Royal Historical Society

Submitted Response to UKRI Open Access Review Consultation

27 May 2020

Full Consultation Details: https://www.ukri.org/funding/information-for-award-holders/open-access/open-access-review/

Background Information Questions

To enable UK Research and Innovation (UKRI) to effectively analyse responses from different stakeholder groups, respondents are requested to provide some background information about themselves. Questions marked with an asterisk (*) are mandatory. In the online response for some questions, including mandatory questions, will only appear for specific types of respondent.

I. Please provide a named contact and email address so that UKRI can contact you regarding your responses. * Professor Margot Finn

II. Please indicate if you are also happy for UKRI to contact you about the outcomes of the consultation. * Yes

III. Please indicate who you are responding on behalf of. *
    b. An organisation

IV. Please specify the name of your organisation. * Royal Historical Society (RHS)

V. Please specify the name of your group/department. * Not applicable

VI. Please specify which country you, your organisation or your group are based in. United Kingdom (England)

VII. Which disciplinary area(s) would you associate you, your organisation or your group with? Please select all that apply. *

<u>a. Arts and humanities</u>

b. Medicine, health and life sciences

c. Physical sciences, engineering and mathematics

d. <u>Social sciences e. Interdisciplinary research</u>

f. Not applicable

If you, your organisation or your group is responding on behalf of a specific discipline within an area indicated above, please describe it using a maximum of five key words separated by spaces: <u>History</u>

VIII. What best describes the capacity in which you, your organisation or your group are responding? *

a. Researcher(s)

b. Publisher (including employees and representative bodies)

c. Learned society or academy with an in-house publishing arm (including employees)

<u>d. Learned society or academy which outsources publishing to a third party (including employees)</u>

e. Learned society or academy which does not publish (including employees)

f. Providers of scholarly communication infrastructure or services (including employees and representative bodies)

g. Library or research management (including departments, employees and representative bodies)

h. Higher education institute (HEI) (including departments, employees and representative bodies)

i. Business that conducts, uses or publishes research and/or innovation (including employees and representative bodies)

j. Research and/or innovation funder (including employees and representative bodies)

k. Member(s) of the public

l. Other research performing organisation (including departments, employees and representative bodies) - please specify:

m. Other user or producer of research outputs - please specify:

n. Other - please specify:

IX. UKRI will share responses to this consultation (excluding personal data) with its sponsor department, the Department for Business, Energy and Industrial Strategy (BEIS), and other UK government departments and agencies, to explore OA issues. Have you or members of your group applied or been part of an application for grant funding from the following? If applicable, please select all that apply.

<u>a. UKRI (including AHRC, ESRC, Research England, as well as predecessor bodies, HEFCE and RCUK)</u>

If you or members of your group have applied or been part of an application for grant funding from

other UK government departments or their subsidiary bodies, please specify the awarding body:
<u>Not applicable</u>

X. If responding on behalf of a company, please provide your Company Registration Number (if known):

XI. If responding on behalf of a charity, please provide your Charity Registration Number (if known):
<u>206888</u>

XII. If responding on behalf of an organisation, please indicate your staff headcount (if known).
    <u>d. < 10 (micro business)</u>

XIII. If applicable, which researcher career stage(s) do you, your organisation or your group represent? Select all that apply.
    a. <u>Postgraduate researcher</u>
    b. <u>Post-doctoral researcher</u>
    c. <u>Research leader (responsible for intellectual leadership and overall management of research projects)</u>
    d. <u>Other (including retired researcher, citizen researcher) – please specify: Retired researchers, researchers based in libraries, archives and heritage organisations incl. museums. Over a quarter of our Fellows are based outside the UK: we thus represent both a national and an international community of historians.</u>

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 / <u>Neither agree nor disagree</u> / Disagree / Strongly disagree / Don't know / No opinion.

If anything is unclear, please explain why (1,350 characters maximum, approximately 200 words).

It is clear that peer-reviewed journal articles based on original research funded by the Research Councils (RCs) are in scope. It is less clear whether peer-reviewed commissioned review articles and special forums in journal articles are in scope. Such articles have a long-standing and distinctive place within History journals nationally and internationally. Many such articles and forum contributions, even when undertaken during periods of Research Council funding, have limited direct connection to authors' original research in RC-funded projects. Others may draw more substantially from such

RC-funded projects.

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? <u>Yes</u> / 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.

Circa 80% of History research is funded by QR/REF, not by RC-grants. 'Green' OA via self-deposit of AAMs in repositories is now the only affordable mechanism available at scale to most historians. Historians report limited access to UKRI block funding for OA, which is predominantly allocated to STEM subjects. Analysis of APC returns for 2016/17 shows how small a proportion of block funding is allocated to Humanities publishers (https://www.ukri.org/files/funding/oa/rcuk-apc-returns-analysis-2016-and-2017-pdf/ : 9). Access to Read & Publish (R&P) and Publish & Read (P&R) OA deals is limited, and its effects unknown.

In this context, we need evidence of the relative utility of Green vs Gold outputs: 1) as effective tools for Humanities research; 2) as effective means of disseminating Humanities research. Further, if one type of OA is more effective than another, we need evidence of how each is distributed among UKRI researchers. Do women, BME and disabled researchers enjoy equal access to Gold with other researchers? UKRI's own 2019 data for the HC Select Committee on Science & Technology 'reveals a shocking disparity in the success rates of female, disabled and ethnic minority applicants for research funding compared to their white, male, non-disabled, counterparts': https://www.tigerinstemm.org/news/pr_ukri_20191105.

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 / <u>No </u>/ 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? <u>Yes</u> / 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.)

1) Zero-embargo CC BY AAM self-deposit is prohibited by the great majority of UK and international History journals. In RHS's October 2019 report, of 107 hybrid History journals surveyed, none provided this option: https://files.royalhistsoc.org/wp-content/uploads/2019/10/17204855/RHS_PlanS_Full_Report_Oct19_FINAL_WEB.pdf : 7, 43-48, esp. 43-46. Non-UK journals were especially antagonistic to this proposal, noting that UK authors, while valued, were not sufficiently numerous among their authors to force a change of their business models;

2) In Humanities journals extensive 'revise and resubmit' processes obtain: e.g. in 2019, 46% of French History's articles were accepted only after this process. Peer review and extensive editorial interventions are integral to producing the final output, as illustrated by this worked example: https://blog.oieahc.wm.edu/what-does-it-take-from-submission-to-publication-at-the-wmq/ . Zero-embargo CC BY undercuts the business model that funds these costs;

3) Historians draw on sources in many ancient and/or modern languages and statistical material. In 2019, sub-editorial costs accounted for 24.5% of total production costs (exclusive of overheads) of our journal. This was the highest category of expenditure within its production process after manufacturing costs (44.8%);

4) Because the Green AAM has not been checked for errors its accuracy is lower than the VoR. Lacking copyediting, it also often differs in its wording from the VoR. Because AAM pagination differs from the VoR, the AAM has very limited utility in historians' footnotes/endnotes. These are the internationally accepted referencing mechanisms by which historians substantiate arguments and render them open to scrutiny by other researchers;

5) CC BY's skeletal 'attribution' requirements allow forms of use which depart from the accepted national and international referencing standards in Humanities. Loosening these standards in publication imperils core skills which Humanities graduates bring to the labour market, notably 'critical thinking' and 'assessing and analysing information as outlined in the British Academy Qualified for the Future report (p.23) In UK History, a substantial portion of the 'Read' audience for scholarly articles is composed of undergraduates who use outputs in their essays, a point with implications that the framing of UKRI's OA policies does not recognize.

6) Gold VoR is a much superior research tool in History compared to the Green AAM, but because typically less than 20% of UK History research is RC funded, the APC model of Gold has limited scope in our discipline.

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 / <u>No</u> / 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.

Mandatory repository deposit of in-scope Gold OA articles represents an unnecessary
duplication of labour on the part of universities, which are already subsidising 20% of the full
economic cost of RC research, given that the UKRI funding level is only 80% of fEC. We know
of no evidence that adding this requirement would significantly enhance discoverability of
these articles. In the absence of countervailing evidence, such a requirement would appear to
be a poor use of scarce public funds by UKRI.

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? <u>Yes /</u> 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.

Historical scholarship is inherently international with global staffing profiles,
collaborators and audiences. Policy protocols that reduce the diversity of the researcher
base, even whilst they may boost parts of the audience base, challenge the quality of UK
research. The version of OA likely to be more economically sustainable nationally within
Humanities (Green) is much less satisfactory internationally in scholarly terms (due to
the inclusion of uncorrected errors, the importance to users of changes to wording
introduced at copy-editing and proofing stages and the lack of stable paginating for
referencing). Neither nationally nor internationally is reference to the Green AAM (as
opposed to the Gold VoR) accepted by journal editors in historical referencing
(footnotes, endnotes and bibliographies). In Humanities outputs have a relatively long
half-life (often 50-60 months: see Mandler, 2014. 'Open Access: A Perspective from the
Humanities', Insights 27 (2): 166–70) and may well be consulted for decades. Rapid
speed of publication is a lower priority than the availability of accurate, citeable
scholarship. We are not aware of any systematic evidence that academic, commercial or
public demand for instant access to inaccurate Green History outputs exceeds demand
for slightly slower access to fully accurate VoRs of these outputs under embargo
systems.
The proposed zero-embargo CC BY mandate for the Green route, currently the only OA

model available at scale to most History/Humanities (and many Social Science) researchers, will clearly limit UK researchers' access to publication in the full range of peer-reviewed journals, while threatening the financial viability of many UK research journals. This represents a fundamental reversal of the UK funding bodies' longstanding REF principles: 'The REF aims to assess all types of research without distorting the activity that it measures.' ('Assessment Framework & Guidance on Submissions', REF2014: 4).

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 / <u>Strongly disagree</u> / Don't Know / No opinion.

Please explain your answer (1,350 characters maximum, approximately 200 words).

Many 3rd-party owners of research materials such as images, literary texts and musical scores do not allow their use/publication by CC BY: of major UK art museums, only Courtauld allows CC BY. Restrictions pertain to public rights-owners (archives, local councils, museums), commercial rights-owners, and private individuals. Removing these items from publications (e.g, by using 'tombstone pages') removes crucial evidence from authors' arguments. It is equivalent to randomly removing graphs documenting clinical results or autoradiographs documenting experiments in STEM subjects. CC BY requirements fundamentally distort the evidence historians can use in their publications, shifting them away from 3rd-party materials unavailable for CC BY (but available with CC BY-ND, CC BY-NC or CC BY-ND-NC) toward those that are CC BY available. This affects both the research questions that can be asked and the arguments that historians can substantiate with evidence.

High-quality publication in History relies upon high-quality copy-editing, proofreading and technical support from professionals, typically employed by publishers. By reducing the revenue streams of these publishers (by reducing their subscription base) zero embargo AAM publication will likely undercut the availability, quantity and/or quality of this editorial support.

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 / <u>Strongly disagree</u> / 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).

We welcome the use of ND. Requiring case by case applications for ND however poses an excessive administrative burden both for researchers and Research Councils. The latter lack both staff numbers and expertise to assess such applications—as RC staff have confirmed to us. In meetings with stakeholders, UKRI representatives have repeatedly stated that they are open to suggestions. We suggest that CC BY-ND be the STANDARD and CC BY the OPTIONAL licence for UKRI OA policy for journal articles. In one fell swoop, this would render the new policies significantly more feasible for AHSS than the proposals.

Some have argued that CC BY-ND precludes data- and text-mining of research outputs. NB however the following government copyright advice: 'An exception to copyright exists which allows researchers to make copies of any copyright material for the purpose of computational analysis if they already have the right to read the work (that is, they have 'lawful access' to the work).' (This applies for non-commercial research only.) Those with the right to read outputs (e.g. by subscription, or via CC BY ND) thus also have the right to use it for computational analysis. See: https://www.gov.uk/guidance/exceptions-to-copyright

CC BY's 'attribution' standards fall far short of international scholarly conventions in HSS disciplines. CCBY's lax standard allows a user to distort facts and/or endanger researchers and their subjects of study (human beings). For example, a user of a researcher's article on chattel slavery, domestic abuse, postnatal depression or human trafficking can re-mix this research in ways that fundamentally distort researchers' (or their subjects') arguments.

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 Don't know / No opinion.

If yes, please explain how (1,350 characters maximum, approximately 200 words).

An inability to publish with CC BY-ND, CC BY-NC, or CC BY NC-ND licences will limit Humanities researchers' access to evidence needed to illustrate/support their arguments in OA outputs, thereby distorting their research. Removing such data also removes readers' ability to test authors' claims.

Some 3rd-party rights holders prohibit any use without –ND, –NC, or –ND-NC. Where 3rd-party rights holders do permit ND/NC licences, there are often time limits problematic for OA (typically 5 yrs) and significant cost implications for researchers for payment to use such materials in OA articles. Current charging models of many cultural institutions

(including several UK national museums) set payments for OA image rights significantly higher than for non-OA outputs.

It is vital that UKRI commits to include payment for such costs in its RC grants, to prevent these new charges falling on authors to absorb from their salaries. We note that displacing such charges onto authors' salaries will have a disproportionately negative impact on persons with protected characteristics under the 2010 Equality Act: both women and BME researchers are demonstrably disadvantaged in this financial context (https://files.royalhistsoc.org/wp-content/uploads/2019/10/17204855/RHS_PlanS_Full_Report_Oct19_FINAL_WEB.pdf , pages 26, 71-72).

Q10. Are there other considerations UKRI should take into account regarding licensing requirements for research articles in-scope of its proposed OA policy? <u>Yes</u> / No / Don't know / No opinion.

If yes, please expand (1,350 characters maximum, approximately 200 words).

There is an obvious disconnect between current DCMS protocols and UKRI's OA proposals. In a decade that has seen significant falls in government Grant in Aid, DCMS has charged cultural institutions with maximising commercial exploitation of their collections (even when in the public domain), a directive that runs directly counter to the free OA reuse of 3rd-party materials recommended by UKRI. Given the likely impact of COVID19 upon (e.g.) DCMS museum and gallery funding, it is unrealistic to expect any imminent relaxation of that commercial imperative.

It is also important to explore the implications of UKRI's proposals for public institutions' commercial agreements with respect to archival materials in their collections. In Australia, government funding has placed digitised national newspaper collections in the public domain OA. In contrast, institutions such as the British Library have agreements with commercial providers such as Findmypast and ProQuest to make images from their research collections available to these commercial entities' paying subscribers. Extracting data from these commercialised assets is a known financial and administrative burden for UKRI-funded researchers. UKRI's proposed policies' implications for these agreements require attention.

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? <u>Yes</u> / 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.

Extending CC BY requirements to QR-funded research will exacerbate the problems we note in reply to Q9. Where research is funded by Research Councils and where 3rd-party rights-holders are willing to make them available for use with CC BY, there is a prime opportunity for UKRI to demonstrate its commitment to OA by creating mechanisms for payment of the (often high) charges levied by cultural organisations and other rights-holders. For QR-funded research, these costs are habitually carried by researchers themselves. Given the known disparities in salaries paid to (e.g.) female and BME staff in the UK (see our response to Q9), extending this mandate to QR-funded research risks imposing disproportionately adverse research conditions on researchers with protected characteristics.

It is important to recognise how pervasive use of 3rd-party materials is in Panel C and D REF submissions. The fullstop book data from REF2014 found that over 50% of these outputs included illustrations, maps, music scores and the like. This study found 'that the following subjects (listed alphabetically) make significant use of third-party content, and therefore are likely to be sensitive to the issue of third-party rights for OA: • anthropology and development studies • architecture, built environment and planning • archaeology • area studies • art and design: history, practice and theory • classics • geography, environmental studies • history • music, drama, dance and performing arts' It noted that 'many image rights holders do not allow the reproduction of their material in books published in a creative commons licence.' (*Open Access & Monographs: Evidence Review*, UUK, October 2019; 11): https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Documents/2019/UUK-Open-Access-Evidence-Review.pdf .   This is no less the case with respect to journal articles.

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.

Very few of the 107 national and international History journals surveyed by the RHS in 2019 considered author retention of copyright to be problematic (see https://files.royalhistsoc.org/wp-content/uploads/2019/10/17204855/RHS_PlanS_Full_Report_Oct19_FINAL_WEB.pdf, page 50). Both journal editors and publishers confirmed that this was the pervasive direction of travel in the sector.

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 journals and OA publishing platforms?

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 **Agree:**

PIDs are essential for discovery, and thus for OA outputs to function (as oppose merely to be published) as 'open'. For smaller charitable journals/publishers, however, which are vital in our discipline, funding to cover the associated costs is needed. See also Eve, Vega and Edwards, 'Lessons from the Open Library of Humanities'. *Liber Quarterly*, 30 (2020).

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**

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

With the proviso that either exemptions or funding/staff expertise is available for smaller journals, which in our 2019 survey reported that these requirements would otherwise be financially prohibitive to them.

e. openly accessible data on citations must be made available according to the standards set out by the Initiative for Open Citations (I4OC) **Don't know**

f. self-archiving policies must be registered in the SHERPA RoMEO database that underpins SHERPA/FACT **Don't know**

g. unique PIDs for research management information must be used and must include the use of ORCID to identify all authors and contributors **Neither agree nor disagree**

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 institutional and subject repositories?

