

Imperial College

London

UKRI Open Access Policy Consultation Imperial College London Response

This document summarises the Imperial College London response to UKRI's Open Access Review consultation¹

In addition to signposting the full UKRI consultation documentation and list of questions, consultation on the Imperial College response to the UKRI OA review has been undertaken as follows

- Presentation and discussion at the Vice Provost's Advisory Group for Research
- Presentations at each of the four Faculty Research Committee meetings
- Via a recorded online presentation accompanied by a short questionnaire²
- Through information circulated via faculty and departmental mailing lists
- Via social media including Twitter, and Yammer

Responses to multiple choice questions are **highlighted**

The response was submitted by Chris Banks, Assistant Provost (Space) & Director of Library Services on behalf of the College.

¹ <https://www.ukri.org/funding/information-for-award-holders/open-access/open-access-review/>

² <https://www.imperial.ac.uk/research-and-innovation/support-for-staff/scholarly-communication/open-access/research-funders-open-access-policies/ukri-open-access-review-consultation/>

UKRI Question	Response
<p>Section A: Research Articles</p> <p>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.</p> <p>If anything is unclear, please explain why (1,350 characters maximum, approximately 200 words).</p>	<p>The policy is clear. It asks for full and immediate open access for in-scope outputs either</p> <ul style="list-style-type: none"> - Version of Record with a CC BY licence - Immediate availability of the Author Accepted Manuscript with a CC BY licence <p>There are current technical shortfalls which may compromise the ability to immediately identify the date of publication which may in turn compromise the ability of the researcher/institution to make available the AAM immediately on publication. This is an issue that could and should be resolved through appropriate metadata and data standards rather than manual intervention being required.</p>
<p>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.</p> <p>If yes, please expand (1,350 characters maximum, approximately 200 words). Please see paragraphs 29-31 of the consultation document before answering this question.</p>	<p>The current REF policy establishes the <u>eligibility</u> of outputs to be submitted to the REF.</p> <p>There are current technical shortfalls which may compromise the ability to immediately identify the date of publication which may in turn compromise the ability of the researcher/institution to make available the AAM immediately on publication. This is an issue that could and should be resolved through appropriate metadata and data standards rather than manual intervention being required.</p>
<p>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.</p> <p>If yes, please expand (700 characters maximum, approximately 100 words).</p>	
<p>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.</p> <p>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</p>	<p>Imperial College London is a research-intensive institution and as such, there are considerable financial implications in moving from a pay-to-read to a pay-to-publish world. Whilst there are some promising read&publish / transformative agreements coming forward, these stand to lock in both OA and subscriptions expenditure, with a cost reallocation exercise between institutions to be negotiated during the term of the</p>

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<p>consultation document). (2,650 characters maximum, approximately 400 words.)</p>	<p>agreement. Institutions with low volume outputs will wish to see their contribution diminish as the % OA content increases. These funds will not transfer to the research-intensive institutions but instead, are most likely to be returned to the home institution, especially if the anticipated outcome of the COVID-19 pandemic is a significant shortfall of income for institutions. Without re-balancing of funding allocations between institutions, e.g. via QR funding, it will be challenging for research intensive institutions to support VoR OA, making it more likely that the more research intensive an institution is, the more likely that institution will need to resort to self-archiving in order to comply with the UKRI policy affordably.</p>
<p>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.</p>	<p>We would be concerned if multiple copies of the VoR were in circulation, particularly if not always accompanied by the original publisher DOI. If this issue can be resolved, then it is possible that the existence of multiple versions may support resilience. A preferred route would be for VoRs to be made available and archived through the national library networks or some form of national library infrastructure in part supported by UKRI. We note and accept that some disciplines are required by their funders to deposit into a discipline-specific repository, e.g. Wellcome and PubMed.</p>
<p>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.</p>	<p>UKRI-funded work comprises a subset of outputs eligible for submission to the REF. Our preference is that the version of record is the version submitted to any future REF and that through negotiations with publishers, we will be able to secure VoR OA for all of Imperial's outputs, not just those funded by UKRI. This means of ensuring open access should not be compromised through any strict limitations on expenditure of UKRI funds to support UKRI-funded research outputs (e.g. any move to limit expenditure to journals within publisher read and publish agreements will compromise the broader ability of the UK to make research funding open access)</p>
<p>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</p>	<p>There was strong but not unanimous support for CC BY licence amongst those responding to Imperial's consultation.</p>

