

Response ID ANON-RE72-PNTX-A

Submitted to REF 2029 Open Access Consultation
Submitted on 2024-06-17 12:44:20

Transparency Statement

Your Details

1 Are you answering on behalf of your organisation or institution, or as an individual?

Organisation or institution

2 What is your organisation/institution?

Organisation:
Arts and Humanities Alliance

3 Country

Other (Please state below)

Other:
The AHA represents subject associations and learned societies that, in turn, represent the whole of the UK.

Section A: open access developments in the sector

4 What are the most important changes in the open access landscape since the development of the REF 2021 open access policy?1) How do these differ across disciplinary areas?2) What are the implications of these changes for the REF 2029 open access policy?

OA landscape changes:

To respond to this consultation, we have drawn substantially on draft responses and general feedback that our affiliates have shared with us, as well as on various statements that key organisations have already placed in the public domain (eg. the Royal Historical Society's blog post on REF2029 and OA and GuildHE's REF2029 OA Position Statement).

While OA seems like an incontrovertibly good thing, the introduction of OA requirements for journal articles and conference proceedings in REF2021 is still unfinished business. Funding arrangements in Arts and Humanities fields are still in a 'transitional' phase, with particular negative impacts being felt by scholarly associations that depend on journal income to fund their activities, as well as by ECRs, independent scholars and those in less well-off institutions who have less easy access to funding for APCs to publish their work.

We therefore argue that the time is not right to try to tighten requirements for OA in respect of short-form publications in any way, and most certainly not to introduce OA for long-form publications mid-cycle. We are deeply concerned about the considerable additional bureaucracy and associated cost of mandating OA for long-form publications, as well as the negative impacts on access to publishing from an EDI perspective. We also foresee potential damage to international collaborations and reputations if we mandate OA for long-form publications that are more logically published overseas and/or in conjunction with colleagues outside UK HE, and we are worried about the lack of evidence of full consultation with publishers about the affordability of the changes from their perspective and the likely impact on their publishing policies. There is further anxiety expressed around the many reasons for exceptions to be made, including the question of third-party materials for which OA compliance cannot be achieved.

Overall, then, we think that undesirable outcomes will significantly outweigh the positive intentions of the extension of the OA policy. At the very least, we would argue that no changes in respect of long-form publications should be introduced part-way through the current REF cycle. In line with the GuildHE Position Statement, we would also encourage a shift away from a compliance-based approach at the level of individual outputs towards assessing OA as part of a commitment to Open Research within the People, Culture, and Environment part of REF2029.

Finally, we would like to flag general frustration with the design of the consultation questionnaire, with its many technical questions and its overly short character limits for feedback. This was an impediment to providing the more heartfelt and critical feedback that stakeholders would like to give and was suggestive of an overly fragmented approach to the design of REF2029.

Section B: journal articles and conference proceedings

Section B: publication, deposit

5 Should deposit requirements post acceptance be maintained where publication isn't immediately open access?

No comment

If yes, why? What would be an appropriate time limit for deposit post acceptance?:

We commend to you the holistic feedback provided in Section A. For all subsequent questions we have responded 'no comment' to avoid giving in to providing a very atomised form of feedback. Many of our affiliates in the Arts and Humanities are responding to this consultation with cogent responses to each of these more technical questions. We have seen general consensus in all responses across the Arts and Humanities organisations that are responding to this consultation and endorse those responses fully.

Section B: access, licensing

6 Do you agree with alignment to the UKRI open access policy in respect of licensing for journal publications by requiring licensing terms equivalent to CC-BY or CC-BY-ND licensing for journal publications?

No comment

What, if any, negative or positive impacts might there be from this change?:

Section B: pre-prints, alternative platforms

7 Do you agree with recognition of alternative platforms as meeting open access requirements as primary platform for publication?

No comment

Please provide any further comment:

Section B: embargo periods

8 Do you agree with the proposed changes to embargo periods for journal publications for main panels A and B (12 months reduced to six months) and main panels C and D (24 months reduced to 12 months), in light of changing standards and practice?

No comment

What, if any, negative or positive impacts might there be from this change?:

Section B: tolerance limits, implementation date

9 Do you agree that changes to the open access policy for journal-based publications should be implemented from 1 January 2025?

No comment

Please provide any further comment:

10 Do you consider that tolerance limit for articles and conference proceedings should be retained at 5% of any submission?

No comment

please provide any further comment :

Section B: exceptions

11 Do you agree with the proposed exceptions for journal publications?

No comment

Should any of the above be removed?:

What, if any, additional exceptions might be required?:

Section C: longform outputs (monographs, book chapters and edited collections)

Section C: publication, deposit and embargo

12 Do you agree that there should be no deposit requirement for longform publications, but that they should be made immediately available as open access upon publication (or no later than 24 months following publication if subject to an embargo)?

No comment

Please provide further comment:

13 Do you agree with the proposal of a maximum embargo period of 24 months for longform publications?

No comment

Please provide any further comment:

Section C: access, licensing

14 Is licensing for third party materials not being granted a reasonable ground for exemption from open access requirements?

No comment

Please provide any further comment:

15 Is sharing of a version of an output without third-party materials if licensing can't be obtained, mirroring the UKRI open access policy for longform outputs, appropriate to meet the open access requirements for REF 2029 policy?

No comment

Does this present issues for output submission and assessment?:

Section C: tolerance level

16 Do you agree with the principle of a tolerance level for non-compliant longform outputs?

No comment

Please provide any further comment:

17 Do you agree with the proposed tolerance level of 10% for longform outputs?

No comment

Please provide any further comment:

Section C: implementation

18 Do you agree with the proposed date for implementation of an open access policy for longform outputs in REF 2029 being for all longform publications for which contracts are agreed from 1 January 2026?

No comment

Please provide any further comment.:

Section C: exceptions

19 Do you agree with the proposed exceptions for longform publications?

No comment

Should any of the above be removed?:

Are there other exceptions you think are necessary for longform outputs? Please provide evidence in support.: