please specify the name of your organisation. \* **British Society of Criminology (BSC)****

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

**VI. Please specify which country you, your organisation or your group are based 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**
- f. Not applicable

If you, your organisation or your group is responding on behalf of a specific discipline within an area indicated above, please describe it using a maximum of five key words separated by spaces: **Criminology**

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

- a. Researcher(s)
- b. Publisher (including employees and representative bodies)
- c. Learned society or academy with an in-house publishing arm (including employees)
- d. **Learned society or academy which outsources publishing to a third party (including employees)**
- e. Learned society or academy which does not publish (including employees)
- f. Providers of scholarly communication infrastructure or services (including employees and representative bodies)
- g. Library or research management (including departments, employees and representative bodies)
- h. Higher education institute (HEI) (including departments, employees and representative bodies)
- i. Business that conducts, uses or publishes research and/or innovation (including employees and representative bodies)
- j. Research and/or innovation funder (including employees and representative bodies)
- k. Member(s) of the public
- l. Other research performing organisation (including departments, employees and representative bodies) - please specify:
- m. Other user or producer of research outputs - please specify:
- n. Other - please specify:

**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.**



- a. UKRI (including AHRC, BBSRC, ESRC, EPSRC, Innovate UK, MRC, NERC, Research England, STFC, as well as predecessor bodies, HEFCE and RCUK)
- b. UK Space Agency
- c. Department for International Development (DFID) and subsidiary bodies
- d. Department of Health and Social Care (DHSC) including National Institute for Health Research (NIHR) and other subsidiary bodies
- e. Department for Environment, Food and Rural Affairs (DEFRA) and subsidiary bodies

If you or members of your group have applied or been part of an application for grant funding from other UK government departments or their subsidiary bodies, please specify the awarding body:

**X. If responding on behalf of a company, please provide your Company Registration Number (if known):** 3515512

**XI. If responding on behalf of a charity, please provide your Charity Registration Number (if known):** 1073154.

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

- a.  $\geq 250$  (large business)
- b.  $< 250$  (medium-sized business)
- c.  $< 50$  (small business)
- d.  $< 10$  (micro business)

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

- a. Postgraduate researcher
- b. Post-doctoral researcher
- c. Research leader (responsible for intellectual leadership and overall management of research projects)
- d. Other (including retired researcher, citizen researcher) – please specify:

Retired researcher, citizen researcher, practitioner researcher, independent researcher



## 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)?** Strongly agree / Agree / **Neither agree nor disagree** / Disagree / Strongly disagree / Don't know / No opinion.

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

It is clear what articles UKRI wish to make completely open access: it is less clear what consideration has been given to the impact on other articles not funded by UKRI but whose previous home - the hybrid journal - may be impacted by and so 'in scope' of the policy on publicly-funded research articles not being published in them

**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?** Yes / No / Don't know / No opinion.

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

Please see paragraphs 29-31 of the consultation document 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 of the consultation document?** Yes / No / Don't know / No opinion.

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

The BSC believes that UKRI should consider hybrid journals as a venue. This is not only because hybrid journals form an important part of the rich publishing scene currently under threat, but criminology research itself is often hybrid – a mixture of the funded and the later extrapolated – and articles too can be hybrid drawing on work that has been publicly-funded but also that that was not. A recent survey among our members suggests that only 20% of criminologists had their work wholly or mostly publicly-funded with 40% not funded by a public body at all and some of the rest had substantially built on what was originally funded work in later publications sometimes decades later – would these sorts of articles be subject to UKRI OA requirements years after the funding had been spent? See below qu 24

**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 / No / Don't know / No opinion.



**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.)

The BSC is a membership body operating as a learned society in the field of criminology. We do not receive public funding – except in, as a charity, being exempt from paying tax on our income – and are non-profit making with all funds being ploughed back into our educational aim.

We believe UKRI thinking is still under-developed in terms of exploring the mechanisms by which the funders intend to replicate the quality of existing publications in its open access models and we believe it has a responsibility to do more to understand the structure and imperatives of the publishing industry and academic community and model predictable outcomes and unintended consequences and field initiatives to address the emerging issues. As it stands, it financialises many of the relationships involved and thus reduces the complex interplay of motivation, working procedures and business models currently in play.

The BSC involvement in journal publishing cannot be reduced to finance; its investment is to shape and encourage our discipline, to ensure a diversity and quality of avenues in which criminologists can publish. The BSC partly owns one journal with a publisher and invests all of its royalty income into supporting a second well-regarded generic criminology journal. The academic publishing endeavour is built on the free goodwill of much of the workforce from the reviewers, editorial board and editors who give up their time in the interests of their research communities ensuring quality articles are published, yes, but also invisibly encouraging and improving the work of those new to the field in the form of feedback and reviewer comments. If UKRI is to swap the money flow from the reader to the author, are they also to recompense this army of workers? In the current model: this work is pro bono – many hours of unpaid work, completed at weekends and in the evenings – that a financialised model is failing to address. Academics welcome the plurality and plethora of current publication methods giving researchers, both publicly-funded and not publicly-funded, academic freedom to choose where to disseminate research findings. Some of our members feel that dividing research into that well-funded by the state and that reliant on the remaining subscription will adversely skew the publishing and citation of research in that the power to accept/reject will be concentrated to the few to the detriment of opposing/radical views.

