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Submitted to REF 2029 Open Access Consultation
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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:
The Society for Research into Higher Education (SRHE)

3 Country

England

Other:

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:

The increased emphasis on OA outputs from governments and funding bodies is a key change in the OA landscape, with an associated increase in OA outputs – SRHE publishes 3 journals, and TAs have meant that these are likely to flip from a hybrid to an OA publication method very soon.

The impact of the movement from a subscription model for journals to APCs for authors is also significant. For institutions covered by TAs, this is less of an issue, but there are clear equity concerns for academics employed by alternative providers, newer researchers without permanent posts, retired academics, and international contributors, particularly from the global south.

Under OA arrangements, there is pressure to increase the number of articles published. This leads to additional burden on editorial staff working to maintain academic standards. Peer review is undergoing an huge strain with increased numbers of articles under consideration.

The rise of predatory journals is also an important change in the landscape. A vast number of pay-to-publish journals have appeared, without quality control or peer review processes.

STEM subjects are often prioritised in terms of APC support, with subjects in the arts, humanities, and social sciences struggling to obtain support, particularly for gold OA.

Increased OA requirements in the REF will have a significant impact on the operation of learned societies like SRHE, which have an important function in the sector. While we support OA for our members, we face serious consequences from its implementation. Journals provide around ¾ of the Society's income, and the consequent income decline will affect our ability to offer our services to the research community. We have real concerns about the negative impact upon our organisation and learned societies more generally following the end of TAs.

The pressures upon academics to publish OA are not always matched by funding support, and so reasonable embargo periods the option to use repositories is crucial. SRHE for instance provides several annual research grants, which usually aim to result in 2-3 published articles or a monograph. We cannot accommodate APCs or BPCs in our grants.

We do not think this is the right time to introduce OA requirements for longform publications. The growth of OA for books in HE research (and the social sciences generally) is much slower than for journals. Of the 30 titles in the SRHE book series published by Routledge (plus 4 more in production), only 1 of these books was published OA. The BPC is hefty and represents a real obstacle for many authors. There is also an equity issue, with only a few universities providing free publishing for staff, which may result in an institutional skew in terms of who can publish what. So if the REF proceeds with this, expectations must be set in consultation with universities and publishers to ascertain the practicalities of increased demands in this area.

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?

Yes

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

This seems a reasonable position, particularly for those authors unable to immediately publish OA. A period of 3 months also seems reasonable. However, overreliance on this method will mean increased deposit of outputs placing considerable demands on platform capacity and administration, along with the costs of these for future REF exercises.

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

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

SRHE supports keeping licensing as broad as possible, offering the maximum choice for authors. We would like to see NC retained as an option. The importance of varied options is particularly important for those academics whose work is not funded.

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?

Not sure

Please provide any further comment:

The Society welcomes in principle the increased level of Open Access offered by many of these platforms, but there are concerns about the ways in which quality and legitimacy of the research presented on the platforms will be ensured/secured. The Knowledge Exchange report cited by the REF consultation acknowledges this in its observation that of the 45 platforms surveyed, only "...23 platforms say they cover certification" defined as "establishing the validity of work". Likewise, there are different approaches to peer review: "...29 [platforms] selected pre-publication [peer review]; 13 post-publication only; 9 multi-stage; 2 mentioned this was the editors' choice and 2 indicated it was not applicable to their platform."

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

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

While SRHE appreciates the REF's consideration of different embargo periods for different academic disciplines, we would ask that original longer embargo periods be retained. The issue here is that as a Society supporting work in the social sciences, our members' work is often unfunded. Where there is funding support for OA publication, we could support decreases in embargos but this is not always (or even primarily) the case in our discipline. We also note that our members' educational research can be published across all panels (for example physics or medical education), and different requirements could negatively impact those working in interdisciplinary fields having to meet different criteria. The negative impact of shorter embargos on publishing and on learned societies such as our own will be significant.

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?

Not sure

Please provide any further comment:

The date seems reasonable if the guidelines are published with sufficient lead time. The REF may wish to consider pushing this date back 6 months to a year in order to prevent publications in the pipeline being caught out by the requirement. It may also wish to state that it comes into effect for publications conditional on a "when submitted for review" timing – as there can be a considerable timelag here.

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

No

please provide any further comment :

SRHE would prefer to see a higher tolerance limit, ideally 10%. This is in light of the fact that social science research/publishing in many parts of the world is operating in an open access environment that is not as advanced as in the UK. The international context of academic publishing is an important factor

here, as our membership engages in high levels of international research collaboration.

Section B: exceptions

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

Yes

Should any of the above be removed?:

No.