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<p>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).</p>	
<p>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).</p>	<p>A small number of Imperial respondents supported the case for an exception. If an exception is to be allowable on a case-by-case basis we would urge that consideration be given to the potential administrative burden for managing exceptions.</p>
<p>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).</p>	<p>We believe that there are sufficient mechanisms (redacting some images, providing low-res options, etc) to allow continued publication. However, any work that UKRI can undertake with rights holders – especially UK public libraries, galleries, and museums, to encourage more liberal online rights for academic purposes would be appreciated.</p> <p>We would also ask UKRI to note the administrative burden attached with the removal/replacement of third party materials as part of the deposit process.</p>
<p>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).</p>	<p>UKRI should make the licensing requirements prominent and explicit at grant award stage to ensure that authors are aware of their obligations and communicate these to non-UKRI co-authors at the earliest opportunity.</p>
<p>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.</p>	<p>Those covered by the ref-after-next policy will constitute a much larger group – possibly all academics on research contracts – than those covered by the UKRI policy. As such, potential costs remain an issue as negotiations for read&publish</p>

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<p>If yes, please expand (2,000 characters maximum, approximately 300 words). Please see paragraphs 29-31 of the consultation document before answering this question.</p>	<p>deals ramp up, particularly for research intensive institutions. The extent to which any element of QR funding is currently hypothecated to support publishing is unknown but this would seem the most pragmatic means by which a shift in funding could be effected as the sector moves from <u>pay-to-read to pay-to-publish</u></p>
<p>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?</p> <ul style="list-style-type: none"> 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 <p>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</p>	<p>It is currently possible for authors to retain copyright but to give away exclusive publication rights such that copyright retention becomes meaningless. It is also possible publish under CC BY but to give copyright to the publisher. To allow the most open options now and in the future, the copyright and deposit rights should remain with the creators. This aligns with view that ownership of research outputs and their use and reuse fits with the developing values and culture of open research. It also enhances the social value of research. At a practical level, it also means that if there are any issues with a publisher placing the wrong licence on a paper there is a compliant, legal route for authors through green and deposit in a local institutional or subject-based repository.</p> <p>UKRI should require the retention of rights to deposit under a CC BY licence. Whether those rights become diluted by the separate (and possibly temporary) application of a CC BY-ND licence at the discretion of the funder, the author should nonetheless have the right to subsequently make the work available under the more liberal CC BY licence.</p>

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<p>of the Copyright, Designs and Patents Act 1988 and institutional copyright policies.</p>	
<p>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).</p> <ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> a. Strongly agree b. Strongly agree c. Strongly agree d. Strongly agree e. Strongly agree f. Strongly agree g. Agree <p>We strongly agreed that the standards suggested for papers in journals and OA publishing platforms are appropriate – and we especially note that the use of DOIs is essential. We would suggest as additional PIDs the Research Organization Registry (ROR) and GrantIDs. Standards and best practice change over time and so there needs to be the flexibility to include new PIDs as they are developed. Where specific schema and guidelines are mentioned (e.g. Crossref and OpenAIRE) there needs to be open and transparent means by which the UK community can influence these.</p> <p>For (g) we would suggest that ORCID be encouraged, not mandated as it is not clear that authors should be compelled to register for ORCIDs. We also note that UKRI can only encourage its use for UKRI-funded authors – co-authors (especially internationally) may not have ORCIDs and their lack should not make a paper non-compliant. We recommend that the clause should only apply to <i>UKRI</i> authors and contributors <i>where they have</i> an ORCID.</p>

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<p>g. unique PIDs for research management information must be used and must include the use of ORCID to identify all authors and contributors</p>	
<p>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).</p> <p>a. PIDs for research outputs must be implemented according to international standards such as DOI, URN or Handle</p> <p>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</p> <p>c. machine-readable information on the OA status and the licence must be embedded in the article in a standard non-proprietary format</p> <p>d. unique PIDs for research management information must be used and must include the use of ORCID to identify all authors and contributors</p> <p>e. the repository must be registered in the Directory of Open Access Repositories (OpenDOAR)</p>	<p>a) Agree b) Agree c) Agree d) Agree e) Strongly agree</p> <p>The issues raised around PIDs in our answer to Q13 apply here also.</p> <p>The network of institutional and subject based repositories internationally is at varying stages of development and some repositories will be more able than others to meet the standards described on Q14. To ensure that repositories can effectively fulfil their role as a key piece of infrastructure in support of the UKRI policy, UKRI should make funds available for their support and development.</p> <p>For 14b, an authors' accepted manuscript may not have been deposited, so it would be impossible to include details of an identifier. This clause should be reworded to include 'if deposited'</p> <p>For 14c, we recommend '...embedded in the article metadata...'</p> <p>It is not clear that institutions can or should mandate researchers to accept the use of ORCID and certainly cannot require co-authors outside of the UK to use ORCIDs. We recommend that the clause should only apply to <i>UKRI</i> authors and contributors <i>where they have</i> an ORCID.</p>

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<p>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).</p>	<p>We recommend UKRI review current accessibility standards and their applicability to journals, OA platforms, and repositories. Also, as suggested for Q13, UKRI should look to requiring as additional PIDs Research Organization Registry (ROR) and GrantIDs.</p>
<p>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).</p>	<p>To meet with the FAIR data principles and best practice as promoted within the research data management community, data access statements should include a permanent identifier (e.g. DOI or accession number) or URL that links to a data repository landing page. While some funders and journal publishers will accept a simple instruction to contact the author this will not be sufficient if the goal is to ensure long-term preservation, access and reuse of research data. Ideally, any links to data should be persistent. A data access statement should also include details of any restrictions or constraints on accessing the data</p>
<p>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?</p> <ul style="list-style-type: none"> 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 <p>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).</p>	
<p>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.</p>	<p>The main consideration is that any OA policy for the REF-after-REF 2021 should have no retrospective requirements for articles published before its implementation that are more stringent than the proposed UKRI OA policy. Articles that are compliant under the UKRI OA policy should be</p>

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<p>If yes, please expand (2,000 characters maximum, approximately 300 words).</p>	<p>considered compliant for REF-after-REF 2021.</p>
<p>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).</p>	<p>There are many variables which will contribute to the cost implications: 1) the extent to which other funders sign up to cOAlition S Plan S aims; 2) Whether or not UK consortia continue to be able to act as a group in negotiating for content 3) the growth of pure OA publishing outlets; 4) the extent to which alternative viable publishing platforms are set up and are adopted by researchers; 5) whether or not VAT on online resources is reduced to zero and could be repurposed to support Oa publishing – noting here that as publisher agreements transition from paying to read (VAT = 0%) to paying to publish (VAT chargeable) this saving will be eroded 7) whether it becomes possible to agree an effective and equitable cost-reallocation between institutions as the % of OA articles increases in transformative deals. As thing stand right now, as a research-intensive institution, the costs to publish are estimated to be double the entire subscriptions budget we currently have available for read subscriptions. This takes into account a) the % of our papers that are authored by Imperial staff only b) the % papers co-authored with other research intensive institutions in the UK c) the % papers co-authored with international authors who are/are not funded by cOAlition S signatories and d) the current average cost of an APC. Only were the APC cost to reduce to ~£300 would it be possible to use current budgets to fully support OA publishing.</p>
<p>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).</p>	<p>Emphatically no. There may be benefits in effort expended in order to enable OA publishing, e.g. the reduction in the number of individual invoices paid, the reduction in the current highly frictionful process between publisher, corresponding author, library in order to process invoices. In other words, there are opportunities at both the publisher and the institution end to make the process much more efficient which can translate into the ability to accommodate a greater volume of OA with no additional staff input. This efficiency will only offset</p>

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	costs. We don't currently see any other opportunity for financial benefits for our institution.
<p>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).</p>	<p>The simple calculation to make is to take current subscriptions costs as the "potentially available pot of money", along with SOME additional funding from funders (assumption being that funders may also wish to divert some funds to OA infrastructure and alternative publishing platforms). Set against that is the average APC x the number of articles co-authored by funded researchers at an institution. If "UKRI" also includes those funded through QR funding then technically every researcher at an institutions is covered by the UKRI policy. For Imperial College to fully transition from read to publish then the current subscriptions budget would fund only half of the publishing costs. Add to this that only 7% of global outputs are UK authored, we will continue need to pay to read the other 93%</p>
<p>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).</p>	<p>Evidence on rise in costs: http://deltathink.com/news-views-open-access-charges-consolidation-continues/</p>
<p>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).</p>	<p>Transparency could be improved greatly through an understanding of the services provided by the publisher: the QUALITY of service can differ greatly between publishers – some will provide decent metadata, others provide shocking metadata; some have improved systems and processes which minimise additional operational costs for institutions, others have terrible processes in place which absorb vast amounts of academic and support staff time; some provide excellent services to the learned societies they publish, others don't; some have great interfaces to their content, others do not.</p> <p>A transparency exercise won't necessarily serve to understand which publishers are additionally profiting significantly and, for some, excessively and which are reinvesting in internal processes and in the overall scholarly endeavour.</p>

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	<p>Meanwhile, peer review and much editorial activity is provided for free by many academics</p> <p>Nonetheless, we would propose a range of measures that might improve transparency around publication charges:</p> <ul style="list-style-type: none"> • Continued use of Jisc Monitor and Total Cost of Ownership project to track prices – with resulting data being shared; • Sharing APC spend data amongst institutions – with agreed methodology; • Removal of confidentially clauses from publisher contracts with publishers (although of the big publishers this mainly affects Elsevier); <p>Transparency of how publishers calculate baseline for transformative deals – spend on subs and number of papers per institution.</p>
<p>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:</p> <ol style="list-style-type: none"> 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 <p>Please explain and, where possible, evidence your answer (2,650 characters maximum, approximately 400 words).</p>	<p>Whilst publication in hybrid journals is still the most expensive route to open access (https://deltathink.com/news-views-open-access-charges-consolidation-continues/), it is also currently one of the most popular routes for UK authors.</p> <p>A phased approach away from hybrid journals is only conceivable once funders of research align their policies and their funding. UKRI should only consider any restrictions on hybrid funding once cOAlition S signatories have grown sufficiently in number to truly influence publishers.</p> <p>We would urge UKRI to lead the discussion amongst all stakeholders on how we can manage a transition. To help make a transition and to allow for more innovative publication platforms to thrive we would also call upon UKRI to support DORA and other such initiatives that look to the intrinsic quality of the research published and not the publication venue.</p>
<p>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 /</p>	<p>Imperial’s repository is used for a variety of types of outputs and to support reporting. As such, UKRI funds are not currently used to support either the repository itself, or any</p>