We also feel that the timing of this initiative is now a major factor see qu 17

**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? Yes / No / Don't know / No opinion.**

**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.

It does not seem necessary to duplicate effort by having to deposit and publish in an OA journal. Few if any institutional repositories offer the same accessibility for readers with, for example, visual impairments, as do publishers meaning that accessibility for Green Open Access versions is usually sub-optimal, with corresponding impacts on equality and inclusion. This will undoubtedly change due to the newly compulsory WCAG AA standard accessibility regulations but the publishers are already achieving these standards so the move to repositories in general seems a backward step as regards accessibility.

**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 / No / Don't know / No opinion.**

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

Please see paragraphs 29-31 of the consultation document before answering this question.

**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 agree / Agree / Neither Agree nor disagree / Disagree / Strongly disagree / Don't Know / No opinion.**

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

**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. Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.**

**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 agree there should be CC BY-ND allowed within the guidelines. In our community there are concerns about research conclusions potentially being stripped from their contexts or theoretical bases and thus open to mis-interpretation or mis-application. Typically, context settings provide important framings for both the research questions and the methodologies used. This is especially important where topics are of a sensitive nature.



We disagree with the proposed way for allowing this. Case-by-case exceptions would be administratively heavy, slow and open to challenge. The decision as to whether or not to apply a CC BY or CC BY-ND license should be at any authors' discretion.

**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? Yes / No / Don't know / No opinion.**

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

**Q10. Are there other considerations UKRI should take into account regarding licensing requirements for research articles in-scope of its proposed OA policy? Yes / No / Don't know / No opinion.**

**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 / No / Don't know / No opinion.**

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

Please see paragraphs 29-31 of the consultation document before answering this question.

**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?**

- 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).

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.

**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
- 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 CC0 public domain dedication; the metadata standard must adhere to international best practice such as the Crossref schema and 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. long-term preservation must be supported via a robust preservation programme such as CLOCKSS, Portico or an equivalent
- e. openly accessible data on citations must be made available according to the standards set out by the Initiative for Open Citations (I4OC)
- f. self-archiving policies must be registered in the SHERPA RoMEO database that underpins SHERPA/FACT
- g. unique PIDs for research management information must be used and must include the use of ORCID to identify all authors and contributors

**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** (700 characters maximum, approximately 100 words, per standard).

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

**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** (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 of the consultation document), are there any technical standards or best practices that UKRI should consider requiring?** Yes / No / Don't know / 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?**

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

The coronavirus lockdown has impacted heavily on all parties concerned with this new policy from the universities to the publishers to the readers and researchers. Specifically, it has impacted on the finances of many learned societies. one of whose main income streams is large events such as conferences, all of which have been cancelled or transferred to free online alternatives. To have the uncertainties of the newly shaped journals on top of this is likely to be the end for some. We feel this imitative should be delayed until at least 2023 when the government itself has said the economy might be in recovery.

**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.

**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 / No / Don't Know / No opinion.

**Please expand, providing evidence to support your view, where possible** (2,000 characters maximum, approximately 300 words).

The BSC part owns one journal central to the discipline and sponsors, with its share of the royalty income from this first journal, another highly-regarded criminology journal. Together these journals, both currently hybrid, represent the best in generalist criminology journals. Given that the proposals would mean the journals could either only accept funded or only accept non funded (in that non funded researchers would not be able to pay author fees and funded authors would not be able to publish in subscription) this would divide our market. As the author pay fees would all come from a monopoly source (state funding), no figures we have yet seen suggests this will increase revenue.

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

**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 / No / Don't know / No opinion.**

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

**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 / No / Don't know / No opinion.**

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

**Q23. Do you think there are steps publishers and/or other stakeholders could take to improve the transparency of publication charges? Yes / No / Don't know / No opinion.**

**Please expand. Views are also welcome on how greater transparency might inform future funding levels** (2,000 characters maximum, approximately 300 words).

The BSC believes strongly in transparency. But in the current climate it is difficult to see why publishers, who are private commercial organisations in the main, are being picked on in this way. Are all commercial organisations involved in public procurement asked to provide this information publicly? Do we get this transparency in our public sector charges – see below.

**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:**

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

The BSC believes that UKRI should consider hybrid journals as a venue. This is not only because hybrid journals form an important part of the rich publishing scene currently under threat, but criminology research itself is often hybrid – a mixture of the funded and the later extrapolated – and articles too can be hybrid drawing on work that has been publicly-



funded but also that that was not. A recent survey among our members suggests that only 20% of criminologists had their work wholly or mostly publicly-funded with 40% not funded by a public body at all and some of the rest has been substantially built on from paid for work. This leaves us in something of a dilemma in that if UKRI insists that hybrid journals are unacceptable for its in scope articles then either our journal becomes all publicly funded (thus giving the state a monopoly on published work) or they remain officially hybrid but in effect - since publicly funded research cannot find a home there - entirely subscription. Whether it can survive at all is moot – it will certainly change its shape.

