1. Aim

1.1 HEFCE has recently launched a consultation on proposals for the implementation of an open access requirement in the post-2014 Research Excellence Framework (REF). This is being undertaken by HEFCE on behalf of the four higher education funding councils. Our proposed response follows overleaf.

2. Background

2.1 As colleagues will be aware, the landscape of scholarly publishing is changing. In particular over the past few years there have been significant efforts to encourage the transition of scholarly publishing towards open access. In HEFCE’s view, the ‘desirable situation in which all outputs from publicly-funded research are freely available on first publication’ is now within reach. Incorporating an open access requirement into the post-2014 REF is intended to help further achieve these ends.

3. Proposal

3.1 HEFCE propose that for submissions to the post-2014 REF (widely expected to be REF 2020), journal articles and conference proceedings first published after 1 January 2016 must have been made accessible through an institutional repository. Outputs must be made available immediately on either acceptance or publication (subject to consultation outcomes), though where appropriate respecting embargo periods in line with HEFCE’s expectations about duration. The final peer-reviewed version of the text should be made available, and in a form allowing readers to search and reuse content. This might mean using specific licences to make content available. Outputs as published must list a UK HEI in their ‘address’ field. Finally, it is accepted that in practice universal compliance is unrealistic and two main options, either asking for full compliance and allowing exceptions on a case-by-case basis, or by specifying a percentage of eligible outputs which must be compliant, have been proposed.
3.2 HEFCE’s consultation seeks advice and feedback on these proposals, both broadly and in response to seven questions posed on specific parts of them. In compiling our response, draft versions have been considered by the ARRO Working Group and REF Strategy Group. I would like to thank everyone who has been involved.

3.3 Responses must be made online by 5pm on Wednesday 30th October 2013.

4. Recommendation

4.1 The Research Committee is asked to ENDORSE our proposed response.

Dr. Tim Brooks
REF Manager

Anglia Ruskin University

Response to HEFCE Consultation on Open Access in the post-2014 Research Excellence Framework

Question 1

Do you agree that the criteria for open access are appropriate (subject to clarification on whether accessibility should follow immediately on acceptance or on publication)?

Do you have any comments on this proposal?

Anglia Ruskin University is fully supportive of the movement within the sector towards open access routes to publication, and we broadly welcome the decision to promote open access publication through the post-2014 REF.

Concerns about the financial consequences of this proposal

We are very concerned about the impact of this proposal in financial terms. While we agree with the sentiment expressed by David Sweeney, that as most research is paid for from the public purse there should be no barriers to accessing that research, the reality is significantly different. The cost of open-access publishing is significant, particularly in order to support article processing charges required under the more prestigious Gold model preferred by the Finch report, RCUK and so on. While the UK Research Councils and other funders provide support for such charges, this income stream is allocated to institutions in proportion to the research funding they already receive. Promoting open access through the REF will disadvantage many smaller, less research-intensive institutions. As ever, the disadvantage will also weigh disproportionately heavily on such institutions, as while the costs will be less, they are also less affordable. Smaller, less research-intensive institutions will therefore be less able to ensure their compliance or to compete on a level playing field in the post-2014 REF. For example, it seems quite possible that enabling open-access publishing could mean that smaller institutions are forced to publish in outlets charging lower or no fees, which may not be the most appropriate place for the research to reach the widest possible audience. This would have consequences for the ‘visibility’ of that research within and outside academia, nationally and internationally, thereby making it less highly rated in future assessment, and less...
likely to achieve the kind of impact desired by government, and therefore directly affecting the institution’s future ability to attract funding for research. Indeed, the proposal will most likely continue the concentration of research funding in a smaller number of institutions across the UK, with all the negative consequences that this entails, despite the recognition of valuable ‘pockets of excellence’ under RAE 2008.

Given the current rules around research outputs in the REF, while it would be the employing institution at the point of publication that covered the costs of open access publication, it would be the employing institution on the REF staff census date that would receive the benefit of this investment in REF terms. This could also be disadvantageous to smaller institutions particularly if they strive to ensure their research is published in the optimum outlet.

We suggest that in order to mitigate some of these effects that HEFCE introduce an explicit element of the recurrent research grant from the academic year in which the policy implementation date (see below) falls. This element of the grant should be driven only by a volume measure, and perhaps a subject weighting, if the costs of open-access publishing can be shown to vary significantly from discipline to discipline. Quality cannot play a part. Such an approach would demonstrate HEFCE’s support for open access in a very meaningful way.