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 /
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 **No opinion**
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? <u>Yes</u> / No / Don't know / No opinion.
Please explain your answer (2,650 characters maximum, approximately 400 words).

Born-OA History journals operated by small charities (for example, *Ambix* and *Programming History*) rely on voluntary academic and/or community-based labour and report that they lack the finances or time to employ specialists to provide the mooted technical standards for their journals. (As noted in our October 2019 *Guidance* report, these technical standards are also not met by many History journals in the DOAJ). This is a problem that extends far beyond History journals. As Collins and Milloy noted in their 2016 OAPEN-UK Final Report https://issuu.com/carenmilloy/docs/oapen-uk_final_report_single_page_v : 37), 'Most learned societies depend upon volunteers from the discipline to manage their activities, but these volunteers rarely have the skills to undertake all the tasks involved in academic publishing. This is particularly true as new digital technologies become more prevalent in the sector: learned societies rely on publishers to manage and produce high quality books that reply with all relevant standards.' If citizen science and a diverse journal ecosystem are to flourish in the new OA environment, access to UKRI funding and/or staff expertise would be requisite for them to comply with these new technical requirements.

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 / <u>No opinion</u>.

Please explain your answer (1,350 characters maximum, approximately 200 words).

Historians access research materials from private and public, hard-copy and digital repositories. E.g. *Reason and Rhetoric in the Philosophy of Hobbes* acknowledges 'His Grace the Duke of Devonshire and the Trustees of the Chatsworth Settlement for permission to study the Hardwick and Hobbes manuscripts…at Chatsworth'. Even materials in public repositories are often owned by 3rd-parties whose agreement is required for any reproduction.
Historical practice is not primarily concerned with reproducibility of data-sets created under specific conditions and owned by specific research projects. It is essential to understand the very different operation of access to 'underlying research materials' within many Humanities disciplines compared to many STEM and Social Science subjects (or sub-fields within them). Some historians do use datasets in ways that make access to underlying research materials feasible and useful. Many quantitative Economic History and Oral History articles thus already provide access to their datasets. However, for the great bulk of research in History neither a qualitative mode of extracting data (targeted qualitative note-taking from archival or printed materials) nor a discursive mode of argumentation makes the provision of

underlying research materials feasible or useful.

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 <u>c. The policy should apply later than 1 January 2022</u> 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).

To gain the confidence of the research community, prior to policy implementation it must be evident to researchers that there are sufficient high-calibre journals available to publish in that meet the new UKRI OA criteria. Based on the evidence in the 2019 RHS survey of 107 UK and international History journals, that is not at present the case with respect to the proposed zero-embargo CC BY AAM 'Green' route. Nor is there sufficient clarity with respect to the availability of 'transformative agreement' model journals. No provision has been made to offer access by ECRs or independent researchers to OA repositories (for Green compliance) or to 'transformative' journals (for Gold compliance). Many ECRs lack stable affiliations with universities (and thus access to repositories and R&P subscriptions). UUK's 2019 *Open Access & Monographs: Evidence Base*: 18, notes the need for exemptions if no provision is made for unaffiliated researchers.

It is too early to predict the impact of COVID-19 on journals, but the combined impact of cancelled annual conferences (events that are integral to the finances of many learned societies that sponsor journals), declining revenues of investment portfolios (which support some larger learned society journals), and current proposals for redundancies/furlough of academic and editorial staff, together with the persistent delays within UKRI's own OA schedule, suggest that the pace of change proposed by UKRI in autumn 2019 is not feasible.

As UKRI staff will be very aware from having undertaken equal opportunities and unconscious bias training, decisions made in haste and/or under duress are disproportionately likely to display unconscious bias, for example against persons with protected characteristics under the Equality Act 2010. In choosing an implementation date, UKRI as a public body will wish to demonstrate to the public and the research community that it has undertaken due diligence in this specific respect.

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? <u>Yes</u> / No / Don't know / No opinion.

If yes, please expand (2,000 characters maximum, approximately 300 words).

For Humanities and many Social Science disciplines, including History, the APC model of Gold publication is (if RCs fund it in their grants) a viable mode of OA publication for journals. This however emphatically is not the case for QR-funded research: the current OA block grant made to universities simply does not cover these costs for most university-based Humanities and Social Science researchers. Most research considered for REF submission will only be able to be published Gold OA within R&P or P&R agreements. This will create a 2-tier system of UK 'open' publication landscape both within the Humanities and Social Sciences and between these subjects (in many of which female researchers are disproportionately concentrated relative to STEM subjects), on the one hand, and STEM subjects, on the other. To the extent that they rely on the twofold APC Gold plus hybrid Green model--the only current OA model that has proved capable of operating at scale without external infusions of cash from charities--the proposals appear to be calculated to result in a first-class Gold route (to which HSS researchers will have limited access) and a second-class Green route (in which HSS researchers will be over-represented).

It remains to be demonstrated that immediate OA via the lower-quality Green route represents better value for money in Humanities and Social Sciences than delayed high-calibre Gold OA via embargo periods. UKRI representatives explicitly justify this decision by citing political expediency rather than evidence. The extension of this new OA mandate to QR-funded research without corresponding funding to support it thus appears to be an ideological preference inimical to the maintenance of high-quality Arts, Humanities and Social Science in the UK.

Q19. Do you think the proposals outlined in Section A will have any financial cost implications for you or your organisation? <u>Yes</u> / No / Don't Know / No opinion.
Please expand, providing evidence to support your view, where possible (2,000 characters maximum, approximately 300 words).

In 2019, RHS's journal, *TRHS*, had c. 8,600 subscribers, of which c. 3,600 (41.9%) were free or heavily discounted Research for Life (R4L) subscribers. In this year, institutional subscriptions accounted for 53.5% and individual subscriptions (by the Society's membership) accounted for 46.5% of our subscription revenues.

Membership dues (which include a subscription to TRHS) provide the largest proportion of RHS's annual income, followed by draw-down from our investment portfolio followed by revenues from Cambridge University Press. The CUP revenues include but are not restricted to journal income, also comprising sales of e.g. RHS handbooks: in 2019, non-journal income

was 19.2% of our CUP income (excluding expenditure and overheads). The RHS itself is not dependent upon the surplus revenues extracted from its publication programme for its continued survival. However, such revenues have unquestionably helped to support both access to Gold VoR outputs from our journals for thousands of readers in (for example) the Global South via R4L (c. 3,600 institutional subscriptions) and the Society's own Open Access initiative (the monograph series New Historical Perspectives). The ironic consequence of the proposals may be that in satisfying one set of OA policy protocols (by 'flipping' our journal), we have to sacrifice our commitment to other philanthropic scholarly agendas (supporting research in the Global South and enhancing UK ECRs' access to our pioneering Gold OA book series).

It is clear from our 2019 survey of 107 hybrid History journals that the zero-embargo CC BY AAM model poses a financial threat to many learned societies that sponsor journals. In History, journal subscriptions typically account for 80% or more of these societies' funding. Over 50 UK-based societies publish scholarly journals in which peer-reviewed History articles appear. Removing such journals from the ecosystem will significantly impoverish researchers' publishing options.

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 / <u>No</u> / Don't Know / No opinion.

Please expand, providing evidence to support your view, where possible (2,000 characters maximum, approximately 300 words).

As noted above, the Society's two largest regular income streams are annual membership subscriptions (of Fellows and Members, which include but are not limited to an annual subscription to the *TRHS*) and the draw-down from our investment portfolio. We would not expect these to be affected by the proposed changes.

Income from Cambridge UP (£55,000 in the last recorded year) is typically our third highest source of income. This figure includes revenue from RHS handbooks (out of scope for UKRI) and from digitisation of our backlist (which we expect to decline and eventually disappear over time irrespective of OA policy).   The extent to which our finances would suffer from the proposals in unclear, especially in the context of emerging R&P agreements which are estimated to be likely to decrease our journal income. There is thus no evidence that the proposals would be beneficial to our organisation.

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 / <u>No</u> / Don't know / **No opinion.**

Please expand (2,000 characters maximum, approximately 300 words).

As our journal currently operates on a subscription model we do not have data on its prospective costs under a pay-to-publish R&P business model. However, we know that switching to this model will increase pressure to increase the volume of articles published. Our journal is edited by an unpaid Literary Director who is an unpaid trustee of the Society. There are limits to how much unpaid labour we can extract from our trustees and we are very conscious that we are already reaching that limit. We encourage UKRI to expand significantly its definition of 'transparent costs', which appears to apply in the consultation solely to 1) publishers' income streams and 2) Research Councils' payments to publishers. This approach ignores two large elephants in the room: 1) the volume of free or heavily discounted editorial labour by researchers that underpins Humanities (and other) journal production, and 2) the cross-subsidisation of UKRI research by other income streams (learned society income, student fees) necessitated by Research Councils' payment of only 80% of fEC. A fully transparent model of accounting would take account of these costs. By ignoring them, UKRI has created a model for OA which fundamentally mistakes how journals function in the Humanities landscape.

