

Academy of Social Sciences response to HEFCE consultation on Open Access and submissions to the REF post-2014

The Academy of Social Sciences counts 46 of the social science Learned Societies and more than 900 of the country's most distinguished social scientists amongst its membership.

The Academy welcomes HEFCE's consultative approach on Open Access (OA), in particular its recognition of the role of the learned societies in *'help[ing] to identify sustainable models for widening access to journal content to the benefit of both their members and of the wider communities in which they work'* and its willingness to work with partners *'including the academic community, other research funders, commercial and not-for-profit publishers, learned societies, librarians'* in formulating policy on OA.

We also welcome HEFCE's acceptance of material *'published via either gold or green routes as eligible, recognising that it is not appropriate to express any preference in the context of research assessment.'* We favour a 'mixed economy' of publications under OA, where Gold OA publications and Green route outputs exist in parity, without one publishing route being privileged over the other in terms of REF or otherwise. However, we still have considerable reservations about the implications for the social science community of RCUK's stated preference for Gold. Whilst HEFCE is not preferring Gold over Green for research assessment, the statement that *'in the long term, the gold rather than green route may be the most sustainable way to deliver open access'*, and the implication that neutrality in terms of Green/Gold may only hold for the transition period, indicates that Green routes may be expected to give way over time to Gold. In the social sciences there is widespread concern about a rapid transition to Gold, both for the sustainability of learned societies and for the global standing of UK research, which is published in an international market. We need clarity on how long the *'the long term'* really is, so as to protect and preserve our research excellence and publishing infrastructure.

We draw HEFCE's attention to the potential inequalities identified in the British Sociological Association submission to this consultation – these potential inequalities between institutions, disciplines and individual academics, warrant close attention in the move to Open Access.

We welcome advice on our expectations for open-access publications, as set out at paragraph 11.

HEFCE appears to be taking a lead from RCUK on issues of licensing and length of embargo periods for articles deposited in repositories under Green routes to OA. However, RCUK

has not yet met substantive concerns expressed by the social science community. We have notified RCUK in response to their issuing the Supporting Guidance for OA, of our continued dissatisfaction with the push towards Gold routes and short (i.e. 6 month) embargo periods for repository-deposited articles.

We also contend that the guidance for application of CC-BY licences to social science output remains too vague, and does not account for the concerns of researchers in social sciences (and humanities) who fear that the integrity of their own interpretation of data could be threatened by CC-BY, which allows re-use without the safeguard of authors' permissions.

We welcome further advice on repository use and on techniques for institutional repositories to cross-refer to subject and other repositories.

We support the use of repositories as a source of OA publications. However, it is unclear how repositories will be established, funded or used in institutions that are not in receipt of the RCUK block grants. In social sciences, many articles may be funded for publication through the QR route rather than through research grants, and sometimes research funding will have been obtained through trusts rather than research councils – how and where such material is to be deposited remains unclear.

We welcome HEFCE's support of the development and use of repositories, and would like to know more about what this might mean in practice.

While we expect that sufficient clarity and reassurance on embargoes and licences will be achieved through the Research Council discussions, we welcome responses which address these issues.

As outlined above, we still have significant concerns about the approach of RCUK in terms of preference for Gold routes over Green, and for establishing maximum embargo periods of 6 months.

In the recently-issued Supporting Guidance, RCUK envisage a maximum embargo period of 6 months for all research papers, even those assigned a 12-month embargo period in the publishers' decision tree. It is just not acceptable to view the 12 month embargo period for HSS output as a temporary measure, without consultation on a move to 6 months and/or firm evidence that it is workable. Embargo periods of six months will seriously threaten the viability of many Learned Societies, with effects not only on publication options, but also on the wider work the societies do in support of their disciplines.

The RCUK Guidance also fails to clarify how exactly CC-BY licences will be applied to social science (and humanities) output, or how it can accommodate third-party material (citation from other work, images etc.).

We welcome advice on the best approach to exceptions and on an appropriate notice period. Any cases made for exceptions should be underpinned by clear evidence.

Given the long publication cycles in many journals (i.e. articles are in the system now to be published as late as 2016) we feel that 2017 is the earliest suitable date for full compliance with OA.

HEFCE states that exceptions are to be permissible '*during this transitional period*' - is the transitional period the same as RCUK's transition to OA '*of around five years*'? Is 100% compliance mandated at end of transition, and will there be a review to confirm that the transition period has ended, and systems are in place to publish with full compliance in all disciplines? These questions need to be answered clearly.

With regard to ways of handling exceptions, HEFCE should note that different institutions have different profiles in terms of disciplinary spread – 80% compliance is not appropriate on a blanket basis as it would be difficult to achieve where humanities and social sciences, rather than STEM subjects, dominate. Furthermore, a key part of the REF is indicating international impact: where authors publish in international journals which may not be OA-compliant they need assurance that their work will fully recognised. If a blanket figure is required for compliance it should be set lower to allow necessary flexibility – 40% might be a realistic aim.

HEFCE '*consider[s] that research in all subjects has equal importance and therefore equally merits receiving the benefits of open access publication*': equal importance is not justification for a 'one-size-fits-all' approach to OA publishing.

We seek comment on when it may be thought inappropriate to expect repository deposit of monograph text. Alternatively, given the percentage of submitted material which is in monograph form, we ask for advice on whether an expectation of a given percentage of compliance as described above (paragraph 18c) would eliminate the need for a special-case exception for monographs.

We do not believe that it has been demonstrated that OA publishing of monographs is workable. Publishers suggest that fees for OA monographs may run at £7-11K – totally impractical for researchers to obtain. Therefore monographs should remain excluded from OA compliance.

We invite comment on whether respondents feel this is the appropriate approach or whether they feel that sufficient progress has in fact been made to implement a requirement for open data as well. We will consider any representations that such a requirement may reasonably now be developed but would also need advice on how this might be achieved.

We do not feel that sufficient progress has been made to implement requirement for open data. Confidentiality relating to human participants in social science research must be upheld. We look forward to further engagement with HEFCE and RCUK on these issues.