We note that HEFCE has no preference in respect of Green or Gold access models and we recognise that Green has a significantly smaller cost implication. However, in order to ensure that these proposals are affordable, particularly for smaller institutions, Green open access must be a viable proposition. David Sweeney explained at one of the consultation events that ‘virtually all’ major publishers offer ‘green’ open access compliant with the proposed REF criteria. However, responses suggested this view is flawed, and in practice what publishers offer as ‘green’ open access would not meet the proposed REF criteria, for example in terms of embargo periods. This is extremely alarming. David Sweeney went on to suggest that if this was not the case now, HEFCE expects it to be the case by the time the proposals come into force. HEFCE should therefore set out clearly what it expects to be the case when the proposals come into force, and undertake to reconsider these criteria should these predictions not be met, to serve as some reassurance to the sector. It might also be a useful exercise to assess submissions to REF 2014, to establish the extent to which open access publication is already in place.

Concerns about the version criterion

We agree with some but not all of the criteria set forward in the consultation document. In particular, we are concerned at the expectation that it is the final peer-reviewed version of the text which must be made available. A basic analysis of the publishers’ permissions provided by the Sherpa/Romeo service shows a sizeable minority of publishers allowing some form of archiving permit only a pre-peer review version of the text to be deposited in an institutional repository. While we accept that the final peer-reviewed version of the text should be the ideal, we propose that, in line with other arrangements recognising this as a transition period, pre-peer review versions of texts should be acceptable for the first post-2014 REF, but that this position should be re-evaluated after that.

Secondly, while we recognise and support the value of material published via open-access routes to be searchable and reusable in a variety of formats, we are unsure how this criterion can be verified easily by REF panels. We are similarly uncertain about ensuring which version of a text has been made available. This could be an onerous, time-consuming undertaking for whoever the responsibility fell to, and we
wonder if this aspect has been fully considered in setting the criteria. This may have particular reference in respect of the issues covered by Question 7 (see below). We are very concerned that the usual audit model employed by REF – requesting proof of compliance for specific outputs selected at random – if used here (as was suggested by a HEFCE representative at one of the consultation events) essentially means making HEIs deal with this, as they would necessarily have to assure themselves that their outputs were fully compliant with all of the criteria, in order to be confident of assuring REF in turn at audit. The burden of this should not be underestimated.

**Concerns about negative consequences on other aspects of the REF**

Finally, we are concerned about whether the impact of these proposals has been considered in respect of other aspects of the REF. Institutional repositories have long been shown to provide additional discoverability for research over and above traditional scholarly publication routes. Repositories also provide an additional source for such research which other users may prefer to use, rather than seeking the same (or similar) content in the formal publication. The current proposals to promote open-access publication will cause an increase on both counts. This may, therefore, cause problems for the use of citation data within REF (limited as it is in the REF 2014 exercise), especially if users reference repository-based versions of outputs, as traditional citations databases such as Web of Science and Scopus rely on in-journal citations data, and do not incorporate repository usage data. Thus, this would make traditional sources of citation data less reliable. It may be a fallacious argument, because REF explicitly does not make use of journal impact factor or other journal rankings, there is nonetheless a broad correlation between the perceived status of a journal and the quality rating assigned to outputs appearing in it. The use of repository-based versions of texts will affect impact factors and may increase the burden on REF panel members in assessing and institutions in preparing submissions, if the perceived value of specific journals is diminished. We do not argue that these points are sufficient to question whether the post-2014 REF should be used to promote open-access – it should be – but it would be remiss of us not to mention these concerns, to help ensure that all the implications of the proposal have been carefully considered.

**Question 2**

_Do you agree with the role outlined for institutional repositories, subject to further work on technical feasibility?_

_Should the criteria require outputs to be made accessible through institutional repositories at the point of acceptance or the point of publication?_

_Do you have any comments on these proposals?_

**Views on the role of institutional repositories**

We welcome the central role outlined for institutional repositories in the consultation document. We agree with rationale for the amendment to initial proposals, allowing outputs to be ‘accessible through’ rather than deposited within institutional repositories. However, we note that although institutional repositories are ubiquitous, they are not universal; the intention of the emphasis on open-access in the post-2014 REF is to encourage the transition of scholarly publishing towards open-access, rather than the use of institutional repositories to provide such access, per se; and there may also be examples of open-access publishing routes within which deposit in an institutional repository would not be appropriate. We therefore propose that while emphasis should be placed on outputs accessible through or deposited within
institutional repositories, it would be wrong to discriminate against open-access publications which are not accessible via or in an institutional repository.

