UKRI Open Access Consultation

London Mathematical Society Response

This is the Society's response to the 2020 UKRI Open Access Consultation, submitted via an online form on 29 May 2020.

Input into the response was gathered from across the Society and from representatives of the UK mathematics community (via a call to Heads of Department). The draft response was circulated to Publications Committee for comment prior to the development of the submitted version.

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).

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).

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 London Mathematical Society has identified that a major challenge for mathematics authors will be the reduction in publication venues where in-scope research articles can be submitted, and the resulting impact such restrictions could have on future international collaborations and the careers of ECRs.

A significant number of pure mathematics journals of high repute where international coauthors would reasonably expect to publish do not offer a compliant route per the draft policy. They operate on a subscription basis and do not have self-archiving policies compliant with what is being proposed by UKRI.

These titles are typically owned and managed by non-profit entities (including learned societies) who are unlikely to be able to implement alternative transformative models or flip to full OA within the

necessary timeframe. The London Mathematical Society feels that if UKRI-funded authors cannot publish in these journals then their ability to compete internationally will be diminished.

The journals owned by the LMS allow authors to deposit an accepted version of their paper into a repository with zero embargo. This reflects established practice within mathematics to use the arXiv to post pre and post-acceptance versions of papers. The author typically grants the arXiv a non-exclusive and irrevocable license to distribute the article rather than a Creative Commons licence.

Mathematics journals who allow zero-embargo self-archiving of accepted manuscripts typically specify that the author must deposit their paper under a non-commercial licence (typically CC-BY-NC). The concern is that attaching a CC-BY licence to the accepted version of a manuscript runs the risk that a third party could commercially publish the article undermining the publishers' only means of recouping the cost of peer review and manuscript processing up to the stage of acceptance.

Whilst the availability of a large corpus of mathematics papers in repositories has not to date affected subscriptions it is conceivable that with better tools to quantify this availability and economic pressures on libraries might lead to future widespread cancellations.

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.

Requiring repository deposit of in-scope articles which have been published OA in a journal would be an unnecessary duplication of effort.

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.

The London Mathematical Society feels that extension of this proposed policy to the REF-after-REF 2021 would severely impact UK mathematics where a much higher proportion of research is supported by QR-funding rather than Research Council grants.

As mentioned under question 4, there are a number of high-profile pure mathematics journals published by non-profit organisations who do not offer a compliant route. For example, in the 2014 REF many submissions were made which included papers from the Annals of Mathematics (47), Duke Mathematical Journal (38), Journal of the European Mathematical Society (23) and Journal of the

American Mathematical Society (19). None of these journals have an option for immediate OA and zero-embargo green with a licence that allows commercial reuse is not available.

Mathematicians are already submitting papers that will be in scope for the REF-after-REF 2021. Therefore, it is essential that they are made aware of the criteria for compliance as early as possible and that these are achievable.

See also our response to Q67.

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).

We do not support the addition a CC-BY licence to author accepted manuscripts which could permit a third party to commercially publish the article and thus undermine the publisher's only means of recouping the cost of peer review and manuscript processing up to the stage of acceptance.

In mathematics there is an established culture of sharing versions of papers up to and including the AAM, however this is typically only permitted under a distribution or CC-BY-NC-ND licence.

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).

Case-by-case exceptions at an article-level would significantly increase the administrative burden for authors and publishers. Blanket exceptions should be agreed.

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).

Author preference within mathematics is often for non-commercial licences. There would be a substantial education piece to be done in order to persuade authors to adopt CC-BY over CC-BY-NC-ND

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.

For the journals it owns the London Mathematical Society no longer requires authors transfer copyright. It is felt that a licence to publish is sufficient to enable the Society and its publisher to make content available whatever the end-user licence.

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 <u>journals and OA publishing platforms</u>?

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

      Strongly agree

   b. article-level metadata must be used according to a defined application profile that supports UKRI's proposed OA policy and is available via a CC0 public domain dedication; the metadata standard must adhere to international best practice such as the Crossref schema and OpenAIRE guidelines

      Agree

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

      Agree

      This may be difficult for some smaller publishers to adopt within the timeframe

   d. long-term preservation must be supported via a robust preservation programme such as CLOCKSS, Portico or an equivalent

      Strongly agree

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

      Agree

      This may be difficult for some smaller publishers to adopt within the timeframe

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

      Strongly agree

      It is important that authors and their institutions have reliable and up-to-date information to assist decision-making

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

Agree

Not all authors have ORCID (or wish to obtain one), we are in the process of making this mandatory for corresponding authors, but this might be difficult to rollout for all 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 <u>institutional and subject repositories</u>?

