ENGLISH ASSOCIATION AND UNIVERSITY ENGLISH

Response to the UKRI Open Access Policy consultation

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)? 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).

Agree

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 before answering this question.

No opinion.

Q3. In setting its policy, should UKRI consider any other venues for peer-reviewed research articles which are not stated in paragraph 47? Yes / No / Don't know / No opinion. If yes, please expand (700 characters maximum, approximately 100 words).

No

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). (2,650 characters maximum, approximately 400 words.)

Yes: although the proposals sustain the Green OA model that is now well-established, and would apply to a relatively small proportion of research, which is mostly supported through QR, the requirement for immediate OA poses two significant threats to the English subject community. 1) Both small publishers and learned societies with journals fear significant financial loss as a consequence of a shift towards zero-embargo

publication, and although there are some good examples of publishers moving towards this, there is no research yet on the risks posed by the sector moving en masse to zero-embargo publication. 2) Moreover, the freedom of choice of UKRI-funded researchers with regards to publishing their articles will be severely limited. Many UK researchers currently publish on the international stage, and journals outside the UK have no incentive to comply. There is significant concern in our community that strict compliance will limit international collaborations in the Humanities: scholars are committed to publishing on the international stage, and not only in OA UK journals.

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.

No; this should be encouraged rather than required since there are significant resource implications wherever the repository of 'accepted' articles is held.

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 before answering this question.

No opinion

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 OGL 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).

Strongly disagree.

We repeat the arguments we have made in previous consultations. Most humanities journals ask authors to sign the CC-BY licenses with the non-derivatives clause, and this is accepted. To replace this with the most permissive license that allows for re-use and adaptation of any kind, provided the original author is acknowledged, is not acceptable to the majority of Humanities scholars, where the line between raw data and its argued

presentation is much harder to draw. The current license offers protection against uses of our work that are regarded by many in our community as unethical (plagiarism).

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 / Strongly 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).

Strongly disagree. Academic publishers argue that the administrative burden of case-by-case exceptions will be worse for smaller publishers and contribute to reduction in publication choice (or possibly further consolidation in journal publishing). In this time of pandemic it is really important not to add to workload.

Q9. Would the proposed licensing requirements for UKRI's OA policy, which exclude third-party content (see paragraph 55), 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).

Don't know. The view of some journal editors is that this would be the case because of poor understanding of CC licenses amongst third-party rights owners.

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).

No opinion.

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).

No. It is imperative that REF policy should be kept separate from UKRI policy. Our researchers are not for the main part key beneficiaries of UKRI funding, and sweeping decisions would impact on their research capability unless funding were increased

significantly through QR. A clearer statement on this would generate more support for UKRI's aspirations - and additional funding - for its funded researchers.

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 policy should require to be retained (2,000 characters maximum, approximately 300 words).

(a): this would protect the rights of authors and their institutions without adding new administrative burden (unlike (b) or (c)).

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): 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), please explain your answer (700 characters maximum, approximately 100 words, per standard).

No opinion.

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): 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), please explain your answer (700 characters maximum, approximately 100 words, per standard).

No opinion.

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).

No opinion.

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), are there any technical standards or best practices that UKRI should consider requiring? Yes / No / Don't know / No opinion.

No opinion.

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). The UK HE funding bodies recognise that due notice will be needed prior to implementation of the OA policy for the REF-after-REF 2021, which will be consulted on in detail after UKRI's OA policy is announced (see paragraphs 29-31). It is therefore anticipated that the OA policy for the REF-after-REF 2021 will not come into effect on 1 January 2021 (that is, at the beginning of the publication period for the REF-after-REF 2021 exercise). The REF 2021 OA policy should be followed until further notice.

c. HE and the publishing sector are facing a very uncertain future over the next year (likely longer). A later start date would acknowledge these challenges.

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-afterREF 2021? Yes / No / Don't know / No opinion. If

Yes. It is important that the policies are synchronised as far as possible, otherwise there is risk of confusion and lack of clarity. Time is needed to raise awareness and to ensure the readiness of institutional infrastructure.

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. There will be loss of income for associations and societies that use funding available from journal income to support the sector (e.g. ECA bursaries and fellowships, as well as the salaries and pensions of any professional services colleagues). There will be costs associated with the administration of OA (data capture, repository management), and the maintenance of repositories.

Q20. Do you think the proposals outlined in Section A 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).

The English Association (co-signatory of this response) fear financial loss as a result of a sudden, reduced (modest) profit share from publications; this would impact on the salaries and pensions of the professional services team who support English Studies, students and teachers, from primary to higher education. We would like to see more research on the impact of transformative agreements, and financial support from UKRI to explore new business models.

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).

No.

Q22. Can you provide any evidence on cost increases and/or price rises (including in relation to OA APCs and subscriptions) and reasons for these? Yes / No / Don't know / No opinion. Please expand (2,000 characters maximum, approximately 300 words).

