

# Full List of Consultation Questions

## 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. \***

**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. \***

a. Yourself as an individual b. [An organisation](#) c. (including part of an organisation, department, informal group) – please

specify type:

**IV. Please specify the name of your organisation. \* [Academy of Social Sciences](#)**

**V. Please specify the name of your group/department. \* [n/a](#)**

**VI. Please specify which country you, your organisation or your group are based in. [United Kingdom](#)**

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

a. Arts and humanities b. Medicine, health and life sciences c. Physical sciences, engineering and mathematics d. [Social sciences](#) e. Interdisciplinary research 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:

**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)**
- d. **Learned society or academy which outsources publishing to a third party (including employees)**
- 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.**

- a. UKRI (including AHRC, BBSRC, ESRC, EPSRC, Innovate UK, MRC, NERC, Research England, STFC, as well as predecessor bodies, HEFCE and RCUK)
- b. UK Space Agency
- c. Department for International Development (DFID) and subsidiary bodies
- d. Department of Health and Social Care (DHSC) including National Institute for Health Research (NIHR) and other subsidiary bodies

- e. Department for Environment, Food and Rural Affairs (DEFRA) and subsidiary bodies

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:

**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):** [1088537](#)

**XII. If responding on behalf of an organisation, please indicate your staff headcount (if known).**

a.  $\geq 250$  (large business) b.  $< 250$   
(medium-sized business) c.  $< 50$   
(small business) d.  $< 10$  (micro business)

**XIII. If applicable, which researcher career stage(s) do you, your organisation or your group represent? Select all that apply.**

a. [Postgraduate researcher](#) b. [Post-doctoral researcher](#) c. [Research leader \(responsible for intellectual leadership and overall management of research projects\)](#) d. Other (including retired researcher, citizen researcher) – please specify:

## 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](#) / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.

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

**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?** Yes / [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.

**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 / No / 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?** Yes / 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. **No if Gold OA is fully funded and accessible to all and provided funding is available for Gold OA in hybrid journals. Yes, if zero Green OA is the default route** owing to lack of funding or to academic institutions' preferences.

Hybrid journals constitute the vast majority of English-language publishing opportunities in the social sciences; fully OA journals are rare. Failure to include hybrids as compliant for Gold OA funding will severely restrict author choice. Availability of APC resources to social science researchers have been shown to be limited, thus restricting the uptake of Gold OA in this sector. (Data from three leading learned societies in the social sciences indicates 10-15% of Gold OA articles in leading journals since the introduction of hybrid; limited by researcher access to APC funding.)

Zero embargo Green route is not a business model - it provides no income. On its own, zero Green embargo OA cannot financially support publishing processes that are essential to underpinning trust and confidence in published research - eg. high quality peer review, editing and copy editing - and efficient promotion, dissemination and discoverability.

There is insufficient evidence that zero embargo Green OA does not/will not, as discoverability improves, undermine subscription sales. It is those sales that provide the revenue to support publishing processes.

We do not see any evidence in social science for a business model that derives income post Green OA publication from repurposing previously published content.

2. **No if the proposed policies relate only to UKRI grant-funded research** as the

volume of that is low in AHSS. **Yes if the same policy is applied to REF publications.** Given the UKRI stated intention to align these two policies, we have responded to this consultation with that context firmly in mind.

This is a matter of scale. Small numbers of Green OA articles can be accommodated, and Gold OA is already widely supported in hybrid journals in the social sciences through APCs and increasingly through R&P / P&R transformative deals.

BUT in REF 2014, > 42,000 journal articles were submitted to Main Panel C. BERA estimates that c.30% of the papers in their journals were submitted to REF 2014. As most authors do not select their REF publications at the time of publishing, a zero green embargo on publication applied to REF would mean that almost all quality journal articles would be affected. This would **undermine the subscription model on which green OA depends** for generating the revenues to pay for publishing costs; and place the future of journal publishing in LS at risk. The resulting loss of income would impact very significantly on LS ability to support their academic communities and disciplines.