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

Agree

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

No opinion

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

No opinion

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

No opinion

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

No opinion.

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).

Whilst it has no strong feelings on this matter, the LMS hopes that when new standards are introduced appropriate support is given to smaller publishers and providers of research infrastructure.

For example, arXiv in their "Feedback on the Guidance on the Implementation of Plan S" (https://blogs.cornell.edu/arxiv/2019/07/18/technical-considerations-for-arxiv-compliance-with-plan-s) stresses that additional resources would be necessary to implement some of the changes required to make the service Plan S compliant, taking into consideration both one-time development and ongoing maintenance costs.

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 London Mathematical Society have indicated a later date for implementation, however our concern with the timeline set out in this policy is somewhat broader. In some basic research disciplines such as mathematics published outcomes directly acknowledging a grant may be accepted several years after funding ceases. This is for two reasons (1) the time taken for a paper to be thoroughly assessed and peer-reviewed by a journal, (b) the time taken for mathematics research projects to bear results.

For example, the median time for submission to acceptance in the Journal of the LMS (a typical, selective, broad-scope mathematics title) is 10 months. This time can be significantly extended if substantive revisions are necessary. It is not unusual for a paper to take 3 years from the submission of an article to a journal to publication of the version of record. During that time there may have been changes to the compliance status of a journal. What does UKRI expect an author and their coauthors to do if during a long submission process the journal become non-compliant by the date of acceptance?

The Society feels that the policy might be better defined as applying to grants current at the formal announcement of these new guidelines or being related to the compliance status of the journal at submission rather than acceptance.

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).

Mathematicians submitting papers now will be doing so knowing that they will be in scope for the REF-after-REF 2021.

Please refer to our answer to Q17.

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).

It is anticipated that there will be costs associated with implementing the standards set out in Section A for the London Mathematical Society's publications for the Society itself (who manage the pre-acceptance stages of publication) and/or its suppliers.

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).

Paragraph 76 of the consultation document recognises that many learned societies depend on the income derived from publishing to support other charitable activities. In 2018-19, the London Mathematical Society received 65.7% of its total income from Publications.

This income is used to support mathematicians and mathematics research in multiple ways. It enables research networks and collaborative activities that touch most if not all UK mathematics research departments, and provides a wide range of research grants, conference grants, prizes, initiatives for early career researchers and the promotion of mathematics as well as supporting teacher CPD and developing international mentoring opportunities.

The LMS continues to award small grants, simpler and more easily accessible than the major large grants available elsewhere, and in doing so plays a crucial role in the UK mathematical funding landscape. In 2018-19 a total of £698,175 was awarded in grants by the Society through all of its schemes. The LMS was able to support 70% of all research grant applications and made 264 research awards in 2018-19.

If the LMS receives a lower level of publications income, the activities it can support will reduce. There will be a noticeable cost to the UK mathematics research community who rely upon such support.

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).

As spend by institutions moves more towards a publish basis (from a read basis), it follows that research-intensive institutions will have considerably higher spend whereas teaching-focused institutions are likely to have lower spend.

Looking at data for the London Mathematical Society's journals, the number of institutions who are paying for subscription access is around 30 times higher than those from which published authors come. Although the journals have an international authorship, there are regions and institutions whose authors publish than others.

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).

For the journals owned and managed by the London Mathematical Society, decisions on the base subscription prices of individual journals are made each year based on a balance of criteria. These include:

(a) the annual volume of content published (excluding open access content)

(b) the extent and citation/usage life of such content of online content available free with a subscription

(c) indirect costs associated with the running of a publishing operation

(d) measures of inflation

(e) an assessment of the academic standing of the journal

(f) competitive considerations

Papers made OA by the green route to compliance are not accounted for under criterion (a) so widespread use of this compliance route would not reduce prices in the same way that gold OA would.

As suppliers increase their prices the costs associated with running a journal will increase. Many of these costs are fixed regardless of the number of papers handled so for selective titles managed by a learned society the benefits of economies of scale cannot be realized.

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).

Whilst the London Mathematical welcomes greater transparency on publication charges there is a concern that mandating a high-level of granularity here would be counterproductive.