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<p>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).</p>	<p>staffing required to manage repository content. Whilst we can see the longer term positives that might arise through the provision of national repository infrastructure we currently believe that some sort of local infrastructure will continue to be needed. Separately, there are very strong views expressed amongst Imperial academics that long established discipline based repositories such as ArXiv, BioarXiv etc should be supported as repository venues. They are used extensively by academics who have a track record of working openly for decades.</p>
<p>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).</p>	<p>There are a number of other costs imposed by publishers on authors – such as submission charges, colour and pages charges. We did not have a strong view as to whether UKRI should allow these costs from OA fund, but whatever UKRI decides there should be clarity in the rules and transparency in costs.</p>
<p>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).</p>	<p>Any funding regime that is limited to transactional payments of APCs in exchange for publication is in danger of exchanging one problematic business model (subscriptions) for another. The UK is already paying significantly more for scholarly communications – through increasing subscriptions and APC payments – that it has historically. We are already seeing publishers attempting to use this higher spend as a baseline for future deals.</p> <p>UKRI should embrace the alternative models promoted in the principles of Plan S and especially encourage models that support zero-embargo green OA. There should be explicit guidance that allows OA funds to be spent on exploring and supporting models other than APC-gold. OA business models continue to evolve. As things stand, the market is exceptionally unbalanced, with the top ~6 publishers attracting a disproportionate percentage of journal publications.</p> <p>Publisher responses to funder-mandated OA vary. Some are seeking a way to manage an affordable transition at a global scale. Funding mechanisms should support</p>

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	both large publishers making such moves whilst making funding available to support innovation.
<p>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).</p>	<p>Currently, the focus on transformative deals is on the largest publishers. However, if we do not look at publishers beyond the big ten there are dangers of the long tail being squeezed. UKRI should work with the community and Jisc to help support smaller and society publishers in the transition.</p> <p>Also, UKRI needs to provide certainty – institutions are shouldering the financial risks associated with multi- year transformative deals. UKRI should look to underwrite some of that risk.</p>
<p>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).</p>	<p>A number of key pieces of infrastructure underpin the draft policy The SHERPA services Romeo and FACT, as well as OpenDOAR are specifically mentioned in the policy. Other services such as the Directory of Open Access Journals are widely used to support open access. As these services are key to the smooth implementation of the policy it is right that UKRI should fund at least part of their costs. Also, a number of other services such as Publication Router can improve metadata and content flow, so improving compliance. Supporting these services would reduce costs in other parts of the workflow.</p>
<p>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).</p>	<p>In responding to this it should be noted that some of the most active engagement with repositories are those created and used by the academic community, e.g. ArXiv, BioarXiv etc which have been in use by researchers for decades.</p> <p>Both a national shared repository and a network of interoperable institutional and subject-based repositories could provide a compliance route to meet the proposed policy. Alternatively, a national, central aggregator could layer on top of institutional and subject-based repositories. All these options have advantages and disadvantages. However, to date we have not seen a comprehensive and systematic comparative analysis of the costs and</p>

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	benefits of these options. This would be essential before any decision to invest in a shared infrastructure could be taken. We would urge UKRI to commission a detailed investigation of both options with a cost/benefit comparison between the options.
<p>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.</p> <p>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.)</p>	<p>Yes. The current pandemic has illustrated clearly the potential value of providing early access to scientific research. While care should always be taken when evaluating any research paper, including preprints where there has not been a formal peer review process, we believe the rapid dissemination of the latest results would provide a significant benefit in a time of public emergency.</p> <p>This would also align the UKRI policy with that of Wellcome, providing consistency and clarity for authors. We would recommend UKRI work with Wellcome and other national and international organisation to develop the definition of 'public emergency'.</p>
<p>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.</p> <p>If yes, please expand (1,350 characters maximum, approximately 200 words).</p>	
<p>Section B: Monographs, Book Chapters and Edited Collections</p> <p>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.</p> <p>If you disagree, please explain your view (2,000 characters maximum, approximately 300 words).</p>	
<p>Q34. Should the following outputs be in-scope of UKRI's OA policy when based on UKRI-funded doctoral research?</p> <p>a. Academic monographs Yes / No / Don't know / No opinion</p>	<p>As these are valuable scholarly research output that arise from UKRI funding they should be made open access. The only caveat would be that the doctoral student may have left academia by the time of</p>