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 / <u>No opinion</u>.

Please expand (2,000 characters maximum, approximately 300 words).

APC payments by authors who publish in our journal are the exception not the rule, and accordingly we do no have meaningful data on this topic.

Q23. Do you think there are steps publishers and/or other stakeholders could take to improve the transparency of publication charges? <u>Yes</u> / 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).

We receive a comprehensive annual report from CUP on our journal and other publications. Unlike the data upon which UKRI exclusively focuses, this also includes information on R4L subscriptions, an integral component of the 'open' landscape in a global (and especially Global South) context.

UKRI is itself a key stakeholder. For full transparency and appropriate policy formulation, it too must acknowledge the income its funded projects rely on from e.g. universities and learned societies. Cross-subsidisation is a core but unacknowledged operating principle of UKRI funding. HEIs subsidise the 20% of RC projects unfunded by UKRI's fEC model. Teaching income from students subsidises both QR and RC research. Humanities subjects routinely cross-subsidise more expensive university STEM subjects. The RHS supports cross-subsidisation as an essential component of universities' independence and ability to undertake medium- to long-term planning to support excellence across the board in research, postgraduate training, teaching and staff development.

RHS routinely cross-subsidises university research, allocating funding to UK university-based UKRI-funded ECRs (subsidised by our members' subscriptions, our investment income and journal). These sums are very significantly in excess of these researchers' institutional subscription charges for our journal and books. As we note in the worked example on page 69, footnote 100 of https://files.royalhistsoc.org/wp-content/uploads/2019/10/17204855/RHS_PlanS_Full_Report_Oct19_FINAL_WEB.pdf : 'the bundled UK cost for 2020 the RHS's journal and its Camden book series [the latter 2 volumes p.a.] is £205 (this is a maximum figure, excluding all discounts).

In financial year 1 July 2018-30 June 2019, RHS awarded (for example) £2,781.56 to support ECR researchers at York University and £3,177.16 to support ECR researchers at Oxford.' Viewed from this perspective, the value of our publications significantly exceeds their cost.

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 not be permitted to support OA publication in hybrid journals

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

    c. <u>UKRI OA funds should be permitted to support OA publication in hybrid journals</u>

    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 UK History researchers are disabled from publishing in hybrid journals they will be disabled from publishing in the great majority of high calibre national and international journals. The 2019 RHS *Guidance Paper* identified 110 OA History journals in the DOAJ. These constitute only a small proportion of History journals, are highly variable in quality, represent only a modest proportion of historical sub-fields, and are predominantly published in Spanish (pages 28-35). Editors of

international hybrid History journals reported that zero embargo CC BY of AAMs was not a business model they were willing to implement (pages 44-49).

R&P or P&R agreements are not now in place sufficient to allow the full range of researchers in the UK (including ECRs and researchers outside the university sector) and their international collaborators to publish in the full range of national and international journals. Access to hybrid journals thus remains of fundamental importance to UK researchers. This is especially the case in AHSS subjects, in which the bulk of university research is funded by QR rather than RCs. In these subjects, ECRs, citizen scientists, museum and heritage professionals and independent researchers publish important research in journal articles.

Allowing and funding publication of these outputs in hybrid journals will be fundamental to UK researchers' ability to publish in a wide range of international journals. This will enhance UK universities' ability to attract the best staff internationally and UK researchers' ability to research and publish with international collaborators. It will also maximise UK researchers' ability to choose the journals best suited—by quality of peer review and editorial expertise—to enhance the quality of the eventual VoR.

The editorial process funded by the subscription model in Humanities is not merely about dissemination. This reflects the fundamental nature of our research, in which the words in which claims are made and evidenced are integral to their effectiveness and essential for other researchers' ability to test them. Expert editing (during the 'revise and resubmit' stage of submission as well as after acceptance of the AAM) is integral to the research process itself in Humanities. It enhances the quality not only of the individual output but also of the researcher's skills-base.

Hybrid journals provide high-quality editorial support and place a large volume of UK research in the 'open' domain. Interdicting them is counterintuitive if UKRI's goal is to increase the proportion of UK research that is published OA.

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 / <u>No opinion</u>.

Please explain and, where possible, evidence your view (2,650 characters maximum, approximately 400 words).

This is a more appropriate question for research organisations that have OA repositories to answer.

Q26. To help accelerate policy adoption, should UKRI introduce any other restrictions on how UKRI OA funds can be used? Yes / <u>No</u> / 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).

Researchers and the institutions that employ them have a much fuller understanding of the overall research landscape (which is also funded by charities, philanthropic donations, teaching, commercial ventures, learned societies and individuals) than does UKRI. Especially within the challenges posed by COVID-19, placing further burdensome restrictions on the use of these funds is unwarranted.

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? <u>Yes</u> / **No** / Don't know / No opinion.

Please expand (2,650 characters maximum, approximately 400 words).

We strongly support the co-existences of diverse models and commend this aspect of UKRI's thinking. However, we are very concerned that its proposals will reduce current diversity, not least by replacing journals sponsored by charities and university presses with proprietary journals managed by a small number of commercial publishers—precisely those whose excessive subscription charges for STEM journals have fuelled antagonism to the current subscription model. Post-COVID, this will become even pressing, given the precarity of university and learned society finances (including funding for innovation).

It is simply not true that there are many business models that are proven to support stable OA Humanities journals *at scale*. Many non-APC models have been tried, but none has yet proved capable of supporting current levels of research dissemination in ways that both sustain research quality and guarantee equivalence of access to publication for both authors and readers. The instability of models such as 'Subscribe to Open' runs counter to the requirements for stable OA imposed by REF. The 'much lower paywall' that tends to be the dominant model in Humanities (compared to STEM) is proving surprisingly hard to replace. This is notwithstanding the very considerable investments made in the UK to support Humanities OA, by non-UKRI funders such as the Andrew Mellon Foundation, the Arcadia Fund and the Wellcome Trust.

The problem is not the lack of technical capacity to produce OA articles, journals

themselves or (for that matter) books, but rather the inadequacies of existing UK business models that ensue from lack of investment in essential publishing personnel and infrastructure outside university and commercial presses. (In contrast, Spanish, Portuguese and Latin American OA Humanities journals have received funding and gained traction: RHS *Guidance*, pages 28-35). Small scale OA innovation allows some excellent niche journals to publish, typically with substantial philanthropic subventions from e.g. Arcadia or Mellon. (RHS's OA book series also benefits from Arcadia funding). Without such subventions, only commercial and larger university presses (which benefit from economies of scale) have to date been shown to allow sustainable OA at volume, with however unsustainable charges to researchers. Humanities learned societies lack the funding from industry/business that underpins OA in some Social Science and STEM societies. In the absence of revenue streams such as this, capacity and scale represent key challenges to born-OA Humanities publishing.

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?** <u>Yes</u> / No / Don't know / No opinion.

Please expand (2,650 characters maximum, approximately 400 words).

UKRI needs to work with universities, journals and other stakeholders to ensure that early career ECRs who are not included within transformative agreements (for example, because they are on short-term contracts or not on research contracts) have access to this publication option. It is not unusual for Humanities ECRs to spend significant portions of the first 3-5 years of their postdoctoral careers outside the contractual frameworks that afford access to R&P and P&R agreements. ECRs who interrupt research for maternity/parental leave in this crucial stage will be further disadvantaged under these agreements if they fall outside their terms and conditions. This is in sharp contrast to the current case, in which there are no price barriers to publish in Humanities journals nationally or internationally due to the absence of the pay-to-publish model other than for so-called predatory journals.

There is a case to consider for UKRI investment in OA journal infrastructure to drive OA innovation forward. But in considering this option, 2 issues in particular will need to be addressed. 1) UKRI's predecessor had a poor record of maintaining investments such as this over time, and UKRI itself has no track record in this respect. Confidence in its ability to maintain funding over time would necessarily be limited. 2) Although a small number of the 107 hybrid journals in the RHS's 2019 survey self-publish (12, or 11.2%), the great majority of journals rely on university presses or proprietary publishers. The

economies of scale they afford are vital because Humanities is a teaching-intensive subject and most researchers do not have capacity (much less expertise) to undertake the many functions entailed by publishing (including incorporating new OA requirements) without their expertise. CUP's charge for 2019 for marketing for our journal (c. 8,300 subscriptions) and bundled scholarly editions was for example £418. This is dramatically less than we would pay on the market as an independent contractor for these services.

