

## REF open access consultation

Research England (on behalf of all four UK funding councils) [opened a consultation in March 2024](#) on policies concerning open access for the REF 2029 exercise. The context for the consultation was as follows:

*The purpose of the REF 2029 Open Access Policy is to outline open access requirements for the exercise. The proposed policy aims to embed progress in the sector for open access submission for journal publications. It also introduces an open access requirement for longform publications. This consultation outlines the proposed policy for REF 2029. Its purpose is to gather a deeper understanding of sector perspectives on key issues and impacts in relation to our policy proposals. Following this consultation, we will develop and implement the final REF 2029 Open Access Policy.*

Commentary in the consultation is limited to 1,500 characters per answer (except for Q4, where it is 3,000 characters), and there is no provision for references / hyperlinks. The deadline for responses is 17 June 2024.

(Qs 1-3 of the webform were standard questions about the responding organisation)

Question	Options (if available)	Response (if required)
<p><b>Section A: open access developments in the sector</b></p>		
<p>It is important for the four UK higher education funding bodies to understand recent open access developments in the sector. This context will support the development of the final open access policy for REF 2029.</p>		
<p>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?</p>	<p>(3,000 character limit – all other questions are a maximum of 1,500 characters)</p>	<p>1. Since REF 2021, growth in transformative agreements (TA) has accelerated and JISC has facilitated OA for UK researchers. However, OA engagement remains globally uneven and this affects researcher attitudes especially with increases in predatory publishing. Learned societies wish to retain a mixed publishing model (OA and traditional submission) to maintain both routes to publication for the best scholarship internationally and to sustain their own charitable activities.</p> <p>2. The Academy of Social Sciences has 48 association members. Within social science, OA impacts have been uneven. TAs have been critical in the rollout in the UK but practices vary internationally and research/publishing are global activities. TAs have helped mitigate inequality of access for individuals in the UK, but for societies the picture is more mixed.</p> <p>While supporting OA, societies face serious impacts from it. TAs are facilitating a managed transition, but some societies report publishing income decline affecting activity levels. Retention of a mixed economy model for OA is essential to allowing the societies to adjust. The sector widely supports gold OA but less so green which relies on</p>

		<p>continuing the subscription model to fund it. There is concern about what will happen after the current round of transformative deals come to an end. Note that researchers also prefer gold OA over green (deposit) OA.</p> <p>Societies need publishing income to act as defenders of quality in scholarly publishing. This is important because OA promotes volume over quality and predatory publishing is widespread as is growth of generative AI which has poorly understood risks. Societies are under pressure from publishing paradigm changes and are frustrated by assertions that they need to adjust their business models when they have worked hard with commercial partners to deliver what is required and are legitimately working with volunteer engagement to raise funds to support our disciplinary communities.</p> <p>There is concern that the withdrawal of cOAlition S funder support for APCs in hybrid journals from 2025 will slow progress towards a more open landscape. Social science journals are not close to being able to “flip” OA without imperilling their societies financially. Pressure to move too quickly is unhelpful and it is important that REF includes both gold and green OA so that outputs (and researchers) are not generally excluded.</p> <p>UKRI policy on funded longform OA publication was welcomed in the social sciences where accessing funds can be more difficult. There are dangers in pushing for OA where work is unfunded. OA works better when funded and sustainable. Unfunded routes need to be carefully managed or they will undermine the progress that has been made in the UK. We wonder about publisher responses regarding green deposit of AAM. We question the timing of inclusion of longform publications and urge careful consideration of this and all the rules governing their inclusion.</p>
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## Section B: journal articles and conference proceedings

### Requirements

The four UK higher education funding bodies, propose the following requirements for submission of in-scope journal-based publications: journal articles (REF 2021 output type D) and conference contributions published in conference proceedings (REF 2021 output type E) for REF 2029:

- 1) Where not published as immediately open access, in-scope journal-based outputs should be available to read, download and search no longer than six months (Main panels A and B) or 12 months (Main panels C and D) after the date of publication.
- 2) Must be the version of record or the author’s accepted manuscript.
- 3) Should be available via a journal website, repository or other appropriate publishing platform.
- 4) The preferred licence is CC-BY or equivalent; CC-BY-ND or equivalent will also be accepted (Please see Creative Commons Licenses for further information).
- 5) The tolerance band of 5% for non-compliance at unit submission level will be retained.

