



## UKRI Open Access Policy – explanation of policy changes

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The new [UKRI Open Access Policy](#) will apply to peer-reviewed research articles, and monographs, book chapters and edited collections, which acknowledge UKRI funding. This document explains the changes to our policy and how decisions were made.

### Our approach to developing the policy

Our new policy is the outcome of the [UKRI Open Access Review](#), which sought to determine a single policy across UKRI.<sup>1</sup> The aims of the review included: having a consistent, clear and unambiguous policy that is as easy as possible to follow; making the outputs of UKRI funded research more accessible and reusable – for the benefit of research, society and the economy; providing sustainable support for open access and better value for money; encouraging the development of new models of open access publishing; and supporting the adoption of open access in the UK and internationally.

Fundamental considerations included UKRI's responsibilities as the UK's largest public research funder and our existing policies and commitment to open access and open research were fundamental considerations. Our policy implements the Government's firm commitment in the [UK Research and Development Roadmap](#) for open publication of publicly-funded research:

*"We will require that research outputs funded by UK government are freely available to the taxpayer who funds research. Such open publication will also ensure that UK research is cited and built on all over the world. We will mandate open publication."*

In evaluating policy options, UKRI sought to achieve the aims detailed above, giving due consideration to risks. Considerations included affordability to the sector, sustainability of scholarly communications and publishing options, author choice, balance of costs for the sector in terms of accessing and publishing research, and potential impacts on equality, diversity and inclusion.

UKRI has worked closely with other funders who also aim to increase access to research including: government departments, the international [cOAlition S](#) group and the UK higher education funding bodies.<sup>2</sup> This should, as far as possible, support policy alignment and aid the process of compliance with open access policies. For example, the UK higher education funding bodies' intention is that they will consider a UKRI open access compliant publication to meet any future national research assessment open access policy without additional action from the author and/or institution. Both UKRI and the UK higher education funding bodies note that the scope of an open access policy for the future national research assessment exercise is much broader than the UKRI Open Access Policy. This will be considered when developing the future national research assessment position.

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<sup>1</sup> The UKRI Open Access Policy will replace the Research Councils' (RCUK) Policy on Open Access and also apply to certain funding provided by Innovate UK (building on [current guidance](#)) and Research England (excluding unhypothecated block grant funding provided to HE institutions).

<sup>2</sup> The four UK higher education funding bodies jointly own and govern national research assessment exercises; they are: [Research England](#), the [Scottish Funding Council](#), the [Higher Education Funding Council for Wales](#), and the [Department for the Economy, Northern Ireland](#).

The policy was developed in line with government consultation principles and best practice. Our review included extensive consultations with research organisations, publishers, learned societies and researchers. We engaged with stakeholders via workshops and a public consultation which received 350 responses. Our review was also informed by internal and externally commissioned analysis, including economic implications. A summary of consultation responses and other evidence is available on our website at [Shaping Our Open Access Policy](#).

We thank all stakeholders who contributed to our public consultation and wider review. The outcome of the consultation showed consensus on the policy ambition and broad support of the policy. There were some different positions put forward by publishing providers and stakeholders representing the research and higher education sector, particularly on proposals that bear on financial considerations. In arriving at our policy, we sought to understand and consider the varying perspectives and implications for different stakeholder groups and disciplinary communities. Our judgements were informed by the balance and strength of the arguments put forward and the underpinning evidence, rather than just by levels of support for particular positions.

Equality, diversity and inclusion is integral to excellence in research and innovation, and [UKRI seeks to embed it in everything it does](#). Open access has the potential to help address equality, diversity and inclusion challenges through increasing access to research. We also sought to understand the potential for the policy to cause or contribute to disadvantages or inequalities, including in relation to early career researchers and researchers in low- and middle-income countries. We invited views in our public consultation and have undertaken an [equality impact assessment](#).<sup>3</sup> While the assessment indicates low risk of significant impact, we will monitor the policy's implementation for unintended consequences.

The main decisions made for the UKRI Open Access Policy are explained below. The document addresses changes from the [Research Councils \(RCUK\) Policy on Open Access](#), and decisions regarding the draft positions that were set out in our [consultation document](#).

## **Policy decisions for research articles**

### **In-scope research articles**

The UKRI Open Access Policy continues to apply to final peer-reviewed research articles. In response to consultation feedback we have sought to clarify some specific definitions in relation to conference proceedings and review articles.

UKRI recognises the value and increasing usage of preprints and that some consultees suggested these should be a route to compliance. We will follow ongoing developments in scholarly communication for non-peer-reviewed outputs and publish a separate UKRI statement on preprints in due course.<sup>4</sup>

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<sup>3</sup> With the Foreign, Commonwealth and Development Office and National Institute for Health Research, UKRI also co-commissioned a [report on open access challenges and opportunities for LMICs](#).

<sup>4</sup> Current UKRI guidance on preprints includes the [Medical Research Council position on preprints](#), [Biotechnology and Biological Sciences Research Council position on preprints](#) and a [joint statement on sharing research data and findings relevant to the novel coronavirus \(COVID-19\) outbreak](#).

## **Immediate open access for research articles**

The UKRI Open Access Policy enables two routes to compliance – the publisher making the final version of record open access or self-archiving of the author’s accepted manuscript in a repository. By allowing both routes to open access the policy is as permissive as possible.

UKRI is requiring immediate open access publication via both routes as we consider this to be the appropriate implementation of the Government’s requirement for outputs of publicly funded research to be freely available.

UKRI recognises that stakeholder groups raised risks in relation to our policy proposals for immediate open access. Concerns included affordability of the policy, implications for author choice, and sustainability of research publishing.

### **Affordability**

The hybrid<sup>5</sup> charging models that emerged following the publication of the RCUK Policy on Open Access have been inflationary, with unsustainable increases in subscription costs and article processing charges.<sup>6</sup> Assuming dominance of hybrid charging models, [our independent economic analysis](#) predicted an increase of £200 million per year for the UK publishing sector, that is, a doubling of the current UK publication charges.

However, the landscape of research publishing in the UK has changed dramatically within the interval of our review, with an increasing number of transitional agreements being negotiated and agreed between higher education institutions and publishers. Transitional agreements provide researchers a route to UKRI policy-compliant open access publication in hybrid journals that are part of these agreements, as well as access to their non-open access content. Transitional agreements offset the cost of accessing non-open access articles against charges for publishing articles open access, with the consequence that these agreements provide full open access with only a modest increase in costs. Journals that between 2017 and 2020 published 51% of UKRI-funded articles are now subject to these agreements. And in 2021 UK transitional agreements provided more than 16,000 open access publications. At the point the policy will apply in April 2022, UKRI expects transitional agreements will have increased to cover the great majority of UKRI-funded articles published in hybrid journals. We consider the take-up of transitional agreements to be important to achieving affordability and we anticipate that the policy will only result in modest cost increases. We also considered issues of affordability when deciding on UKRI open access funding provision, including use of UKRI funding for publication in hybrid journals. Further details are set out below.

### **Use of UKRI funding for transitional hybrid publication**

UKRI has decided not to allow its future open access funding to be used for publication charges in hybrid journals unless covered by a transitional agreement agreed with Jisc. While our policy seeks to be agnostic as possible in relation to publisher business models, we think, on balance, this restriction will aid transition to open access at a more affordable cost to the sector.

We emphasise that authors can still choose to publish in hybrid journals that are not part of a transitional agreement, or where their research organisation is not a participant in an existing

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<sup>5</sup> Hybrid: A publishing model where a subscription-based journal allows authors to publish specific articles as open access, charging an Article Processing Charge (APC) to the author for this.

<sup>6</sup> While detailed estimates vary according to the period and the data source, subscription charges have risen some 20% in the period 2015 to 2020 and article processing charges some 16%, with a clear pattern emerging of higher article processing charges in hybrid journals than fully open access journals, even though the costs of publication are similar in either case.

transitional agreement. Authors can be compliant with UKRI's open access policy either via self-archiving in a repository (where a journal accepts submissions acknowledging UKRI) or by using other funding sources for article processing charges.

#### Author choice

Author choice of publication venue was an important consideration for UKRI's review. Our assessment is that a significant majority of venues that publish UKRI-funded articles will be able to offer suitable open access options to UKRI-funded authors by April 2022. This includes publication options via fully open access venues, and articles published in hybrid journals under (or expected to be under) transitional agreements, and self-archiving options.

UKRI will be supporting Jisc<sup>7</sup> to scale up transitional agreements with the diversity of publishers and research organisations. This is in recognition that smaller publishers and societies have specific issues to negotiate, and that small research organisations face specific challenges in participating in such agreements. We also highlight that the [SPA-OPS project](#), which UKRI co-funded, has developed a toolkit to help learned society publishers identify routes transition to open access.