We also agree with the amendment that in order to comply with open-access requirements in the post-2014 REF, the output does not need to be deposited in the submitting institution’s repository. We note the amendment agreeing that deposition in an author’s institutional repository at the point of publication (or acceptance; see below) would be eligible. However, this could continue to be problematic – the researcher is dependent on their employing institution at that time making the output available, and could therefore be disadvantaged in a future institution if outputs were not made available as they should have been. We are not sure what the solution for this problem is, or indeed if there is one. However, we believe the implications should be borne in mind as it has a bearing on other aspects of these proposals.

All of the above comments notwithstanding, we recognise that for practical purposes it might well be preferable that open-access outputs included in an institution’s REF submission are available either in or through that institution’s repository, and we would recommend that the final requirements emphasize this as a ‘best practice’ approach (but not, for the reasons argued above, as a requirement).

When should outputs be made available?

As to when outputs should be made available if the open-access route is via an institutional repository, we are of the view that the requirement should be at point of publication, though we do not believe this should prevent outputs being made available sooner, should this be appropriate and preferable to individuals, institutions, or disciplinary practice (and indeed partially convincing arguments were made at one of the consultation events as to why date of acceptance could be more easily managed by institutions). Point of publication of the final peer-reviewed version of a text (which we would understand to mean ‘early online’ or equivalent, rather than formal paper publication) is clearly definable and a matter of public record, so adherence can be verified easily; this data can also be harvested from databases such as Scopus. Date of publication is also more likely to be acceptable to collaborators, particularly international, for whom open-access publication is less embedded, or where there are reasonable grounds (not covered by formal embargo arrangements) to make outputs publicly available on date of publication.

Date of acceptance is more nebulous, as what this means and the date in question may vary from publisher to publisher or be more easily open to interpretation (for example, whether acceptance is of a submitted draft, the final peer-reviewed version, or the agreed proofs). Publishers’ correspondence is also typically with a single lead author, leaving co-authors dependent on the lead to ensure that date of acceptance is promptly communicated and/or the output promptly deposited in the lead author's institutional repository. As with the issue around the location of the repository, as discussed above, this could leave other authors at a disadvantage as they are dependent on the lead author in these regards. We also consider that date of acceptance may be problematic for future REF exercises, as deposit in a repository would have the effect of making an output publicly available. If this were towards the end of one REF period, this could render it unsubmittable in its actual published form (including early online) in a future exercise, given the delays between acceptance and publication. Date of acceptance would also, presumably, require institutions to maintain proof of the date of acceptance, as this information is not usually a matter of public record, unlike publication date.
Whether it is date of acceptance or date of publication that is ultimately decided upon, we note the use of the word ‘immediately’ in question 1 of this consultation, which is not repeated in question 2. While we certainly agree that outputs should be made available as soon as possible, and that ‘immediately’ would be the ideal, we would expect the requirement to allow a realistic window for the output to be deposited in an institutional repository or other open-access route, say within two months, of date of publication/acceptance. There are a number of practical considerations (e.g. authors or repository support staff being away; technical issues with repository functionality; need to have agreement of collaborating authors for upload) which make ‘immediately’ an impossible criterion to achieve in practice.

In either case we would also point out that some record would have to be kept of the date an output was uploaded to an institutional repository or the metadata allowing access to it was inputted. Guidance on the appropriate evidence needed (for example, a time-stamped screenshot?) would be helpful. Doing so will also add to the burden of these proposals. We do not disagree with the need for this criterion, so do not raise the burden as an issue, but nonetheless we feel that the overall burden created by these proposals should not be ignored.