### Exceptions

Allowable exceptions proposed for journal articles and conference proceedings are:

- 1) Third-party content was included for which licenses could not be obtained.
- 2) Outputs were authored in whole by one or more non-volume contributing staff prior to implementation of the open access policy for REF 2029.

- 3) Criteria beyond the control of the HEI (such as personal circumstances of the author, industrial action, closure days and software issues).
- 4) Output has a demonstrable and substantive connection to the submitting institution but was published following the end of the author's period of employment, and it has not been possible to determine compliance with the criteria.
- 5) It would be unlawful to deposit, or request the deposit of, the output or to otherwise make this available.
- 6) The publication concerned requires an embargo period that exceeds the stated maxima and was the most appropriate publication for the output.

**Publication as open access**

As per REF 2021 policy, the four UK higher education funding bodies consider that publication in a journal, with immediate (and irrevocable) availability upon publication of the version of record and appropriate licensing remains an appropriate standard, and that publications meeting this requirement will not have any further requirements to meet.

**Deposit**

HEIs raised concerns about the burden imposed by needing to meet and track deposit requirements post-publication. In response, the four UK higher education funding bodies, consider that there is an opportunity for reducing burden by simplifying the requirement.

- 1) It is proposed that REF2029 move to a requirement that relates to publication rather than acceptance. This is to avoid operating a two-tier system, potentially requiring a higher, or conflicting, standard.
- 2) The approach proposed is that in-scope outputs should be made available at the point of publication or at the expiry of any applicable embargo period.

This removes the requirement for deposit of in-scope outputs, which were not published as immediately open access, to be deposited in a suitable repository within a given period (for REF 2021 this was three months or 92 days).

This is replaced with a requirement for repository deposit or otherwise making the output available through a suitable platform on publication.

However, the four UK higher education funding bodies are mindful of mitigating for unforeseen adverse consequences that might arise from this approach, and therefore wish to invite comment from the sector.

<p>5. Should deposit requirements post acceptance be maintained where publication isn't immediately open access?</p>	<ul style="list-style-type: none"> <li>• Yes</li> <li>• <b>No</b></li> <li>• Not sure</li> <li>• No comment</li> </ul> <p>If yes, why? What would be an appropriate time limit for deposit post acceptance?</p>	<p>It would aid institutions to reduce administrative burden in monitoring outputs post-publication. We support the decision to move the deposit requirement from acceptance to publication because this may help avoid a two-tier system of deposits.</p>
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**Section B (continued): access, licensing**

**Access**

We will retain the requirement for items to be discoverable, fully searchable and freely available for download.

**Licensing**

In REF 2021 for journal articles allowed submission of CC-BY-ND-NC licensed outputs, while encouraging more fully open licensing, such as CC-BY or OGL. There have since been wider moves within the sector, and in particular within universities and funder policies towards embedding rights retention for authors, as well as UKRI policy requirements to mandate more fully open licensing (CC-BY as standard, with ND allowed by exception and where demonstrated as appropriate).

The four UK higher education funding bodies propose to more closely align licensing requirements with the UKRI policy, with publications needing to meet at minimum licensing terms equivalent to CC-BY-ND with no exclusion for commercial use permitted. The four UK higher education funding bodies strongly encourage the use of more open licensing where there is no clear rationale for applying more restrictive measures.

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?

- Yes
- **No**
- Not sure
- No comment

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

We wish to see the inclusion of NC (non-commercial) in the licensing requirement. We believe that licensing should be flexible, ensuring author rights.

While we welcome the inclusion of ND in permitted licensing in the UKRI policy, we are concerned that REF extends its reach beyond work supported by the funding bodies. We support keeping licensing as broad as possible so that authors can make appropriate choices for their work. We would not wish to see NC excluded and believe that authors should have maximum choice in the publication venues for their work. The increase in generative AI lends support to this argument where work may be used for commercial purposes without permission or licensing.

More broadly, generative AI poses a challenge for the society sector through the growth in paper mills and AI generated submissions. The costs are an additional editorial effort to find and exclude such submissions and there is risk where submission may get through and influence AI generated responses to public queries. These processes represent an additional and new burden for societies that publish.

## Section B (continued): pre-prints, alternative platforms

### Pre-prints and alternative publication platforms

Pre-prints are not in scope of the UKRI policy and as noted the four UK higher education funding bodies have agreed to consider alignment where possible with this policy. However, as with other measures relating to open access, the four UK higher education funding bodies also must consider the implications for a wider pool of outputs and output types.

We note with interest the development of alternative publication platforms. Some examples are referenced in the [Knowledge Exchange report on alternative publication platforms](#). We also note the extent to which publication through these platforms can meet the broader requirements of open access policy for REF 2029 in terms of access, licensing, and embargo periods.

The four UK higher education funding bodies consider that there is a strong case to continue to recognise dissemination through pre-print or other open platforms as meeting either initial publication or repository requirements for post-embargo dissemination. However, this requires that the published output should align to the general requirements for meeting open access policy by being the version of record or author accepted manuscript, rather than a preliminary or transitional 'near final' version as allowed for in REF 2021.

The sector is invited to comment on whether, and how, there may be further scope for first publication through alternative publication platforms to be recognised as meeting in full all open access requirements in their own right, and therefore within the scope of policy for REF 2029.

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

- Yes
- No
- **Not sure**
- No comment

Please provide any further comment.

On the face of it, this seems sensible. Most- but perhaps not all- publishers allow their journals to accept submission on articles that have been published on a preprint server although some (T&F for example) specify that it must be a non-commercial preprint server. Clearly where this is not permitted it would create a problem that would undermine the condition and so there should be careful checking that this acceptance is commonplace and critically that it is global, as many UK funded authors will be publishing in high status journals published overseas especially in the USA. It is worth bearing in

mind that the scholarly record is best served by funded gold OA which sees immediate access to the version of record and avoids potential version confusions.

## Section B (continued): embargo periods

### Embargo periods

REF 2021 allowed for up to 12 months for main panels A and B, or 24 months for main panels C and D. This allowed for authors to adhere to the different practices and expectations of publishers in respect of these different disciplinary areas.

In light of progress towards open access for journal publications, including positively increasing movement towards embedding rights retention in practice, the four UK higher education funding bodies propose that while a disciplinary differential is recognised, the allowable maximum embargo periods for REF submission, should be reduced to six months for main panels A and B, and 12 months for outputs for main panels C and D.

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?

- Yes
- **No**
- Not sure
- No comment

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

Where work is funded for OA publication, we could support decreases in embargo periods, but a challenge is that not all the work that will be submitted to the REF will be funded. In these cases (often in the SHAPE disciplines, arts, humanities and social sciences) we ask that the REF Team are consider the impact of shorter embargos on publishing and furthermore the impacts of this further down the line on societies and their publishing incomes.

We favour retention of the 24 month embargo period. Associations depend to varying extents on publishing income to fund their role in the research landscape. Shorter embargo periods jeopardise the subscriptions model on which our charitable expenditures depend.

We do however welcome the recognition of disciplinary differences allowing for a longer embargo for SHAPE disciplines than for STEM ones.

## Section B (continued): tolerance limits, implementation date

### Tolerance limits for journal articles and conference proceedings

Following the relative success of REF 2021 with only 25% of in-scope outputs overall not meeting open access compliance, of which the majority were subject to policy exceptions, the four UK higher education funding bodies consider that it is appropriate to review the level of tolerance allowed for these publications. Noting however, the potential impact of submitted outputs produced by non-volume contributing staff, and differential rates of non-compliant, or unflagged submissions across the main panels in REF 2021 the four UK higher education funding bodies propose to retain the allowed tolerance level for open access non-compliance of articles and conference proceedings at 5% of any unit submission.

### Implementation date for revised requirements for journal-based publications

The four UK higher education funding bodies propose that these revised requirements will be applicable to journal articles and conference proceedings published from 1 January 2025.

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

- Yes
- **No**
- Not sure
- No comment

The Academy supports the highest acceptable tolerance level for non-OA outputs in light of the international context in which publishing takes place. Many areas of the world in which social science research is published are not at the same point in the shift towards a

	Please provide any further comment.	<p>more open future. We request that the tolerance level is raised to 10% in recognition of this.</p> <p>We understand and welcome that “exceptional” outputs will not be counted within the non-compliant tolerance limit, and very much hope that institutions will only be judged by whether they are within or outwith the tolerance band and not by the degrees of compliance. We also ask if this will inform scoring in the “People, Culture and Environment” element of the assessment and if so, how important it will be and what the consequences might be. Thinking of unforeseen outcomes will be important so as to manage equality, diversity and inclusion considerations particularly in relation to inclusion in the REF of early career researchers.</p>
10. Do you consider that tolerance limit for articles and conference proceedings should be retained at 5% of any submission	<ul style="list-style-type: none"> <li>• Yes</li> <li>• <b>No</b></li> <li>• Not sure</li> <li>• No comment</li> </ul> <p>Please provide any further comment.</p>	We have responded “no” because it is important to give institutions and authors as much time as possible to ensure that they understand the compliance rules. Setting the implementation date will to a large extent depend on how quickly the REF team is able to firm up and publish the guidelines. The REF Team should consider pushing this date back or consider a change to submissions made after 1 January 2025 rather than outputs.
<p><b>Section B (continued): exceptions</b></p> <p><b>Exceptions</b></p> <p>There have been several changes to the underpinning basis for submissions in REF 2029 as compared to earlier exercises. These include:</p> <ol style="list-style-type: none"> <li>1) Removing the need for attribution of outputs to a named author.</li> <li>2) Allowing submission of outputs produced by a wider pool of authors with a demonstrable link to the submitting institution.</li> <li>3) Submission of outputs by staff who do not have significant responsibility for research, for instance, research enabling staff.</li> </ol> <p>The four UK higher education funding bodies propose an exemption to cover these circumstances which will therefore allow flexibility for institutions in selecting outputs for submission from this wider pool. However, the four UK higher education funding bodies are clear that to the greatest extent, institutions should seek to make submitted outputs open-access compliant. The four UK higher education funding bodies consider that the following exceptions should be applicable:</p> <ol style="list-style-type: none"> <li>1) Third-party content was included for which licenses could not be obtained.</li> <li>2) Outputs were authored in whole by one or more non-volume contributing staff prior to implementation of the open access policy for REF 2029.</li> <li>3) Criteria beyond the control of the HEI (such as personal circumstances of the author, industrial action, closure days and software issues).</li> <li>4) Output has a demonstrable and substantive connection to the submitting institution but was published following the end of the author's period of employment, and it has not been possible to determine compliance with the criteria.</li> <li>5) It would be unlawful to deposit, or request the deposit of, the output or to otherwise make this available.</li> <li>6) The publication concerned requires an embargo period that exceeds the stated maxima and was the most appropriate publication for the output.</li> </ol>		
11. Do you agree with the proposed exceptions for journal publications?	<ul style="list-style-type: none"> <li>• <b>Yes</b></li> <li>• No</li> </ul>	<p><b>Should any of the above be removed?</b></p> <p>No.</p>

	<ul style="list-style-type: none"> <li>• Not sure</li> <li>• No comment</li> </ul>	<p><b>What, if any, additional exceptions might be required?</b></p> <p>We have nothing to add to this list and welcome the broadening of the pool for potential contributors to the REF. This is important for the career progression of these individuals and sets high standards for inclusivity.</p> <p>We do wish to raise an additional point related to the definition of conference proceedings (REF output type E). For REF 2021, it is understood that conference proceedings could include books or monographs but subsequently the UKRI OA policy notes that these outputs should be treated as longform publications. The definitions for the output varies between the two models and this could be usefully clarified.</p> <p>We would like to see prohibitive cost being added as an explanation for why a licence for third party content could not be secured.</p> <p>Finally, we would welcome a straight forward process for claiming an exception so as not to add unnecessarily to the REF burden for institutions and researchers.</p>
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## Section C: longform outputs (monographs, book chapters and edited collections)

### Requirements

The four UK higher education funding bodies signalled to the sector in the 2016 REF consultation policy statement that while monographs and other longform publications would not be in scope for REF 2021, it was their intention to include a requirement for open access to also apply to longform outputs, as a feature of the following REF.