3. **Yes in terms of the 12 month embargo proposed for monographs** publishing; the available evidence indicates that at least a 24 month embargo is required to recoup publishing investment in producing the monograph. The scale issue also applies here in terms of REF after REF-2021; 4,685 books (authored and edited) were submitted to MPC in REF 2014 and it is highly unlikely that Gold OA funding will be available at this scale for monographs. Thus, there needs to be a sustainable commercial business model to underpin their production.

**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 / No / 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.

This is unnecessary duplication of effort and will be potentially confusing in having two different versions available in different places. Journals have digital preservation measures in place for all articles and make articles readily accessible and discoverable.

**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? Yes / 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.

**See points above in response to Q4 and the issue of scale.**

There is a strong preference among learned societies in social sciences for the Gold OA route:

- with sufficient government funding behind it;
- a model that enables equitable and widespread access to Gold by researchers; and
- in which all parties recognise the need for reasonable charging and appropriate cost efficiencies.

Hybrid journals, wherein most journal article publishing in social sciences takes place, are an essential component of the REF-after-REF 2021 landscape. Hybrids are a means to continue to support an ongoing transition to full OA, whether through APCs or P&R deals, the former being especially important for those societies who publish independently (ie not with a commercial publishing partner). The latter offer advantages of scaling up the Gold OA offer widely across the Academic community.

It is important to recognise that there is willingness to embrace Gold OA more fully by learned societies and our authors but until now this has been limited by author access in the social sciences to APC funds from their institutions. This has been identified, for example, in a consultation of the sociology community by the British Sociological Association. It is widely reported anecdotally by other social science academics too.

The Zero Green OA route applied at the scale of REF-after-REF 2021 will only have a necessary underpinning business model if:

Either, embargo periods are sustained in social sciences for a minimum 12 month period;  
Or, only those articles actually submitted to the REF are required to be available (green OA) from the time of REF submission.

Or, the author submitted paper (not AAM or VoR) is placed in a zero embargo repository.

**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 / Strongly disagree / Don't Know / No opinion.

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

A CC BY licence enables any third party publisher to exploit the repository manuscripts and to republish them commercially, to the detriment of the original publisher who has paid for all the costs associated in getting the article to the point of AAM. A CC BY NC licence should be applied in these circumstances.

**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](#) / 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 agree and disagree as follows:

**We [agree](#) there should be CC BY-ND allowed within the guidelines.** In the social science community there are concerns about research conclusions potentially being stripped from their contexts or theoretical bases and thus open to mis-interpretation or mis-application. Typically context settings provide important framings for both the research questions and the methodologies used. This is especially important where topics are of a sensitive nature.

At the British Sociological Association, authors have been offered a choice of licenses and 43% chose a more restrictive license than CC BY because it was more appropriate for their work, which is nuanced, complex and persuasive, as opposed to formulaic. The research topics in sociology - and widely in the social sciences - can be highly sensitive, from gender to socio-economic and race inequalities. The sociologists consulted felt that CC BY without restriction would impede the topics they could write about, and since British sociology is world leading, this would impose restrictions that would threaten its ability to be cutting edge and to sustain that status.

**We [disagree](#) with the proposed way for allowing this. Case-by-case exceptions would be administratively heavy, slow and open to challenge.** Taking note of the evidence above, we recommend that a more pragmatic approach is adopted, that enables exceptions by sector (aligned with main REF panels), by discipline or by grant. The decision as to whether or not to apply a CC BY or CC BY-ND license would then be at the authors' discretion within permissive sectors.

**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 / No / Don't know / [No opinion](#).

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

**Q10. Are there other considerations UKRI should take into account regarding**

**licensing requirements for research articles in-scope of its proposed OA policy?** Yes / No / Don't know / No opinion.

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

**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?** Yes / 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 should be aware that academic re-use licensing (through ALCS) is a revenue stream to authors that will no longer be available under a CC BY licence. Academic publishing does not usually offer much in the way of royalties to authors, and licensing revenue for re-use of published material can be a positive contribution for writing which is often done outside of working hours.

**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 poli-**



**cy 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.

The current arrangements work well. Furthermore, [if an article is published CC BY it is irrelevant who holds the copyright](#).

**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
- 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
- c. machine-readable information on the OA status and the licence must be embedded in the article in a standard non-proprietary format
- d. long-term preservation must be supported via a robust preservation programme such as CLOCKSS, Portico or an equivalent
- e. openly accessible data on citations must be made available according to the standards set out by the Initiative for Open Citations (I4OC)
- f. self-archiving policies must be registered in the SHERPA RoMEO database that underpins SHERPA/FACT
- g. unique PIDs for research management information must be used and must include the use of ORCID to identify all authors and contributors

**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 / [No opinion](#).

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
- 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
- c. machine-readable information on the OA status and the licence must be embedded in the article in a standard non-proprietary format
- d. unique PIDs for research management information must be used and must include the use of ORCID to identify all authors and contributors
- e. the repository must be registered in the Directory of Open Access Repositories (OpenDOAR)

**Q15. To support the adoption of technical standards for OA, are there other standards, actions and/or issues UKRI should consider? Yes / No / Don't know / [No opinion](#).**

**Please explain your answer** (2,650 characters maximum, approximately 400 words).

The policy on technical standards needs to be sufficiently straightforward and cost effective to encourage compliance. Going too far with technical specifications could be counter productive.

**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 / [No opinion](#).**

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

UKRI should consider initiatives to encourage transparency and openness of underlying research materials but be as permissive as possible. It should be encouraged but not mandatory.

**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 c. [The policy should apply later than 1 January 2022](#) 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).

[Applying the policy to all articles accepted for publication on or after 1 January 2022 means that it will apply to many articles submitted as early as 01 Jan 2021 - very shortly after the planned announcement of UKRI policy. Better to align with the revised REF 2021/ REF after REF 2021 timing when known and to have a date of compliance from when articles are submitted for publication.](#)

**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?** Yes / No / Don't know / [No opinion](#).

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

**Q19. Do you think the proposals outlined in Section A will have any financial cost implications for you or your organisation?** [Yes](#) / No / Don't Know / No opinion.

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

Yes, significant financial implications, that will affect the work that learned societies can do in support of the academy and, for some societies, existential implications.

[For UKRI research-grant funded articles, the cost impact will be small as article volumes are small.](#)

**If a similar policy is rolled out more widely to REF-after-REF 2021**, it would result in significant reduction in core income to learned societies; and a concomitant reduction in their ability to support their discipline and its academic community. Early career scholars in particular will be affected as they are one of the main beneficiary groups. **Some learned societies will be at risk of failing.** This situation has been further compounded by the current Covid-19 crisis and the loss of revenue from annual conferences and associated membership. These are the three main sources of income for most learned societies - membership subscriptions, major conferences and events, and publishing revenue.

Many learned societies in the social sciences generate 40-70% of their total income from scholarly publishing. This applies to societies across the range of sizes. Publishing has been a longstanding source of income, and a well-established business model. All proceeds from publishing are used by learned societies to support charitable activities that help sustain the academy, and its research and teaching excellence, in a wide variety of ways: for example, that promote and develop good practice (eg BERA & BSA research ethics guidance); that help widen participation in higher education (eg RES diversity programme); that support ECRs in transitioning to academic careers (eg RGS-IBG small research greats scheme & training programme); that set and manage professional standards (eg RSS, BPS and RTPI chartered status); and that foster international research discourse and collaboration (eg PSA international conference; and the conferences and Special Interest Groups common in many societies). All contribute to sustaining the research ecosystem, and in ways that are complementary to the work of UKRI and others. **All are the primary bodies that represent disciplines and their academic practitioners.**

Social sciences in the UK are world leading, ranking either first or second (to the USA) in the world today in each of the main disciplines. The learned societies are an integral part of that success story.