UKRI Question	Response
<p>b. Book chapters Yes / No / Don't know / No opinion</p> <p>c. Edited collections Yes / No / Don't know / No opinion</p> <p>Please explain your view (1,350 characters maximum, approximately 200 words).</p>	<p>publication of subsequent monographs or book chapters. UKRI would need to put in place a clear funding stream for these outputs.</p> <p>The policy should be explicit about including ebooks, born digital texts, etc.</p>
<p>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).</p>	<p>Any definition of 'suitable' in 'only suitable publisher' would have to be very tight otherwise this could become a blanket exception.</p>
<p>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.</p>	<p>For consistency, the same allowance that trade books are out of scope that is being proposed for this OA policy should also apply to the REF-after-REF 2021 OA policy</p>
<p>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?</p> <p>a. 12 months is appropriate</p> <p>b. A longer embargo period should be allowed</p> <p>c. A shorter embargo period should be required</p> <p>d. Different maximum embargo periods should be required for different discipline areas</p> <p>e. Don't know</p> <p>f. No opinion</p> <p>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).</p>	

UKRI Question	Response
<p>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?</p> <ul style="list-style-type: none"> 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 <p>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).</p>	
<p>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?</p> <ul style="list-style-type: none"> 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 <p>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).</p>	
<p>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).</p>	

UKRI Question	Response
<p>Please note that funding is further considered under paragraph 110 of the consultation document (question 53).</p>	
<p>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).</p>	<p>For output where there is not a publisher willing to make the version of record openly available or where the cost is prohibitive, deposit in a repository should be perfectly acceptable route to meeting the objectives of the UKRI policy.</p> <p>However, we note that an accepted manuscript will go through multiple stages in the publishing cycle - including indexing, copy editing, language corrections, references and citation corrections, etc. In some cases there may be a significant gap between the quality of the manuscript and the final published text. Therefore, providing OA to the final version should always be the preferred compliance route, provided an appropriate licence is used and the cost is not prohibitive.</p>
<p>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.</p>	
<p>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).</p>	<p>We support the draft policy's signal that CC BY is strongly preferred for in-scope material. However, we understand the concerns of some academics that CC BY is too liberal a licence. To maximise compliance with the policy we see CC BY-ND as an acceptable compromise between the benefits of wider use and re-use offered by CC BY and the desire to see a more restrictive licence. UKRI may wish to review and revise this after a few years if there is any wider evidence to support a view that CC BY-ND is either too liberal or too restrictive.</p>
<p>Q44. To what extent do you agree or disagree that UKRI's OA policy should include an exception for in-scope</p>	<p>We agree that the possibility of exceptions should be allowed, but we would suggest that good practice in making these</p>

UKRI Question	Response
<p>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.</p> <p>Please explain your view (1,350 characters maximum, approximately 200 words). Questions 45-46 concern how 'significant reuse' may be defined.</p>	<p>containing significant third-party materials be investigated to minimise exceptions. In many cases, a complete, single-supply 'closed' version is made available through the institution, with a redacted or low-resolution version being made openly available. This allows for the wider dissemination of the research without significant liability for third-party rights. The decisions of which version to make widely available are partly informed by risk assessment issues – UKRI should provide guidance and perhaps underwrite that risk to increase openness. Also, UKRI should investigate the possibility allowing the full costs of securing open rights for third-party materials in grants.</p>
<p>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).</p>	<p>Redacting material should be allowed as a last resort once the options of legal exceptions, use of low-resolution alternatives, etc have been exhausted. Note that these options carry a significant administrative burden</p>
<p>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).</p>	
<p>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).</p>	
<p>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.</p>	