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

SRHE would like to see prohibitive cost added as an exception for failing to secure a licence for third party content . It would also be very helpful to have an automated/standardised list of exemptions with clear rules (e.g. definition of prohibitive cost) so that these exemptions would not need to be made on an onerous case-by-case basis.

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

Please provide further comment:

SRHE is concerned about the implementation of OA longform requirements for the 2029 exercise in general, and would prefer that this be deferred to the following REF exercise. We are not convinced that the publishing processes and funding options will have developed sufficiently to accommodate this requirement for 2029. As noted in our answer to question 4, our own experience shows that of the 30 titles in the SRHE book series published by Routledge (plus 4 more in production), only one of these books was published Open Access. REF considers many research outputs that are not supported by the funding bodies and support for longform publications is generally lower than access to funds for journal articles. Book Publication Charges represent a real obstacle for many authors.

Having said this, we agree that there should be no deposit requirement given that publications will become available either on publication or post-embargo, but we do take issue with the 24 month maximum, as the assumption that longform sales are virtually complete within 24 months is not borne out in our experience, or more generally within the social sciences. This proposal also makes no reference to paperback editions or second and subsequent editions of a work, and it would be helpful to know how these will be accommodated.

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

No

Please provide any further comment:

SRHE has taken issue with the proposal to include longform publications in the REF 2029 because of the uncertainty involved. We feel that there needs to be more extensive modelling and testing of key assumptions, and there is no additional funding to support this initiative. We are also concerned about the practicality of this proposal, and would like reassurance that publishers have been consulted, as this represents a real risk to the book publishing model, as well as to authors and learned societies. Our own book publishing portfolio indicates that sales are by no means complete within the first 24 months – many of our publications have a slow burn. We would therefore not agree with the 24-month embargo, and would recommend at the very minimum an extension to 36 months. The current recommendation of 24 months assumes that a pattern of sales that applies to physical book publication will continue to apply when readers are aware that an OA version is on the horizon – this represents a disciplinary difference from STEM subjects. It is also worth noting that there will be an incentive to use an OA version even if it is not the final approved manuscript.

Section C: access, licensing

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

Yes

Please provide any further comment:

SRHE is pleased to see this being included as a reasonable ground for exemption, given the difficulty and considerable expense of obtaining third-party rights in many cases. This can be especially problematic for unfunded research outputs, but is a more general problem in our discipline. If not included as a ground for exemption, many social science outputs would be restricted from the REF.

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

Does this present issues for output submission and assessment?:

SRHE would resist the proposal that authors submit versions of their work excising 3rd-party elements for which licensing cannot be obtained. This can significantly impact upon the argument and evidence of the research, and if authors can demonstrate that they have attempted to obtain the rights in good faith, their work should be considered under an exemption. Incomplete versions of research outputs can result in a false impression and negatively impact future decisions around quality and funding. This policy is disproportionately likely to affect researchers in the social sciences and the arts and humanities, and the disciplinary-specific implications should be kept in mind so as not to disadvantage these researchers.

Section C: tolerance level

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

Yes

Please provide any further comment:

Given the concerns that we have expressed throughout this consultation about the inclusion of longform outputs in the 2029 REF, if these do go ahead, we would definitely encourage a healthy tolerance level for non-compliance.

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

No

Please provide any further comment:

SRHE would suggest that any tolerance level for longform outputs should be significantly higher – a minimum of 25% - to allow for both the practical publishing considerations that we have outlined throughout our responses to this consultation, but also for equity issues. There is a particular emphasis for Early Career Researchers to publish REF-compliant outputs, putting a burden on them with regard to longform publications that is not shared equally by more senior colleagues who are more likely to publish in traditional formats. This is a generational issue, and the exemptions should not be awarded (albeit inadvertently) on the basis of seniority. Until sufficient funding sources are available for longform OA, we would encourage either the removal of the longform requirement for REF 2029, or a much more generous tolerance level for non-compliance.

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

Please provide any further comment.:

Given all of the concerns that we have already raised, and our expressed preference that the longform OA requirement be deferred to the next REF exercise, we would not support such an early implementation date. The leadtime for book publication far exceeds that of journal publication, and this needs to be factored into the implementation date. Publishers, authors and societies will need time to prepare and assess the future impacts of the policy. A later start date would provide this longer period for preparation.

Section C: exceptions

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

Yes

Should any of the above be removed?:

No.

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

SRHE welcomes the exclusion of trade books and creative works from OA requirements, but we have some concerns regarding the definition of trade books, as we feel that there can be significant overlap between trade and academic, particularly in the social sciences and arts and humanities.