**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 / **No** / Don't Know / No opinion.

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

**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 / No / Don't know / **No opinion.**

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

**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 / No opinion.

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

There are several examples known to the Academy of leading learned societies in the social sciences who have exerted effective influence on their commercial publishing partners (and in one case on multiple publishing partners) to **keep price rises down** to the lower end of the proposed scale, on the argument that this is beneficial for their community and for readership in general.

There is also an example where, if the proposed policy is introduced, the learned society will need to increase the APCs for their gold OA journal because it does not cover its costs and is currently subsidised by hybrid subscription income.

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

LS could ensure that publication income and expenditure is clearly differentiated in their annual financial statements (it is for some but not all); and include clarity on specifically how that revenue is used to support charitable activities in the narrative to the financial statements. (This would apply to the many learned societies that have charitable status; not all are charities.)

Most learned societies in the social sciences publish with commercial partners, and may not be privy to all the matters they wish to be transparent. However, we welcome transparency on double dipping strategies.

**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. UKRI OA funds should be permitted to support OA publication in hybrid journals

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).

In social sciences hybrid journals offer the main route to Gold OA; very few fully OA journals exist that are English language. For example, only 0.3% of journals on the Directory of Open Access Journals are identified as sociology and only one of them is English language.

Furthermore, with little APC funding available, those fully OA journals that do exist are often either financially unsustainable or have to be subsidised (not something that learned societies generally have the resources to do). For example, the RGS-IBG cross subsidises its fully OA Journal with revenues from subscription journals; and the Regional Studies Association's fully OA journal is similarly supported by cross subsidy – the APCs do not meet the costs of the journal and APC increases are probable.

**Thus, if UKRI did not fund Gold OA in hybrid journals it would severely restrict the availability of publishing outlets, and hence UK author choice, across the breadth of the social science disciplines and communities.**

The international perspective is also important. Hybrid journals ensure pathways to publication for authors who do not have access to Gold OA funding, including many international authors or those based outside of universities, such as in professional practice. For BERA, for example, over 60% of journal submissions are from outside the UK and most are in countries not currently covered by transformative agreements. A key dimension of the UK's social science being recognised as world leading is through its journals and publishing. Hybrids are fundamentally important in this respect and to sustain that status they need to be open on an equitable basis to authors from across the world, including the UK. That requires them to sustain both a Gold OA route and a subscription pathway.

Furthermore, UKRI wishes to see research it has funded published open access. Hybrid journals offer that facility just as well as fully OA journals and should be embraced within the policy. The emergence of P&R / R&P transformative arrangements offers an opportunity to many hybrid journals in social sciences to embrace OA more fully and this may well benefit the gradual transition to a more sustainable model of OA, while preserving the high quality of hybrid journals and global equity in access to them. Hybrids have undoubtedly helped the shift in re-

cent years to OA.

**We strongly encourage a permissive policy to UKRI supporting OA funding in hybrid journals.**

**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 / No opinion.

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

**It depends on degree.** UKRI funds should be used in the main to support Gold OA routes, which stand the best chance of moving the publishing system as a whole sustainably into an open access world over time, both in the UK and globally, and which provide a business model for creating and making available the VoR publication.

Using UKRI OA funds to support institutional repositories is a matter of balance and cost effectiveness. In principle using a proportion of funds to support efficient institutional repositories is sensible; but sinking funds inefficiently and disproportionately using funds to support repositories at the expense of supporting Gold OA is not desirable.

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

**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?** Yes / **No** / Don't know / No opinion.

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

We do not see any other models apart from APC's and P&R / R&P as being capable of meeting the scale needs.

However, capacity should continue to exist to support innovation, and this flourishes in a more permissive environment.

**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?** Yes / No / Don't know / No opinion.

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

UKRI should seriously consider using the block grant to fund R&P / P&R deals nationally for UK universities as a whole, across the main publishers; and distributing lesser amounts directly to institutions to support APCs for those journals that are independently published and to support local repositories.

**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 / No opinion.

**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).

**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).

Extraordinarily cumbersome and costly; would duplicate existing institution and subject repositories; and no need with search engines becoming ever more efficient. Better to spend the money in supporting Gold OA.

**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 / No opinion.

**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.)

Implement policy at those times when SAGE Committee is mobilised, as now.



**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 / No opinion.

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

There is not a tradition of pre-prints in most social sciences, partly owing to the nature of the research; one exception being that economics has an established working papers series. Preprints are a more established culture in STEM. We are unsure if they would be supported by the social science disciplinary communities; and they would require funding support if implemented.

We consider it better for all stakeholders to focus limited resources on achieving a main aim of immediate OA via Gold routes.

## 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).

The definitions and inclusion of book chapters, edited collections, and conference collections is clear.

**However, we worry at the complications** that might arise when the editors of a collection are funded by UKRI but not all authors of chapters or papers in that collection are so funded. This needs further clarification. For example, where a discipline has a strong presence of practitioner-based researchers, edited volumes may contain individual chapters whose authors have not been funded by UKRI. We would not want to see the opportunities for such authors to publish in an edited collection diminished by the policy.

The alternative scenario is equally as challenging. For example, the BSA cites the fact that 90% of their book publishing portfolio are edited collections, in which the UKRI funded chapters are a small minority. If the policy does not allow for flexibility in such circumstances it could result in the funded chapters being excluded from edited collections, as the minority of funded chapters would not provide sufficient funds for the book to be published fully OA.

We agree with the out of scope definitions, including trade books and text books.

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

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

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

Early career researchers have well documented difficulty in gaining access to OA funding in general, and there is no reason to expect the same not to apply to book chapters and doctoral theses published as monographs. We are concerned at issues of equality, inclusion and diversity if OA requirements include UKRI-funded doctoral research.

**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?** Strongly agree / **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).

There is typically only modest profit (at best) to be made in monograph publishing; better to allow one publisher to continue to exist in a highly specialised field of monograph publishing rather than have none.

**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?** Yes / 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.

The limited nature of monograph publishing opportunities in some disciplines. Some social science learned societies, who publish in partnership with commercial publishers, negotiate

for monograph publishing to be included as part of their publishing partnership. This is to ensure that opportunities for monograph publishing routes exist for scholars within the discipline. Monograph publishing outlets are becoming very restricted in some disciplines, owing to financial viability, and the publisher may not otherwise support it.

**This is one of many unquantified - and unquantifiable - benefits to the academy that arise from learned society collaborations with commercial publishing partners that are not taken into account in this consultation.**

**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 b. A longer embargo period should be allowed 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).

By all accounts one year is insufficient to recoup the financial investment in the monograph publishing process (see UUK Evidence Review, 2019). Thus the Green OA route should have a longer embargo period and/or more consideration given to Gold OA funding routes. The Regional Studies Association cites clear evidence on this in social sciences.

However, this area should be subject to further review, analysis and pilot studies before a decision is taken on policy. It is still very early days for open access in monograph publishing.

**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 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).

We refer you to the British Academy's report *Open Access and Book Chapters* (2019) for Green OA. 12 months for the sciences and 24 months for book chap-

ters in AHSS would be appropriate.

**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 b. A longer embargo period should be allowed 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).

For the same reasons as Q 38.

**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? Yes / 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).

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

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

**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.

In the likely event that Gold OA funding is not available for many of the books submitted to future REF, then the Green AAM route will dominate.

If this is the case, it is vital that there is an embargo period that allows monograph publishing to be financially sustainable for the publisher to enable costs in the review, editing and production process to be recouped.

As stated in an earlier response, 12 months is unlikely to be sufficient.

**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?** Strongly agree / 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).

This is recommended in the UUK report *Open access and monographs: Evidence review* (2019).

**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?** Strongly/ 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.

**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 / Strongly disagree / Don't know / No opinion.

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

**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).

**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.

We would urge that the CC BY-ND licensing as proposed in this policy be included within the REF policy when it comes into effect.

**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. 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'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.

**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).

**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/ No.**

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? Yes / No / Don't know / No opinion.**

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

**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? Yes / No.**

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

Being able to offer book series' to members and to learned society communities is important; we encourage UKRI to do more learning about the impact of OA on books

**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).

**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 / [No opinion](#).

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 / [No opinion](#).

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 / [No opinion](#).

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 / No / Don't know / [No opinion](#).

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

**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 / Disagree / Strongly disagree / Don't know / [No opinion](#).

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

## 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?** [Yes](#) / No / Don't know / No opinion.

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

The learned societies in social sciences support the principle of open access publishing and recognise the benefits for scholars and to the research community in particular.

**There are trade-offs and we sincerely hope that a suitable compromise can be reached between UKRI, institutions, scholars, publishers and learned societies that recognise that we all exist in the academic scholarly system and all bring value to it in our different ways.**

Benefits to individual grant-funded researchers in the social sciences will **only** accrue if Gold OA in particular is **more fully and more equitably** available as this offers an excellent route to high quality review, production, dissemination and discoverability of the Version of Record.

In the wider context of REF-after-REF 2021 the same applies, providing sufficient funding can be found to underpin widespread Gold OA, and in this case very many scholars in social sciences would benefit from more widely available and equitably accessible Gold OA, including early career scholars.

**Q61. Do you foresee UKRI's proposed OA policy causing and/or contributing to any disadvantages or inequalities?** [Yes](#) / 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).

1. There will be significant disadvantages for learned societies and their capacities and scope, as set out in previous answers (Q 4). As many provide services especially geared to early career researchers (and are unusual in so doing), **the ECR community in particular will be disadvantaged** with reduction in the scope and level of support. One example among the many available in learned societies is the BERA Early Career Researcher (ECR) Network that offers support to those who are in the process of completing their masters or doctorate in education, as well as those who have completed their studies within the past 5 years. It seeks to meet the needs of not only those who are pursuing studies and/or careers as researchers within Higher Education, but also those who are practitioners seeking to undertake research to support their development. It's provision includes training, networking, guidance (eg. on getting published) and small grants.

UKRI can partially address both this by focusing its policy on transformational P&R/R&P deals. Seeking to offer competitive funding to learned societies to provide ECR services is **not** an appropriate alternative. It would offer no security of funding longer term and would result in patchy provision across disciplines. Such short term, competitive funding is not a replacement for the loss of core publishing income that has been part of learned society revenues and financial models for decades, and centuries in some cases.

2. The policy may also serve to increase inequalities that already exist in relation to access to Gold OA funding within institutions for scholars in the social sciences and for early career scholars.

This would need to be very carefully monitored post policy introduction to ensure cross sector equity.

3. **If UKRI excludes hybrid journals** from its policy we will see a substantial reduction in the choice of journals available to all researchers in the social sciences since the majority of hybrid journals are currently non-compliant with the proposed Green OA policy.

UKRI can address this by specifically including funding of Gold OA in hybrid journals within the policy.

4. The policy may also increase the proportion of UKRI funded articles that are published Green OA (some institutions being unwilling to fund APCs). The articles thus available as AAMs under OA will not benefit from the added value seen in the VoR publication and associated promotion and discoverability. This will disadvantage readers.

**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?** Yes / 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).

LMICs scholars benefit from the existence of international hybrid journals, which offer a wide exposure for scholars whose papers are accepted for publication. Hybrids are an accessible route to publication and profile in a setting where APC payments are generally not available. The continuing financial sustainability of hybrid journals is important in this regard.

LMICs also benefit from philanthropic initiatives of commercial publishers (and their learned society publishing partners), who make journals available in low income countries on free and low cost schemes. These include HINARI, INASP, Research4Life and the eIFL Foundation, which support readership in LMICs and offer APC waivers. These may become less of a priority and less available where resources are squeezed. Where journals are not financially stable, waivers are not an adequate solution to inequalities.

Some learned societies also offer opportunities to support researchers in LMICs to benefit from advice and capacity building, such as in preparing a publication for submission in their international journals. This too may be squeezed in a more financially constrained world of publishing.

UKRI can address these issues by including hybrid journals within the policy and focusing efforts on Gold OA thereby offering some security of financial sustainability to learned societies and their journals.

**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?** Yes / 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).

Challenge to the financial viability (existence) of some of the smaller and mid sized learned societies in the social sciences **if** the proposed policy for publications arising from UKRI grant funded projects is extended in its current form to REF.

UKRI should be cognisant of this, in deciding its final policy, and the fact that some 100,000+ members (largely academic researchers) of learned societies in the social sciences find those organisations and their activities of sufficient merit to pay a discretionary membership fee each year.

UKRI should be willing to:

1. Differentiate the policy for publications arising from research grants from the policy for those submitted to REF, such that the latter has an embargo period for green OA; or
2. Put its weight and money behind P&R / R&P deals.

**The social science LS community is keen to see an article policy for both research grant publications and those for REF after REF2021 that:**

- focuses on Gold OA routes to enable immediate open publication of journal articles,
- allows for and funds publishing in hybrid journals, and
- has a business model to enable publishing processes to take place (peer review, editing, dissemination etc) and publishing income to be sustained at reasonable levels with appropriate transparency.

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

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

1. Put UKRI weight behind P&R / R&P deals and see hybrids as part of the driving force to the transition to a fuller OA world.

2. Encourage more researchers to have a greater and balanced understanding of open access publishing and the opportunities and challenges it poses for all stakeholders. The level of knowledge among the academic community is generally low, as exemplified by a recent RES meeting with its community of Heads of Economics; and anecdotally too from many other learned societies in social science. The Academy of Social Science OA working group of learned societies has committed to provide guidance for scholars in the social science community, subject to available resources.

3. Value the learned societies for their many and varied contributions to the research ecosystem and its communities.

**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).

There is a high risk that if the policy lands with a large scale reliance on zero Green embargo for REF-after-REF 2021 we will see some journals failing, and others opting to remain as purely subscription journals and refocusing their attention outside the UK/EU. This will reduce the opportunities for UK authors, reduce the leading profile of UK journals and pub-

lishing, and lose the genuine opportunity for hybrids to be a driver of the longer term transition to a fuller OA world.

It will also run the risk of reducing the attractiveness of the UK to researchers coming from overseas, and of retaining UK talent itself, especially in combination with the highly likely reduction in EU research funding for social science post Brexit.

## Section E: Further Comments

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

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

The publishing system is changing and at a time when the world is in turmoil; trying to force a more rapid or more disruptive change than those happening at present through transformative deals could well be counter productive to open access in the longer term.

**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?** Yes / No.

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

These proposals are not a development of existing policy, but represent a marked and potentially highly disruptive change in approach and scale if applied to REF after REF 2021. For the reasons given above we believe the risks are huge for the learned society sector (and for what they do as part of the ecosystem) if there is commonality in the two policies. We strongly believe that there either needs to be two policies that respond to the very different scales of outputs to which they are being applied; or, alternatively, full financial support for P&R deals which offer the best approach to OA at scale for all parties concerned if UKRI wish, above all else, to have commonality across the policies.

We would also like to see evidence from UKRI as to the extent to which research publications submitted to REF are in reality publicly funded. Research grants, QR funding, research infrastructure support and funding from major charities only account for part of the funding used to underpin research in universities. There are other sources and cross subsidies too. In a setting of mixed public and private funding for research it is not clear how REF open access demands can be justified

on the basis of public funding. We would welcome some clarity from UKRI on this point.

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

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

UKRI is asking for evidence, with the implication that if evidence cannot be provided little attention will be paid to arguments presented. It is genuinely difficult to generate evidence when the proposals represent a marked shift in policy and in a setting where such an approach at scale has not been applied anywhere else in the world - there is little evidence on which to build or to justify these proposals. In this case, we urge that the precautionary principle is applied; and that a mutually agreeable compromise is sought wherein all stakeholders bear some 'costs' and all see some benefits.