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 / <u>No opinion.</u>

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).

If Green OA through self-deposit of the AAM proves to be the chief model of OA compliance within Humanities, access to OA repositories by researchers who operate outside the university framework will be essential. Funding for either OA repositories or access to universities' existing repositories would in this context be welcome. Researchers requiring such access include ECRs (a constituency in which, in History, includes relatively more female and BME researchers than the senior ranks of the discipline), archivists, librarians, heritage and museum professionals, emeriti and independent researchers/citizen scientists. The School of Advanced Studies (University of London) is to be commended for extending access to its OA repository to its former PhD students for the first 5 years of their ECR careers.

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).

In principle this would be appealing if it had happened years ago before universities all built their own institutional repositories in response to HEFCE policies. However, that ship has now long sailed and this is not a cost- or labour-effective proposal for the public purse.
However, as a bare minimum for the PhD students the Research Councils fund, there is an ethical obligation to ensure that ECRs have access to a repository in which to

place their outputs whilst they are building their careers but lack a stable institutional affiliation. This is an especially acute problem in Humanities where co-authorship is not the norm, and thus ECRs' publications lack access to institutional repositories via their co-authors' access.

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 / <u>No opinion</u>.

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 / <u>No opinion</u>.
If yes, please expand (1,350 characters maximum, approximately 200 words).

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).

Many aspects of the proposed policy are clear. However:
Para. 96c proposes to apply the policy 'to an edited collection when the editor(s) of the
collection acknowledge(s) funding from UKRI'. Edited collections in HSS, even when the
editors have received RC funding, typically include chapters by UK and international authors
who have not been externally funded. Requiring them to abide by UKRI policies would deter
them from contributing, reducing the expert pool from which RC-funded editors could recruit
authors.
Removing 'trade books' from scope (paragraph 98) is welcome. However, the conflation of
'trade books' with 'monographs' fails to account for the commissioning of edited collections
such as 'Companions' and 'Handbooks'. See the BA report *Open Access and Book Chapters*
(2019), pages 18-19. 'Cross-over' books, which form a significant minority of History
monographs, also fit poorly within this rubric.
The removal of 'scholarly editions' from scope is welcome. It will help to prevent these
volumes from disappearing. They play a key role in advancing historical scholarship, perform
very well in History REF output submissions (as reported in REF2014's Panel D final report),
and retain their research relevance for many years. RHS publishes scholarly editions in our
Camden series. These are significantly more expensive to produce than standard monographs,
due to their complex editing and format. RHS publishes scholarly editions in its Camden
volumes. We can only afford to publish them OA when this is funded by external grants. The
long gestation times of such books, often published in multi-volume series, also renders their
OA release extremely challenging if they are funded by RC grants (which often end more than
a year before their production).
Removing 'exhibition catalogues' from scope is welcome, although additional work is needed
to identify other heavily illustrated scholarly collections (such as *catalogues raisonné*) that
should also be excluded.

Q34. Should the following outputs be in-scope of UKRI's OA policy when
based on UKRI-funded doctoral research?

a. Academic monographs Yes / <u>**No**</u> / Don't know / No opinion
b. Book chapters Yes / <u>**No**</u> / Don't know / No opinion
c. Edited collections Yes / <u>**No**</u> / Don't know / No opinion

Please explain your view (1,350 characters maximum, approximately 200 words).

The PhD thesis already falls within UKRI OA policy, with an embargo to allow them significantly to expand research for book publication. Postdoctoral ECRs typically fund this research by a combination of fellowships funded by charities, fixed-term university teaching and employment outside the university sector. Publishers, commissioning editors and scholarly editors input into that new research and writing, adding substantial value. If UKRI wishes to ensure that this new research and analysis is also published OA, it should (like the Wellcome Trust: https://wellcome.ac.uk/funding/guidance/open-access-guidance/how-get-open-access-funding) establish dedicated funding to which researchers can apply to cover any BPCs.
The RHS has funded two monograph series focused on ECRs' first books. *Studies in History* (1975-2000, Boydell & Brewer) brought out over 100 non-OA titles. *New Historical Perspectives*, a born-OA collaboration launched in 2015 by RHS with the Institute of Historical Research (IHR) and University of London's Humanities Digital Library, published its first OA monograph in 2019. We fully subsidise the BPC on behalf of authors: our costs and liabilities per volume for *NHP* considerably exceed those for *Studies.* This extensive experience with monographs based on PhD theses informs our response to this question.

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? <u>Strongly agree</u> / 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).

The range of national and international publishers in History that provide authors with an OA option is expanding year on year—a welcome development that deserves further investment and encouragement. However, the availability of an OA option is very unevenly distributed across different sub-fields of research. Moreover, author costs for OA vary significantly across imprints and internationally. Without exemptions, authors in (for example) sub-fields that require publication in languages other than English to reach target audiences effectively, or who make substantial use of non-English language sources, and/or sub-fields that are better represented outside than within the UK, will lack appropriate outlets for high-quality

research outputs. (Jubb, *Academic Books & Their Future*, 159, notes that 'one of the core features of the publishing ecology for scholarly books in the arts and humanities—unlike that for scientific journals—is that it is multilingual'. There is a balance to be struck here between maintaining the quality and enhancing the likely reach of longer-form UK research outputs (for example, by publishing analyses of Latin American culture, history or language in Portuguese or Spanish), on the one hand, and maximising the potential volume of dissemination by OA, on the other.

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? <u>Yes</u> / 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.

UKRI proposes a dramatic change to UK book publication but adduces no systematic data to support its proposed 12-month embargo. Publishers typically accrue 70% of sales within 2 years of publication and 80% within 3 years (*Open Access & Monographs: Evidence Review*: 4). Academic book publishing is not characterised by significant profits levels (Collins & Milloy, 2016: 38; Jubb, *Academic Books & Their Future*, 2017: 56, 103). UKRI's proposed embargo appears to assume that publishers either do not need to recoup their full costs or can do so even if their titles are available OA after 12 months. No evidence supporting these highly contentious assumptions is offered.
Monograph writing is fundamental to the professional development of Humanities researchers, nationally and internationally. An excellent first monograph can help secure permanent employment, grant income and career progression. As Panel D's *Overview Report* for REF2014 (page 52) underlines, 4* research is disproportionately found in monographs and scholarly editions. Without due care, the proposed policies may render uneconomic the production to a high standard of UK Humanities monographs.
RHS's experience with our new, born-OA book series underlines the labour and financial (including subsidy) costs associated with high-calibre OA book production. The nominal cost for the waived BPC for a single OA volume (as set by UoL Press) is £7,500. In contrast, our cost to produce 3 conventional titles p.a. in our previous book series was £10,200. We can only afford the OA model by sharing the cost across 3 organisations.
Distinguishing among 'trade', 'crossover' and 'academic' titles will be highly complex. There is a case for including such titles (as well as Companions and Handbooks) in the 'trade' exemption, reducing the volume of books within scope and thus increasing the likelihood of effecting this policy sea change without damaging Humanities researchers and the wider UK research base.

Q37. Regarding monographs 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 <u>**b. A longer embargo period should be allowed**</u> 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).

The proposed 12-month embargo is not underpinned by any evidence with respect to its
viability. It runs counter to the evidence on publishers' sales in several OA reports. The
capacity of externally-funded OA book series (including the 5 titles p.a. of the RHS's new OA
book series) and of institutionally-funded OA book initiatives at the newer university presses
was tiny pre-COVID and will be challenged in the post-COVID financial context. UCL Press
(for example) publish 3-4 titles per month, on average, roughly 50 times less than the global
output levels of (say) the academic divisions of OUP or CUP. Authors will necessarily
depend upon commercial monograph publishers, independent publishers and established
university presses for the great bulk of publications in the next 5-10 years. The commercial
viability of these publishers—already severely squeezed in the past decade by university
spend on STEM journals (see Jubb, *Academic Books & Their Future*, 63)—is fundamental to
the health of Humanities and Social Sciences. A proper analysis, including controls, of
phased, subsidised embargo periods (0, 12, 24, 36, 48 months) and OA book publishing is
urgently needed. Setting an embargo without this evidence risks undermining dissemination
of research funded by the public purse.

Q38. Regarding book chapters 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 <u>**d. Different maximum
embargo periods should be required for different discipline areas**</u> 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).