We expect a small minority of subscription-only venues will be unable to (or choose not to) offer full open access options that are aligned with our policy proposals. Our policy provides the option for these venues to still offer zero-embargo self-archiving to UKRI-funded authors. We note that some publishers already offer this option.

#### Sustainability of publishing

Some publishers suggested our immediate open access requirement would risk loss of income and damage the sustainability of the research publishing endeavour, but we judge this risk to be low. Our policy only applies to (in-scope) articles from UKRI-funded research and the UK market is only a small proportion of the global market. Our independent economic assessment concluded that the policy's impact 'on the domestic industry is unlikely to be substantial'. Based on our evaluation, we consider there is scope for reductions in subscription income, which are then somewhat balanced by open access charges, and therefore the policy will not endanger the publishing endeavour. We are encouraged by the number of fully open access journals/publishers and by the rapidity and number of transitional agreements that publishers have already negotiated with UK research organisations.

In summary, having considered the current open access landscape, expected expansion of transitional agreements, and the views and evidence submitted by stakeholders, we have assessed our policy to be affordable, sustainable and important to ensure public value.

#### Licensing and copyright for research articles

The UKRI Open Access Policy retains the primary requirement for a Creative Commons Attribution (CC BY) licence from the RCUK Policy on Open Access. CC BY is an internationally accepted, machine-readable licence widely used in scholarly publishing. It removes barriers to reuse of research outputs, such as uncertainty about how information can be used or the need to seek permission, while preserving the moral rights of authors in line with established scholarly norms.

Having considered concerns raised by humanities and social sciences stakeholders that a CC BY licence could enable misquoting and/or misuse of some research, particularly on sensitive topics, we

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<sup>7</sup> [Jisc](#) is a charity that is owned by and serves UK higher and further education institutions. It provides digital infrastructure and cyber security to the HEIs. It negotiates on behalf of HEIs national agreements for research articles and for transitional agreements in particular.



have decided to introduce an exception permitting CC BY-ND (no derivatives) licence. However, we consider CC BY to be an appropriate licence in most cases and our review encountered limited evidence demonstrating issues arising from our existing CC BY policy requirement. In making the CC BY-ND exception subject to justification UKRI wishes to ensure that due consideration is given to restricting opportunities for sharing and reuse of publicly funded research. Evidence gathered from the application of the exception will inform future review of our policy.

We considered how to support the inclusion of third-party materials in research articles. Our policy supports this by making clear that UKRI's licensing requirements do not apply to any materials included within a research article that are provided by third-party copyright holders. Third-party materials can therefore be subject to a more restrictive licence.

#### **Changes to licensing requirements for AAMs**

UKRI will require authors to notify a publisher at the point of submission that a CC BY licence (or other licence permitted by UKRI) is applied to any resulting author's accepted manuscript. Our review heard evidence that publisher licensing policies typically put different constraints on author's accepted manuscripts and that they are often restrictive and complex. Therefore, this requirement will ensure licensing expectations are clear prior to any publishing agreement. The author can then apply an appropriate licence that can support zero-embargo self-archiving where this is necessary.

A further change to our licensing requirements for author's accepted manuscripts is that, in line with other funders, a CC BY-NC (non-commercial) will not be permitted. Cases to permit licences restricting commercial reuse were primarily made by publishers in relation to concerns about risks to revenues. However, as outlined above we have assessed our policy to pose a low risk to publishing sustainability. From the perspective of public value, we do not consider it appropriate to restrict opportunity for reuse of research articles for innovation purposes, given UKRI's role in supporting innovation. We also recognised stakeholder concerns that CC BY-NC can be a barrier for non-commercial reuse due to ambiguity about how 'commercial' and 'non-commercial' reuse is defined in relation to research activities.

#### **Copyright**

While many consultees supported a requirement for authors or research organisations to retain copyright, on balance we consider our licensing requirements to be sufficient to meet the policy aims and facilitate compliance. However, we acknowledge that it is good practice for researchers and research organisations to retain the copyright to their work; indeed, some publishers responding to our consultation noted they already enable this.

#### **Data access statements**

Throughout our consultation there was support for data access statements to be contained in research articles. Our new policy requires data access statements to support open and transparent research but recognises there is variable practice across disciplines.