No.

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).

Yes, we agree there should be more transparency in terms of publication charges (APCs and BPCs), and we agree that this should inform future funding levels. We also recognise that publishing carries a cost that needs to be met. Copy-editing, quality of production, advertising, peer review of books and special journal issues are obvious costs that are part of a publisher's overheads. Understanding the costs of publication needs to be part of a review of UKRI funding.

Q24. Regarding UKRI's consideration about restricting the use of its OA funds for publication in hybrid journals (see paragraph 80), 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

c. We strongly argue that hybrid journals are an important part of a diverse publishing ecosystem, delivering progress towards Open Access: articles published under the green route are publicly available. Most humanities journals are hybrid journals, and this will remain the case for some years, even with transformative deals, because the route to OA journal status is less clear for smaller publishers. UKRI funding should not be used to benefit one part of the sector - the larger well-established businesses for example - at the expense of smaller publishers. The point of this UKRI consultation is to ensure that UKRI research is published open access, and it is and can be in hybrid journals, alongside high-quality 'green' outputs funded through QR or self-funded (independent scholars).

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).

Strongly agree. Allowing UKRI OA funds to be used for the support of institutional repositories will ensure that the green route to OA remains a viable option, and the repositories in different types of institution can be developed at the same pace. It will also ensure that the work they archive remains available at times of significant financial stability.

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).

No. More restrictions add to the administrative burden of universities at a challenging time, and carry additional costs.

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).

There are several different business models being considered across the Humanities: e.g. APC, open and subscribe. We would welcome further advice and research on the impact on learned societies. We would also welcome financial support to help us explore new business models. The English Association charges a membership fee to fund its many different activities, and we would be reluctant to increase this at this time of economic uncertainty, especially since so few of our members, school teachers, general public, researchers are UKRI-funded; this UKRI requirement should be funded by UKRI.

Q28. As discussed in paragraph 74, 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.

Don't know.

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).

No opinion.

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.

Neither agree or disagree. We are not sure of the resource implications: a national repository might alleviate burdens on HEIs of archiving outputs, however it might duplicate effort and draw resource from the funding of research.

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.)

No opinion.

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).

No opinion.

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) 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).

Agree. We agree with the exemption of trade books, scholarly editions, textbooks, and all kinds of fictional and creative writing. The question of what counts as a trade book will, however, need explaining quite carefully.

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).

(a) No. OA publication of the thesis should be sufficient. Subsequent publication should fall within the scope of the OA REF policy,
(b) Ditto
(c) **No. We note that it may be hard to define the relationship between an edited collection and a doctoral candidate's research; as with other research outputs completed during a period of funded research but not arising directly from that project.**

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).

Strongly agree. 'Only suitable' is an extremely problematic criterion: we argue that authors should have the ability to publish in the best series, or with the best publisher, for their research, even where this does not allow an OA option. It is certainly possible that the 'best' publisher for a niche area in English studies is based outside the UK. They may be 'best' because they enable an author to reach the widest possible audience because of their reputation and networks.

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.

No opinion.

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).

b) A minimum of 24 months and ideally 36 months (the latter aligns with some current academic publishers' policies). 12 months is far too short given the life of a monograph and its impact. The UUK OA And Monograph Evidence Review reported that "70% of publisher sales take place in the first two years after publication, with 80% of sales taking place in the first three years". In the humanities, reviews do not usually appear until 18-24 months post-publication and this has an impact on sales, and therefore the sustainability of publishers' lists. We are reluctant to make the case for different embargo periods for different disciplines because we feel this would be confusing, and would like to see a stronger explanation of why the 12-month embargo period has been chosen.

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)

b) See above. There may be a case for a shorter embargo period for chapters than for edited collections as a whole: we understand that the whole is greater than the sum of its parts; however it would depend what proportion of the chapters are available OA. (Publishers need to recover their costs to have an incentive to keep publishing edited collections which are a valued and significant contribution to production of new knowledge.) However as at Q38, while we are reluctant to make the case for different embargo periods for different disciplines because we feel this would be confusing, we would prefer d) to a).

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).

b. We understand that sales patterns for monographs and edited collections are very similar. Therefore as at Q38 a longer embargo period should be allowed until we have a better understanding of the impact of these decisions on a fragile industry (book publishing). This is especially important as we move into a deep recession. As at Q38, while we are reluctant to make the case for different embargo periods for different disciplines because we feel this would be confusing, we would prefer d) to a).

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 (question 53).

Longer embargo periods offer greater protection for smaller publishers, who may publish a small number of significant monographs in niche areas. We do not understand the aim of UKRI policy to be the concentration of power in the hands of larger publishers and warn against unintended consequences.

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).

Disagree. There is likely to be significant divergence in text between accepted manuscript and final version of record given editorial and copy-editing input. Some publishers (https://edinburghuniversitypress.com/open-access-publishing/open-access-for-authors) allow deposit of proof copies after an embargo period (36 months) which is a sensible compromise.

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).

EDI concerns require clarification of deposit requirements for early career and non-affiliated researchers, to minimise barriers to compliant publication for researchers without a current institutional affiliation, and hence without access to BPCs (from HEI or funding body) or easy access to institutional repositories.

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).

Disagree. Where an external organisation (e.g. the academic publisher) has invested in the development of the book while bearing the risk of not recovering costs through lower sales, we believe there needs to be flexibility as regards use of NC licenses.

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 / 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.

Agree. Although it will increase administrative burdens, and therefore the costs of OA, a system of exceptions is the most practical workaround to the well-established difficulties of licensing third-party materials for OA publication (cost of fees, time required to identify rights-holders, negotiate). This will also protect Early Career Researchers who may have less access to institutional and funding-body support for fees. Publishers do not bear these costs as a matter of course and without exceptions, the range of options for publication will be restricted.

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).

Strongly disagree. Researchers often use their own photographs if an original image is not available, or they pay to have a photograph taken for their book. A description of a painting which is included as evidence is no substitute for an image.

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).

No opinion

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).

Yes. Permission fees are usually calibrated to print runs and time-limited; publishers report resistance and/or misunderstanding from rights-holders in agreeing fees for open-ended access.

Q48. Regarding monographs, book chapters and edited collections, are there any additional considerations relating to licensing requirements and/or thirdparty 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).

Without serious research at the level of individual disciplines on the impact following from licensing requirements and third-party rights, an ill-judged OA policy for REF will likely have grave unintended consequences in terms of skewing patterns of publication and areas of research (e.g. towards out-of-copyright material, authors whose estates take a more permissive approach to licensing).

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.

b) will be the most flexible and allow for the widest dissemination of research: publishers have experience in licensing reuse which authors and institutions do not; whereas option

c) will impact the ability of publishers to sustain their activities through licensing reuse (translations, reprints).

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).

If BPCs are included in UKRI funding, or a longer embargo period for Green OA is agreed, then there is no obstacle to implementing this policy as soon as it is agreed; OA books are already published in our discipline without obstacle where this is required by, and supported by, grant funding.

Given the significant disruption to both publishing and library purchasing of the current global pandemic, likely to impact finances for another 24-36 months at least, and which already poses an existential risk to many organisations, we would urge that implementation of a destructive 12 month embargo policy should be delayed until at least 1 January 2026 to allow publishers time to recover, and to adapt their business models.

NB: in our discipline UKRI funding supports a very small minority of research: so this answer should not be taken as any support for the likely massive disruptive effect of a change to REF OA policy around books.

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 that might be helpful? Yes / No. If yes, please expand (2,000 characters maximum, approximately 300 words). The UK HE funding bodies recognise that due notice will be needed prior to implementation of the OA policy for the REF-after-REF 2021, which will be consulted on in detail after UKRI's OA policy is announced (see paragraphs 29-31). It is therefore anticipated that the OA policy for the REF-after-REF 2021 will not come into effect on 1 January 2021 (that is, at the beginning of the publication period for the REF-after-REF 2021 exercise).

Precise explanation of deposit requirements, and responsibilities. This should be supported by evidence-based advice on the likely EDI implications of a change to this policy, its impact on publication patterns, promotions and recruitment, and guidance on

how HEIs should work to mitigate these impacts. We are extremely concerned about the implications of uneven access to BPCs between and across institutions.

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).

UKRI policy change will have relatively little impact on our discipline given the small proportion of research funded directly by UKRI grants; REF policy will have a massive impact on our researchers and on the publishers we collaborate with. The issues for the humanities, and for publishers, have been covered many times (from the Crossick Report to the UUK Open Access and Monographs Evidence Review) but there is no confidence within the subject community that these concerns have been fully understood, or taken into consideration.

We believe that the full costs and benefits of established academic publishing protocols are poorly understood and that therefore the risks of changes to REF policy are being underestimated. These include the benefits to the research ecosystem of editorial input to shape a project to ensure the widest possible readership given the topic; the costs of external readers' reports (in some case four or five readings of proposals and manuscripts); marketing to reach the audience and ensure the discoverability of research.

If this requirement applies from the mid-point of a REF cycle there will need to be a clear statement of which books this applies to (e.g. signing of contract, acceptance of final revised manuscript, publication date).

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).

Make the case (strongly) for UKRI to financially support its Gold OA policies properly as part of enhanced funding for humanities research: funding for APC and BPCs would accomplish two objectives: widen accessibility and reuse of specialised research materials; support and sustain the research ecology of the humanities, including publishers and learned societies.

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).

No opinion

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.

No