Current OA embargo periods vary across subjects, often 12 months in STEM and 24 in AHSS.
This reflects differences in production processes and costs. For example in STEM subjects

edited books are often compilations of conference papers. Comparable Humanities volumes will (even if based on an initial conference) typically entail substantial 'revise and resubmit' alteration as well as the commissioning, peer-review and editing of new contributions not presented at the initial conference. This model of scholarly production entails very different costs than is typical in STEM (e.g, Engineering) edited collections. No evidence has been presented by UKRI that extant variations in embargo can be safely removed, allowing publishers to provide expert services and to recoup their costs.   Anecdotally, even pre-COVID librarians reported that they would not purchase books due to be published in Gold OA after only a 12-month embargo. An arbitrary embargo based on aspiration rather than evidence risks seriously compromising the infrastructure for UK scholarly communications in the medium- to long-term. We need UKRI funding for research to test tiered, subsidised BPC payments alongside scaled embargo periods (of 0, 12, 24, 36 and 48 months).

Q39. Regarding edited collections 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 <u>**b. A longer embargo period should be allowed**</u> 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).

Edited volumes are, arguably, the publication type in history and the humanities where OA can cause maximum possible benefit in terms of wide dissemination. Such titles are often less well-placed than monographs to attract sales, and their contents may be bibliographically obscure: journals review them much less often than monographs (if at all) and their varying content is typically of varying interest to individual readers. Readers' ability to access individual chapters via JSTOR makes OA digital publication of VoRs of such titles very appealing.
However, taking the whole production cycle into account and bearing in mid the costs associated with production of these volumes, an embargo of less than 48 months is unlikely to be financially viable without significant subsidies. The RHS president's edited OA volume (UCLP, 2018), heavily subsidised and sold at cost price, attracted 300 print sales within c. 24 months, but this figure is anomalous, not normative, within the wider UCLP list of scholarly publications. As with Question 37, there is an imperative need for systematic modelling to determine a viable embargo period.

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? <u>Yes</u> / 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).

We know from experience that OA book publication by learned societies is more expensive than conventional publication (see above, Q36). Any assessment of this model must acknowledge its cost, including significant start-up and maintenance subsidies. We also note the need for UKRI's timeline to reflect the protracted start-up of such initiatives, which typically rely on tiny staff establishments. RHS's OA book series was launched in 2015; it published its 1st title only in autumn 2019. It will publish a full complement of 5 titles 5 years after its foundation.

All of the assumptions about demand cycles and the institutional context of monograph behaviours in the consultation are, understandably, pre-COVID. Given, however, that all available evidence thus far suggests that library budgets will now be squeezed even tighter than before, it seems likely that acquisition of new book titles will become an even smaller part of library budgets, with obvious implications for demand and sales patterns, impacting viable embargo periods in turn. Commentary from senior librarians suggests that monographs made freely available after a 12-month embargo would simply not be purchased. Publishers' ability to recover production costs in this context would be compromised. Monograph production is fundamental to excellent 'science' in the Humanities. As the Panel D report of the REF2014 History sub-panel made explicitly clear, monographs and scholarly editions are disproportionately the types of outputs in which the highest calibre of History research is found. Imposing an OA model on monographs which stifles their production will be profoundly damaging to the Humanities.

This again suggests the need for proper scenario modelling (with tiered BPC funding for different embargo periods). This need is even greater now than before the pandemic, as any monographic evidence carried over from the pre-COVID world will, in this context, be of limited validity.

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 / <u>**Disagree**</u> / Strongly disagree / Don't know / No opinion.

Please explain and your view (1,350 characters maximum, approximately 200 words).

If UKRI's intention is to put a version of the output—regardless of quality, accuracy or utility—into the public domain without regard to the wider health or sustainability of the research environment, zero-embargo AAM self-deposit for books will meet the policy requirement. This will be to the detriment of, for example, researchers with disabilities such as dyslexia and dyspraxia and researchers whose first language is not English. Whether presses located within the UK will allow self-deposit of the AAM is unknown. That international (for example, US) presses will refuse to do so if clear from their responses to the RHS 2019 journal survey, detailed in our *Guidance Paper*.
If the policy requirement is intended to maximise the utility of OA publications for researchers and other users, mechanisms to support sustainable dissemination of the VoR will instead be needed.

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.

UK Humanities university presses sell a substantial proportion of their books outside the UK; in contrast, US university presses (which publish a substantial minority of UK History outputs) are significantly less dependent on sales outside the US (Jubb, *Academic Books and Their Future*: 46). A national OA mandate is exceptionally problematic in this international context. Jubb notes that 'At present, revenues from e-books typically represent at best 20-30% of total sales revenues for academic books….Moreover, book publishers operate on margins very much smaller than their journal publishing counterparts.' (page 103).
One model that UKRI has dismissed with little consideration is the freemium model, in which immediate 'read' OA to the VoR is free but readers pay for additional functionality (for example, to mine or download the VoR). Given the complexity of the monograph production process and market, failing to test the viability of freemium models alongside phased OA embargoes would appear to be a missed opportunity to develop a diverse OA landscape for books.

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? <u>Strongly agree</u> / 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).

Allowing –ND licences will substantially enhance the development of OA in HSS without compromising text-and data-mining. Disallowing –ND will remove substantial volumes of research materials (that is, the primary sources that form the 'data' or evidence base in Humanities research) from researchers' use in their publications.
UUK's October 2019 *Open Access & Monographs: Evidence Review* (page 10) explicitly recommended that 'Future policy for OA books should permit the inclusion of the ND licence.' We strongly concur with this evidence-based conclusion.

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? <u>Strongly agree</u> / 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.

The fullstop data reported in UUK's 2019 *Open Access & Monographs: Evidence Review* (page 11) demonstrate that over 50% of books returned for REF2014 included illustrations, maps, music scores and similar materials that are often owned or controlled by 3rd parties. That is, this is a *majority* not a niche practice within book publishing. Given the high proportion of research materials used by AHSS researchers that is composed of 3rd-party materials and the great reliance that even UK public institutions (for example, archives, heritage organisations, libraries and museums) place on funding derived from commercial licencing of these materials, it is essential that the UKRI policy includes exceptions.

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 / <u>Strongly disagree</u> / Don't know / No opinion.
Please explain your view (1,350 characters maximum, approximately 200 words).

There are 2 key issues:
1) The proposal is tantamount to asking STEM researchers to publish articles and books without a random selection of images or graphs of their data that demonstrate their

claims. Would 'tombstone' pages be acceptable in STEM contexts? They are not acceptable in AHSS. Tombstone pages compromise authors' ability to illustrate and defend their arguments AND compromise their readers' ability to test or validate these findings—a fundamental aspect of 'science' in the European sense. In the REF-after-REF2021, these readers will include assessors on REF panels, to the detriment of these outputs.

2) This question assumes that 'a link to the original' source will be available. In many cases in History and other HSS disciplines, however, no version of the 3rd-party material will be in the public domain in digital form: the author's digital copy (if any) may be the only such copy in existence. There will thus be nothing to link the 'tombstone page' to. In devising REF policy, HEFCE/UKRI have long argued there was no intention to change what or how research is undertaken. This proposal fundamentally subverts that accepted policy, and thereby UKRI's stated function in legislation, to 'facilitate, encourage and support research' (http://www.legislation.gov.uk/ukpga/2017/29/pdfs/ukpga_20170029_en.pdf , p.67, para 93)

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).

'Significant use' applies when a substantial argument or narrative in a given output cannot be made/illustrated effectively without reference to the associated 3rd-party material. For example, an output that relies for comprehension and/or validation on the reader's ability to view a specific image or to read a specific text or musical score entails 'significant use' of that material, regardless of the number of such images or texts under examination in the output.

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.

Licencing issues (the need to allow CC BY-ND) and global 3rd-party rights issues will need to be taken into account in framing viable policies, which permit maximum access without distorting the initial research object itself. We also note (paragraph 104) the apparently cavalier dismissal of CC BY-NC as a licensing option, in response to (unnamed) stakeholders. Other unnamed UKRI stakeholders might wish to register the obvious paradox about the publication of high-class content through non-profit or charitable channels (like university presses) being then directly exploited by third parties for commercial gain.'
As Colins and Milloy, OAPEN-UK Final Report, page 43, note, because licencing is a major cost of OA book publication in AHSS, mechanisms for accommodating the lag-time between the end of Research Council grants and the publication of books (and other outputs) with 3rd-party materials that require licencing is important. Using data from Researchfish, the British Academy's 2019 study of *Open Access and Book Chapters* (pages 45-47) found that 38% of AHRC-funded book chapters appeared 2 or more years after the end of the grant and 7% appeared 5 or more years after the grant's end.

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. <u>UKRI should require an author or their institution to retain copyright and not exclusively transfer this to a publisher</u>
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.

We note however that it may be the case that the rights retention protocols of single-author monographic work are somewhat different from those applicable to book chapters in edited volumes.

Knowledge of intellectual property and licensing conventions remains weak, in both university managements and throughout the academy. Improved researcher education in this domain is vital, whatever the licensing protocols chosen.