UKRI Question	Response
<p>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.</p>	
<p>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?</p> <ul style="list-style-type: none"> 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 <p>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.</p> <p>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.</p>	<p>The arguments for monographs and other in-scope materials echo those for journal articles. It is possible to retain copyright but give away exclusive publication rights. It is also possible publish under CC licences but to give copyright to the publisher. To allow the most open options the copyright and deposit rights should remain with the creators. This fits with view that ownership of research outputs and their use and reuse fits with the developing values and culture of open research. It also enhances the social value of research. At a practical level, it also means that if there are any issues with a publisher placing the wrong licence on a paper there is a compliant, legal route for authors through green. Finally, the policy for monographs, book chapters and edited collections should be consistent with that for journals.</p>

UKRI Question	Response
<p>Q50. Regarding the timing of implementation of UKRI's OA policy for monographs, book chapters and edited collections, which statement best reflects your view?</p> <p>a. The policy should apply from 1 January 2024</p> <p>b. The policy should apply earlier than 1 January 2024</p> <p>c. The policy should apply later than 1 January 2024</p> <p>d. Don't know</p> <p>e. No opinion</p> <p>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).</p>	<p>The arguments for open access to monographs and other in-scope materials are as compelling as those for journal articles. However, to date there has not been a UKRI policy. Setting a date of just under four years from now will give researchers, publishers, and libraries time to put in place the processes and infrastructure needed to support the policy. Any later and there is a danger that planning will drift.</p> <p>However, we acknowledge that there are still a number of practical issues to resolve before the start date, not least those of cost and, for long form publications arising from these, portability of publication costs. Therefore, we would propose a 'bedding-in' period of a number of years beyond 1 January 2024 during which we monitor the major issues in fulfilling the policy and during which UKRI would not impose sanctions for non-compliance.</p>
<p>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.</p> <p>If yes, please expand (2,000 characters maximum, approximately 300 words).</p>	<p>Guidance on third-party material and the options for including low-res versions/redacting/providing alternative versions/etc.</p> <p>Guidance on copyright and rights retention</p>
<p>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.</p> <p>If yes, please expand (2,650 characters maximum, approximately 400 words).</p>	
<p>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.</p> <p>If yes, please expand (2,650 characters maximum, approximately 400 words).</p>	<p>To best determine the optimum funding levels and mechanisms we need to understand the size of the issue – how many monographs acknowledge UKRI funding directly? This number could be increased significantly depending on how monographs and related outputs are considered for the REF-after-REF 2021. But however large the financial costs nationally, UKRI will need to provide extra</p>

UKRI Question	Response
	<p>funds to cover the costs as there are no existing sources of funding within UK HEIs</p> <p>We can envisage three potential funding mechanisms – a Wellcome-like system where authors approach UKRI when contracting with the publisher; a block-grant for monographs; or included costs in initial grant proposals. All these mechanisms have advantages and disadvantages. Whatever mechanism is used, clarity from UKRI will be required. Especially if an author moves from one institution between grant award and publication.</p> <p>If the solution is block grants, these should be separate to the journals block grant. UKRI might want to treat book chapters as ‘big articles’ rather than ‘short books’ as they often share more in common with journal articles than with longer monographs. Funding for book chapters might sit better with the journals block grant. We acknowledge that not all monograph publishers charge Book Processing Charges (BPCs). Together with UKRI we need to think about how they can be funded. How can we support models such as Open Library of Humanities or Knowledge Unlatched? Again, there are a variety of options - allowable costs within block grants; direct funding from UKRI; etc. Ideally, any support would be multi-year to provide stability and allow for continuity of planning.</p> <p>As with journals, we are concerned about the long-tail of publishers and we would be willing to work with UKRI and Jisc to investigate the possibility of procurement agreements with consortia of smaller publishers and/or university presses.</p>
<p>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).</p>	<p>The Directory of Open Access Books is a key piece of infrastructure in this space and UKRI should consider providing long-term financial support. Also, deposit of title metadata in the DOAB should be made a condition of compliance.</p> <p>If the idea for a central repository is taken up it should be open to monographs, book chapters, and edited editions</p>

UKRI Question	Response
<p>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.</p> <p>Please expand (2,000 characters maximum, approximately 300 words).</p>	
<p>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.</p> <p>If yes, please expand (2,000 characters maximum, approximately 300 words).</p>	
<p>Section C: Monitoring Compliance</p> <p>Q57. Could the manual reporting process currently used for UKRI OA block grants be improved? Yes / No / Don't know / No opinion.</p> <p>If yes, please explain how (2,000 characters maximum, approximately 300 words).</p>	<p>While the current manual reporting process works relatively well, it misses APCs 'in the wild', i.e., APCs payed by researchers out of funds for which there is no central reckoning or if non-standard financial codes are used.</p> <p>There may be ways in which the system could be automated – with improved data flow from submission systems and publishers. Publication Router is a tool here, as potentially is the proposed OA Switchboard. Consistency across Publisher Dashboards would be useful. Use of GrantIDs should to be encourage and data passed from publishers to institutions. Reporting on percentage of papers that are compliant is harder as there is no certainty in the total number of papers from authors at a given institution. Again, standard identifiers and data flows from publishers will help. There will need to be clarity for papers with co-authors from multiple institutions – who has responsibility to report the compliance of the paper?</p>
<p>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.</p>	<p>The introduction of sanctions should be considered as a last resort, especially if, as we hope, the grant conditions include the requirement for immediate OA. In other words, providing the grantee is made aware of their responsibilities at the point of grant award.</p> <p>Targeting of sanctions must also be appropriate. Where universities have put appropriate processes in place to support</p>

UKRI Question	Response
Please explain your answer (2,000 characters maximum, approximately 300 words).	open access publishing, they should not be penalized in instances where authors and/or publishers ignore guidance. Similarly, authors should not be punished for institutional failures. Institutions should also have an opportunity to examine and challenge, when necessary, data not provided through their own repository or other infrastructure. This will help ensure sanctions would only be applied in genuine cases of noncompliance.
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).	

UKRI Question	Response
<p>Section D: Policy Implications and Supporting Actions</p> <p>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.</p> <p>Please expand (2,650 characters maximum, approximately 400 words).</p>	<p>Imperial is unable to provide access to all of the research outputs that our researchers and students need. There are UKRI-funded researchers who will not be able to directly access all the UKRI-funded research they are interested in. These problems only increase as we move out of the HE sector, with alumni, entrepreneurs, policy makers, and patients all having extremely limited access to current research. A move towards greater open access through this proposed policy will move us towards greater use and reuse of UKRI-funded research.</p> <p>There will be long-term benefits of reducing subscription costs as similar policies are adopted worldwide and an ever proportion of the world's research literature is made available OA. We are currently in a hybrid state – with both subscription and OA costs. Funders such as UKRI can help to accelerate the change and ensure that publishers to not use current spend as a baseline for future revenues.</p> <p>If policies aligned, both within UKRI and with other national and international funders, then there will be benefits in streamlining processes within institutions and lowering overheads.</p>
<p>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.</p> <p>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).</p>	<ul style="list-style-type: none"> • There may be a reduction to the number of options of publishing venues for some authors if publishers not willing to adapt their policies • Well-resourced authors in well-funded institutions and/or subject areas may have more options and greater options than those in less well funded areas • This may include early career researchers and care will need to be taken not to disadvantage this sector of the community.
<p>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.</p> <p>If yes, please expand, referencing specific policy elements and including any comments on how UKRI could address any</p>	<p>Imperial authors are keen to continue their collaborations across the globe. Some are concerned that any move to accelerate the flip of significant journal titles to pure OA / APC will result in restrictions in publishing venue particularly for those working in the global south</p>

UKRI Question	Response
<p>issues identified (2,650 characters maximum, approximately 400 words).</p>	
<p>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).</p>	
<p>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).</p>	
<p>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).</p>	
<p>Section E: Further Comments Q66. Do you have any further comments relating to UKRI's proposed OA policy? Yes / No. If yes, please expand (2,650 characters maximum, approximately 400 words.)</p>	
<p>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.)</p>	
<p>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).</p>	