**Question 3**

*Do you agree that the proposed embargo periods should apply by REF main panel, as outlined above?*

*Do you agree with the proposed requirements for appropriate licences?*

*Do you have any comments on these proposals?*

**Embargo periods**

As with any new initiative we welcome the greatest possible alignment of its requirements with existing policies and expectations. Therefore, aligning embargo periods with the expectations already laid down by the UK Research Councils is sensible. We note, however, that their policies already allow for a ‘usual’ and a ‘maximum’ embargo period and, for simplicity, would argue that the ‘maximum’ period should be applied for purposes of the post-2014 REF. Similarly, we note that the UK Research Councils distinguish not merely between STEM and non-STEM subjects, but between biomedical and other STEM subjects, as well as with other non-STEM subjects. If followed closely in the expectations for the post-2014 REF, this would mean a mixed approach, particularly in Main Panel A. We would therefore propose ignoring the different approach to biomedical and non-biomedical adopted by RCUK, and sticking simply with their STEM and non-STEM maximum embargo periods. (We note that RCUK aspire to a standard maximum embargo of six months, and would expect that REF policy will be re-evaluated after the first post-2014 REF to ensure that it remains in step with RCUK expectations).

There is a practical point around embargo periods, which is that in order to be submitted to the REF, outputs need to be available in the public domain. This does not necessarily mean that they are freely available, as they could be subject to an embargo which does not expire until after the end of the REF period. Open access to the output cannot, therefore, be proven. We would welcome a statement to confirm that such outputs are nonetheless eligible for submission to the post-2014 REF.

**HEFCE proposals over-complicated**

We note with interest the discussion of appropriate licenses for open access publications, particularly in respect of the criterion around making outputs fully
searchable and reusable, which we had taken to be a software/formatting issue, as opposed to being licence-dependent.

Obviously in order for an output to be made available on an open access basis, it must have the appropriate licence. It would be helpful if a specific licence or licences could be identified as being compliant with these criteria. However, we wonder if including consideration of licencing terms (even in as broadly and open-endedly terms as they are proposed here) and, indeed, embargo periods, is an unnecessary complication to the proposals. Institutions are already able to deposit outputs in open-access repositories; they do so in accordance with whatever licence terms and embargo periods are stipulated by the publishers from whose content these items are drawn, or following the requirements of the funders who supported the research. Including requirements for embargo periods and licence types that conform to certain expectations seems to be at best unnecessary, and, as with other proposals made above, assuring such compliance seems likely to be onerous and time-consuming.

It could also, potentially, be a negative influence on researchers’ behaviour. It may influence their selection of where to publish their research – rather than the most appropriate journal for their research, by which they can reach their target audience as quickly and effectively as possible, but which have less-than-ideal licensing or embargo terms, they may choose outlets because they meet the requirements of the post-2014 REF, but in other ways are less appropriate. Alternatively, by imposing yet another set of considerations, researchers may simply decide not to pursue open-access compliant routes, thereby opting out of REF submission altogether, with the concomitant consequences. The proposals also imply a belief that institutions have control over where researchers publish. Obviously a ‘hearts and minds’ approach can be taken by institutions to persuade researchers to include open access and the REF in their consideration of where to publish, but ultimately researchers will publish where they choose. Specific HEFCE funding as proposed above would be helpful to institutions in enabling them to exert influence over researchers’ publications practices.

We return again to the point made in the consultation document, about the present period being one of transition. While we strongly support open-access publishing, and applaud the initiative to promote it through the post-2014 REF, the best progress will be made in collaboration with the publishers, rather than in conflict with them. Therefore, we would argue that the focus of these initiatives has to be those publishers who do not yet permit open access publication, rather than those who are not providing ideal open access permissions. Worrying about the detail of open-access publication, such as licence types and embargo periods, seems to us premature at this stage. We recommend that these criteria are abandoned for the first post-2014 REF at least, and reconsidered thereafter.

**Question 4**

Do you agree that the criteria for open access should apply only to journal articles and conference proceedings for the post-2014 REF?  
Do you have any comments on this proposal?

We are fully supportive of the proposal that the criteria for open access should apply only to journal articles and conference proceedings. This seems to us entirely appropriate and sensible, as these are the output types which are very likely to form the majority of submissions to REF 2014 (and future exercises), and for which open-access publishing options are already best-established. This is the kind of common-
sense approach we wish to see apply in other areas of the proposal, such as in regards to specifying requirements around embargos and licence types.

Saying that, questions were raised at a consultation event that suggested that conference proceedings were perhaps insufficiently mature to be included as has been proposed. We have no view to offer in this regard other than to comment that the argument made was convincing and we hope it will be investigated.