For submission of in-scope longform publications for REF 2029, which include published books (REF 2021 output type A), book chapters (REF 2021 output type B), edited books (REF 2021 output type C) and scholarly editions (REF 2021 output type R), the four UK higher education funding bodies propose the following requirements:

- 1) If not published as immediately open access, in-scope longform publications must be made available to read, download and search no longer than 24 months after the date of publication.
- 2) Should be the version of record or the author's accepted manuscript.
- 3) Available on a publisher website, repository or other appropriate platform.
- 4) Preferable licenced CC-BY or equivalent, but will accept licensing equivalent to CC-BY-ND, CC-BY-NC and CC-BY-NC-ND.
- 5) There will be a tolerance band of 10% at unit submission level.
- 6) Can exclude third party materials, if licensing can't be obtained.

### Exceptions

Proposed exceptions are:

- 1) Where the only appropriate publisher, after liaison and consideration, is unable to offer an open access option that complies with the REF policy.
- 2) Reuse permissions for third-party materials cannot be obtained and there is no suitable alternative option available to enable open access publication.
- 3) Outputs published before 1 January 2026.
- 4) Outputs for which publication agreements were put in place before 1 January 2026.
- 5) Outputs with demonstrable and substantive connection to the submitting institution, but published following the end of the author's period of employment, and it has not been possible to determine compliance with the criteria.
- 6) Where it would be unlawful to deposit, or request the deposit of, the output or to otherwise make this available.

7) The publication concerned requires an embargo period that exceeds the stated maxima and was the most appropriate publication venue for the output.

## Section C (continued): publication, deposit and embargo

### Publication

As with journal publications, longform outputs will meet open access requirements for REF 2029 in full when meeting the following conditions:

- First publication (either in place of or in addition to a commercial print or e-book publication) of an output in its final publication version.
- Shared in electronic form.
- Immediately irrevocably available for free access and distribution
- Which meets licensing requirements.
- Shared via an appropriate publication platform, which may be a publisher website, repository, or other appropriate publication platform.

As with journal publications it is recognised that disciplinary publication norms and other factors may often dictate or limit the options for selection of the most appropriate publisher for a longform output, and there is an international dimension to publications which requires some degree of recognition. 78% of REF 2014 longform publications were published within the UK. See [Open Access Monographs in the UK: a data analysis](#).

This may mean that, in some cases, the most appropriate publisher may not offer options which will allow full compliance with open access requirements, and the four UK higher education funding bodies have designated an exemption to cover this eventuality.

### Deposit and embargo

The four UK higher education funding bodies recognise that there are special considerations in respect of longform publications and embargo periods with author and publisher interests, in terms of their ability to realise their commercial interests. There is a need to balance this with the imperative to ensure that open access obligations are met within a reasonable period. Noting that most sales occur within the first two years post-publication, the four UK higher education funding bodies propose that a maximum embargo period of 24 months should be applicable where this is a contractual requirement of the publisher.

In seeking to align requirements for longform publication with those for journal-based publication as far as possible, where an output is not made immediately open access while subject to an agreed embargo period, there will be no deposit requirement. However, following the implementation of this policy, in-scope longform outputs should be made immediately open-access on publication or no later than 24 months post-publication where subject to an embargo period.

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)?

- Yes
- No
- **Not sure**
- No comment

Please provide further comment.

We would like to challenge the assumption that longform publications should be included in REF 2029. A key issue for social science researchers is access to funding for open access books. We would prefer that longform publications are NOT included in 2029 but are reconsidered for the following REF as appropriate. When OA requirements are introduced, they should have sustainability of the research and publishing sectors at their heart. The REF policy introduces no new funding for longform publications unlike the UKRI policy which has a ringfenced fund. REF pulls from a pool of research outputs that far exceeds that supported by the funding bodies and funding for longform publications is not comparable with access to funds for journal articles. They are very different.

Given this general position, we do agree with the sensible suggestion that there should be no deposit requirement given that they will become available either on publication or post-embargo but we challenge the 24 month maximum embargo which is based on

		assumptions of consumption behaviour which seem likely to change if green OA versions of longform publications become available.
13. Do you agree with the proposal of a maximum embargo period of 24 months for longform publications?	<ul style="list-style-type: none"> <li>• Yes</li> <li>• <b>No</b></li> <li>• Not sure</li> <li>• No comment</li> </ul> <p>Please provide further comment.</p>	<p>We challenge the inclusion of longform publications in the REF 2029 because insufficient modelling and testing of key assumptions has taken place and because there is no additional funding to support it. A pilot study would be welcomed to test likely consumer behaviours and thus the impact on both publishers and societies. Many social science societies have extensive book portfolios.</p> <p>We strongly disagree with the 24 month embargo. Only 70% of sales occur in this window which across a big books portfolio leaves a lot of important income to the societies on the table. Furthermore, there is a big assumption that sales will remain in the same pattern if there is an OA version of the publication available and given the expense of most long form publications there will be a clear financial incentive to use the OA version even if only the Author Agreed Manuscript. The 24 month embargo is a clear risk to the long-form publishing model and to authors, societies and their publishers. The embargo should be lengthened and we suggest 36 months. It is worth bearing in mind that the publishers may make decisions at odds with this policy and their views should be specifically sought.</p>
<p><b>Section C (continued): access, licensing</b></p> <p><b>Access</b> In keeping with other aspects of open access policy, electronically hosted or published outputs should be fully discoverable and searchable by anyone with a suitable internet connection and (non-specialist) equipment.</p> <p><b>Licensing</b> The licensing standards for the UKRI open access policy, while encouraging the maximum use of fully open or licensing by attribution, recognise that the interests of authors of longform publication may reasonably extend to proprietary ideas and concepts, and to elements of the work such as images on which they should reasonably continue to exercise control. This therefore allows for licensing up to and including CC-BY-NC-ND or equivalent. The commitment of the four UK higher education funding bodies has not been to exceed or require any more stringent standard than this policy.</p> <p><b>Third-party licensing</b> The four UK higher education funding bodies consider that licensing for third party materials not being granted, is a reasonable ground for exemption from open access requirements. This recognises the issue of reliance on third-party licensed materials, underpinning the research being published. This would limit meaningful assessment of those materials and in effect, excluding such publications from submission to the REF.</p>		
14. Is licensing for third party materials not being granted a reasonable ground for exemption from open access requirements?	<ul style="list-style-type: none"> <li>• <b>Yes</b></li> <li>• No</li> <li>• Not sure</li> <li>• No comment</li> </ul> <p>Please provide further comment.</p>	<p>It is important that this exemption be included, or some outputs may be excluded from REF. The impact of this exemption would be felt most strongly in SHAPE disciplines which are already under significant funding pressure within their institutions.</p> <p>Additional exclusions may be for scholarly editions, scholarly illustrated catalogues and exhibition catalogues (already out of scope for UKRI). This would have the advantage of potentially reducing the number of exceptions applied for.</p>

		<p>In and out of scope needs careful definitions. For example, exhibition catalogues seem to be on the border. The position of trade and crossover books (important for positioning disciplines with the public) would benefit from clarification. The distinction between trade and academic books is blurred. We would prefer these books to be included in REF. The potential impacts on publishers should be considered to avoid university presses being subject to pressure that do not apply to their commercial counterparts, by virtue of their editorial practices (eg, commercial presses publish more trade books which are excluded from the policy). Crossover books must remain available in print and in an OA world this can be a difficult business model to sustain.</p> <p>Finally, in EDI terms, more established researchers have more freedom to publish the books they wish, giving rise to a generational inequity and concern that UK researchers rights to publish with their preferred publisher may be impeded.</p>
<p>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?</p>	<ul style="list-style-type: none"> <li>• Yes</li> <li>• <b>No</b></li> <li>• Not sure</li> <li>• No comment</li> </ul> <p>Does this present issues for output submission and assessment?</p>	<p>We believe that where licensing of third party materials has been sincerely attempted but not achieved, the output should be permitted to be entered for REF and the tolerance band should be assessed based on the number of submissions made by institutions. We are concerned however that authors should not be forced to share partial copies of their work which may potentially undermine and undervalue it and which could lead to assumptions around quality and fundability in the future. The disciplinary specific focus of this needs to be carefully considered to ensure that researchers in the arts, humanities and social sciences are not disadvantaged in any way.</p>
<p><b>Section C (continued): tolerance level</b></p> <p><b>Tolerance level for longform outputs submitted as non-open access</b></p> <p>The four UK higher education funding bodies propose that a tolerance level of 10% at unit submission level is appropriate. This recognises that the ongoing transition to open access for longform publications is not as advanced as for journal-based publications, and the relative challenge that this transition represents.</p>		
<p>16. Do you agree with the principle of a tolerance level for non-compliant longform outputs?</p>	<ul style="list-style-type: none"> <li>• Yes</li> <li>• <b>No</b></li> <li>• Not sure</li> <li>• No comment</li> </ul> <p>Please provide further comment.</p>	<p>In the Academy's view, longform publications should not be included in the 2029 REF- but if the decision is that they will be, we support the principle of a tolerance level. We welcome that outputs with exception status will not be counted towards to non-compliant tolerance limit.</p> <p>We suggest that the structure of the REF can inadvertently become exclusionary with some researchers less likely to be submitted. The intensification of OA into longform publications could jeopardise unfunded research for example. We encourage careful consideration of this at all stages in the process. REF should take care not to have exclusionary policies that researchers in some disciplines or career stages can't meet.</p>
<p>17. Do you agree with the proposed tolerance level of 10% for longform outputs?</p>	<ul style="list-style-type: none"> <li>• Yes</li> <li>• <b>No</b></li> <li>• Not sure</li> <li>• No comment</li> </ul> <p>Please provide further comment.</p>	<p>Because we argue that longform publications should not be included in the 2029 REF, we believe that any tolerance level, if they are included, should be as high as reasonably possible. Not all social sciences have a tradition of longform publication, but a sufficient number do that this is an area of significant concern for us. We would prefer to see the tolerance increased perhaps to 30%.</p>

