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Submitted to REF 2029 Open Access Consultation
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Transparency Statement

Your Details

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

Organisation or institution

2 What is your organisation/institution?

Organisation:
British Philosophical Association

3 Country

Other (Please state below)

Other:
United Kingdom

Section A: open access developments in the sector

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

OA landscape changes:

Philosophy, like all humanities disciplines, is in a hostile financial environment. Philosophy departments are closing and retracting. (E.g. in 2024 Kent's dept. closed; in 2023 Wolverhampton's dept. closed. Others in the past two years (e.g. Birkbeck, Roehampton) have lost both staff and courses.) The proposed extension of the OA requirements to longform outputs will almost certainly make an already difficult situation impossible. It is not overly dramatic to suggest that introducing the OA policy to longform outputs will threaten UK humanities' ability to remain world leading. The likely outcome is the further devaluation and ultimate demise of UK humanities.

The financial pressures on UKHE are well known, with the OfS recently estimating that 40% of Universities are financially precarious. Extending the OA requirements to longform publications makes books, often the strongest humanities outputs, expensive compared to journal articles. It is estimated that the average OA cost is 10k per book, yet there is no provision to fund these additional costs. The claim that publishers will be happy with green publication after two years is so far unsubstantiated and in our experience unlikely. In the May British Academy consultation meeting Steven Hill suggested that QR funds could be used to meet OA costs; this would result in a perverse chasing of REF success just to fund publications for the next REF. Universities are already disinvesting in humanities; if humanities' research becomes exceptionally expensive (especially when compared to journal disciplines) this trend will be encouraged.

In addition, the prohibitive cost means Universities will be unable to provide funding for all researchers to publish OA, meaning rationing of financial support will be required. This would result in academic censorship (even if in a weak form), undermining academic integrity and freedom.

Research England cannot ignore the funding problem or pretend it is elsewhere in the system. When it comes to longform outputs, REF is driving the change and creating the problem. This will shift costs from a highly profitable private sector to a financially precarious public sector.

The claim that the change has already happened because the UKRI OA policy is in place is wholly disingenuous. The UKRI requirements apply to only a very small proportion of books whose OA it funds directly; it should not be used to justify the extension to REF. Books which were the outcomes of AHRC and ESRC grants constituted only 5% of the books submitted to REF 2014, according to the consultation's data analysis. Extending OA requirements to REF will mean it applies to almost every book and without funding. This fundamentally changes research culture and expectations; it will have devastating consequences.

We agree with the OA principle that publicly funded research should be freely available, but if the cost is so high it will stop research, the move to OA should be paused.

Section B: journal articles and conference proceedings

Section B: publication, deposit

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

Yes

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

When a publication is not immediately available OA, it seems reasonable to permit later deposit. The REF should maximise flexibility to allow authors the possibility of publishing with the widest range of journals and publishers, and it should research – in discussion with globally established and dominant publishers – the implications of any changes before new policies are imposed.

Section B: access, licensing

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

No

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

If the aim of OA is the principled aim of ensuring that as much publicly funded work as possible is freely available then there is no reason to enforce certain types of license. The aim of aligning with UKRI is not a justification for any change in REF policy and practice. Very few publications in philosophy are outcomes of UKRI funding, or subject to the UKRI OA requirements. The introduction of OA in UKRI should not be used as a precedent for extending OA requirements to REF. The consequences of extension to REF is to extend from a small number of outputs to the majority, deeply affecting research culture in adverse ways.

The culture change from pay to read to pay to publish is devastating. It will likely mean – as already noted – the rationing of funding for publication, threatening academic freedom and vastly reducing the ability of philosophers to publish, or to publish well. If the REF is concerned about research culture, then it should recognise that no amount of additional processes will address the damage of not being able to publish work which reaches the standard of peer-review with the most established and dominant global publishers. The proposed changes will place more obstacles in the way of UK academics publishing their work and will therefore have a negative effect on research culture.

Section B: pre-prints, alternative platforms

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

Yes

Please provide any further comment:

Any platform which complies in making the publication available openly should be regarded as meeting the OA requirements.

Section B: embargo periods

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

No

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

We see no reason to reduce the current embargo periods. To do so would reduce the possibility of publishing in some well-regarded journals, which are unlikely to comply. The REF should remain as flexible as possible, and research any change with publishers before imposing a more restrictive policy.

Section B: tolerance limits, implementation date

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

No

Please provide any further comment:

We see no reason to adopt these changes so fast and mid-cycle. We are very concerned that not enough research has been done with publishers to assess the impact of these changes. In previous cycles, the REF has been very careful to take time before implementing new policies and has been careful to explore unintended consequences. There is a real danger that ideological commitments will lead to the imposition of policies which will have devastating consequences on the whole sector, but particularly the humanities.

In previous cycles Research England has worked with the academic community to find solutions which are mutually acceptable and workable. Ultimately the REF depends on academic buy-in (both for submission and assessment), proceeding without heeding the real concerns of an already beleaguered academic community is reckless. It threatens both the future of the sector and the legitimacy of the REF.

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

Yes

please provide any further comment :

Retaining a tolerance limit is essential. If the aim of the REF is to accurately track the state of research in the UK, then ensuring that it is likely that Universities can submit their best research is essential. The further tightening of OA rules make it likely that academics will be forced into difficult choices,

and they will often choose to publish non-OA compliant outputs, for reasons of reputation, wanting to be in the journals which provide the assurance of the best peer-review, accepting these publications will not be submitted to REF.

A general switch to 'pay to publish' rather than 'pay to read', changes the incentives in the publishing industry. It encourages publishers to aim for the publication of quantity rather than quality, and it is already the case that many journals are being encouraged to publish more articles. If this trend continues then there may well be unintended consequences, especially given the role that publication currently plays in key institutional processes, such as hires and promotion. The radical nature of what OA incentivises needs to be taken into account and considered seriously and carefully before these policies are imposed.

Section B: exceptions

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

Not sure

Should any of the above be removed?:

We ask that Research England be as flexible as possible with regard to exceptions. The aim of REF is to assess the strongest work. There is a real danger that the OA agenda will increasingly exclude some of the strongest publications because of non-OA compliance. Exceptions cannot always be foreseen in advance, and might be needed for all kinds of personal and professional reasons.

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

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

Section C: publication, deposit and embargo

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

Yes

Please provide further comment:

We agree there should be no deposit requirement for longform publications. However, we have significant concerns about a blanket roll-out of UKRIs OA requirements for longform publications. (See other answers.)

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

Not sure

Please provide any further comment:

The period of time over which longform outputs sell well varies. It is not uncommon for a book to be picked up some time after publication, for example, featured by a journalist or in a popular outlet and then become popular. Given this the *longest possible embargo period is desirable*.

In addition, as discussed in more detail in the answer to question 19, if many established and dominant publishers do not agree, requiring this will mean UK academics will no longer be able to publish with the best publishers with professional practices of peer review and copy-editing, and importantly with large marketing machines, that enable books to reach audiences that otherwise they would not. This will lead to researchers facing a stark choice between producing a REF book or a book with an established publisher with extensive reach (which will be better, given the global market in philosophy, for appointment, promotion and reputation).

Section C: access, licensing

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

Yes

Please provide any further comment:

In some cases excluding third-party materials to meet OA requirements will compromise the academic integrity of a work. Accordingly, this is a reasonable grounds for exemption.

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?

Yes

Does this present issues for output submission and assessment?:

Yes, see answer to 14.

Section C: tolerance level

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

Yes

Please provide any further comment:

A tolerance level for non-compliant longform outputs is essential. The shift to OA for longform outputs is far more dramatic a change than it was for journal articles. We suggest that the extent of the tolerance level needs to be informed by research. It also depends on whether the REF makes adequate provision for cross-over books (discussed later). If it does not then the tolerance level should be extended dramatically. The perceived quality difference in publishers is a crucial factor in determining where people publish. While this might change over time, it will not happen quickly, nor in a small, global discipline like philosophy, will it happen if the UK moves to OA unilaterally. It is still the case that the quality of publisher matters in philosophy, for appointment, promotion and reputation. UK philosophers increasingly face an impossible choice – publish in a way which is OA compliant, or publish in a way which will increase their reputation and make them most employable, recognising that the job market in philosophy is global. (On this last point: the details of being REF compliant and indeed a REF star do not map well onto what is required in other countries for many academic jobs in the humanities.) If philosophers make this choice, increasingly REF submissions will not contain the best philosophy, which will give the impression that UK philosophy, currently a globally significant player, is weaker than it is.

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

No

Please provide any further comment:

See answer to question 16. The appropriate tolerance level requires detailed research before it is implemented, and 10% is likely far too low. (See further the answer to question 19.)

Section C: implementation

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

No

Please provide any further comment.:

Given the scale of this change we suggest that this policy is – minimally – not introduced until the next REF cycle. This would allow time for serious research, with the most prestigious publishers (which remain publishers of choice in philosophy and which have marketing machines which get philosophers invitations to festivals, and reviews in high profile international media which other publishers cannot match), with hard pressed Philosophy Departments (to understand the impact on research culture and morale), and with Universities (to understand where funding is to be found in an increasingly squeezed sector).

In addition, imposing an arbitrary mid-cycle deadline is likely to lead to some panic and a rush to get contracts in place before the deadline.

Section C: exceptions

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

No

Should any of the above be removed?:

The exceptions are too narrow; they don't include cross-over books. Trade books are rightly exceptions, but they're aimed at the "broader public and not primarily an academic audience". Many Philosophy trade books are not like this; they aim at both academia and other audiences. These books are scholarly, intended as REF outputs, and have wider appeal. We suggest including them and have: "a trade book is intended at least in part to reach an audience beyond academia". Alternatively, have three classes:

Academic books "intended for an academic audience". Subject to OA.

Cross-over books "intended for an academic audience and a public audience". Not subject to OA.

Trade books "intended primarily for a public audience". Not subject to OA.

It is often said that OA books are more read than non-OA books. However, they are read by different audiences. The best philosophy cross-over books are read by journalists, policy-makers and the general public, with reviews in influential outlets. Non-academic audiences are only going to read books which are well-produced and well-marketed. If the OA requirements are imposed, it will stop UK academics publishing them. (In these cases, publishers aren't parasitic on public-funded research; they provide access to readers who are otherwise unavailable to academics.) To disincentivise UK academics publishing such books would be to cede this space to journalists and non-UK academics, further undermining the humanities.

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

Cross-over books must not be subject to OA requirements (either by extending the definition of trade books or making cross-over books a separate category also exempt from OA requirements). If they are, this will negatively impact the visibility and influence of philosophy. Philosophy is a global discipline and UK philosophers are globally highly regarded, with dominance in the field which is disproportionate to their relatively small numbers. The OA requirements will only apply to UK academics, which will mean that UK academics will have to make impossible decisions about whether they publish with the most dominant and influential publishers in their fields (often US academic presses) or whether they publish with OA compliant publishers to meet REF requirements.

In addition, the REF needs to be explicit with regard to how books will be categorised. We strongly support allowing authors to self-categorise. We reject proxies, such as price points. While trade and cross-over books are often produced at affordable prices by publishers (an important reason they reach public audiences) price points are not reliable proxies. For example, trade or cross-over books featuring good-quality photographs would undoubtedly be expensive.