

15 May 2017

Professor Anne Kelso AO
Chief Executive Officer
NHMRC
GPO Box 1421
CANBERRA ACT 2601

lauren.wisniewski@nhmrc.gov.au

Dear Professor Kelso

NHMRC OPEN ACCESS POLICY: DRAFT FOR CONSULTATION

Thank you for the opportunity to comment on the draft NHMRC Open Access Policy. Open Access continues to be a hot topic amongst the research community. In responding to the draft NHMRC Open Access Policy we have consulted with colleagues from the Research Office, Faculties and Research Centre and the Division of Library Services. I trust our comments will be useful to you in finalising the policy.

1. NHMRC Open Access Policy: Publications

CSU suggests an alternative terminology to use of the word 'immediate' for the metadata to be made available in the institutional repository. While every effort is made to upload data to the repository as soon as possible, there can often be unintentional or unavoidable delays and it would be unfortunate if these resulted in non-compliance. Typically, communications re publications are managed directly between the author and the publisher and so there is typically a short lag period until the institution is notified. The policy notes that the *publication metadata requirement applies regardless of whether the publication is openly accessible upon publication, will be made openly accessible in the future, or will never be made openly accessible*. We are strongly supportive of this statement, and also note that if publications cannot be made open access within 12 months it should be noted in the RGMS. Perhaps a timeline for metadata upload could be considered within a 2 month timeframe.

Further clarification is requested with respect to book chapters, nothing however that these are not the most common publication format in most NHMRC-supported disciplines. It is suggested that if an entire book was the result of NHMRC funded research that it should be held to the same standards of open access practice as journal articles and refereed conference papers.

2. NHMRC Statement on Data Sharing

CSU is supportive of the concept of open access data sharing, with appropriate conditions and protection of data measures. The draft policy provides strong guidance in this area and reinforces that fact that it is critical to incorporate plans for data sharing from an early stage in the research process, including during design, ethics applications and informed consent. Best practice in the research data management space would dictate similar practices.

There is still some reluctance to make data open access for fear of competitors or other uses. This may change over time, but areas of concern include for example data arising from research projects with multiple funding streams or extensive datasets which may be used for an extended period by the original research team. Greater clarity in this area would be helpful. It is noted that the draft policy cautions against the release of early stage raw data or inappropriate data analysis which is critical advice.

3. NHMRC Principles for Accessing and Using Publicly Funded Data for Health Research

CSU is supportive of the stated principles which are clearly stated and make expectation of both data custodians and research teams very clear.

4. Listing of IP Generated from Public Funding in SourceIP

The requirement for IP generated through publically funded research to be listed in SourceIP should be supported. This platform will not compromise the IP but will greatly enhance the collaboration and exploitation opportunities for researchers/institutions who have generated the IP.

In closing, I wish to note our continued support for open access to research outcomes and research data, to ensure maximise utilisation of critical knowledge and learnings. I was fortunate to be involved in the recent F.A.I.R working group with the Australian Open Access Strategy Group, and we continue to support the Australian Research Council (ARC) Open Access Policy and welcome the similarities between the policies of the ARC and NHMRC.

Kind regards



Professor Mary T Kelly

Deputy Vice-Chancellor (Research, Development & Industry)