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 e. 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).

The new policy should apply from a date determined by the availability of credible scientific evidence of its feasibility, including its ability to operate without damage to the UK research base. UKRI has proposed a 12-month embargo period in the absence of evidence that this is a viable option and in obvious defiance of widely reported and accepted evidence on academic book sales. Funding a substantial study of different tiers of embargo (0, 12, 24 ,36 and 48 months), each with an associated, tapered BPC would allow UKRI to choose an embargo regime scientifically, based on evidence that allowed for sustainable book publication over the short-, medium- and long-term by UK Humanities and Social Science researchers. This would allow the UK to become a world leader in high-calibre AHSS OA book production—a development very much to be welcomed. The current proposal is arbitrary and unsubstantiated. As such it is not fit for purpose and risks damaging UK science nationally and internationally.

To gain credibility within the AHSS community, UKRI's OA book policies need to address the question of why swift access (0-12 months) to a Green version of an book output is considered by UKRI to be superior to slower OA access to the Gold VoR. The latter is the only version that is fully functional for research purposes. The editorial processes that distinguish between the AAM and the VoR are integral to its full use by the research community.

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/ <u>No</u>.
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? <u>Yes</u> / No / Don't know / No opinion.

If yes, please expand (2,650 characters maximum, approximately 400 words).

Because the great majority of REF outputs in Humanities are not funded by Research Councils,
unless UKRI plans to add substantial new funding for QR-based OA outputs it will need to
allow its RC and REF OA policies to diverge. It would be feasible to publish all RC-funded
books OA via the Gold BPC route, although inevitably this would reduce the amount of RC
funding available to undertake research as opposed to disseminate research. It will however
not be financially feasible to publish all REF book outputs via Gold routes; Green options will
perforce need to be studied systematically to ensure their sustainability and enhance their
quality. Comparative analysis of the impact on publishers of different embargo periods (0, 12,
24 , 36 and 48 months) of both Gold and Green OA are urgently needed. If UKRI's intention is
to increase use of AAMs, UKRI would also need to pay greater attention to how AAMs can be
formatted so as to be used effectively by persons with disabilities (for example, visual
impairments and dyslexia)—something that publishers routinely effect in converting texts
from AAM to VoRs.

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? <u>Yes</u> /
No.

If yes, please expand (2,650 characters maximum, approximately 400 words).

Pragmatically, the sensible option will be for Research Council applicants to include a
provisional costing of APCs and BPCs into their grant proposals but for these funds to be held
by the Research Councils themselves (rather than allocated directly to PIs and Co-Is) until
called for. This is the model used by the Wellcome Trust. This would prevent the RCs from
allocating funding to grant holders for outputs that fail to appear and would also ensure that
the RCs could with ease collect systematic data on OA publishing, which could inform future

policy developments.

Financial support to bolster further UKRI-funded institutions that provide expertise, staff time and infrastructure for OA publishing—for example, the Institute of Historical Research and the wider School of Advanced Studies—would further enhance researchers' access to high-quality OA publication. The findings of the Community-led Open Publication Infrastructures for Monographs (COPIM) project awarded £2.2 million from the Research England Development (RED) Fund in 2019 will be of much interest. But as OA advocate and Plan S champion Martin Eve has (with Vega and Edwards) recently underlined with respect to the Open Library for Humanities, the labour, overheads and complex market peculiarities associated with these innovative models should not be underestimated ('Lessons from the Open Library of Humanities', *Liber Quarterly*, 30 (2020).

It must be recognised in this funding context that under the legacy model the UK is probably paying for less than 40% of the monographic publication costs incurred by its researchers, given the export-dominated sales models of almost all UK-based academic publishers. Indeed, UK monograph publishing has been export-dependent for at least thirty years now, with important implications both for publishers and researchers. Prior to COVID, it was hard to envisage an effective and sustainable Open Access publication model that did not cost the UK more than the current legacy model. Post COVID, it is hard to envisage any models that do not result, fundamentally, in a significant net reduction in monograph outputs overall, and the funding context within the UK specifically to support any such OA transition will, inevitably, be weaker, with obvious malign implications for that transition.

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).

Creation of a fund (and appointment of administrative staff to deliver funding) for Gold OA publication charges to which AHRC and ESRC-funded researchers could apply for OA costs incurred after the end of their awards, for outputs resulting from these awards. In Humanities, the interval between the end of an award and the contracting of outputs (especially books) may be considerable, especially for precarious ECRs. The Wellcome Trust operates such a fund, and whilst not unproblematic, it is a mechanism that clearly attests to this funder's commitment to OA and plays and enabling role in advancing both the quality and the volume of OA outputs.

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 / <u>No opinion</u>.

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 / <u>No opinion</u>.
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 / <u>No opinion</u>.
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 / <u>No</u> / Don't know / No opinion.

Please explain your answer (2,000 characters maximum, approximately 300 words).

UKRI OA policy is in a period of considerable change. Humanities outputs often appear many years after the research grants that funded them. Policing adherence to changing UKRI policies in this context, and in the context of researcher mobility between institutions over time, represents poor use of public money. It would also require the Research Councils to take on new staff to perform this policing function. Any such funds would be much more effectively deployed funding studies to better understand, for example: the impact of OA embargo periods on book sales (and thus the ability of publishers to recoup their costs and remain in business) and the actual impact (as opposed to the mere dissemination or downloading) of UKRI-funded titles across the full range of Research Councils. The latter type of study will be vital if UKRI is to demonstrate value to money for the taxpayer.

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 / <u>Disagree</u> /
Strongly disagree / Don't know / No opinion.

Please explain your answer (2,000 characters maximum, approximately 300 words).

Monitoring REF OA requirements already absorbs a significant volume of labour at sufficient
cost; there are better purposes to which OA funding could be put than monitoring.

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?** <u>Yes</u> / No / Don't know / No opinion.

Please expand (2,650 characters maximum, approximately 400 words).

The consultation's recognition that hybrid OA mechanisms for journals represent a positive contribution to the sustainable evolution of OA is very welcome news for both History journal editors and researchers. For journal editors, hybrid has proven a pathway to OA that allows for significant expansion of OA without destroying the funding base available for high quality peer review and editorial interventions. As Wise and Estelle noted in their 2019 Information Power report, p. 5, hybrid journals are 'crucially important to the growth in immediate OA uptake. In 2016 UK researchers chose to publish more than half their articles in these titles, and the proportion of such articles published in immediate OA…rose from 6% in 2012 to 28% in 2016.'   For journal editors of our community, the caveat is that we lack robust evidence that zero embargo self deposit of AAMs is either feasible (give what we know about 3rd-party rights issues) or financially viable in the medium- to long-term For researchers, the inclusion of hybrid journals dramatically expands the potential range of national and especially international journals in which they will potentially be able to publish their research, subject to the same caveats.

As a society that publishes (and subsidises) a Gold open access book series (with no payment of BPCs by our ECR authors) we are very keen to see researchers' access to the Gold model expand. It is disappointing to see so little attention in the consultation document to the importance and the costs (including labour and expertise) of Gold OA or a due recognition of the significantly enhanced utility of Gold versus Green outputs for undertaking research in Arts, Humanities and Social Science disciplines.

**Q61. Do you foresee UKRI's proposed OA policy causing and/or contributing
to any disadvantages or inequalities?** <u>Yes</u> / 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 absence of any evidence that UKRI has undertaken an Equality Impact Assessment, in keeping with the Equality Act 2010's Public Sector Equality Duty, is a matter of serious concern. In meetings between UKRI representatives and stakeholders who intend to respond to the consultation, the former group have indicated strongly that the onus for equalities assessment lies with the latter group.

The 'precarious nature of the academic career' for ECRs and the ways in which this career structure interrupts ECR access to OA funding is noted in UUK's 2019 Evidence Review (p. 18). It does not appear (based on the death of references in the consultation document to ECRs) that UKRI has accorded sufficient thought or provision to the relative disadvantage of ECRs in the proposed models compared to their current situation. Postdoctoral ECRs either need exemptions from Green and Gold OA requirements (for example, for REF) or continuous access to institutional repositories (for example, from their doctoral universities) and funding (from Research Councils and/or JISC) to R&P deals.

The consultation helpfully moots routes that maintain hybrid journal publication models, while encouraging conversion to OA. If the outcome of the consultation is to interdict hybrid options, we expect the impact of this policy decision to be deleterious, especially with respect to authors' ability to publish in international journals and collaborate internationally. With respect to books, UUK's 2019 *Open Access & Monographs: Evidence Review* (p. 16, citing Adena, 2019, p. 31) observed, 'A recent report from Knowledge Exchange highlights the need for diverse and sustainable OA policies, noting that "sparse access to BPCs creates new inequalities, limiting publishing options."'