		We ask that the REF Team undertake a pilot study to assess the impact of its proposed rules for the exercise. The impact of the 24 month embargo on consumer decision making and the number of outputs that would not meet the OA requirements could be included in such a pilot study.
<h2>Section C (continued): implementation</h2>		
<p><b>Implementation of open access requirements for longform publications</b>  The four UK higher education funding bodies propose that these requirements should apply to all submitted outputs where contracts for publication are signed after 1 January 2026.</p>		
<p>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?</p>	<ul style="list-style-type: none"> <li>• Yes</li> <li>• <b>No</b></li> <li>• Not sure</li> <li>• No comment</li> </ul> <p>Please provide further comment.</p>	<p>Given that we argue against the inclusion of longform publications in the 2029 REF and have called for pilot studies to be undertaken to assess the impact of the REF rules as presented, clearly we would prefer a later implementation date. Publishing longform publications can take a long time with significant lags in the system, and the REF Team should bear in mind that the sooner they are able to publish the final guidelines the easier it will be for institutions to comply with them. As said earlier, the lead time for longform publication is very long, significantly longer than for journal article publication. Consideration should also be given to the publishers including significant numbers of university presses, that will need time to assess the future impacts of the policy.</p>
<h2>Section C (continued): exceptions</h2>		
<p><b>Exceptions</b>  The four UK higher education funding bodies propose the following exceptions for longform outputs:</p> <ol style="list-style-type: none"> <li>1) Where the only appropriate publisher, after liaison and consideration, is unable to offer an open access option that complies with the REF policy.</li> <li>2) Reuse permissions for third-party materials cannot be obtained and there is no suitable alternative option available to enable open access publication.</li> <li>3) Outputs published before 1 January 2026.</li> <li>4) Outputs for which publication agreements were put in place before 1 January 2026.</li> <li>5) Output has a demonstrable and substantive connection to the submitting institution but was published following the end of the author's period of employment, and it has not been possible to determine compliance with the criteria.</li> <li>6) It would be unlawful to deposit, or request the deposit of, the output or to otherwise make this available.</li> <li>7) The publication concerned requires an embargo period that exceeds the stated maxima and was the most appropriate publication venue for the output.</li> </ol>		
<p>19. Do you agree with the proposed exceptions for longform publications?</p>	<ul style="list-style-type: none"> <li>• <b>Yes</b></li> <li>• No</li> <li>• Not sure</li> <li>• No comment</li> </ul>	<p><b>Should any of the above be removed?</b>  n/a</p> <p><b>Are there other exceptions you think are necessary for longform outputs? Please provide evidence in support.</b>  It is good to see the inclusion of trade books (monographs and edited collections) and creative works included as exceptions and we welcome the principle of author choice. None of the exceptions should be removed.</p>

		<p>UKRI policy's list of out of scope includes textbooks, text editions, scholarly illustrated catalogues and exhibition catalogues (Annex 1 UKRI). These are not listed as exceptions for the REF and this is an unwelcome inconsistency. It could be an accidental omission.</p> <p>Again, we hope that the process for claiming exceptions will be light touch.</p>
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