

Response to draft National Statement on the Transition to an Open Research Environment

Introduction

The Royal Irish Academy ('the Academy') welcomes the opportunity to respond to the draft *National Statement on the Transition to an Open Research Environment* and to engage in the subsequent national planning process. The Academy's c. 500 members represent the very best internationally recognised researchers in the sciences, humanities and social sciences on the island of Ireland, and are deeply enmeshed in the everyday realities of research, teaching and learning, and training and mentoring of early career researchers. The Academy welcomes the National Open Research Forum's statement that it wishes to talk to stakeholder groups as it progresses these initiatives and the Academy is keen to play a full part in such future ongoing discussions.

The Academy is firmly supportive of the principles of open research and open access and the principles expressed in the draft Statement are welcomed. In particular, the Academy welcomes the commitment within the Statement to supporting researchers

“to maximise the impact of their work while ensuring that they are assisted, recognised and rewarded for practicing open research”.

The Academy and its members welcome the initiative of the National Open Research Forum in working towards the roll-out of a positive and timely implementation plan to support high quality research across the Irish research system. This initiative is particularly relevant given the recent announcement by Science Europe of a new initiative – Plan S – which aims for full and immediate open access to publications from European publicly funded research.¹

Summary of main points

- The attitudes, behaviours and culture of researchers, research performing institutions and public research funders are key to achieving a successful transition.
- Transition to an open research environment must be accompanied by simultaneous reform of the systems for research evaluation and career progression.
- Ireland must “crawl before it can run”: significant investment and discussion is needed to identify how best to achieve an equality of open access opportunity for publicly funded researchers regardless of discipline or institution. Change must be supported by appropriate infrastructures and supports.

¹ Science Europe, 2018, *Coalition S: making full and immediate open access a reality – guidance on the implementation of Plan S*.

- The costs of implementing and supporting the mechanisms, systems and skills training to adequately preserve and make research data available should be built into the costs of all research including that funded through the HEA core grant to higher education institutions (HEIs) and public funders.
- The Academy would welcome a recognition within the National Statement that the transition to an open research environment should have as a key objective to enhance and support research excellence, research integrity, and public trust in science.
- Humanities and social sciences expressed concern regarding commercial use of their work if a CCBY licence become an automatic requirement for open access. The option to avail of a non-commercial (NC) clause to the proposed requirement for a CCBY license thereby making it a CCBY (NC) license should be a matter for decision by each individual researcher.
- To avoid duplication and/or differing reporting requirements across research funders, the implementation plan should agree a collective set of requirements and reporting mechanisms for adoption in the grant terms and conditions of all public research funders.
- Clarity is needed as to the status of Plan S vis-à-vis publicly funded research in Ireland given that only one public research funder is currently a signatory to the plan.

Open research, Plan S and its implications for Ireland

Open access and open research have been the subject of both discussion and action (for example, through the development of institutional and national repositories) in the past 8 years but are now particularly topical due to the work of the National Open Research Forum and the publication of ‘Plan S’ by Science Europe in September 2018.

Plan S is being led by a group of national research funders with support by the European Commission and European Research Council. Plan S requires that, from 2020, scientific publications that result from research funded by public grants – including national and European research councils - must be published in compliant Open Access journals or platforms. Plan S has been endorsed by Science Foundation Ireland but this covers only a limited percentage of the publicly funded research performed in Ireland

There is some confusion as to the status of Plan S requirements and principles vis-à-vis Irish publicly funded research including whether this obligation extends to all publicly funded research, whether all Irish public research funders intend to sign up to it, the economic viability of the proposals, and the implications for research evaluation and career progression. The Academy through its membership of ALLEA (the All European Academies) will shortly issue a response to Plan S.²

² This response benefitted greatly from sight of an early draft of the ALLEA response by Professor L. Drury.

Open access and publication fees

The Academy supports the Statement's principle that "All researchers should be supported to publish in what they consider the most appropriate open access journal, platform or repository".

Equality of opportunity in terms of funding support to enable researchers to exercise this choice regardless of discipline, institution or research funder will be key to ensuring maximum impact from the transition to OA. A frequently expressed concern is that a lack of funding for open access may force researchers to forego attempts to publish in prestigious journals and to choose instead less expensive but less well-regarded channels. The implementation plan should detail the additional funding supports to be made available to support higher education institutions and national research funders to enable this researcher choice and to avoid a possible two-tier system in which only some national research funders or HEIs or disciplines can support or avail of open access 'gold' publication fees.³ Clarity as to the funding of purchasing of open access must be achieved at the earliest possible stage to enable informed choice and support changes in researcher behaviour. Researchers noted that industry, particularly small and medium indigenous industries, and civil society, often face considerably barriers in accessing research as they may not necessarily have the funds available to pay journal access charges.

The move to open access has clear implications for small trade publishers such as the Academy. There is a concern that it may lead to a narrowing of the publication avenues open to scholars particularly in the humanities. As a publishing house, the Academy welcomes the move towards open access and is exploring options to allow full open access to its publications, both scholarly and trade. For example, it has released a number of special editions on an open access model (e.g. *the 'Praeger Reviews'*, commissioned articles written by international experts that focus on biological and environmental research topics): however, the costs of high-quality peer review and editing are considerable and are not fully covered in current public grants. The Royal Society Open Science journal offers an interesting model of an open journal publishing high-quality original research across the entire range of science based on objective peer-review which draws upon the Fellowship of the Royal Society and includes article level metrics.

Copyright and open license

The cited preference within the draft national statement for the use of an open licence "preferably the Creative Commons Attribution Licence CC BY" may be viewed as a matter of concern for authors generally,

³ "Gold open access refers to work that is immediately available free to the user at the point of publication, usually after the payment of a charge by (or on behalf of) the author, which is sometimes substantial. Green open access refers to work that is available in a pre-publication format in a repository after an embargo period, with no payment". *Science Europe's Plan S: making it work for all researchers*. British Academy, November 2018, p.1., at: <https://www.thebritishacademy.ac.uk/news/british-academy-commentary-on-science-europes-plan-s-making-it-work-for-all-researchers>

not just those who are publicly funded academics. The 2015 HEFCE commissioned report by Crossick summarises it thus:

“While even the most liberal of the CC licences (‘Attribution’ or ‘CC BY’ for short) requires that source material be named and attributed to the author, it does not require that the new work show exactly how the original material has been used. As such, CC BY has come under criticism from prominent academic voices who are concerned that it permits (and maybe even encourages) the kind of copying and repurposing without specific citation that the academic community commonly thinks of as plagiarism.... the potential for misuse may well exist, and the degree of confidence we might have in the appropriateness to scholarly publishing of the CC BY licence therefore rests on our confidence in the extent to which existing academic norms and practices can be maintained in a more open environment.”⁴

The Academy is of the view that consideration should be given to allowing researchers, particularly those in the humanities and social sciences, include a ‘non-commercial’ (NC) clause to the CC BY licence to address concerns regarding potential mis-use of their work.

Open Access, the humanities and social sciences

The British Academy’s May 2018⁵ position paper provides a useful discussion of the concerns of humanities and social sciences disciplines – shared by many of their counterparts on the island of Ireland – in respect of open research, copyright and the use of CCBY licenses. It notes:

- The low number of open access journals and platforms for HSS research.
- The need for national and European OA plans to address the path to OA for monographs.
- The suitability of hybrid journals should be re-considered as these hybrid journals are particularly common in the HSS. Given the shortage of fully OA journals in the HSS and the very short timeline to bring these into existence hybrid journals in the HSS may well have a valuable role to play in extending OA in these disciplines.
- To maintain standards and ensure research integrity, scientific publishing across all disciplines will continue to require peer review, data-checking, and editing to be carried out at some stage by some body. The costs associated with these actions are not minor and must be met at some stage.

⁴ Crossick, G., 2015, *Monographs and Open Access*, London: HEFCE, p. 42 at: https://www.thebritishacademy.ac.uk/sites/default/files/British_Academy_paper_on_Open_access_and_monographs-May_2018.pdf

⁵ “Open access and monographs: where are we now?” A position paper by the British Academy, May 2018, at: <https://www.thebritishacademy.ac.uk/publications/open-access-monographs-where-are-we-now>

Impact on systems for research evaluation and career progression

Within an open access system how will systems of research evaluation be supported and evaluated to ensure quality of standards? What implementation actions can be put in place to support new systems of research metrics and research excellence?

Higher education institutions and public research organisations prioritise impact factors and citations which accrue from publication in high-prestige journals. There is some suggestion that the system is becoming increasingly reliant on journals. Several disciplines have noted a move away from the traditional once-off PhD thesis to the delivery of approximately 5 – 6 accepted journal papers to meet PhD requirements with a growing emphasis on journal publications as a measure of excellence and impact for early career researchers.

The current system of career progression for researchers currently include a heavy weighting towards publication records including numbers of publications and the journals and or academic presses with which the publications were made. The implementation plan must recognise and respond to this through interactions with the higher education and public research system to move towards a simultaneous re-design of metrics of career success to include modes of open research.

Skills training

The emphasis on the provision of skills for open research for researchers at all career levels is welcome. The Statement should ideally express its commitment to achieving equality of opportunity and access to skills training for researchers regardless of discipline or institution or funder and the implementation plan should prioritise a standardised approach to skills training.

The Academy wishes to draw attention to the work of the National Research Integrity Forum in establishing and rolling out a standardised training system for research integrity across all signatory institutions thereby ensuring a quality and standardised experience for all researchers. This model could similarly be followed by the National Open Research Forum to ensure a standardised model of skill development across the public research community.

Open access and research data

Questions raised by researchers consulted with by the Academy include:

- What process will be in place to adjudicate between the twin compulsions to a) make data open and b) comply with GDPR requirements? One example offered of this in practice was that of a researcher who felt they could not make their data open access as it was impossible to completely anonymise it and as such might expose them to a liability under GDPR

- How will consent for open access research be obtained from research participants? Will research participants have the right to specify that their data can only be used by named researchers rather than openly available?
- How will open access to cross-national data where jurisdictions implementation and regulations around open access differ be supported?
- The end user experience should be prioritised in the design and enhancement of national infrastructures for access to and preservation of research to ensure that data is not just stored but can be accessed in a format that easily enables its re-use.
- The vulnerability of digital infrastructures to global pressures and crises with consequent threats to the availability of material published exclusively online.
- The environmental impact of electronic databases, particularly the energy demands.

About the Royal Irish Academy

The Academy promotes and supports excellence in scholarship across the sciences, humanities and social sciences. It is an independent, self-governing body of Ireland's most distinguished and internationally renowned scholars and scientists. The Academy encourages and facilitates scholarly informed debate and discussion on issues of public interest in line with its members' expertise.

For more information on this submission please contact the Royal Irish Academy, policy@ria.ie