**Q25. To what extent do you agree or disagree that UKRI OA funds should be permitted to support OA costs that support institutional repositories?** Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.

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

**Q26. To help accelerate policy adoption, should UKRI introduce any other restrictions on how UKRI OA funds can be used?** Yes / No / Don't know / No opinion.

**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 / No / Don't know / No opinion.

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

**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 / No / Don't know / No opinion.

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

**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 / No / Don't know / No opinion.



**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).

We do not believe that Open Access proposals cover sufficient accessibility criteria. The commitment seems to centre on financial imperatives and the rather narrow accessibility aim of ensuring academic articles are available free of charge to those who might want to read them. We do not believe that many practitioners and members of the public have the time or necessary academic training to want to access the material in a format intended for fellow academics. Therefore, we believe that UKRI should commit to ensuring that funding is also committed to make the material not just physically accessible but accessible in the wider sense of being in a format likely to be read and promulgated by the public at large. This could additionally mean jointly funding a publicly-usable information management system and database with a sophisticated search engine mechanism for interested parties to locate topic areas rather than specific articles in specific journals – the discoverability factor.

**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.

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

**Q31. Should UKRI require preprints to be made OA where there is a significant benefit with regard to public emergencies?** Yes / No / Don't know / No opinion.

**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.)

**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.

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



## 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 of the consultation document) are clear?** Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.

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

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

- a. Academic monographs Yes / No / Don't know / No opinion
- b. Book chapters Yes / No / Don't know / No opinion
- c. Edited collections Yes / No / Don't know / No opinion

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

**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 / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.

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

**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 / No / Don't know / No opinion.

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

Please see paragraphs 29-31 of the consultation document 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. 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).

**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?**

- 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).

**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?**

- 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).



**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 / No.**

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

Please note that funding is further considered under paragraph 110 of the consultation document (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 / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.**

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

**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 / No / Don't know / No opinion.**

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

Please see paragraphs 29-31 of the consultation document 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 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).

**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 / No / Don't know / 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?** Yes / 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?** Yes / No / Don't know / No opinion.

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

Please refer to paragraphs 29-31 of the consultation document 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
- 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.

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

- 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).

**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 might be helpful?**  
Yes/ No.

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

**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 / No / Don't know / 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 / No.**

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

**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 / No / Don't know / 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? Yes / No / Don't know / 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 / No / Don't know / No opinion.**

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



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

**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 / No / Don't know / No opinion.

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

**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)?** Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.

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

**It is not clear how compliance can be monitored comprehensively and therefore enforcement would be ad hoc and potentially unfair, or perceived to be, if directed disproportionately at one group of researchers. Unless a financial sanction is imposed at first breach, there is no incentive for funded researchers to comply initially as they stand a good chance in a risk assessment of not getting caught and, if caught, would be warned before sanctions would apply.**



## 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 / No / Don't know / No opinion.**

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

As a charity whose charitable aim is to increase public education about criminology, we support the principles of open access for publicly-funded research, particularly to the wider public and to those researchers without the institutional backing which funds access to the literature including discipline practitioners, who form some of our membership.

We welcome therefore UKRI's plans to encourage open access by funding that access.

**Q61. Do you foresee UKRI's proposed OA policy causing and/or contributing to any disadvantages or inequalities? Yes / No / Don't know / 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).

The policy may serve to increase inequalities that already exist in relation to access to OA funding within institutions for scholars in the social sciences and for early career researchers.

**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. / No / Don't know / 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).

Scholars from LMICs benefit from the existence of international hybrid journals, which offer a wide exposure. Hybrids are an accessible route to publication and profile in a setting where author payments are generally not available. The continuing financial sustainability of hybrid journals is important in this regard

**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 / No / Don't know / No opinion.**



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).

**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 (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? Yes / No / Don't know / No opinion.**

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

## Section E: Further Comments

**Q66. Do you have any further comments relating to UKRI's proposed OA policy? Yes / If yes, please expand (2,650 characters maximum, approximately 400 words.)**

*The BSC believes in the principles of open access but believes UKRI's policy focusing on one small area of public spending does not go far enough. We believe the UK government should lead the way on open access for information about public spending and publicly-funded work of all sorts by making immediately public the vast array of state documentation including but not limited to:*

*all reports leading to policy change,  
all funding agreements/ contracts relating to public money,  
all consultation response reports,  
all minutes of meetings held by public bodies including UKRI's in deciding this policy.  
all lists of staff employed by public bodies and their roles*

*Exemptions could apply only in exceptional circumstance – and would be time limited. Additionally, Freedom of Information requests by the public to public services should all be reviewed as to their reasonableness (as to time needed to gather) not by the body to whom they are addressed. That could be a better-funded Information Commissioner or some other body. The current system is not working.*

*In short, transparency and accessibility should apply to much wider areas of public spending.*

**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 / No.**

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

**Q68. Do you have any further thoughts and/or case studies on costs and/or benefits of OA? Yes / No.**

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