Our review also heard that open research data is important to good research and that maintaining openness of publicly funded research data should be required. While we consider this to be outside the scope of the open access policy our research data policies are related and clarify that the ownership of the data generated from the research that UKRI funds resides with the researchers or their institutions and should be managed so that it remains as open as possible.

## **Technical standards for journals and repositories**

To facilitate findability, accessibility, interoperability and reuse of articles, and to support automation to enhance efficiency and ease of compliance, the UKRI Open Access Policy requires journals and repositories to meet certain technical standards. Practice around technical standards for research articles, journals and repositories has matured since the RCUK Policy on Open Access was launched. It is a reasonable expectation that to support full open access, standards are expected for research articles and supported by journals, publishing platforms and repositories.

Based on feedback from consultees, engagement with stakeholders and participation in international discussions, we have refined the proposed standards. This includes making clear that some standards, such as a Creative Commons CCO (no rights reserved) licence for metadata, are encouraged rather than required, recognising there are some barriers to implementation.

## **Policy decisions for long-form outputs**

### **Increasing access to long-form research**

Openly sharing knowledge communicated through long-form outputs has benefits for researchers, the higher education and the public. We are extending our open access requirements to long-form outputs to ensure access to, and opportunity for, impact from all outputs arising from publicly funded research. This is in line with the government's requirement. Our policy aligns with the approach of other funders and builds on multi-stakeholder work that has been underway in the UK.<sup>8</sup>

We consider the development of open access books to be at a suitable point for the introduction of a UKRI policy in support of this. Our different requirements for long-form outputs recognise: the less mature open access landscape for these outputs; that these are new requirements that will have a more significant impact on some disciplines (such as the humanities); and the diverse publishing ecology of presses which is intrinsic to sustainability of long-form publishing. We will also be providing funding alongside the policy that will aim to support different open access models.

We will work closely with the sector in implementing our policy and to support the wider development of open access books. We note there are already sector-led initiatives, some supported by UKRI such as [OAPEN-UK](#) and [Community-led Open Publication Infrastructures for Monographs \(COPIM\)](#).

### **Definitions for in-scope long-form outputs**

The policy scope for long-form outputs is largely in line with the position we consulted on. Responding to stakeholder feedback we have further clarified some details such as definitions regarding edited collections, trade books and catalogues.

### **Open access routes for long-form outputs**

#### **Routes supporting a diversity of open access models**

Our policy enables compliance either via making the final version of record open access or through self-archiving an author's accepted manuscript in a repository. This recognises the need for flexibility

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<sup>8</sup> Examples include, the [Monographs and Open Access](#) project led by Geoffrey Crossick for HEFCE and the subsequent work of the [Universities UK Open Access Monographs Working Group](#); the UK HE funding bodies [signalling their intention](#) to move towards an OA monograph requirement for a future national research assessment exercise; and funder policies such as that of Wellcome and the European Commission.



to enable compliance across different research organisations and publishers, and to be supportive of different open access models.

Stakeholders highlighted the importance of the final published version of record for long-form research outputs, and the greater editorial role of publishers than for articles. Therefore, where open access is achieved via self-archiving an author's accepted manuscript, our policy allows the author and publisher to agree the appropriate version to self-archive and requires a link to the version of record.

#### Maximum embargo of 12 months

UKRI's preference is for immediate open access. However, our policy allows a maximum 12-month embargo for both compliance routes, although we expect open access of the version of record will typically be immediate where costs have been paid. This seeks to balance enabling timely access and opportunity for reuse, while providing scope for publishers to recoup costs in first year alongside any income from print sales. A 12-month embargo aligns with other funder policies.

There was significant support from consultees for a 12-month embargo, although we recognise publishers largely advocated for longer, primarily due to concern about their ability to recoup income. In order to mitigate any risks, UKRI will be providing funding to support models that make the version of record open access, alongside publishers maintaining print income. The policy also provides scope for exploration of delayed open access models, allowing reduced charges to authors to make the version of record open access. We consider there is scope for publishers to be able to offer authors open access options compliant with our policy, especially as the implementation date is not set until January 2024 and our policy provides flexibility to support different open access models.

In assessing the open access landscape, many publishers and university presses have (or are developing) open access models. Initiatives such as COPIM will further aid development. We also note that our review heard that open access business models could be important to support the long-term sustainability of monograph publishing.

#### Specialist publisher exception

Informed by feedback to a proposal in our consultation, we have decided to include an exception where a specialist publisher is the only appropriate outlet for scholarship and is unable to offer an open access. However, given the flexibility of our policy we expect authors and publishers to discuss options to make works open access and anticipate use of this exception should be rare.