We also noted a discrepancy in your terminology – the current REF rules refer to ‘conference contributions’ which could include papers presented but both published and unpublished formally thereafter. We would welcome further clarity on what precisely is intended by ‘conference proceedings’ in respect of the open access criteria proposed.

**Question 5**

*Do you agree that a notice period of two years from the date of the policy announcement is appropriate to allow for the publication cycle of journal articles and conference proceedings?*

*Do you have any comments on this proposal?*

**Policy implementation date**

We agree that a two-year notice period from the date of the announcement of this policy to its implementation is appropriate. However, we would suggest that in order to best manage this in the post-2014 period, it would be sensible for the policy to apply from 1 January, so that it applies for the whole of a calendar year. Given that the notification of the intention to pursue this course of action was given in broad terms in February 2013, and assuming that the detailed policy is delivered as promised in early 2014, we believe that 1 January 2016 is a reasonable implementation date, especially as exceptions will be permitted.

In setting this implementation date, we would ask for the policy to provide absolute clarity about what is intended. Are outputs published before the implementation date excluded from any consideration of its open-access status? For example, if a threshold approach is taken to exceptions (see question 7 below), would this apply only to outputs published on or after the implementation date, or could compliant outputs published before this date also be used to ensure that the compliance threshold has been met? What date of publication would be taken for ‘early online’ type outputs – the formal paper publication, or the earlier online publication? If deposition in a repository is agreed to be required on acceptance rather than publication, what would happen with an output accepted in 2015, but not published until 2016 – would this need to be compliant with the implemented policy?

**Possible institutional strategies and REF response**

We would also request that guidance be given to how the panels would treat a submission to the post-2014 REF in which the journal articles and conference proceedings were all published prior to the policy implementation date, such that the submitting unit was not demonstrating any preference for open access. Although this may be an unlikely scenario, it is not impossible. For REF 2014, for example, it would be entirely legitimate to compile a submission whose outputs had been published between 1 January 2008 and 31 December 2010. It would be unfair to institutions for any steps taken to prevent such a submission only being published with the post-
Question 6
Do you agree that criteria for open access should apply only to those outputs listing a UK HEI in the output’s ‘address’ field for the post-2014 REF?
Do you have any comments on this proposal?

We agree that the criteria for open access should only apply to those outputs listing a UK HEI in the output’s ‘address’ field for the post-2014 REF, for the reasons set out in the consultation document.

We would request further clarification around this criterion, as we have done above in regards to the implementation date. Non-UK-based researchers may have been able to publish in open-access journals, and, if you accept our arguments in response to Question 2 above, about the desirability of accepting open access outputs not included in an institutional repository or accessible via one, it follows that it may be that previously non-UK-based researchers may actually have outputs eligible under this policy. Should a threshold policy be put into place, would such an output be allowed to contribute towards it? Similarly, we can foresee a scenario in which a non-UK-based researcher, who has published in collaboration with a UK-based colleague, moves to the UK. In such a scenario the outputs would have a UK HEI address, but whether they had been deposited in an open-access repository would be dependent on the originally-UK-based colleague and their institution. This could disadvantage the originally-non-UK-based researcher. Similar concerns could apply to staff moving into HEIs e.g. from industry or other non-HE sectors, and we would welcome further guidance on these scenarios.

Question 7
Which approach to allowing exceptions is preferable?
If selecting option b:
• Do you agree that the percentage targets are appropriate?
• Do you believe the percentage target should apply consistently or vary by REF main panel?
Do you have any comments on these proposals?

We agree that some form of exception rule is essential to ensure this policy can have the desired effect without being overly disadvantageous to individual researchers or institutions.

Full compliance model

The proposal to expect full compliance but to accept exceptions on a case-by-case basis is probably the easiest system to operate. We acknowledge the greater element of risk for institutions entailed by this approach. However, this could be mitigated to some extent by developing a system modelled on the approach taken to dealing with individual staff circumstances under REF 2014 – i.e. by developing a series of agreed examples which can guide institutions in establishing acceptable exceptions. Some of these we have identified above, for example where researchers are dependent on previous employing institutions that did not deposit outputs in their institutional repository. A second approach to mitigating the risk of a case-by-case exception approach would be to allow submission of reserve outputs, in much the same way as in REF 2014 reserve outputs could be submitted in case claims for
double-weighting recognition were not accepted. If one or both of these methods were adopted, we would strongly support this option.