For all authors in Humanities, where typically 20% or fewer research outputs are RC-funded, the likely pragmatic consequence of the proposals will be to channel much Humanities research down Green routes. This will increase the volume and dissemination of the least accurate, most erroneous, least citeable and least consistently discoverable versions of AHSS research. Undertaking Humanities research with AAMs is problematic: researchers can 'read around' in these documents to find what they contain, but minimally need to access the VoR prior to checking notes from the AAM against the VoR for accuracy prior to inclusion in texts intended for publication.

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? <u>Yes</u> / 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).

Two potential impacts will be especially important to consider. The first is whether the

proposed changes (for example, the development of national, UK-based R&P and P&R deals) will cost LMIC authors out of the journals publication market. With very few exceptions, History journals currently impose no costs for submitting or publishing article. We know from comments from African and Indian historians that any APCs they are charged will need to be paid personally from salaries. (For these perspectives, see also https://oxfamblogs.org/fp2p/what-are-the-downsides-to-open-access-for-the-global-south/ and https://www.universityworldnews.com/post.php?story=20191001143012482). Pay-to-publish will preclude publication by many Global South academic researchers in thousands of journals that are now 'open' to them.

The second major question will be whether and how charitable schemes such as Research for Life (R4L) will be reconfigured to fit the new pay-to-publish models. Thousands of researchers currently receive full, Gold 'read' access to our journal via R4L. As noted in the paragraph above, staff at these universities can publish without charge in History journals as well. It is unclear where the funding to include LMIC authors in the new Gold models will come from.

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? <u>Yes</u> / 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).

UKRI will wish to consider the relative accessibility of Green AAM and Gold VoR outputs for persons with disabilities (such as visual impairments and dyslexia and dyspraxia.

Q64. Are there any other supporting actions (not identified in previous answers) that you think UKRI could undertake to incentivise OA? <u>Yes</u> / No / Don't know / No opinion.

If yes, please expand (2,000 characters maximum, approximately 300 words).

Many postdoctoral ECRs are broadly in favour of/enthusiastic about OA relative to more senior colleagues—an enthusiasm that may in part reflect limitations of their knowledge about editorial processes and costs. Yet ECRs are among the researchers with least access to high-quality (Gold) versions of OA, including Read & Publish. They often also lack consistent access to institutional repositories, essential for the Green route. Measures and funding from UKRI designed to clarify and enhance postdoctoral ECRs' access to high-quality OA will build

support for OA across all career stages.

Our own (RHS) ability to innovate with respect to OA books has been underpinned by the staff, digital and publishing expertise made available to us through collaboration with the IHR, School of Advanced Studies and University of London Press. The costly infrastructure and labour requirements associated with high-calibre OA publishing must not be underestimated. Continuity of access to such staff and infrastructure is also essential: the 'crowd-sourcing' and 'subscribe to open' models proposed by Information Power may be viable for one-off or niche initiatives, but they cannot carry the full burden of UK Humanities and Social Science book publishing.

A broader approach to 'open scholarship' would also consider the COPE Ethical Guidelines for Peer Review

(https://publicationethics.org/files/Ethical_Guidelines_For_Peer_Reviewers_2.pdf). These are not unproblematic: for smaller journals, implementation can exacerbate editorial labour deficits; for these journals it will not be possible to provide meaningful, anonymised submission or acceptance statistics. However, there was significant interest among surveyed editors (RHS *Guidance Paper*, 2019) in the COPE framework. Its operation, taking into account the position of smaller journals, would promote more robust data on journal peer review (for example, for equality impact assessments) and enhance the 'open' landscape.

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).

The broad tendency of the proposal appears likely to consolidate the grip on scholarly publishing of a small number of large commercial publishers. As they negotiate new contracts, these publishers are now actively extending their reach from control of journal outputs alone to control of these articles' underlying data under the aegis of the 'open science' agenda. They are precisely the publishers whose escalating APC costs appear to be disproportionately driving up library, funder and researcher costs. (As Pollock & Michael noted in 'News and Views: Trendspotting on OA Spending', *Delta Think*, 9 April 2019: 'More than half the expenditure on APCs in 2016 went to the three major publishing groups, Elsevier, Springer Nature, and Wiley, with a particularly sharp rise for Elsevier since 2014.')

 UUK's 2019 *Open Access & Monographs: Evidence Review* (p.22) notes that the 'open science' model is not configured to accommodate the modes and methods of AHSS research. There are legitimate concerns within our community in this context that the very poor fit that already exists between UKRI's OA policies and AHSS modes of research will be further exacerbated by the open science trend, which is fundamentally configured by publishing practices and large commercial publishers who are anomalous (not normative) in AHSS.

Section E: Further Comments

Q66. Do you have any further comments relating to UKRI's proposed OA policy? <u>Yes</u> / No.

If yes, please expand (2,650 characters maximum, approximately 400 words.)

In O'Leary & Hawkins's 2019 *Exploring Open Access E-book Usage* (p. 4), the authors state that 'Delivering on the potential for usage data to support diversity, quality and impact for monographs requires that it be comparable, trusted, granular, and appropriately benchmarked.' These comments ring true for OA policy more broadly. A striking feature of the proposed policies is how little effort has been made at any point to justify the UKRI proposals for reasons other than explicit political expediency. In part, this tactic reflects the presence of a significant data deficit: evidence on the actual utility of/use of OA content by academic researches, commercial groups, government and the broader public is limited. More surprising is the very limited expenditure by UKRI funders on developing and maintaining robust systematic data to inform emerging OA policies. Commissioned reports such as Wise & Estelle's 2019 *Society Publishers Accelerating Open Access and Plan S* offer sweeping generalisations based on small and noisy datasets, in this instance, using a sample of only 105 learned societies across AHSS and STEM, of which 42 (40%) publish with Wiley (pp. 11-12). Given that there are at least 50 UK societies that publish scholarly journals in History alone (RHS, *Plan S and UK Learned Societies: The View from History*, 2019: 26-34), there is an urgent need for scoping work to produce basic data on the scholarly publishing landscape spanning from AHSS to STEMM. Even the simplest questions—how many UK journals supported by learned societies are there, what proportion of research articles do they publish and how significantly do journal revenues figure in their finances—remain to be answered systematically because they remain to be asked systematically. Formulating REF policies in particular in the absence of such data and in the early infancy of R&P and P&R agreements puts the cart firmly in front of the horse.

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? <u>Yes</u> / No.

If yes, please expand (2,650 characters maximum, approximately 400 words.)

In AHSS disciplines where the research output is the primary output of value and <u>is</u> the research (rather than e.g the record of an experiment, leading to some other 3rd-party

outcome, as in many STEM subjects), the creation of outputs and the means of their circulation are umbilically linked. An enduring challenge in policy discussions about OA implementation has been their presumption of one (generally biomedical) model of research generation, and hence circulation. Our responses highlight the challenging implications of this premise for non-STEM disciplines. This is, importantly, in the context of general support for OA as a practice to which RHS devotes significant internal resource. Going forward, we hope to see a much more rounded appreciation by UKRI of the breadth of research creation, and thus enhanced understanding of effective modes by which all research might be circulated in sustainable, scalable ways without compromising either quality or internationalism. This will become even more important in the straitened resource circumstances in which UK funders and HEIs will find themselves in the years to come, post-pandemic.

Extending Gold OA funding to RC outputs would be expensive. But, with appropriate consideration of licencing and 3rd-party issues, it would also be relatively straightforward and—if funded fully by the Research Councils—send a very clear message to researchers and universities from UKRI about the value of OA. This would also rapidly generate a large bank of systematic data on Gold OA, which could be tested by UKRI against Green options (for example, Re dissemination rates, utility and impact). Extending Gold OA to REF journal publications through R&P or P&R agreements may be feasible, potentially at the cost of excluding ECR and lower and middle income nation (for example, Global South) researchers. Or, this development may simply replicate problems that have developed from journals 'Big Deal' agreements. Extending Gold OA to books at scale would be financially prohibitive without major investment in infrastructure by funders or universities (itself likely financially prohibitive, even prior to COVID-19).

Seeking to equalise RC and REF OA policies is inherently problematic because the dual funding steams rely upon distinctive types of cross-subsidisation to function. The dual funding model plays a fundamental part in maintaining the excellence of UK science. Seeking to equalise OA policies across distinctive funding streams undercuts that strength and appears to represent a poor use of public funds based on ideological rhetoric in the absence of strong evidence.

Q68. Do you have any further thoughts and/or case studies on costs and/or benefits of OA? Yes / <u>No</u>.

If yes, please expand (2,650 characters maximum, approximately 400 words).