#### Training grants exception

Also informed by feedback to our consultation, we have decided to include an exception for monographs arising from UKRI training grants. UKRI recognise these are often published a considerable time beyond the lifetime of a grant, when the author may not have access funding and/or support from their research organisation. However, where possible, we expect research organisations to provide UKRI open access funding and support to enable their students to make long-form outputs open access. Where funding is unavailable, we also encourage authors and publishers to consider alternative options to make long-form outputs of publicly funded research open access such as self-archiving an author's accepted manuscript.

#### Supporting development of technical standards

Our policy does not include any technical standard requirements for long-form outputs as standards are less mature than that of articles. While there is consensus that standards are desired, it is clear from responses to our consultation that practice varies, and it would not be appropriate at this time to

have requirements. UKRI will work with stakeholders to further understand practice and identify how to progress the development and adoption of standards.

## **Licensing and copyright for long-form outputs**

### **CC BY preferred but other licences are permitted**

In line with our consulted position, CC BY is strongly preferred to maximise opportunity for sharing and reuse, but CC BY-ND is permitted. We have also decided to permit other Creative Commons licences including CC BY-NC. Our requirements are more permissive for long-form outputs in order to support transition to open access and to help mitigate potential risks to related publishing activities. We recognise that the use of open licences is less established for long-form outputs. UKRI also recognises that publishers and university presses have lower sustainability margins and a more significant role in editing and curation for long-form outputs. Our requirements will also align more closely with other funders policies, which permit CC BY-NC.

### **Third-party material exception**

We acknowledge there can be challenges sharing third-party rights where open access books contain substantial amounts of third-party materials. Therefore, we will include an exception where cost and difficulty securing rights is prohibitive. The wording of the exception has been refined based on stakeholder feedback and we will provide guidance on different options available to authors to publish open access versions of works containing third-party materials.

### **Copyright and licensing requirements for AAMs**

While there was support among consultees for a requirement relating to copyright and/or licensing requirements for AAMs, we have opted not to introduce this requirement at this stage given this is a new policy. Other funders do not currently have such requirements. Also, variation in the editorial involvement needs to be better understood ahead of such a requirement. Again, we acknowledge that it is good practice for authors and research organisations to retain the copyright to their work.

## **Timing of implementation**

### **Research articles from 1 April 2022**

The policy applies to research articles submitted for publication on or after 1 April 2022. Due to delays in announcement, this is slightly later than the January 2022 date consulted on. We have also changed the implementation date to point of submission rather than acceptance, in response to feedback.

This date recognises sector transition to open access for research articles is well established, helps maintain momentum, and facilitates alignment with other funder policies to aid ease of compliance, while providing sufficient notice to research organisations and publishers for preparation prior to the start date. Many consultees supported a 2022 implementation date, citing these reasons, although we acknowledge publishers largely advocated for a longer. As noted above, our assessment suggests most of the venues UKRI authors currently publish in are expected to be able to offer a compliant route from April 2022, particularly given the expansion of transitional agreements.

### **Long-form outputs from 1 January 2024**

The policy will apply to monographs, book chapters and edited collections published on or after 1 January 2024. This substantial implementation period is intended to provide additional notice and time for preparation. It reflects that this is a new extension to our policy, that the landscape is less mature for long-form open access and that the time to publication for books is longer. Many





consultees were supportive of this timeframe, although we acknowledge that publishers largely advocated for longer.

## **Funding decisions**

Financial support for open access was a key consideration for UKRI and we welcome the stakeholder input we received. Taking this into account alongside internal and commissioned cost analysis, we have decided to continue a block grant to research organisations. This will support a range of costs (including support for different open access models), providing research organisations with local flexibility in how best to meet the policy intent.

We are also significantly increasing our level of funding for open access, recognising that UKRI-related research funding is substantially higher than when funding levels were established for the RCUK Policy on Open Access.

We have also determined the need to provide ring-fenced funding to support our new open access requirements for monographs and long-form outputs. The mechanism for allocation will be defined further in preparation for the policy start date.

Our increased investment in open access, which will also include some wider support for open access infrastructure and other supporting interventions, will help support the sector to achieve our policy aims and compliance requirements. It should also support the wider sector to sustainably transition to open access. Further information about funding can be found on our website at [Shaping Our Open Access Policy](#).