**Threshold model**

We are not sure that a threshold approach can be valid. Institutions will presumably be asked to indicate which of their outputs meet the open access requirements; it is this declaration that will then be tested by audit. Therefore, the threshold will in practice be a threshold of institutional declarations, rather than actual compliance. A full compliance model would be no different, but would, at least, enable audit of both the exceptions declared by institutions as well as outputs claimed to be compliant, and less likely to allow institutional game-playing.

A percentage-based threshold approach would also be very problematic to operate. As noted in responses above, there are a number of possibilities where compliant outputs produced before the implementation date or outside the UK could contribute to the threshold, and we would wish clarity on whether these can. We would also need absolute clarity on various criteria which determine whether an output is eligible or not, including detailed explanations of the process for ensuring this compliance. Again, we have raised these above, for example whether outputs are fully searchable and reusable, if they have the appropriate embargo and licence terms, etc. HEIs will need to be able to replicate the post-2014 REF’s approach to this, in order to check that the percentage threshold has been reached. These calculating/checking activities will be very burdensome, in any case, and would not be finalised until decisions about which outputs to be submitted have been made. This would make a threshold model virtually impossible for institutions to work with.

A threshold model would also be potentially problematic in regards to researcher behaviour. Setting a threshold that, say, only 70% of outputs actually need to comply may lead to some researchers deciding that therefore they need not worry about these restrictions. In terms of the ‘hearts and minds’ approach institutions could take to influence researchers referred to above, it would be preferable to have a 100% compliance target.

We assume that submitting non-compliant outputs would lead to some form of penalty (see below). In the case of the threshold approach in particular, the nature of these penalties would need to be carefully thought through. In the situation that a submission fails to meet the threshold, individual outputs could not be penalised, as there would be no means of establishing which non-compliant outputs were acceptable under the threshold, and which were not. This would further suggest that a threshold model is unworkable in practice.

The proposals for a threshold target do not make it explicitly clear how this threshold target is to be calculated. Three options seem likely: percentage of all eligible outputs submitted by the institution across all of its UoAs; percentage of all eligible outputs submitted by the institution across all of its UoAs falling under the same Main Panel; and percentage of all eligible outputs submitted within a single UoA. Of these, some would be ruled out depending on the nature of the percentage target chosen, of course. The latter is the most supportable of these options, as it leaves the institution in the most flexible position to calculate where it stands and react accordingly, but none of these options is particularly attractive.

As to the target percentages, should the threshold approach be adopted, we feel if a single consistent target is adopted it should be equivalent to the lowest threshold
acceptable in any Main Panel – 60% for Main Panel D, to use your example. We accept this may mean the intentions of this policy to promote open access may not be effectively met, and would think that varying the target by Main Panel would give sufficient flexibility.

Penalties for non-compliance

Finally, in regards to either approach, we request that the consequences of non-compliance are clearly explained. For example, will non-compliant outputs be automatically given an unclassified grade? This would seem to be unduly harsh, and may encourage institutions not to submit their best research if there are concerns about its compliance, thereby potentially preventing the post-2014 REF from being able to showcase the best of UK research. Alternatively, it would mean reducing the quality profile of a submission for a reason unconnected with its actual quality, thereby damaging the reputation of the submission, its home institution and indeed UK Plc unnecessarily. Or would some other form of penalty be applied, that would be less severe? One proposal made at a consultation event entailed a financial penalty in proportion to the extent to which an institution failed to comply with the set threshold. Given that the threshold approach cannot be accurately audited, this form of penalty is in practice unworkable.

Is this the right approach?

As a final point, we are concerned that introducing these criteria will mean a fundamental change in UK research assessment practice. Since the first RAE took place, the purpose of research assessment has been to identify and reward quality. Whether something is or is not available in open access form has no bearing on its quality. We suggest, therefore, that while the post-2014 REF can be used as a means to promote open access, in essence it should be run in the same way as REF 2014. Data can be collected alongside about the open access status of publications included in submissions, subject to a separate rating and reward process in respect of the proportion of the outputs that are available in open access format. This would, at a stroke, remove many of the issues raised above around influencing researcher behaviour, compliance rates and penalties, and make the exercise entirely about influencing publishers to adopt open access models.