Transparency on how any profits/ surpluses are reinvested would also be useful as it would properly inform author choice. The Society endeavours to make clear to its readers and authors that all surplus income from its publishing programme is used to support mathematicians and mathematics research in the form of research grants, conference grants, prizes, initiatives for early career researchers and the promotion of mathematics.

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 <u>not</u> be permitted to support OA publication in hybrid journals

    b. UKRI OA funds should <u>only</u> be permitted to support OA publication in hybrid journals where they are party to a transformative agreement or similar arrangement

    c. UKRI OA funds <u>should</u> 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).

If the aim is to publish as many in-scope papers OA then UKRI should support the costs of doing so irrespective of business model.

Only allowing hybrid as part of a transformative arrangement or similar might lead to a situation where an author submits to a compliant journal in good faith and then the arrangement ends before their paper is accepted leaving them in breach of the UKRI policy. This is also true of models such as subscribe-to-open where a journal's compliance status could change annually.

The LMS also wishes to ask UKRI for clarity on so-called "mirror journals". The *Proceedings* and *Transactions of the American Mathematical Society* which are important subscription titles have "mirror" titles where those wishing to publish OA can opt to do so.

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).

There are many experiments underway at the present time, and these should be allowed to run their course to build an evidence base that can contribute to the development of future UKRI policy. However, we are concerned that such models will not be sustainable at scale nor, in the case of subscribe to open, guarantee compliance year-on-year.

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).

UKRI should continue to work closely with Jisc to ensure such arrangements can be put in place across the UK between institutions and as many publishers (large and small) as possible.

UKRI should also be mindful that it is extremely unlikely that any mathematics journals will be in a position to reach a point where a flip to full OA is possible in the short to medium-term. Transformative agreements which apply across portfolios with a mix of disciplines should allow for different rates of transformation.

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).

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).

This would be unnecessary duplication of effort. It would be far better for UKRI to support work to standardise IRs and subject repositories in terms of the data (particularly with respect to versioning)

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).

The London Mathematical Society supports making preprints (prior to formal review) being available and certainly this should be strongly encouraged in all disciplines where there is a benefit for rapid dissemination. However as mentioned previously (under Q4) when using the arXiv to share work mathematicians typically only assign a licence to distribute as opposed to a CC-BY license.

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).

It should be made clear that for edited collections the policy only applies to chapters directly funded by UKRI and not the whole edited collection or conference proceedings.

We feel that there may be grey areas when it comes to texts for a graduate student course which might be taken by a handful of students but might be defined as a textbook.

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 <u>monographs</u> 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).

Sales of the LMS Lecture Note Series only begin to decline sharply after year 2 after publication. This is only one example and the Society does not have a large portfolio of books on which it can base its response but anecdotally this differs to other disciplines.

Q38. Regarding <u>book chapters</u> 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 <u>edited collections</u> 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
g. **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).

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).

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 reduction in choice of journals available to researchers to publish in will likely reduce the international UK research competitiveness and is likely to disproportionally disadvantage those early on in their careers. There are very few fully OA journals, slightly more journals currently in a transformative agreement (if funds are available) and many subscription journals with no compliant green route, given the UKRI's requirement for a CC-BY licence.

UK researchers will be seen to be less desirable to collaborate with by overseas mathematicians if the outputs of joint work cannot be published in the most appropriate journals. ECR's in particular need to remain competitive on the international stage, which will require them to be able to publish in the best places for their work.

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).

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).

The London Mathematical Society feels that the timescale of implementation coupled with the policy's applicability on date of acceptance will pose significant issues. Mathematicians writing and submitting papers

in May 2020 could feasibly not have those papers accepted until January 2022 and so might unwittingly find themselves non-compliant with this policy.

There will be a similar ongoing uncertainty as to which journals will be counted as compliant a year or more into the future, and in due course in the years approaching 2024 when UKRI is may not be able to say with confidence whether it will still support transformative arrangements.

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).

The London Mathematical Society feels that UKRI should provide clear guidance to those affected by the new policy and subsequent extension to the REF. Engagement activities at mathematics conferences and via Heads of Department would be welcomed. The Society would be happy to facilitate these activities in partnership with UKRI.

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).

It is possible that there may be other implications which will not be identified until the full, detailed policy is released.

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.)

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.)

The observations made in Q61 will be greatly compounded if the OA policy for the REF-after-REF 2021 is brought into line with the proposed UKRI policy. Moreover, if all the best UK research is excluded from many of the most prominent, high profile journals, the international image of UK research will be greatly reduced.

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).